



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Investigate and
Design Clean Energy Financing Options for
Electricity and Natural Gas Customers.

FILED
10/05/20
02:57 PM
Rulemaking 20-08-022

**FUELCELL ENERGY, INC. OPENING COMMENTS ON ORDER INSTITUTING
RULEMAKING TO INVESTIGATE AND DESIGN CLEAN ENERGY FINANCING
OPTIONS FOR ELECTRICITY AND NATURAL GAS CUSTOMERS**

Jennifer Arasimowicz
EVP, General Counsel, Chief
Administrative Officer & Corp. Secretary
FuelCell Energy, Inc.
3 Great Pasture Road
Danbury, CT 06810
(203) 825-6070
jarasimowicz@fce.com

Brady Borcharding
Director of Government Affairs, West Coast
FuelCell Energy, Inc.
3 Great Pasture Road
Danbury, CT 06810
(415) 710-7167
bborcharding@fce.com

October 5, 2020

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Investigate and Design Clean Energy Financing Options for Electricity and Natural Gas Customers.

Rulemaking 20-08-022

FUELCELL ENERGY, INC. OPENING COMMENTS ON ORDER INSTITUTING RULEMAKING TO INVESTIGATE AND DESIGN CLEAN ENERGY FINANCING OPTIONS FOR ELECTRICITY AND NATURAL GAS CUSTOMERS

Pursuant to Rule 6.2 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, FuelCell Energy, Inc. (“FCE”) submits these comments on the Order Instituting Rulemaking to Investigate and Design Clean Energy Financing Options for Electricity and Natural Gas Customers.

I. Introduction

FCE is a global leader in the stationary fuel cell market, providing affordable and clean onsite energy, 24/7 at sites including wastewater treatment plants, hospitals, universities, industrial facilities and serving utilities including at substations. FCE has been a participant for many years in California’s clean energy programs and has made meaningful contributions to assisting California’s goals with respect to emissions reductions, microgrids, and biofuels. FCE fuel cells are a clean, reliable “energy platform” that produce power and can deliver solutions with additional features such as biogas clean-up, heat recovery for combined heat and power (“CHP”), and vehicle quality hydrogen for zero-emissions fuel.

II. Comments

FCE welcomes the opportunity for robust conversation about how California can create programs and mechanisms for customers to access the wide array of clean energy investments available today and is excited to be able to participate in this proceeding.

FCE has extensive experience with the Connecticut Green Bank and has worked very successfully with it to provide clean energy opportunities in Connecticut. Given that understanding, FCE looks forward to offering feedback to the Commission based upon this experience with the hope that it will advance the discussion of the topics considered in this rulemaking. As this Order described in detail, California has initiated many avenues for the financing of green technology over the last two decades. It is prudent that the Commission uses this rulemaking to assess what has worked and what can be improved for the future so that customers can make energy investment choices with as few barriers as possible.

Given the breadth of programs, policies, and technologies that this rulemaking will be considering, it is curious that the Commission did not refer to biogas, biomethane, or hydrogen. All three of these energy resources play a significant role in decarbonizing California's electric grid and will continue to have an important role in California's energy future. Hydrogen especially must play a key role in this discussion given its applications in transportation, energy storage, and pipeline decarbonization. It is only prudent in a proceeding examining all available options for financing green energy infrastructure that the Commission include all available sources of renewable and zero carbon energy.

III. Conclusion

The path to reaching GHG reduction goals and transforming California into a carbon-free economy will require creativity from regulators, policymakers, technology developers, and the public. Exploring available financing options and creating new financing tools through a public stakeholder process shows the Commission's prudence in addressing all aspects of how to make California increasingly more efficient and green. FCE looks forward to contributing to and

learning from the process of identifying the best options for creating effective tools to finance the infrastructure to realize California's policy goals.

Dated: October 5, 2020

Respectfully submitted,

/s/

Jennifer Arasimowicz
EVP, General Counsel, Chief
Administrative Officer & Corp. Secretary
FuelCell Energy, Inc.
3 Great Pasture Road
Danbury, CT 06810
(203) 825-6070
jarasimowicz@fce.com

Brady Borcharding
Director of Government Affairs, West Coast
FuelCell Energy, Inc.
3 Great Pasture Road
Danbury, CT 06810
(415) 710-7167
bborcharding@fce.com