

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company
(U 902 M) for Authority, Among Other Things, to
Update its Electric and Gas Revenue Requirement
and Base Rates Effective on January 1, 2019

And Related Matter.

Application 17-10-007
(Filed October 6, 2017)

Application 17-10-008
(Filed October 6, 2017)

**RESPONSE OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL ON DRAFT
RESOLUTION G-3573**

Emanuel Wagner
Deputy Director
California Hydrogen Business Council
18847 Via Sereno
Yorba Linda, CA 92866
310-455-6095
ewagner@californiahydrogen.org

March 5, 2021

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902 M) for Authority, Among Other Things, to Update its Electric and Gas Revenue Requirement and Base Rates Effective on January 1, 2019

And Related Matter.

Application 17-10-007
(Filed October 6, 2017)

Application 17-10-008
(Filed October 6, 2017)

RESPONSE OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL ON DRAFT RESOLUTION G-3573

I. Introduction

The California Hydrogen Business Council (CHBC)¹ appreciates the opportunity to provide comments on draft resolution G-3573, issued by the Energy Division of the California Public Utilities Commission (CPUC) filed on February 11, 2021. The CHBC supports the proposed resolution in almost all respects, particularly in its full approval of the renewable gas program area of which renewable hydrogen is a primary element. Our comments focus on two items in the draft resolution:

A. CHBC respectfully urges the CPUC to amend the draft resolution to allow funds to be directed toward developing technologies to convert methane to hydrogen (and value-added products) as these conversion technologies support the expanded use of renewable hydrogen.

B. CHBC agrees with the CPUC that SoCalGas in their proposed Clean Transportation program should support zero-emission vehicles, focusing on hydrogen fuel cell electric vehicle development and fueling infrastructure.

¹ The CHBC is comprised of over 120 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: www.californiahydrogen.org/aboutus/chbc-members/

These recommendations are explained in further detail in the comments section below.

II. Comments

A. CHBC respectfully urges the CPUC to amend the draft resolution to allow funds to be directed toward developing technologies to convert methane to hydrogen (and value-added products) as these conversion technologies support the expanded use of renewable hydrogen.

The CHBC understands and supports the Commission's caution in supporting research that advances fossil fuel use. However, the technologies in the area that the draft resolution disallows are conversion technologies. They are renewable if the feedstock they are processing is renewable. The strong majority of renewable hydrogen being dispensed as vehicle fuel in the state today is produced through biomethane reformation. This is an essential transitional pathway that will continue to play a significant role in the state's renewable hydrogen supply, even as electrochemical and thermochemical technologies advance. The CHBC urges the Commission to permit SoCalGas to continue its research program in methane-to-hydrogen conversion technologies to the extent that they improve the economics and/or environmental footprint of renewable methane to renewable hydrogen pathways.

B. CHBC agrees with the CPUC that SoCalGas in their proposed Clean Transportation program should support zero-emission vehicles, focusing on hydrogen fuel cell electric vehicle development and fueling infrastructure.

CHBC agrees with the CPUC that accelerated R&D for medium and heavy zero-emission vehicles is needed in light of Governor Newsom's Executive Order N-79-20² and the recently adopted Clean Truck Rule³. A strong effort to commercialize this technology would significantly cut GHG emissions and eliminate other pollutants in the long-haul trucking sector, one of the most significant contributors to those emissions in the transportation sector.

² <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-text.pdf>

³ <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>

III. Conclusion

The CHBC thanks the Commission for their consideration of this response.

Respectfully submitted,

Dated: March 5, 2021



Emanuel Wagner
Deputy Director

California Hydrogen Business Council

18847 Via Sereno

Yorba Linda, CA 92866

310-455-6095

ewagner@californiahydrogen.org