



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

03/08/21
04:59 PM

Order Instituting Rulemaking to Adopt Biomethane Standards and Requirements, Pipeline Open Access Rules, and Related Enforcement Provisions.

Rulemaking 13-02-008

REPLY OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL TO THE JOINT COMMENTS OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G), PACIFIC GAS AND ELECTRIC COMPANY (U 39 G), AND SOUTHWEST GAS CORPORATION (U 905 G) REGARDING HYDROGEN-RELATED ADDITIONS OR REVISIONS TO THE STANDARD RENEWABLE GAS INTERCONNECTION TARIFF

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March 8, 2021

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I. Introduction

The California Hydrogen Business Council (CHBC)¹ appreciates the opportunity to respond to the JOINT COMMENTS OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G), PACIFIC GAS AND ELECTRIC COMPANY (U 39 G), AND SOUTHWEST GAS CORPORATION (U 905 G) REGARDING HYDROGEN-RELATED ADDITIONS OR REVISIONS TO THE STANDARD RENEWABLE GAS INTERCONNECTION TARIFF, filed on February 22, 2021.²

Our comments are summarized below and explain in detail after this section.

- a. CHBC supports the near-term development of several demonstration projects, gather relevant data, and inform the development of hydrogen injection standards and interconnection protocols and agreements**

- b. CHBC agrees on any Injection Standard development to be independent of definition discussion of renewable and/or green hydrogen**

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:

<https://www.californiahydrogen.org/aboutus/chbc-members/>

² <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M368/K055/368055460.PDF>

II. Comments

a. CHBC supports the near-term development of several demonstration projects, gather relevant data, and inform the development of hydrogen injection standards and interconnection protocols and agreements

The CHBC applauds the decision by the ALJ to move forward with the consideration of the proposed Hydrogen Blending Demonstration Program and the creation of Renewable Hydrogen Memorandum Accounts. The CHBC urges the Commission to schedule a prehearing conference and for the memo accounts to be authorized at the earliest time possible. The CHBC sees a need for these next steps to commence without delay so that projects can be started in a timely manner to help develop the relevant data to safely create hydrogen injection protocols and standards, paving the way for deep decarbonization projects to be built at scale in California to achieve significant GHG reduction goals.

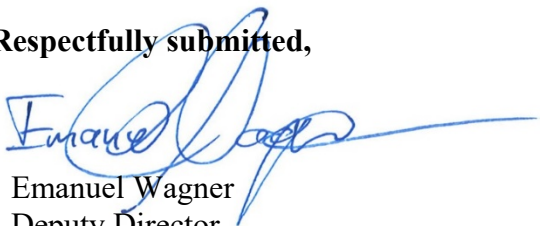
b. CHBC agrees on any Injection Standard development to be independent of definition discussion of renewable and/or green hydrogen

The CHBC agrees with the Joint Utilities' request to keep definitional issues separate from pipeline injection eligibility. The hydrogen industry and stakeholders are working to develop a mutually supported definition of green or renewable hydrogen. This process should not be the cause for any delays in developing the preliminary standards and demonstrations and therefore be treated separately.

III. Conclusion

The CHBC thanks the Commission for considering these comments and looks forward to further collaborating with the Commission and stakeholders.

Respectfully submitted,



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Dated: March 8, 2021