

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

Order Instituting Rulemaking to Create a
Consistent Regulatory Framework for the
Guidance, Planning and Evaluation of
Integrated Distributed Energy Resources.

Rulemaking 14-10-003

**OPENING COMMENTS OF THE CALIFORNIA HYDROGEN BUSINESS
COUNCIL ON PROPOSED DECISION ADOPTING PILOTS TO TEST
TWO FRAMEWORKS FOR PROCURING DISTRIBUTED ENERGY
RESOURCES THAT AVOID OR DEFER UTILITY CAPITAL
INVESTMENTS**

January 25, 2021

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I. Introduction

In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), and the Administrative Law Judge’s ruling seeking comment on the Proposed Decision Adopting Pilots to Test Two Frameworks for Procuring Distributed Energy Resources That Avoid or Defer Utility Capital Investments (“PD”) issued on January 5, 2021, the California Hydrogen Business Council (CHBC)¹ provides the following comments. Our comments focus on our support for maintaining technology neutrality in the distributed energy resource (DER) tariff program design.

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/>

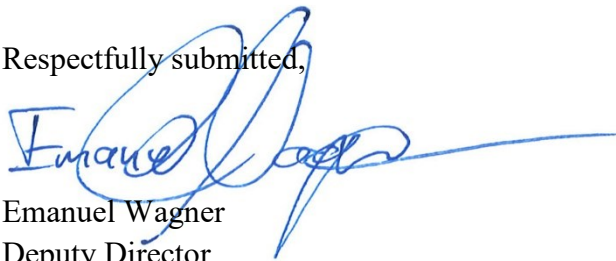
II. Comments

The CHBC supports the Commission’s recommendation that the DER tariff design ought to maintain the principle of technology neutrality. In Section 4.1.1, # 6 of the proposed Guiding Principles for Distributed Energy Resources Tariff Designs states that such designs ought to “Maintain technology neutrality among different distributed energy resource types while recognizing that some distributed energy resources will be better able to meet certain needs than others.”² The CHBC supports this important principle, which we believe will be fundamental to fulfilling the promise of DERs to support the state’s climate, clean energy and resiliency goals.

IV. Conclusion

The CHBC appreciates the opportunity to submit this comment on the PD and the Commission’s effort to design DER programs that support a broad range of technologies.

Respectfully submitted,



Emanuel Wagner
Deputy Director

California Hydrogen Business Council

Dated: January 25, 2021

² PD, p. 10