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<b>Project Title:</b>	Renewables Portfolio Standard 10th Edition Guidebook Update
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*Comment Received From: Mainspring Energy*  
*Submitted On: 10/30/2024*  
*Docket Number: 21-RPS-02*

## **Mainspring Energy Comments on RPS Guidebook Update - 10th Edition**

See attached letter.

*Additional submitted attachment is included below.*

**Mainspring Energy**  
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October 31, 2024

California Energy Commission  
715 P Street  
Sacramento, California 95814

***Re: Request for Comment on the Proposed Scope for the Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition***

Mainspring Energy, Inc. (“Mainspring”) appreciates the opportunity to submit comments to the Energy Commission’s Proposed Scope for the Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition. We strongly support the goals of the Renewable Portfolio Standard (RPS) and for the proposal to update the Guidebook pursuant to AB 1921 (Papan), to include linear generators using renewable fuels to the definition of renewable electrical generating facilities.

Mainspring is a leading California-headquartered manufacturer of linear generators, which deliver local power that is dispatchable and renewable fuel-flexible. Mainspring’s linear generator offers a unique non-combustion capacity and energy solution that simultaneously addresses the critical need of reducing greenhouse gas and criteria pollutant emissions, while also enhancing grid reliability and resilience.

With the very recent signing of AB 1921 (Papan), we appreciate CEC’s quick action to update the RPS guidebook and include the provisions of the bill. This legislation maintains technological neutrality and provides a level playing field for fuel cells and linear generators. Linear generators offer the same capability as fuel cells to produce renewable electricity.

However, within the scope of proposed updates to the RPS guidebook, we are concerned with the potential removal and exclusion of fuel cells or linear generators using hydrogen gas with reference to AB 1921. The scope and the focus of AB 1921 was to solely expand the definition to include linear generators using renewable fuels. Renewable hydrogen has been a key resource and component of the RPS program for many years, and will continue to be vital for fuel cells, gas turbines, and now

linear generators. These pathways are crucial for the state to reach its renewable energy goals while ensuring grid reliability, safety, and minimizing cost impacts.

We respectfully request that the CEC clarify that hydrogen produced from these eligible feedstocks including utilizing renewable electricity delivered through the grid, should be treated as renewable, consistent with its historic definition of renewable hydrogen in the 9<sup>th</sup> edition of the guidebook.

Thank you for the opportunity to submit comments to the Energy Commission's Proposed Scope for the Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition. We look forward to working with the Commission to implement the goals and intent of AB 1921 and to supporting the deployment of renewable energy throughout the state.

Sincerely,

*Kent Leacock*

Kent Leacock  
Sr. Director Public Affairs  
Mainspring Energy