

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Continue
Electric Integrated Resource Planning and
Related Procurement Processes

R.20-05-003

**REPLY COMMENTS OF THE GREEN HYDROGEN COALITION ON
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON AN
ADDITIONAL PROPOSAL FOR A RELIABLE AND CLEAN
POWER PROCUREMENT PROGRAM**

Tim Kamermayer,
Director, Policy and Regulatory Affairs
GREEN HYDROGEN COALITION
19890 Scott's Flat Road
Nevada City, CA 95959
Telephone: (916) 936-7163
Email: Tkamermayer@GHCoalition.org

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In accordance with the *Administrative Law Judge's Ruling Seeking Comments on an Additional Proposal for a Reliable and Clean Power Procurement Program*, issued June 23, 2026 (June 23 Ruling), and the July 13, 2026, ruling extending the comment schedule, the Green Hydrogen Coalition (GHC) respectfully submits these reply comments. These comments are timely filed pursuant to the Ruling of July 13, 2026, which extended the deadline for opening comments to August 14, 2026, and for reply comments to September 2, 2026.¹

I. INTRODUCTION AND SUMMARY OF RECOMMENDATIONS

The GHC appreciates the opportunity to reply to the opening comments to the June 23 Ruling and the extensive amount of time dedicated to this process by the California Public Utilities Commission (Commission). GHC believes the opening-comment record strengthens the case for adopting option three with a modification that includes a separate track addressing long lead-time (LLT) resources. The GHC is a California educational 501(c)(3) nonprofit organization formed in 2019 to facilitate policies and practices that advance green hydrogen production and use in all sectors of the economy to accelerate a carbon-free energy future and a just energy transition. Our sponsors include charitable foundations, renewable energy users and developers, utilities, and other supporters of a reliable, affordable green hydrogen fuel economy for all.

¹ Administrative Law Judge's Ruling Seeking Comments on Additional Proposal for a Reliable and Clean Power Procurement Program, R.20-05-003 (June 23, 2026) (June 23 Ruling), at 2, 18–20, CPUC Doc. 609223925; Ruling Partially Granting Joint Investor-Owned Utilities' Request for an Extension of Time, R.20-05-003 (July 13, 2026), at 9–10, CPUC Doc. 610764732.

While parties disagree about several features of the Reliable and Clean Power Procurement Program (RCPPP), including whether the Commission should adopt the proposal at all and how procurement obligations should be allocated, there is broad agreement on option three being insufficient for long lead time resources to compete and participate. These parties include system operations, consumers, renewable and firm-resource developers, storage, wind, community choice aggregators, and utilities. The opening-comment record thus repeatedly identifies the same concern with the proposal: a uniform five-year binding schedule with only two years after the proposed contracting deadline to be online is not workable. While there is no specific ban on LLT resources in the June 23 Ruling, the five-year framework functionally removes LLT resources from being a part of a load serving entity's (LSE) portfolio because they cannot be built and online in time.

Functionally excluding LLT resources from participating in the RCPMP will materially limit the state from meeting its ambitious decarbonization goals. Aside from the fact that a uniform schedule that cannot be met by otherwise-needed resources is not technology neutral in practice, there is also the issue that the five-year framework becomes a filter for only projects and resources with shorter development timelines. GHC believes the solution is maintaining the RCPMP's portfolio-to-procurement link in option three while using the ten-year planning horizon mark as a separate LLT requirement.² By preserving the five-year track while adding a binding ten-year LLT track with early contracting, stable compliance values, and enforceable development milestones, the RCPMP can create a program that properly factors in all of the renewable energy pathways and long-duration energy storage opportunities available to the state. GHC recommends that the Commission:

1. **Adopt the portfolio-based framework with differentiated schedules.** Retain the five-year track for resources capable of meeting it and establish a binding ten-year LLT track for resources selected from the ten-year Preferred System Plan (PSP) and Transmission Planning Portfolio (TPP) horizon.

² Green Hydrogen Coalition, Opening Comments on Administrative Law Judge's Ruling Seeking Comments on Additional Proposal for a Reliable and Clean Power Procurement Program, Cal. Pub. Util. Comm'n, Docket No. R.20-05-003 (Aug. 14, 2026).

2. **Require early, financeable commitments.** For the LLT track, determine and allocate the binding need at T–10; require 100 percent of each LSE’s allocated obligation to be under qualifying long-term contract by T–7; and require commercial operation and delivery by T, subject to narrowly defined, milestone-based extensions.
3. **Define qualifying LLT resources by needed attributes and demonstrated development requirements.** The rules should be technology neutral and performance based. Renewable and clean hydrogen production, storage, delivery, and generation pathways, including repurposing for hydrogen-capable gas turbines, should be expressly eligible when they satisfy the adopted attributes, emissions requirements, and verification rules, without creating a technology-specific quota.
4. **Count centralized procurement conservatively.** Reduce an LSE obligation only for centralized procurement entity (CPE) quantities supported by executed, Commission-approved contracts that are reasonably likely to achieve commercial operation, with annual reconciliation and an enforceable backstop for shortfalls.

II. **THE OPENING-COMMENT RECORD CONFIRMS THAT A UNIFORM FIVE-YEAR SCHEDULE IS NOT WORKABLE FOR LLT RESOURCES**

A. **Parties with different interests identify the same timing problem.**

While unanimous consensus over the five-year binding framework does not exist, a strong contingent of parties that submitted opening comments note concerns over LLT resources being able to come online within that window. The California Independent System Operator Corporation (CAISO) explains that a uniform five-year online requirement is insufficient for LLT and transmission-dependent resources. CAISO also observes that major transmission upgrades cannot necessarily be completed within five years and that the schedule would leave only two years between the contracting deadline and commercial operation. CAISO recommends resource-specific timelines that account for the facilities and network upgrades required to interconnect from the selected portfolio. GHC agrees with the CAISO that “...these resources require lengthy development timelines, complex permitting processes, and, in some cases, significant transmission infrastructure investments before achieving commercial operation. For renewable and clean hydrogen, conversion of existing gas turbines may require more than a five-year lead time, due to needed fuel development, contracting, and turbine retrofits. The Commission should establish

solid procurement obligations sufficiently in advance of identified system need dates to support timely development and reduce the risk these resources are unavailable when needed.”³

Environmental Defense Fund (EDF) similarly states that five years is “not nearly sufficient” for LLT development and recommends procurement requirements at least ten years in advance, with longer horizons where appropriate. GHC agrees with EDF that the proposal could “act as another barrier to procuring the long-lead time resources the State needs to meet its energy goals.”⁴ The Utility Reform Network (TURN) recommends differentiated timing: shorter treatment for resources that can be developed quickly, at least five years for longer-lead resources, and potentially seven to ten years where transmission or shared infrastructure must be developed.⁵

Concerns for LLT resources even appear in comments that do not endorse the June 23 proposal. The Public Advocates Office notes that five years may be insufficient and points to mid-term reliability of LLT deadlines extending seven to ten years.⁶ The California Community Choice Association opposes the proposal but agrees that a five-year horizon can be insufficient for LLT resources and may steer procurement toward resources that are easier to build.⁷

GHC acknowledges that these positions do not establish agreement on every design detail nor on the GHC’s suggestion for modifying the ten-year planning horizon into a LLT track for procurement. They do, however, establish that the Commission should not make a five-year schedule as the only doorway through which the modeled portfolio can reach procurement. Thus, the opening-comment record demonstrates that whatever option is chosen by the Commission should incorporate LLT resources into the planning framework by providing more time than two years after contracting to come online.

³ Opening Comments of the California Independent System Operator Corporation (Aug. 14, 2026) (CAISO Opening Comments), at 4, 6–8, CPUC Doc. 614997061.

⁴ Opening Comments of Environmental Defense Fund (Aug. 14, 2026) (EDF Opening Comments), at 14–15, CPUC Doc. 615005843.

⁵ Opening Comments of The Utility Reform Network (Aug. 14, 2026) (TURN Opening Comments), at 7–8, CPUC Doc. 614474077.

⁶ Comments of the Public Advocates Office (Aug. 14, 2026), at 17, CPUC Doc. 615003219.

⁷ California Community Choice Association’s Comments (Aug. 14, 2026), at 14–15, CPUC Doc. 615005837.

B. Resource developers confirm that the obstacle is development reality, not a request for relaxed accountability.

GHC believes providing more time for LLT resources to come online ensures their inclusion in the RCPMP without removing obligations on these resources to comply. Opening comments from entities focused on specific projects are particularly instructive on the insufficiency with a five-year binding window for LLT resources. Ormat Technologies, Inc. describes a roughly ten-year geothermal development cycle and proposes that a 2028 need determination support a June 2038 online date while preserving the proposed requirement to contract within three years.⁸ The California Wind Energy Association identifies transmission and interconnection timelines of five to ten years or more and recommends extensions commensurate with the facilities needed to interconnect selected resources.⁹ GHC agrees with these points and notes that renewable hydrogen projects can experience an even longer-lead time due to hydrogen's unique needs for sourcing required renewable energy, feedstock development, and developing hydrogen transport solutions. The responses thus demonstrate that many renewables need more time than is currently contemplated in option three.

The Long Duration Energy Storage Council (LDES Council) states that two years after contract execution is not feasible for many long-duration storage projects, recommends a project-specific contractual commercial-operation date, and urges that penalties not apply before that approved date.¹⁰ GHC agrees and would note that electrolytic green hydrogen is considered a form of long-duration energy storage, pursuant to Senate Bill 1369 (Skinner, 2018) which amended PU code 400.3 to expressly include green electrolytic hydrogen among the energy-storage technologies that the CPUC, Air Board and CEC should seek to increase where feasible, cost effective and consistent with state policy.¹¹ LDES Council also accurately notes that Department of Water Resources (DWR) procurement decisions have previously allowed seven to nine years between approval and delivery.¹²

Other parties also propose an intermediate seven-year track or phased contracting schedule. American Clean Power-California recommends a seven-year cycle with 60 percent contracted at

⁸ Comments of Ormat Technologies, Inc. (Aug. 14, 2026), at 6–7, CPUC Doc. 614587081.

⁹ California Wind Energy Association Comments (Aug. 14, 2026), at 12–13, CPUC Doc. 614484377.

¹⁰ Long Duration Energy Storage Council Response (Aug. 14, 2026), at 11–13, CPUC Doc. 614488828.

¹¹ Energy: green electrolytic hydrogen, S.B. 1369, 2017-2018 Reg. Sess., ch. 567, 2018 Cal. Stat. 567.

¹² LDES Council Response at 12.

T-4 and 100 percent at T-2.¹³ Fervo Energy recommends approximately seven years from order to commercial operation, with a substantial showing in year three and full contracting in year five.¹⁴ NextEra Energy Resources proposes a seven-year horizon with phased contracting milestones.¹⁵ GreenGenStorage supports full contracting by the third year after the need determination and an LLT online requirement extending to T+8 or the contracted date, no later than T+10.¹⁶

Those proposals vary, but they confirm two points central to GHC's recommendation. First, the RCPPP must distinguish development schedules rather than impose a uniform online deadline. Second, an extended online date can be paired with earlier commercial commitments and measurable milestones. Therefore, a longer LLT runway is not a waiver of procurement accountability; it is the structure needed to make accountability meaningful and ensure these projects can participate in the state's clean energy goals.

III. THE COMMISSION SHOULD ADOPT A BINDING TEN-YEAR LLT TRACK

A. The LLT schedule should connect the ten-year portfolio determination to early contracting and an achievable online date.

GHC continues to recommend a simple three-stage schedule. The Commission should identify and allocate the incremental LLT need selected for the ten-year horizon when it adopts the applicable PSP or TPP portfolio. Each LSE should demonstrate three years later that 100 percent of its allocated LLT obligation is under qualifying long-term contract. The contracted resource should be online and delivering seven years after contract execution and ten years after the binding need determination.¹⁷

The GHC recommendation preserves the June 23 Ruling's proposed three-year contracting period while giving an LLT project seven years after contract execution for financing, permitting, interconnection, shared infrastructure, construction, and commissioning. It also avoids the potential problem of waiting until late in the ten-year horizon to create a binding commercial signal. The ten- and fifteen-year horizons without binding stipulations will likely be seen as advisory

¹³ American Clean Power-California Opening Comments (Aug. 14, 2026), at 15-18, CPUC Doc. 615005841.

¹⁴ Fervo Energy Company's Opening Comments (Aug. 14, 2026), at 2-4, CPUC Doc. 614587074.

¹⁵ NextEra Energy Resources, LLC's Comments (Aug. 14, 2026), at 9-12, CPUC Doc. 614483669.

¹⁶ Opening Comments of GreenGenStorage, LLC (Aug. 14, 2026), at 13-16, CPUC Doc. 614587061.

¹⁷ GHC Opening Comments.

signals, nothing more. Whereas the T-7 contract milestone recommended by the GHC evolves an advisory market signal into financeable offtake commitment.

The Commission may also adopt an intermediate track for resources that cannot meet the ordinary five-year schedule but do not require the full ten-year horizon. The seven-year proposals in the opening-comment record provide a reasonable basis for that additional tier, but a ten-year track will still be needed for the longest-lead resources and associated transmission or shared infrastructure.

B. Eligibility should turn on portfolio attributes and demonstrated lead time.

The Commission should define an LLT procurement category by the system attributes selected in the adopted portfolio and by an objective showing that the resource or pathway requires an extended development schedule. Relevant attributes may include clean firm capacity, continuous or multi-day duration, seasonal energy availability, fuel inventory, local or deliverability value, ramping and start capability, and the ability to reduce exposure to correlated weather or storage-duration risk. Relevant development factors may include permitting, specialized equipment, subsurface characterization, new transmission, major network upgrades, or shared fuel-production, storage, and delivery infrastructure.

The category should not be defined as a closed list of favored technologies. Technology neutrality requires comparable treatment of pathways capable of delivering the required attributes and meeting adopted greenhouse-gas, criteria-pollutant, deliverability, and performance standards. GHC therefore reiterates that renewable and clean hydrogen-fueled repowered turbines, fuel cells, linear generators, and associated production, storage, and delivery infrastructure should be eligible when the complete pathway satisfies those standards. The Commission should model conversion efficiency, storage losses, fuel availability, delivery constraints, generator performance, lifecycle emissions, and cost transparently. GHC does not request a hydrogen mandate or a predetermined procurement quantity; it requests a fair eligibility and modeling framework.¹⁸

The Commission should also recognize incremental capability created at existing sites through qualifying repowering, augmentation, turbine conversion, fuel-cell additions, or renewable and clean hydrogen storage additions. Eligibility should attach only to the incremental

¹⁸ Id. at 6.

clean-energy and reliability capability above an auditable baseline, with clear rules preventing duplicate claims.

C. Repowering should receive credit for auditable incremental capacity, with SB 1350 implemented through coordinated but distinct program accounting.

GHC argues that the opening-comment record confirms that repowering should not be deferred to an unspecified future phase of RCPPP development. The Western Power Trading Forum (WPTF) explains that the annual Resource Adequacy program does not provide a durable signal for major maintenance or repowering.¹⁹ San Diego Gas & Electric Company emphasizes that repowered resources may preserve existing sites, land rights, and deliverability while avoiding some greenfield-development and transmission costs.²⁰ CAISO supports a mechanism for updating the procurement baseline so that repowered resources retain a pathway to procurement compliance value, and NextEra Energy Resources proposes crediting the incremental accredited contribution created by a repower, modification, or expansion. These positions support resolving the core eligibility and accounting rules in the initial RCPPP framework.²¹

The Commission should treat the incremental clean energy and reliability capability created by qualifying repowering, augmentation, turbine conversion, fuel-cell addition, or renewable and clean hydrogen storage addition as eligible procurement. Compliance credit should be measured against an auditable pre-project baseline and awarded only for the incremental capacity or resource attributes created by the investment. Existing capability should not be relabeled and counted as new procurement without demonstrating clean repowering against the auditable baseline. At the same time, the framework should recognize incremental improvements in accredited reliability contribution, duration, emissions performance, or other required portfolio attributes even where the project does not materially increase nameplate capacity. This approach preserves the Ruling's incremental-procurement principle while avoiding unnecessary greenfield development and preserving useful interconnection and grid infrastructure.²²

¹⁹ Comments of the Western Power Trading Forum on the Additional Reliable and Clean Power Procurement Program Proposal (Option 3) (Aug. 14, 2026), at 3–4, CPUC Doc. 614474072.

²⁰ Comments of the Western Power Trading Forum on the Additional Reliable and Clean Power Procurement Program Proposal (Option 3) (Aug. 14, 2026), at 3–4, CPUC Doc. 614474072.

²¹ CAISO Opening Comments at 11–12; NextEra Energy Resources, LLC's Comments at 15–17.

²² June 23 Ruling at 12; GHC Opening Comments at 5–6.

SB 1350 reinforces the need for that eligibility pathway. The statute took effect immediately on June 29, 2026, and amended Public Resources Code section 25741 to include within the definition of a renewable electrical generation facility a facility that converts qualifying hydrogen gas to electricity in a turbine and satisfies the statute’s conditions. SB 1350 establishes potential renewable energy and renewable energy-certificate eligibility; it does not itself establish net qualifying capacity, create an RCPPP clean-firm category, or mandate procurement of a particular technology.²³ Therefore, there are opportunities for the Commission to incorporate this new end-use to allow LSEs to fully optimize this pathway for power generation across the Commission’s programs and goals, smartly opening the door to transforming California’s existing thermal generation fleet.

GHC would encourage the Commission to coordinate RCPPP implementation with the California Energy Commission’s implementation and certification of SB 1350. As noted in the opening comments, candidate-resource assumptions and model contracts should reflect the statute’s requirements, including eligible renewable hydrogen production, avoidance of duplicate claims for the electricity used to produce hydrogen, hourly matching for electrolytic production beginning January 1, 2030, prohibitions on resource shuffling and unbundled renewable energy certificates, physical delivery of hydrogen to the turbine, and the required air-district confirmations regarding greenhouse-gas and air-pollutant reductions and nitrogen-oxide emissions. Contracts should separately identify ownership and retirement of renewable energy certificates, RCPPP capacity and category value, and Resource Adequacy capacity. This coordinated accounting would permit customers to receive the distinct benefits of a qualifying repower without counting the same megawatt-hour or capacity attribute more than once.²⁴

D. Procurement and transmission planning must use the same assumptions and milestone calendar.

GHC agrees with parties that identify transmission coordination as one of the foundational issues around implementation. An LLT obligation cannot be implemented reliably if the procurement program assumes deliverability that the transmission plan cannot provide on the same schedule. The final framework should identify the busbar mapping, transmission deliverability assumptions, transmission-plan deliverability allocation, and maximum import capability

²³ S.B. 1350, 2025–2026 Reg. Sess. (Cal. 2026), Chapter 35.

²⁴ GHC Opening Comments at 11-12.

treatment applicable to each selected category before LSE solicitations. Where the adopted portfolio requires new transmission or major upgrades, the Commission should align the binding LLT determination with the TPP and require reporting against both project and transmission milestones. CAISO, Ormat, CalWEA, and the Western Power Trading Forum each identify transmission coordination or upgrade timing as a central implementation issue.²⁵ Furthermore, repowering existing gas turbines with clean and renewable hydrogen, and/or the addition of new clean and renewable hydrogen fuel capacity would smartly leverage those facilities' existing interconnection and transmission capacity.

IV. DWR CENTRAL PROCUREMENT SHOULD COMPLEMENT, NOT DISPLACE, LSE PROCUREMENT OF LLT RESOURCES, AND CPE CREDITS SHOULD BE MATURE AND RECONCILED

As GHC explained in opening comments, DWR centralized procurement should complement, rather than displace, LSE procurement of LLT resources.²⁶ Opening comments from other parties confirm that this is not a GHC-specific concern with option three. The LDES Council states expressly that central procurement mechanisms “should complement, not replace, LSE-led procurement and should not be viewed as the exclusive means of securing LLT resources.”²⁷ GreenGen similarly concludes that a discretionary procurement channel closed to portions of the LLT resource class cannot carry primary responsibility for LLT procurement, while Hydrostor explains that the limited scope and uncertainty of DWR procurement necessitate continued procurement of LLT resources through the RCPMP.²⁸ EDF, SoCalGas, ACP-California, CEJA, Sierra Club, and WPTF likewise support preserving an LSE procurement pathway for residual need or for quantities not covered by successful centralized procurement.²⁹

That result is also consistent with D.24-08-064. The Commission described the DWR mechanism as a strategic market-transformation tool, expressly left room for individual LSE procurement, and determined that centralized procurement should remain separate from, and

²⁵ CAISO Opening Comments at 7–8; Ormat Comments at 6–7; California Wind Energy Association Comments at 12–13; Comments of the Western Power Trading Forum (Aug. 14, 2026), at 7–8, CPUC Doc. 614474072.

²⁶ GHC Opening Comments at 11–12.

²⁷ LDES Opening Comments at 12.

²⁸ GreenGen Opening Comments at 9–10; Hydrostor Response at 8–9.

²⁹ Environmental Defense Fund Comments at 12; Southern California Gas Company Opening Comments at 7–8; American Clean Power–California Opening Comments at 10–12; California Environmental Justice Alliance and Sierra Club Comments at 15; Western Power Trading Forum Comments at 10–11.

coordinated with LSE procurement requirements. The Decision also established maximum quantities and authorized DWR to procure anywhere from zero to those maximums.³⁰ Consequently, a Commission needs determination, procurement request, or solicitation cannot establish that DWR will actually procure the resource.

DWR's statutory eligibility limitations provide an additional reason not to make DWR solely responsible. Public Utilities Code section 454.52(h) excludes resources that use combustion to generate electricity, except for combustion ancillary to geothermal generation, and permits only a narrowly defined category of pumped hydroelectric resources. Although SB 1350 now recognizes qualifying renewable-hydrogen turbine generation as renewable generation, it did not eliminate the separate statutory prohibition on DWR procurement of combustion-based generation.³¹ Exclusive reliance on DWR could therefore leave no procurement pathway for an LLT resource or attribute identified in the PSP; such as, qualifying renewable hydrogen fueled turbines that DWR currently lacks authority to procure.

GHC disagrees with parties that view concurrent procurement tracks as potentially being in competition. The Alliance for Retail Energy Markets (AReM) argues that LSEs should not compete with DWR, and that resources requiring substantial economies of scale should instead be procured by DWR or through an IOU cost-allocation mechanism.³² The concern about duplicative solicitations is legitimate, but it supports coordination. Central procurement may be appropriate for particular resources or quantities, while the RCPMP remains necessary for residual need, resources outside DWR eligibility, and circumstances in which DWR procures less than the authorized maximum.

The Commission should therefore determine the total LLT need, preserve a binding LSE obligation for any quantity not covered by mature, centralized procurement, and reduce that obligation only when a DWR resource is supported by an executed, Commission-approved contract and is reasonably likely to achieve its applicable online date.³³ Credits should reflect the resource's accredited quantity and should be reconciled annually against contract status, development milestones, and expected commercial operation. If a centralized quantity is delayed,

³⁰ D.24-08-064 at 2–4, 40–41, 49, 51–52, 73, and 82–83.

³¹ SB 1350.

³² Alliance for Retail Energy Markets Comments at 8–9.

³³ The Utility Reform Network Opening Comments at 6; GreenGen Opening Comments at 9–10; Hydrostor Response at 8–9.

reduced, or terminated, the corresponding obligation should be restored through a schedule that permits orderly replacement procurement. This dual-track structure avoids double counting without making the achievement of California's LLT resource needs dependent upon a single, discretionary, and statutorily limited procurement channel.

V. CONCLUSION

The opening-comment record confirms that the June 23 proposal can provide a durable bridge from integrated resource planning to procurement only if the implementation schedule reflects the resources and infrastructure selected by the plan. GHC respectfully requests that the Commission adopt the proposal with: (1) an ordinary five-year track; (2) a binding ten-year LLT track with need determined at T-10, full contracting at T-7, and delivery at T; (3) technology-neutral, attribute-based eligibility that expressly permits qualifying renewable and clean hydrogen pathways; (4) mature and reconciled centralized-procurement credits that complement the LSE's procurement of LLT resources.

Respectfully submitted,

/s/

Tim Kamermayer
Director, Policy and Regulatory Affairs
GREEN HYDROGEN COALITION
19890 Scotts Flat Road
Nevada City, CA 95959
Telephone: (916) 936-7163
Email: Tkamermayer@GHCoalition.org

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