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**Comment from Electro-Active Technologies on Distributed Clean Hydrogen Production with Onsite End Use Draft Solicitation Concept**

*Additional submitted attachment is included below.*

1. Exhibit a carbon intensity of 0.45 kilograms of carbon dioxide equivalent per kilogram of hydrogen produced

ElectroActive is excited to see the allowable emissions from hydrogen production process at 0.45 kg GHG/kg of H<sub>2</sub>. We believe this is the step in the right direction. We would encourage CEC to consider a criteria which provides higher scoring for approaches which result in carbon-negative hydrogen production. This would expedite emissions reduction from the state of California enabling the state to tackle impacts of climate change at a faster rate.

2. Ensure onsite end uses align with California's carbon neutrality targets and reduce sector-wide emissions

the production target of 1-5 tons of hydrogen per day for distributed generation and onsite use does not favor use cases such as fork lifts, farm machinery, emergency or back up power, industrial use in small scale industries such as local food processing which exist across the Central Valley, etc., since these operations need < 1 TPD hydrogen. We request CEC to consider lowering the target production capacity for on-site generation to support such use cases.

3. Minimize water consumption where possible and limit water consumption to 9-13.5 kilograms of water per kilogram of hydrogen produced

We suggest CEC to consider favourable scoring for use of low quality water or wastewater in production of hydrogen.

4. Are there any concerns with this solicitation allowing the use of CCUS for a project to be carbon neutral? If so, why?

While it is great to see CEC giving a focus to carbon neutral, we feel allowing CCUS to be used in achieving that should be discourage. We suggest providing favorable scoring for projects that do not require CCUS to be carbon neutral, or ideally negative.

5. Eligible renewable electricity sources include biomass digester gas, or municipal solid waste conversion (non-combustion thermal process).

We suggest that if renewable electricity sources from biomass digester gas, or municipal solid waste conversion (non-combustion thermal process) are allowed, it should come with a requirement that any fugitive methane emissions be accounted for and incorporated into life-cycle emissions since even a small amount of methane leakage can negate the benefits of these electricity sources.