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*Comment Received From: California Hydrogen Business Council  
Submitted On: 4/2/2021  
Docket Number: 19-ERDD-01*

**Comments of the California Hydrogen Business Council on  
Hydrogen Blending into Existing Natural Gas Systems Scoping  
Workshop**

*Additional submitted attachment is included below.*

April 2, 2021

California Energy Commission (CEC) Docket Unit, MS-4  
Re: Docket No. 19-ERDD-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Comments of the California Hydrogen Business Council on Hydrogen Blending into Existing Natural Gas Systems Scoping Workshop for a Future Solicitation**

Dear Dr. Yahui Yang,

The California Hydrogen Business Council (CHBC)<sup>i</sup> appreciates the opportunity to submit these comments on the workshop held by the California Energy Commission (CEC) on March 18, 2021. The CHBC will address the CEC's questions and provide additional comments related to the future solicitation.

The CEC posed the following four questions, and CHBC's responses follow each question.

**“Due to limited funding, should certain application or scale of demonstration projects be prioritized over others for demonstrating hydrogen blending?”**

The CHBC encourages coordination with UC Riverside and the gas utilities' application A.20-11-004 to choose projects that fill knowledge gaps and support a statewide hydrogen injection standard's timely development.

**“What are the key challenges that must be addressed for demonstrating hydrogen blending? How should the technical tasks regarding planning, siting, safety, and measurement verification be approached?”**

The CHBC does not have technical advice on specific key challenges to be addressed. The CEC should work closely with the gas utilities to determine and address these issues. Importantly, for the CEC-supported research to be useful, it must focus on real-world projects on California's gas system, and the California gas utilities need to be involved.

**“What are the expected outcomes of these demonstration projects? What are the specific performance metrics that should be measured or compared against to evaluate the viability of blending for the demonstration projects?”**

The results should show at which percentage levels hydrogen can be safely injected into the gas grid without impacting the existing gas infrastructure and end-use applications. Important metrics would include GHG reduction potential, cost, safety, system integrity, reliability, and resiliency.

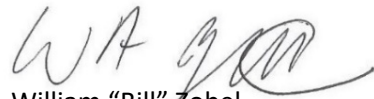
**“What other considerations or requirements should be incorporated into the future GFO?”**

The CHBC asks the CEC to work with gas utilities to identify injection points and generally encourages coordination with utilities to match their injection project plans. It is imperative the CEC avoid funding research that would have minimal applicability and require replication by the utilities. Instead, the CEC should support projects that lay the groundwork for general applicability, leading to the development of a statewide injection standard and the highest potential for decarbonizing the gas grid.

The CHBC would also ask the CEC to accelerate the timeline for issuing the GFO and selection. Under the current timeline, the GFO may not be issued until late 2021, with responses and selection taking several months and project construction and operationality not reached until 2023 or later. Considering the need to accelerate decarbonization efforts, that is a very long timeline. CHBC urges for shortening the GFO process to seek projects to start injection hydrogen by 2022.

Thank you for your consideration of these comments.

Sincerely,



William "Bill" Zobel

Executive Director

California Hydrogen Business Council

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<sup>1</sup> The CHBC is comprised of over 120 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.** CHBC Members are listed here: <https://www.californiahydrogen.org/aboutus/chbc-members/>