

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-IEPR-01
<b>Project Title:</b>	General Scope
<b>TN #:</b>	236854
<b>Document Title:</b>	California Hydrogen Business Council Comments - CHBC Comments on Draft Scoping Order for the 2021 Integrated Energy Policy Report
<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>	2/19/2021 3:41:36 PM
<b>Docketed Date:</b>	2/19/2021

*Comment Received From: California Hydrogen Business Council  
Submitted On: 2/19/2021  
Docket Number: 21-IEPR-01*

**CHBC Comments on Draft Scoping Order for the 2021 Integrated Energy Policy Report**

*Additional submitted attachment is included below.*

## California Hydrogen Business Council Comments on Draft Scoping Order for the 2021 Integrated Energy Policy Report

February 19, 2021

### **I. Introduction**

The California Hydrogen Business Council (CHBC)<sup>1</sup> appreciates the opportunity to comment on the California Energy Commission’s (CEC) Draft Scoping Order for the 2021 Integrated Energy Policy Report. The CHBC supports the focus areas of energy reliability over the next five years, evolving role of the pipeline gas system, building decarbonization and energy efficiency, and energy demand as key topics for in-depth discussion and analysis via the IEPR process.

In the comments below, CHBC is providing specific recommendations to the CEC that should be addressed or incorporated in the final scoping order.

### **II. Comments**

#### **a. Energy Reliability Over the Next Five Years**

The CHBC is supportive of the specific areas of discussion presented in this section. In addition, CHBC suggests expanding the topic of “retrofit existing pipeline gas-fired electric generation resources to improve their efficiency to support achieving policy goals” to not only focus on improving efficiency but also assess retrofit turbines that can handle blend fuels, such as natural gas/hydrogen mixtures, so that retrofit gas turbine generation can gradually or fully transition using green hydrogen as a fuel source as it becomes available.

---

<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/)

In the section on technology and policy solutions, the CEC could also include a discussion to reduce renewable generation curtailment and overgeneration, which has reached record levels in 2020 in California.

Long duration and seasonal energy storage will be key to energy reliability. Per SB 1369 (Skinner), the IEPR should examine how electrolytic hydrogen can be used as a scalable, long-duration storage resource to support decarbonization goals while providing reliability and resiliency to the energy system.

**b. Evolving Role of Pipeline Gas: Trends and Outlook**

The CHBC supports developing a transition planning for the gas system and will provide input to the IEPR process and workshops on blending and converting the gas system to hydrogen. Examinations and studies of the future role of the gas system in a decarbonized world must include hydrogen.

**c. Building Decarbonization and Energy Efficiency**

The CHBC encourages a technology-neutral, diversified approach to building decarbonization that includes zero-carbon fuels like hydrogen rather than an all-electric one. While state agencies and building electrification advocates report that there is consensus that building electrification is the most viable and least-cost path to zero-emission buildings, such conclusions are challenged by a growing group of experts who are championing hydrogen as an important solution to include in building decarbonization strategies. For example, green hydrogen is being pursued for building heating and appliance applications in countries and regions around the world, where it is being recognized that a diverse approach will be required to achieve to deep decarbonization that includes efficiency, electrification, renewable hydrogen, and other renewable gas, among other strategies. We urge the CEC to incorporate the learnings from other countries in its assessment. A technology-neutral approach is also prudent given the virtually impossible task of currently calculating a realistic future cost comparison between all-electric homes and those that rely on renewable gas for some uses because of the uncertainty of wildfire impacts on future electricity rates.

**d. Energy Demand**

Under the Electricity, Natural Gas, and Transportation Demand Forecasts development, CHBC would again urge the CEC to embrace a technology neutral-approach and not focus on any specific storage technology.

**III. Conclusion**

The CHBC appreciates your consideration of these comments and looks forward to working with you on this report.

Regards,

A handwritten signature in black ink, appearing to read 'WAZobel', is written over the printed name and title.

William Zobel

Executive Director | California Hydrogen Business Council | [wzobel@californiahydrogen.org](mailto:wzobel@californiahydrogen.org)