

April 17, 2018

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The Honorable Ben Hueso
 California Senator
 State Capitol, Room 4035
 Sacramento, California 95814

RE: SB 1440 (Hueso): Biomethane Procurement Goals – SUPPORT IF AMENDED

Dear Senator Hueso:

The California Hydrogen Business Council (CHBC) would like to express support for SB 1440 but seeks amendments to improve the bill to allow full support from our industry.

The CHBCⁱ is a California industry trade association with a mission 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.

For the past several years, the CHBC and its members have been working with various government agencies and other renewable gas market participants to expand market opportunities for existing and developing technologies for renewable gas, including renewable hydrogen. Your bill could continue that market development.

We request you to amend the current bill to be inclusive of a broad spectrum of renewable gas, as opposed to only biomethane, in keeping with the spirit of state law. SB 1383 guided the California Energy Commission, Public Utilities Commission and Air Resources Board to “consider additional policies to support the development and use in the state of renewable gas that reduce short-lived climate pollutants in the state.” The author’s intent was to include not only biomethane but also other renewable gases like renewable hydrogen.

In addition, we request you expand the procurement target for “renewable gas” from the 2020 goal of 32 billion cf by adding a goal of 100 billion cf by 2030 to allow for long-term investment and commitment to establish a market for renewables gases.

Finally, we request you replace the language of the statutory price cap with a direction for the PUC (in consultation with the Air Board) to implement price controls and allow market mechanisms to be applied.

We look forward to working with your office on the passage of SB 1440 once our proposed amendments are incorporated.

Sincerely,



Emanuel Wagner
Assistant Director
California Hydrogen Business Council

ⁱ 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 of the CHBC include Advanced Emission Control Solutions, Air Liquide Advanced Technologies U.S., Airthium, Alameda-Contra Costa Transit District (AC Transit), American Honda Motor Company, Anaerobe Systems, Arriba Energy, Ballard Power Systems, Bay Area Air Quality Management District, Beijing SinoHytec, Black & Veatch, BMW of North America, California Performance Engineering, Cambridge LCF Group, Center for Transportation and the Environment (CTE), CNG Cylinders International, Community Environmental Services, CP Industries, DasH2energy, Eco Energy International, Eldorado National – California, Energy Independence Now (EIN), EPC - Engineering, Procurement & Construction, Ergostech Renewal Energy Solution, EWII Fuel Cells, First Element Fuel, FuelCell Energy, GenCell, General Motors, Geoffrey Budd G&SB Consulting Ltd, Giner ELX, Gladstein, Neandross & Associates, Greenlight Innovation, GTA, H2B2, H2Safe, H2SG Energy Pte, H2Tech Systems, Hitachi Zosen Inova ETOGAS GmbH, HODPros, Hydrogenics, Hydrogenious Technologies, Hydrogen Law, HydrogenXT, HyET - Hydrogen Efficiency Technologies, Hyundai Motor Company, ITM Power, Ivys, Johnson Matthey Fuel Cells, Kontak, KORE Infrastructure, Life Cycle Associates, Linde North America, Longitude 122 West, Loop Energy, Luxfer/GTM Technologies, McPhy Energy, Millennium Reign Energy, Montreux Energy, National Renewable Energy Laboratory (NREL), Natural Gas Fueling Solutions – NGFS, Natural Hydrogen Energy, Nel Hydrogen, New Flyer of America, Next Hydrogen, Noyes Law Corporation, Nuvera Fuel Cells, Pacific Gas and Electric Company - PG&E, PDC Machines, Planet Hydrogen, Plug Power, Port of Long Beach, PowerHouse Energy, Powertech Labs, Primidea Building Solutions, Proton OnSite, RG Associates, Rio Hondo College, Rix Industries, Sacramento Municipal Utility District (SMUD), SAFCell, Schatz Energy Research Center (SERC), Sheldon Research and Consulting, Solar Wind Storage, South Coast Air Quality Management District, Southern California Gas Company, Sumitomo Corporation of Americas, Sunline Transit Agency, T2M Global, Tatsuno North America, The Leighty Foundation, TLM Petro Labor Force, Toyota Motor Sales, True Zero, United Hydrogen Group, US Hybrid, Verde, Vinjamuri Innovations, Volute, WireTough Cylinders, Zero Carbon Energy Solutions.