

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

Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339
and Resiliency Strategies.

Rulemaking 19-09-009
(Filed September 12, 2019)

**OPENING COMMENTS OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL
ON THE ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS
ON TRACK 2 MICROGRID AND RESILIENCY STRATEGIES STAFF PROPOSAL,
FACILITATING THE COMMERCIALIZATION OF MICROGRIDS PURSUANT TO
SENATE BILL 1339**

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August 14, 2020

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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”), and the Administrative Law Judge’s ruling seeking comment from interested parties staff proposal titled, “Facilitating the Commercialization of Microgrids Pursuant to Senate Bill 1339” (Staff Proposal) issued in the above captioned proceeding, the California Hydrogen Business Council (CHBC)¹ welcomes the opportunity to provide the following comments.

II. Comments

The CHBC has no comments on the specific questions asked in the Ruling, but appreciates that the Commission has moved swiftly to complete two tracks in this proceeding so far, and has the

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/>

following points to share:

- 1. We appreciate the Commission recognizing in its proposal that hydrogen is one of the fuels to be considered in microgrid planning² and that fuel cells are to be considered as a generation resource.³**

We strongly support a technology neutral approach to resource eligibility and appreciate the Commission taking such an approach of including multiple fuel technology options, including hydrogen and fuel cells.

- 2. We recommend the Commission select Proposal 3 Option 2 for a simple standardized tariff for customer-owned, behind-the-meter microgrids.**

We thank Staff for considering our and other parties' request to reexamine and potentially exempt some fees, such as departing load and standby charges, as they apply to microgrids.⁴ The CHBC believes Proposal 3 Option 2 would help overcome these barriers to market entry and therefore recommends to adopt this option. We also recommend not adopting Proposals 4 or 5, which we think would be counterproductive to achieving state goals of rapid deployment of cost-effective microgrids to support resiliency.

IV. Conclusion

The CHBC thanks the Commission for the opportunity to comment on the Staff Proposal and looks forward to working with you on refining it and on Track 3.

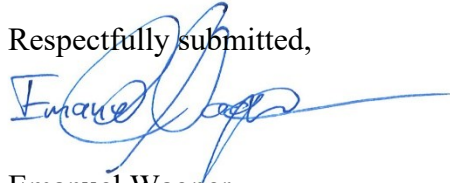
² Staff Proposal, pp. 18 (Table 1), 19, 23

³ Id., p. 18, etc.

⁴ Id., p. 65-66

Dated: August 14, 2020

Respectfully submitted,

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

Emanuel Wagner
Deputy Director
California Hydrogen Business Council