BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish
Policies, Processes and Rules to Ensure Safe and
Reliable Gas Systems in California and Perform
Long-Term Gas Planning.

Rulemaking 20-01-007
(Filed January 16, 2020)

COMMENTS OF THE GREEN HYDROGEN COALITION
TO RULING ISSUING WORKSHOP REPORT AND STAFF RECOMMENDATIONS,
SEEKING COMMENTS, AND MODIFYING PROCEEDING SCHEDULE

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COMMENTS OF THE GREEN HYDROGEN COALITION
TO RULING ISSUING WORKSHOP REPORT AND STAFF RECOMMENDATIONS,
SEEKING COMMENTS, AND MODIFYING PROCEEDING SCHEDULE

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Green Hydrogen Coalition (“GHC”) hereby submits these comments to the Ruling Issuing Workshop Report and Staff Recommendations, Seeking Comments, and Modifying Proceeding (“Ruling”), filed by Administrative Law Judge (“ALJ”) Ava Tran on October 2, 2020.

I. INTRODUCTION.

The GHC is a California educational 501c3 non-profit organization. The GHC was formed in 2019 in recognition of the game-changing potential of green hydrogen to accelerate multi-sector decarbonization and combat climate change. The GHC’s mission is to facilitate policies and practices that advance green hydrogen production and use in all sectors of the economy where it will accelerate a carbon-free energy future. Our sponsors include both renewable energy users and developers and supporters of a reliable, affordable green hydrogen fueled economy for all. GHC appreciates the opportunity to participate in this proceeding and contribute to changes to gas infrastructure planning necessitated by California’s policy goals.

II. COMMENTS ON THE WORKSHOP REPORT AND STAFF RECOMMENDATIONS.

GHC appreciates staff’s consideration of Scoping Memo Issue 1(c), which addresses measures to ensure that gas needs of electric generators are met during multiple days of low renewable generation. This is an issue of critical importance because wind and solar are the lowest
cost energy sources at the margin today, and as more wind and solar are brought online, electric generation systems will become increasingly more difficult to manage and maintain reliability, particularly during the spring, fall, and winter when there will be multi-day and ultimately seasonal surpluses and shortages of energy. Today, green hydrogen can be produced from renewable generation via electrolysis and can serve as an effective form of multi-day and seasonal storage. Green hydrogen can also be produced from biogas and via gasification organic matter, including municipal waste. It can be safely stored in above ground pressurized containers, transported via pipeline, road or rail, and, it can be safely blended into existing natural gas pipelines to displace methane and reduce its carbon content, helping to decarbonize many gas end uses, including thermal electric generation.¹ Because the factor inputs to produce green hydrogen are theoretically unlimited, California’s ability to produce green hydrogen is also unlimited. As such, the ability to decarbonize California’s natural gas pipeline system and maintain system reliability is inextricably tied to green hydrogen.

The Workshop Report cites several stakeholder remarks that also supported consideration for the role of hydrogen. The California Hydrogen Business Council (“CHBC”) presented preliminary results from RESOLVE modeling exercises that show renewable hydrogen “would reduce the need for battery storage and reduce the amount of thermal capacity that needs to be retired.”² The California Council on Science and Technology (“CCST”) also pointed to the need to develop low greenhouse gas fuel, such as hydrogen, to address multiday or seasonal supply-demand imbalances. However, GHC notes that the Track 1B staff recommendations do not include mention of green hydrogen as a tool to meet multiple days of low renewable generation, per Track 1B Scoping Memo Issue 1(c).³ As such, GHC strongly agrees with CHBC’s recommendation⁴ and urges the Commission to consider green hydrogen in its adoption of new market structure and regulations under Track 1A and 1B, in addition to Track 2.

By planning and investing in green hydrogen today, California can ensure technical barriers, anticipated cost reduction, and market mechanisms are developed and continually improved upon to address increasingly common and critical multi-day and seasonal supply-

¹ Hawaii’s natural gas pipeline system on the island of Oahu currently has a 12% hydrogen content. [https://www.hawaiigas.com/about-us/] and [https://www.hawaiigas.com/clean-energy/hydrogen/]
² Workshop Report at 26.
³ Workshop Report at 40.
⁴ Workshop Report at 26.
demand imbalances. In the long run, GHC believe promoting green hydrogen today represents a least-cost, best-fit approach to ensuring reliability and achieving California’s decarbonization goals.

III. CONCLUSION.

GHC appreciates the opportunity to submit these comments to the Ruling and the Staff Recommendations and looks forward to working with the Commission and other stakeholders in this proceeding.

Respectfully submitted,

Janice Lin
Founder and President
GREEN HYDROGEN COALITION

Date: November 2, 2020