



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Revisit Net
Energy Metering Tariffs Pursuant to Decision
D.16-01-044, and to Address Other Issues
Related to Net Energy Metering.

Rulemaking 20-08-020
(Filed August 27, 2020)

**REPLY COMMENTS OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL ON
THE PROPOSED DECISION ADOPTING GUIDING PRINCIPLES FOR THE
DEVELOPMENT OF THE SUCCESSOR TO THE CURRENT NET ENERGY
METERING TARIFF**

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February 1, 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 Guiding Principles for the Development of the Successor to the Current Net Energy Metering Tariff (“PD”) issued on January 5, 2021, the California Hydrogen Business Council (CHBC)¹ provides the following reply comment.

II. Reply Comment: We support balancing NEM with energy storage, as long as the principle of technology neutrality is upheld, so that a broad range of storage technologies, including green electrolytic hydrogen, are eligible to participate as part of the program design.

Clean Coalition advocates for promoting energy storage in the NEM tariff program,² and Small Business Utility Advocates (SBUA) also calls for balancing NEM with energy storage.³ The CHBC supports this, as long as the principle of technology neutrality is upheld in the program design, so that all storage technologies, including green electrolytic hydrogen, are eligible to participate. Maintaining technology neutrality would comply with the SB 1369 mandate, which

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/>

² Clean Coalition Opening Comments, p. 3

³ SBUA Opening Comments, pp. 4-5

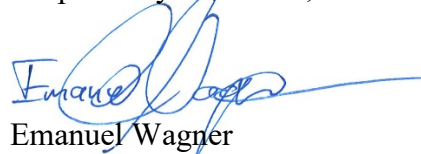
requires the Commission to consider green electrolytic hydrogen a form of energy storage. SBUA also recommends that principle (e), which specifies with which policies the NEM successor tariff ought to coordinate, specify the addition to that principle of SB 1339 (Stern, 2018), “(i)n order to clarify that this proceeding should consider whether the successor to the net energy metering tariff should maintain an absolute limitation on import from the grid to NEM energy storage systems.”⁴ We agree that this is an important issue to resolve and that this recommendation is a sensible next step.

III. Conclusion

For the reasons set out above, the CHBC respectfully requests that the Commission grant this motion for party status.

Dated: February 1, 2021

Respectfully submitted,



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⁴ Ibid, p. 5