

DOCKETED

Docket Number:	22-IEPR-01
Project Title:	2022 Integrated Energy Policy Report Update
TN #:	247824
Document Title:	Northern California Power Agency Comments - NCPA Comments re on Draft IEPR
Description:	N/A
Filer:	System
Organization:	Northern California Power Agency
Submitter Role:	Public Agency
Submission Date:	11/30/2022 1:14:43 PM
Docketed Date:	11/30/2022

*Comment Received From: Northern California Power Agency
Submitted On: 11/30/2022
Docket Number: 22-IEPR-01*

NCPA Comments re on Draft IEPR

COMMENTS OF THE NORTHERN CALIFORNIA POWER AGENCY ON DRAFT 2022
INTEGRATED ENERGY POLICY REPORT UPDATE

Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of:
2022 Integrated Energy Policy Report Update
(2022 IEPR Update)

Docket No. 22-IEPR-01

**COMMENTS OF THE NORTHERN CALIFORNIA POWER AGENCY ON DRAFT
2022 INTEGRATED ENERGY POLICY REPORT UPDATE**

The Northern California Power Agency¹ (NCPA) offers the following comments to the California Energy Commission (Commission) on the draft 2022 Integrated Energy Policy Report Update (Draft Report), released on November 8, 2022.

I. Introduction

As a practical matter, NCPA is pleased that a significant portion of the draft report addresses the potential role that hydrogen might have in helping the state reach its aggressive decarbonize goals. As the Commission notes on page 6 of the Draft Report, “hydrogen holds promise in playing important roles in California’s clean energy future.” NCPA agrees, and to that end, the Commission finds itself in the unique role of facilitating the research that will be needed to test the viability of a transition that would result in repurposing a transmission network that is currently designed to deliver natural gas to end-users across the state. In many respects, in an environment where traditional baseload resources are being retired, the ability of California to truly maintain grid reliability will be dependent on the use of hydrogen for power generation. As noted in these comments, NCPA’s work to blend hydrogen at the Lodi Energy Center (LEC) is consistent with this effort.

Our comments today focus on two specific areas; one addressing a technical correction, and the other endorsing CEC efforts to develop the state’s Clean Hydrogen Program.

II. Comments on the Draft Report

A. Technical Clarification Needed – Pages 79-80 of the Draft Report

NCPA is pleased that the draft IEPR recognizes the work being done at the Lodi Energy Center to blend hydrogen with natural gas for power generation purposes. Our blending efforts

¹ NCPA’s members are the Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Shasta Lake, and Ukiah, Plumas-Sierra Rural Electric Cooperative, Port of Oakland, San Francisco Bay Area Rapid Transit (BART), and Truckee Donner Public Utility District. Collectively, these publicly-owned utilities, rural electric cooperative, port authority, public transit district, and public utility district provide reliable and affordable electricity to approximately 700,000 electric customers in central and northern California.

began in 2020 when the NCPA Commission agreed to move forward with the installation of an upgraded turbine that is capable of using combustors that can blend natural gas with a mixture of up to 45% green hydrogen, a step that would reduce the plant’s greenhouse gas emissions by a third, promote grid reliability, and ensure integration with intermittent renewables like wind and solar. NCPA respectfully requests that the language at the bottom of page 79 and top of page 80 of the Draft Report be modified to reflect the fact that the NCPA combustion turbine is past the “exploration” stage and has been “fully upgraded” to incorporate hydrogen blending capability. All upgrades to the combustion turbine are now complete at LEC and we want to make sure that the final report reflects this correctly.

B. NCPA Supports Suggested Direction of State’s Clean Hydrogen Program

NCPA understands that the Commission has been appropriately tasked with implementing California’s Clean Hydrogen Program, consistent with statutory directives included in Assembly Bill 209. As the Draft Report notes, the current budget year commits \$100 million toward “establishing a hydrogen program to provide financial incentives to in-state low-carbon hydrogen production through electrolysis or biofuels using renewable energy.” (Page 84) NCPA supports this effort and applauds the Commission for providing some insights about potential funding opportunities related to hydrogen deployment. To help spur the development of hydrogen production capability, NCPA recommends the use of grants in this regard, as it will provide the most expeditious manner in which to fund a more robust deployment of electrolyzers, and help reduce the production cost of hydrogen.

III. Conclusion

NCPA appreciates the Commission’s consideration of these remarks and looks forward to working with the CEC as the agency finalizes the Draft Report and moves towards implementation of the important policy objectives. Please do not hesitate to contact the undersigned or Scott Tomashefsky at (916) 781-4291 or scott.tomashefsky@ncpa.com with any questions.

Dated: November 30, 2022

Respectfully submitted,



C. Susie Berlin
LAW OFFICES OF SUSIE BERLIN

Attorneys for the:
Northern California Power Agency