

**DOCKETED**

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*Comment Received From: Josh Harmon*  
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**PG&E Comments RE Draft 2023 IEPR Report**

*Additional submitted attachment is included below.*

December 1, 2023

California Energy Commission  
Docket Number 23-IEPR-01  
715 P Street  
Sacramento, CA 95814

**RE: Draft 2023 Integrated Energy Policy Report**

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) Draft 2023 Integrated Energy Policy Report (Draft 2023 IEPR). PG&E notes that our comments on the Draft 2023 IEPR are brief to avoid duplication with our comments on the November 15 workshop on Load Modifier Scenario Results as well as anticipated comments on the upcoming December 6 workshop. Our comments below address chapter two, underlining the concern we have that there remains insufficient support for midstream hydrogen activities.

**The CEC should advocate for state and federal incentives for advancing the midstream component for the delivery and storage of clean and renewable hydrogen.**

There are several incentives to produce clean and renewable hydrogen. However, delivery of that hydrogen from producers to end users is a critical component of the overall hydrogen ecosystem. As noted on page 64 of the draft report, PG&E is undertaking a large project to test hydrogen at transmission pressure in transmission assets. As this project will provide valuable learning for all of California – and North America- PG&E believes its customers should not be burdened with its full cost. State and Federal funding for this project would help inform a safe hydrogen blending standard which would help enable existing gas infrastructure to be leveraged for the delivery of this clean energy.

**The general modeling approach used in the draft report should include the delivery and storage of clean and renewable hydrogen.**

In addition to assessing several hydrogen production pathways<sup>1</sup>, PG&E would like to emphasize that the CEC's modeling should include leveraging existing gas infrastructure for the delivery of hydrogen as a potential cost-effective mechanism.

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<sup>1</sup> Page 78 of the Draft 2023 IEPR

PG&E appreciates the opportunity to comment on the Draft 2023 IEPR and looks forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon  
State Agency Relations