

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

Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339
and Resiliency Strategies.

Rulemaking 19-09-009
(Filed September 12, 2019)

**REPLY COMMENTS OF CALIFORNIA HYDROGEN BUSINESS
COUNCIL ON ASSIGNED COMMISSIONER'S AMENDED SCOPING
MEMO AND RULING FOR TRACK 3**

March 10, 2021

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MEMO AND RULING QUESTIONS FOR TRACK 3**

I. Introduction

The California Hydrogen Business Council (CHBC)¹ appreciates the opportunity to submit reply comments per Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), and the Administrative Law Judge’s ruling seeking comment from parties on the Amended Scoping Memo and Ruling Questions for Track 3 issued on February 9, 2021, in the above-captioned proceeding.

II. Reply Comments on Proposed Scope and Schedule

The CHBC urges the Commission to promptly begin work on Track 3 to evaluate resiliency to inform the development of the multi-property microgrid tariff and the customer-facing

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/>

microgrid tariff to fairly create compensation framework across all microgrid programs and technologies.

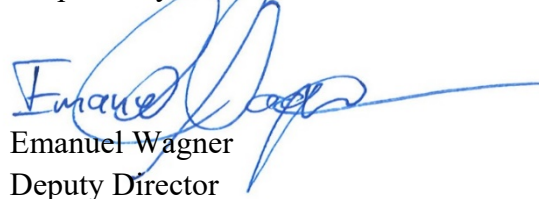
The CHBC agrees with several parties' comments that the PUC should establish methodologies to value resilience before assigning values, compensation, and incentives to the customer-facing microgrids tariff. We urge the Commission to immediately begin an analysis on the value of resilience. This should also apply to the multi-property microgrid program. We support the alignment to develop both programs to avoid creating distinct compensation and incentives for the tariffs and therefore misalign the microgrid programs. We implore the Commission to accelerate the schedule to establish the value of resiliency components and then proceed with work on the multi-property tariff and the customer-sited microgrid tariff.

III. Conclusion

The CHBC appreciates the opportunity to provide reply comments to the Commission. The CHBC again urges the Commission to quickly establish a customer-sited microgrid tariff and multi-property microgrid tariff to address California's current energy resiliency issues and avoid adding new fossil-fueled generation.

Dated: March 10, 2021

Respectfully submitted,



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