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Renewable Hydrogen Production Comment Letter

Additional submitted attachment is included below.



South Coast Air Quality Management District

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August 8, 2017

California Energy Commission
Dockets Office, MS-4
Docket No. 17-HYD-01
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Comment Letter on Draft Solicitation Concepts for Renewable Hydrogen Transportation Fuel Production Facilities and Systems

Dear Chairman Weisenmiller,

South Coast Air Quality Management District (SCAQMD) staff is pleased to provide comments on draft solicitation concepts for renewable hydrogen production facilities.

SCAQMD staff strongly suggests that any upcoming solicitation for renewable hydrogen production should include additional provisions for medium and heavy-duty source categories, which are essential to achieve the required 45% and 55% over baseline NOx reductions referenced in the 2016 AQMP for 2023 and 2031, respectively. There would be a sizeable investment by project partners beyond the CEC in order to cover the cost of an onsite production facility, with up to 1,000 kg/day for light duty and additional capacity for medium and heavy-duty applications. With fuel cell truck and bus projects in need of a regular and lower cost source of hydrogen, the medium and heavy-duty sector could benefit from onsite renewable hydrogen production, compared to the current cost of delivered hydrogen for light-duty vehicles.

Further cost benefits may be possible using a combined heat and power source in addition to hydrogen production. SCAQMD staff have identified several potential locations in our jurisdiction that may be suitable candidates for onsite production, such as the Inland Empire and the local ports complex. Considering 100% renewable, large-scale hydrogen production or storage projects have not been conducted in the past, SCAQMD staff further urges the CEC to increase the level of funding available towards this effort. We would also urge the CEC to include a method of weighting or scoring applications to provide additional credit towards applications generating capacity for medium and heavy-duty applications.

SCAQMD believes that production of renewable hydrogen in the South Coast Air Basin is key to ensuring a sufficient supply of hydrogen for light, medium and heavy-duty applications, and providing criteria pollutant benefits, greenhouse gas, and petroleum usage reduction. If you have any questions, please do not hesitate to contact me.

Sincerely,

Matt Miyasato, Ph.D.
Deputy Executive Officer

NB:lm:psk

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