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**CHBC Comments on Draft 2020 IEPR Update, Volume II The Role of
Microgrids in California's Clean and Resilient Energy Future**

Additional submitted attachment is included below.

CHBC Comments on Draft 2020 IEPR Update, Volume II: The Role of Microgrids in California's Clean and Resilient Energy Future

March 22, 2021

I. Introduction

The California Hydrogen Business Council (CHBC)¹ appreciates the opportunity to comment on the Draft 2020 Integrated Energy Policy Report (IEPR) Update, Volume II, released on March 8, 2021.

II. Comments

a. Clarify terminology for renewable and fossil-fueled generation

Volume II differentiates between “renewable” and “fossil-fueled” backup power² and separates microgrid generation into “*renewable generation*” and “*fossil fuel generator*.”³ Both battery and fuel cell systems can serve as either renewable or clean fossil generation, depending on its fuel. Battery storage often uses grid electricity to charge, which is still mostly fossil-fueled, and fuel cell systems can be renewable, fossil, or both. We, therefore, urge the CEC to instead use the phrase “*distributed energy resource*.”

b. Differentiate between combustion and non-combustion/zero-emission

The CHBC suggests differentiating between combustion and zero-emission, or non-combustion generation. Diesel generators are significant sources of local air quality and greenhouse gas (GHG)

¹ 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/

² Page 4

³ Figure 1 on page 8

emission impacts, whereas fuel cell systems using hydrogen have zero GHG and criteria pollutants emissions.

c. Technology Neutrality

The CHBC continues to urge the CEC to follow a technology-neutral approach in defining a microgrid and its components, as a microgrid represents a complete system that allows grid isolation and islanding. Unfortunately, the IEPR stipulates solar and battery systems be considered the key components of microgrids.⁴ However, microgrids can include other technologies, and these should be included, as well. The CHBC requests the addition of hydrogen, electrolyzers, and fuel cells to the final report as other microgrid components. In addition, rather than redefining the definition of microgrid to a technology-specific view⁵, the CHBC urges using the definition from SB 1339.⁶

III. Closing Remarks

The CHBC thanks the Commission for the opportunity to comment on the 2020 IEPR Update, Volume II: The Role of Microgrids in California’s Clean and Resilient Energy Future.

Best regards,



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⁴ Pages 23-24

⁵ Page 8

⁶ “Microgrid” means an interconnected system of loads and energy resources, including, but not limited to, distributed energy resources, energy storage, demand response tools, and other management, forecasting, and analytical tools, within a clearly defined electrical boundary that can act as a single, controllable, and grid-independent entity, can connect to, disconnect from, or run in parallel with, larger portions of the electrical grid, or can be managed and isolated to withstand larger disturbances and maintain electrical supply to connected critical infrastructure. - Senate Bill 1339.