

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue
Implementation and Administration, and Consider
Further Development, of California Renewables
Portfolio Standard Program.

Rulemaking 15-02-020
(Filed February 26, 2015)

**CALIFORNIA HYDROGEN BUSINESS COUNCIL SUPPORT FOR FUELCELL
ENERGY AND TOYOTA MOTOR NORTH AMERICA PETITION TO MODIFY
DECISION 15-09-004 AND SUPPORTING DOCUMENTS IMPLEMENTING THE
BIOMAT PROGRAM AND REQUEST FOR EXPEDITION**

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December 2, 2019

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I. Introduction

The California Hydrogen Business Council (“CHBC”)¹ submits these comments in support of the FuelCell Energy (“FCE”) and Toyota Motor North America (“Toyota”) Petition to Modify Decision 15-09-004, and in support of expedited attention to the Petition. We also support the request made by the National Fuel Cell Research Center (“NFCRC”) in their comments submitted on November 19, 2019 for language modifications to the Decision, the Bioenergy Market Adjusting Tariff (“BioMAT”) program and Power Purchase Agreement (“PPA”), which would make certain that projects using directed biogas are eligible for the BioMAT program.

¹ 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.

The CHBC is a California industry trade association with a mission to advance the commercialization of hydrogen in transportation and stationary resources to reduce greenhouse gas, criteria pollutant emissions and dependence on oil. Our more than 100 members include fuel cell and electrolyzer companies, auto manufacturers, industrial gas companies, and natural gas companies with an interest in hydrogen and hydrogen infrastructure in California.

II. Comments

The CHBC strongly supports the tri-generation project under development at the Port of Long Beach by FuelCell Energy and Toyota. We view it as a groundbreaking demonstration of how ports can transform from becoming one of the heaviest polluters, which in the Los Angeles basin causes serious public health impacts, to critical hubs of sustainability and innovation that are integral to cleaning up our air, energy, and environment. Specifically, this project will showcase cutting edge technology capable of reducing criteria air pollutants, toxics and greenhouse gas emissions— including short-lived climate pollutants, while also advancing efficient water use and ZEV transportation. The pipeline directed biogas used to make electricity in the project is explicitly eligible in the BioMAT program.

The project addresses several state priorities, such as:

- Advancing hydrogen fuel cell electric transportation, per AB 8 and Executive order B-18-48, by supplying fuel for hydrogen vehicles, and moreover by specifically supplying renewable hydrogen for transportation, per SB 1505.
- Advancing community public health in underserved regions, per AB 617, such as those surrounding the ports that depends largely on fuel switching from diesel-based transportation

and equipment to zero emissions options like hydrogen fuel cells, in order to reduce criteria and toxic air pollution. The project will also support advancement of fuel cell technology that can displace onsite fossil fuel backup generators that emit air pollutants. This is especially timely in an era of increased planned public safety power shutoffs and unplanned outages due to wildfire.

- Reducing short-lived climate pollutants, SB 1383, by repurposing organic waste that would otherwise emit methane, into useful energy.
- Deeply reducing other greenhouse gas emissions, per SB 350 among other provisions, by providing renewable electricity generation, as well as fuel for ZEV transportation.
- Improving resiliency by providing a system that will generate power, via a stationary fuel cell, that is capable of 24-7-365 service in all conditions for the Toyota logistics facility, as well as baseload power in communities with constrained transmission lines, including disadvantaged communities. Underground fuel lines make this solution more resilient to weather risks than traditional overhead electricity grids, and the project’s modular design allows for continued operations during repairs or part replacements.

III. Conclusion

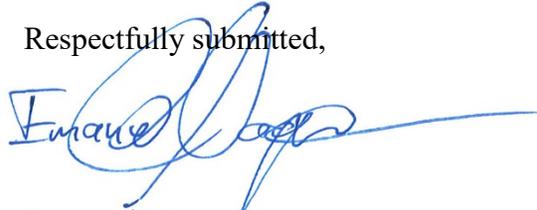
Making ports the “nerve centres for scaling up the use of clean hydrogen” is the number one recommendation from the International Energy Agency in a recent report calling for tapping “into hydrogen’s potential to play a key role in a clean, secure and affordable energy future.”² This project is a vital demonstration of this principle. Numerous industry, government, and research stakeholders have invested time and resources into the project. Now is the time for

² <https://www.iea.org/publications/reports/thefutureofhydrogen/>

implementation. The CHBC supports the Petition of FCE and Toyota as a critical next step and thanks the Commission for their consideration.

Dated: December 2, 2019

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Emanuel Wagner", with a long horizontal flourish extending to the right.

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