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Docket Number: 22-RENEW-01*

**National Fuel Cell Research Center Comments on DEBA DER GFO  
Draft Solicitation Concept**

Please find National Fuel Cell Research Center comments in the PDF.

*Additional submitted attachment is included below.*



March 15, 2024

**VIA ELECTRONIC FILING**

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 22-RENEW-01  
Distributed Electricity Backup Assets (DEBA)  
DER Grant Funding Opportunity (GFO) Draft Solicitation Concept**

Dear Commissioners and Staff:

On behalf of the National Fuel Cell Research Center (NFCRC), we applaud this important grant funding opportunity (GFO) to incentivize the construction of cleaner and more efficient distributed energy resources (DERs) that increase supply or reduce (or shift) load to improve the reliability of the state's electrical grid, particularly during extreme events. However, we respectfully submit that further clarification and greater scientific detail is needed in the Draft Solicitation Concept in one critical area – the definition, standards and criteria relating to identifying and providing benefits to disadvantaged communities (DACs).

The NFCRC (1) facilitates and accelerates the development and deployment of fuel cell technology and systems; (2) promotes strategic alliances to address the market challenges associated with the installation and integration of fuel cell systems; and (3) educates and develops resources for the power and energy storage sectors. The NFCRC was established in 1998 at the University of California, Irvine, by the U.S. Department of Energy and the California Energy Commission to develop advanced sources of power generation, transportation, and fuels and has overseen and reviewed thousands of commercial fuel cell applications.

As currently drafted, the Draft Solicitation Concept is unclear in that it:

- refers variously to projects that are “located in or benefitting” disadvantaged communities (“DACs”) as well as to those that are simply “located in” DACs; and
- appears to include a mandatory requirement that DAC projects must receive a letter of support from “an environmental justice community-based organization,” but does not provide a definition of this term or qualification requirements.

We respectfully submit that the Solicitation should be modified to utilize an objective and data-backed measurement of which projects will most effectively benefit disadvantaged communities in California. For example, the Solicitation could require applicants to demonstrate annual cumulative emissions reductions that benefit DACs, including both GHGs and criteria pollutants such as NO<sub>x</sub> and SO<sub>2</sub>, using widely accepted metrics. Applicants could simply utilize existing and standardized tools like the EPA's eGRID emissions database and the EPA COBRA tool to demonstrate the extent to which a given project will benefit human health and the environment by reducing annual air emissions that impact California DACs. This approach would be objective, data driven, and far more likely to produce quantifiable benefits to DACs.

Respectfully Submitted,

/s/ Jack Brouwer

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