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Noya PBC's Comments to CEC's California Carbon Management Hub

1. Please describe your interest in partnering with other entities to apply for DOE funding and outline the role and expertise your organization would contribute to a carbon management hub. Include any relevant experience from prior collaborative projects that could help inform and strengthen a hub-based partnership.

Noya is interested in partnering with other entities to apply for DOE funding. Noyaâ€™s role would be as a DAC technology provider. Noya would be deploying an interruptible, all-electric, water-positive DAC approach that can pair easily with behind-the-meter renewable energy resources and provide water for a variety of uses (e.g. local community water needs, green hydrogen production, or sustainable aviation fuel (SAF) production). Noya is excited to prove out the feasibility of flexible DAC deployments and to demonstrate the advantages of significant water production as a co-benefit in a region that is facing ongoing water scarcity risks.

2. Which types of state-level support beyond grants â€” such as stakeholder convening, streamlined processes, technical assistance, research access, and community engagement â€” is your organization most interested in, and which does your organization believe would be most effective for advancing carbon management efforts, particularly with regards to a hub-based approach?

Noya is most interested in state-level support around stakeholder convening to ensure that any projects in the state have robust community engagement and support driven by a meaningful community benefits agreement process.

3. What is the current Technology Readiness Level (TRL) of your technology and/or the development stage of your project (e.g., preliminary front-end engineering and design, demonstration)? Please provide potential outcomes from partnering with your organization, including estimated annual carbon capture capacity (in tonnes per year), description of product (if carbon utilization), co-benefits (e.g., hydrogen or water production), and other relevant details.

Noya is deploying a TRL 6 project in the first half of 2025 and moving into pre-FEED on its first commercial facility. As mentioned in #1 above, Noya generates a significant amount of water as a co-benefit, at a scale of roughly 5:1 water production for each unit of CO2 captured.

4. What challenges are you currently facing, particularly related to funding (e.g., offsetting construction or operating costs, securing offtake agreements)? What challenges â€“ financial or otherwise - do you anticipate in scaling these technologies

within a hub-based approach, and are there any challenges unique to establishing a hub in California?

Our two biggest concerns around establishing a hub in California are: 1) the amount of time it will take to get the project permitted and built, given existing regulations in the state (particularly CEQA compliance), 2) our ability to procure sufficient low-carbon energy at affordable rates.