

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Emergency Disaster Relief Program.

Rulemaking 18-03-011
(Filed March 22, 2018)

**REPLY COMMENTS OF THE CALIFORNIA HYDROGEN BUSINESS
COUNCIL ON THE ASSIGNED COMMISSIONER AND THE
ADMINISTRATIVE LAW JUDGE'S REQUEST FOR COMMENTS ON
WIRELINE PROVIDER RESILIENCY STRATEGIES**

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I. INTRODUCTION

In accordance with Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Hydrogen Business Council (CHBC)¹ respectfully submits reply comments to parties on the Administrative Law Judge’s Ruling Requesting Comments on Wireline Provider Resiliency Strategies, issued July 22, 2020. A summary of our reply comments is below and elaborated on in the section that follows.

- A. We agree with Public Advocates that clean backup generation technologies ought to be prioritized over diesel backup power.**
- B. Opting for hydrogen fuel cell systems helps address Parties’ concerns about permitting burdens.**

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. CHBC Members are listed here: <https://www.californiahydrogen.org/aboutus/chbc-members/>

- C. We support the Public Advocates’ recommendation to broaden the definition of critical facilities.**

II. REPLY COMMENTS

- A. We agree with Public Advocates that clean backup generation technologies ought to be prioritized over diesel backup power.**

Public Advocates urges wireline providers to be subject to the same requirements as wireless providers, per the wireless Decision, “to use clean energy backup power options before using diesel generators to meet the resiliency requirements.”² Hydrogen fuel cell systems have a long, successful track record in the telecommunications industry, are more reliable than diesel generators, and the obvious choice to protect the environment and public health. Hydrogen fuel cell reliability is rated at 99.6% compared to diesel generator reliability of up to 88.4%.³ Whereas diesel generators are noisy and emit criteria pollutants and air toxics, hydrogen fuel cells are quiet and produce zero emissions. This is especially important in California, where several regions consistently fail to meet air quality standards, disadvantaged communities suffer cumulative impacts of diesel and other pollutants, and where many parks and residential areas would need the protection of low impact back up generation. Hydrogen also has far lower greenhouse gas emissions than diesel, even when produced conventionally.⁴ When produced using a renewable feedstock, like electricity or biogas, hydrogen can be greenhouse gas-free over its lifecycle. Hydrogen fuel cells have furthermore served thousands of telecommunication

² Public Advocates Opening Comments August 12, 2020 at 7.

³ Ibid, referencing Survey of Reliability and Availability Information for Power Distribution, Power Generation and HVAC Components for Commercial, Industrial and Utility Installations, Hale/Arno, IEEE Industrial and Commercial Power Systems Technical Conference, 2005

⁴ https://www.fueleconomy.gov/feg/fcv_benefits.shtml

locations, utility, railroad and government communications requirements for many years. Encouraging their use now is neither experimental, nor imprudent. Their established track record should be one more reason to support widespread adoption in lieu of polluting diesel alternatives.

B. Opting for hydrogen fuel cell systems helps address Parties’ concerns about permitting burdens.

A number of wireline providers expressed concerns in comments that operating diesel generators at their sites would entail onerous permit requirements that cause delays.⁵ Notably, hydrogen fuel cells, because they emit zero criteria air pollutants, are exempt from air district permits, and there are also other low emissions options that are exempt. We, therefore, urge the Commission to not waive permitting for diesel generators and encourage adoption of low and zero emission options.

C. We support the Public Advocates’ recommendation to broaden the definition of critical facilities.

The CHBC supports the Public Advocates’ request that the definition of critical facilities be broadened to “include anchor institutions that provide essential community services and other critical customers, including schools, libraries, community centers, local government and tribal offices, radio stations, residential customers and small businesses.”⁶ We similarly support the Rural County Representatives request that facilities designated as critical by the Commission in D. 20-05-051 be included in the definition “for important public health and safety reasons,”⁷ like “schools, jails and prisons, public health departments, skilled nursing facilities, nursing homes,

⁵ Opening Comments of AT&T, Charter Communications, Inc., Comcast Phone of California, LLC, Cox Communications.

⁶ Public Advocates Opening Comments at 26.

⁷ Rural County Representatives of California Opening Comments at 11.

blood banks, health care facilities, dialysis centers, hospice facilities, public and private utility facilities, facilities associated with the provision of drinking water or processing of wastewater, facilities associated with the provision of manufacturing, maintaining, or distributing hazardous materials and chemicals, and facilities associated with automobile, rail, aviation, major public transportation, and maritime transportation for civilian and military purposes.”⁸ We also agree with their recommendation that community resource centers have access to critical communications during planned power shutoffs.⁹

III. CONCLUSION

The CHBC thanks the Commission for this opportunity to share reply comments and urges you to consider our recommendations to ensure essential power services are maintained during power shutdowns without compromising air quality, the environment and other important priorities.

Dated: August 21, 2020

Respectfully submitted,



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⁸ Rural County Representatives of California Opening Comments at 11.

⁹ ID at 12.