

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

Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning
Framework and to Coordinate and Refine
Long-Term Procurement Planning
Requirements.

Rulemaking 16-02-007
(Filed February 11, 2016)

**REPLY COMMENTS OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL ON
THE PROPOSED DECISION ON THE 2019-2020 RESOURCE PORTFOLIOS TO
INFORM INTEGRATED RESOURCE PLANS AND TRANSMISSION PLANNING**

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Dated: March 17, 2020

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I. INTRODUCTION

The California Hydrogen Business Council (CHBC)¹ appreciates the opportunity to submit the following reply comments to the *Proposed Decision on the 2019-2020 Resource Portfolios to Inform Integrated Resource Plans and Transmission Planning* (PD).

II. REPLY COMMENTS

We agree with comments made by CESA, EDF and others that support the Commission including a wide range of long duration storage technologies in the resource portfolio by 2026. As EDF states, when discussing long-duration storage, “there are a variety of technologies that can meet the exact same need identified by the Commission’s modeling.”² CESA asserts that

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. Members are listed here: www.californiahydrogen.org/aboutus/chbc-members/.

² EDF Opening Comments to PD, p. 6

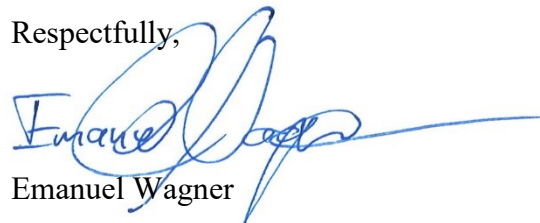
storage via green hydrogen is among the types of storage that could comply with the Commission’s operating requirements for long-duration storage.³ Southern California Gas Company similarly encourages the Commission to “identify hydrogen specifically as an eligible resource, in addition to pumped storage, under ‘long-duration storage resources with similar attributes ’”⁴ and to “evaluate the (LADWP) Intermountain Power Project as a potential long duration storage procurement strategy to meet 2026 procurement goals,” along with other projects.

We continue to strongly believe that allowing a diverse range of long duration storage technologies, including hydrogen solutions that can particularly provide flexibility and scalability, will best enable California to ensure reliable electricity service while transitioning to a predominantly renewable power portfolio.

III. CONCLUSION

CHBC appreciates the Commission’s consideration of these reply comments and looks forward to continuing to collaborate to integrate hydrogen solutions into California’s integrated resource planning.

Respectfully,



Emanuel Wagner

Deputy Director

California Hydrogen Business Council

March 17, 2020

³ CESA Opening Comments to PD, p. 10

⁴ Southern California Gas Company Opening Comments to PD, p. 2