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Comments on the November 17 Lead Commissioner Workshop on SB 423 Implementation of Emerging Renewable and Firm Zero Carbon Resou

Additional submitted attachment is included below.

CALIFORNIA HYDROGEN BUSINESS COUNCIL

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December 7, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 21-ESR-01
715 P Street
Sacramento, CA 95814

RE: Comments on the November 17 Lead Commissioner Workshop on SB 423 Implementation of Emerging Renewable and Firm Zero Carbon Resources (Docket No. 21-ESR-01)

Dear Commissioners,

Thank you for the opportunity to submit comments in response to the November 17, 2023, SB 423 Firm Zero-carbon Resources Workshop (Workshop). The **California Hydrogen Business Council (CHBC)** is comprised of over 135 companies, agencies, and individuals involved in the business of hydrogen. Our mission is to educate the public on the substantial benefits of hydrogen and to develop and advance policy positions that support the commercialization of hydrogen in the energy and transportation sectors to achieve California's climate, air quality, and decarbonization goals.

We appreciate and recognize the importance of identifying the set of firm zero-carbon technologies that, coupled with renewables, can reliably deliver California's carbon neutral future. As acknowledged, reliability is an absolute requisite to maintaining support for California's carbon goals. It is imperative that electricity planning ensure all hours, and all seasons have sufficient **clean firm resources** to balance California's clean intermittent resources.

To that end, the CHBC encourages the CEC to categorize all hydrogen-sourced electricity, including from fuel cell systems and novel technology such as linear generators, as zero-carbon in the upcoming SB 423 Report – particularly given the intent to use the SB 423 Report as a key input into the SB 100 process. Stationary fuel cells are uniquely suited to provide the required clean, high-efficiency, 24/7 load-following power generation resource with virtually zero emission of criteria pollutants, and no net water demand. Likewise, novel technology such as linear generators are capable of delivering local power that is dispatchable and fuel-flexible, without combustion.

Additionally, in line with the 2022 Scoping Plan Update[1], SB 100's "100% carbon capture" analysis considerations[2], and other key proceedings, we encourage clearly identifying specific roles for Carbon Capture and Sequestration (CCS) to enable a more holistic consideration of technology.

Finally, in support of the need for clean firm power, CHBC emphasizes that the use of hydrogen in the power generation sector will support energy system reliability and help achieve significant air quality and greenhouse gas emissions reductions benefits. Scaling up the use of hydrogen in power generation with the aforementioned technologies facilitates the adoption in a number of hard-to-electrify sectors.

Thank you for the opportunity to provide input and comment on this critical subject.

Sincerely,

____s_____

Jennifer Hamilton
Deputy Director
California Hydrogen Business Council

[1] DRAFT 2022 SCOPING PLAN UPDATE https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf
[2] 2021 SB 100 Joint Agency Report, California Energy Commission, March 2021, p. 17, available at: https://efiling.energy.ca.gov/EFiling/GetFile.aspx?tn=237167&DocumentContentId=70349