

DOCKETED

Docket Number:	16-OIR-06
Project Title:	Senate Bill 350 Disadvantaged Community Advisory Group
TN #:	233961
Document Title:	FuelCell Energy Inc Comment re 7-17-20 Disadvantaged Communities Advisory Group Meeting
Description:	N/A
Filer:	System
Organization:	FuelCell Energy Inc.
Submitter Role:	Public
Submission Date:	7/20/2020 4:14:04 PM
Docketed Date:	7/20/2020

*Comment Received From: FuelCell Energy Inc.
Submitted On: 7/20/2020
Docket Number: 16-OIR-06*

**FuelCell Energy Inc Comment re 7-17-20 Disadvantaged
Communities Advisory Group Meeting**

Additional submitted attachment is included below.

July 20, 2020

Tyrone Roderick Williams
Chair, Disadvantaged Communities Advisory Group
California Public Utilities Commission

Re: FuelCell Energy Comments re: 7/17/2020 Disadvantaged Communities
Advisory Group Meeting

Dear Mr. Williams:

On behalf of the FuelCell Energy (FCE), I'd like to thank the members of the Disadvantaged Communities Advisory Group (DACAG) and California Energy Commission (CEC) and California Public Utilities Commission (CPUC) for their continued and diligent attention to the disproportionate impacts of air pollution, and pollution burden generally, on disadvantaged communities. It is with this in mind that FCE respectfully submits written comments for the July 2020 meeting of the DACAG.

FuelCell Energy is a US-based manufacturer of clean and efficient fuel cells with projects throughout California, many in disadvantaged communities. FCE provides affordable and clean onsite energy, 24/7 at behind the meter sites including wastewater treatment plants, hospitals, universities, and industrial facilities and also at grid-connected sites. FCE has been a participant for many years in California's clean energy programs and has made meaningful contributions to meeting California's emissions reduction, microgrid and biofuel goals.

As you contemplate the development of microgrids and the operation of the Self-Generation Incentive Program, please keep in mind that the use of fuel cell systems without combustion for power generation eliminates criteria pollutant and air toxics emissions, while maintaining the resiliency and reliability expected of baseload power. Fuel cells also reduce greenhouse gas emissions and can achieve zero-carbon emissions when fueled by biogas or renewable hydrogen. These features directly align with the environmental and social justice goals of AB 617 and the carbon and criteria emission reduction goals of SB 100 and SB 350.

As we look for options to provide resilient local power sources that can ride through grid outages without adding to the local air pollution burden, fuel cells are superior options to conventional solutions like diesel generators. The use of diesel back-up generators is rightfully problematic for many stakeholders and particularly for FCE.

Not only can FCE fuel cells provide the necessary resilient back-up power in place of those diesel generators, but FCE fuel cells provide significant short and long term air quality improvements. Fuel cell technology, if deployed widely, will deliver air quality benefits now, which means fewer Californians breathing NOx, SOx, and PM 2.5 this year, next year, and not just in 10 or 15 years when we must meet our targets.

FCE currently operates a fuel cell for the Riverside Regional Water Quality Control Plant which generates renewable electricity directly from the biomethane created on-site at the plants. In the past, when this biomethane has had no useful outlet, it has been flared or vented directly into the air, right in the heart of the communities surrounding these facilities. In Riverside, our fuel cell is actively reducing emissions and, importantly, preventing criteria emissions and smog from ever being emitted into those communities. Later this year, we expect to be fully operational at a similar facility in San Bernardino where an FCE fuel cell will be capturing biomethane, producing clean energy, and preventing enormous amounts of criteria pollution, greenhouse gases, and short-lived climate pollutants from ever being emitted.

Additionally, FCE works directly with public entities to bring up-front project financing to make sure these projects are operational as quickly as possible, creating environmental benefits as immediately as possible. As this state and its local public agencies enter a prolonged period of economic uncertainty brought on by the COVID-19 pandemic, the ability for FCE to provide project financing and expedient project delivery should not be discounted as policymakers consider clean energy projects that create tangible near-term air quality benefits. Unlike some intermittent renewable resources, fuel cells are very easy to site in dense urban areas, connecting directly to the local distribution system and providing clean power right in the heart of the community where it is needed most.

FCE would like to emphasize the importance of policies that expand the use of fuel cells and renewable biomethane. We want to reiterate that fuel cells can be an important part of the solution to both improve local air quality and to reduce greenhouse gas emissions in disadvantaged communities.

Again, FuelCell Energy thanks the DACAG, the CEC, and the CPUC for your work and appreciates the opportunity for FuelCell Energy to provide comments.

Sincerely,

_____/s/

Brady Borcharding
Director of Government Affairs, West Coast
FuelCell Energy, Inc.