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IEPA 23-IEPR-06 Comments

Additional submitted attachment is included below.



Independent Energy Producers Association

California Energy Commission
Docket No. 23-IEPR-06
715 P Street
Sacramento, CA 95814

November 1, 2023

RE: Hydrogen Analysis for Electricity Generation in the 2023 IEPR

The Independent Energy Producers Association (IEP) appreciates the opportunity to submit comments on the Hydrogen Analysis for Electricity Generation in the 2023 IEPR Workshop (“Analysis”) held September 8, 2023. IEP is California’s oldest and leading nonprofit trade association, representing the interests of developers and operators of independent energy facilities and independent power marketers. Our members collectively own and operate approximately one-third of California's installed generating capacity. IEP holds a great interest in the Commission’s Analysis of hydrogen for electricity generation because hydrogen, when paired with our members’ renewables, can serve as a low-carbon power generation resource that can be stored seasonally, making our grid more resilient.

Hydrogen’s role in California’s clean energy transition has never been clearer; public and private funds are flowing into hydrogen projects that can help strengthen the grid and offer energy storage solutions the state desperately needs. As California looks to lead this transition as one of the federal Hydrogen Hub fund recipients, we must utilize policy frameworks that promote competitive markets. IEP supports policy frameworks that are technology-neutral, based on carbon-intensity metrics, and align with existing hydrogen market rules and regulations. Additionally, the IEP recommends policies that incorporate the realities of project development and investment, anticipating project timelines of at least fifteen years. Following these

criteria will send the right market signals for hydrogen investment, all while not stymieing the existing hydrogen market.

IEP is encouraged by the work of the Commission staff and stakeholders to develop this year's IEPR.

We look forward to the incorporation of hydrogen as a leading player in the state's clean energy transition.

Signed,

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