

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-SB-100
<b>Project Title:</b>	SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future
<b>TN #:</b>	234381
<b>Document Title:</b>	California Hydrogen Business Council Comments - CHBC Comments Urging Inclusion of Zero Carbon Scenario and Green Electrolytic Hydrogen as a Long Duration Storage and Electricit
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	California Hydrogen Business Council
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/19/2020 8:15:24 PM
<b>Docketed Date:</b>	8/20/2020

*Comment Received From: California Hydrogen Business Council  
Submitted On: 8/19/2020  
Docket Number: 19-SB-100*

**CHBC Comments Urging Inclusion of Zero Carbon Scenario and Green Electrolytic Hydrogen as a Long Duration Storage and Electricit**

*Additional submitted attachment is included below.*

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# California Hydrogen Business Council Comments Urging Inclusion of Zero Carbon Scenario and Green Electrolytic Hydrogen as a Long Duration Storage and Electricity Generation Resource in Modeling for SB 100 Joint Agency Report Docket No. 19-SB-100

August 17, 2020

The California Hydrogen Business Council (CHBC)<sup>1</sup> strongly supports comments submitted to this docket on August 14, 2020 by True North Renewable Energy (TNRE), Orsted, and Mitsubishi Hitachi Power Systems (MHPS), urging the SB 100 Joint Agency Report to include in its modeling

- a zero (or near zero) carbon scenario, per the intent of state policies like SB 100 and Executive Order B-55-18.
- green electrolytic hydrogen as a zero carbon long duration storage and power generation resource.

As the CHBC has shared in previous comments in this and other agency proceedings, green electrolytic hydrogen holds great promise to provide dispatchable, decarbonized firm power that can be stored in vast quantities until needed, such as during seasonal and peak demand periods. It also presents many economic opportunities for California, due to its high potential for a rapid downward cost trajectory and for creating and retaining good, green jobs in the state. Additionally, renewable hydrogen and green electrolytic hydrogen are key to enabling California to reach its goal of carbon neutrality economy wide, including in hard to abate applications like industrial heat and chemical processes, legacy building heat, back up

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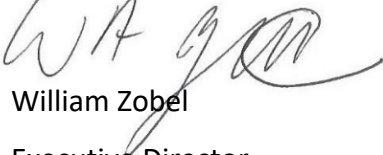
<sup>1</sup> The CHBC is comprised of over 100 companies and agencies involved in the business of hydrogen. Our mission is to advance the commercialization of hydrogen in the energy sector, including transportation, goods movement, and stationary power systems to reduce emissions and dependence on oil. The views expressed in these comments are those of the CHBC, and do not necessarily reflect the views of all of the individual CHBC member companies. Members are listed here: [www.californiahydrogen.org/aboutus/chbc-members/](http://www.californiahydrogen.org/aboutus/chbc-members/)

generation, heavy duty transportation, and passenger vehicles where plugging in is difficult, long ranges and bigger vehicles are demanded or fast refueling is needed.

The CHBC agrees with the points made in the TNRE/Orsted/MHPS letter and are additionally heartened that a newly released report by E3 for CARB does model a zero carbon power generation scenario for California in two of its scenarios for achieving carbon neutrality economy wide.<sup>2</sup> Both of these scenarios include dispatchable zero carbon fuel, such as hydrogen. While we believe there are refinements to be made to the E3 analysis, we highly encourage CARB, CEC, and the CPUC to take this general approach of considering a zero carbon scenario for electricity generation when implementing SB 100.

The CHBC appreciates your consideration of these comments and looks forward to working with you further to better understand how decarbonized hydrogen technologies can play vital roles in enabling California to fulfill the requirements of SB 100.

Best regards,



William Zobel

Executive Director

California Hydrogen Business Council

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<sup>2</sup> See pp. 54-55, *Achieving Carbon Neutrality in California - PATHWAYS Scenarios Developed for the California Air Resources Board*, E3; DRAFT: August 2020