BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Emergency Disaster Relief Program.	Rulemaking 18-03-011 (Filed March 22, 2018)

COMMENTS OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL ON THE ASSIGNED COMMISSIONER'S PROPOSED DECISION ADOPTING WIRELESS PROVIDER RESILIENCY STRATEGIES

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BEFORE THE PUBLIC UTILITIES COMMISSION
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Order Instituting Rulemaking Regarding Emergency Disaster Relief Program.	Rulemaking 18-07-003 (Filed March 22, 2018)

COMMENTS OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL ON THE ASSIGNED COMMISSIONER'S PROPOSED DECISION ADOPTING WIRELESS PROVIDER RESILIENCY STRATEGIES

I. Introduction

Pursuant to the Assigned Commissioner's Proposed Decision Adopting Wireless Provider Resiliency Strategies issued in this proceeding mailed on June 11, 2020 ("Proposed Decision"), the California Hydrogen Business Council (CHBC)[1] hereby submits the following comments to parties. To summarize, we are disappointed that the decision continues to allow use of polluting diesel generators while doing nothing to encourage use of zero emissions hydrogen fuel cell backup generators to ensure that critical services, including telecommunication, remain resilient and reliable 24/7/365 without emitting criteria air pollutants or air toxics. This is especially troubling because not only are zero emissions backup power solutions for telecommunications necessary to protect the health and safety of Californians – particularly during the ongoing respiratory threat caused by the COVID-19 pandemic – and to encourage an important route to market for the hydrogen industry, but also they are more reliable, often more cost-effective, and

[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/.

just as flexible if not more so than diesel generators. These points are elaborated on in the following comments, which we hope you will use as a basis to reconsider your proposed decision to be more inclusive and supportive of hydrogen fuel cells over diesel generation.

II. COMMENTS

A. Hydrogen fuel cells are more reliable than diesel generators.

Nothing is more important to emergency backup power than being sure it works during the time of need. Hydrogen fuel cell reliability is rated at 99.6% compared to diesel generator reliability of up to 88.4%.[2] This is a key reason that the CPUC should be leveraging this rulemaking to encourage the use of stationary fuel cells, including hydrogen fuel cells, over diesel generators.

B. Multiple refueling pathways make hydrogen fuel cells a practical option for emergency backup generation.

Regular refueling and top-offs in advance of an outage can be supplied by a hydrogen fueling network, akin to the diesel "bump truck", is available, allowing fuel cells to serve sites with high capacity and multi-day power needs. Alternatively, in more remote locations, empty hydrogen cylinders can be replaced with full ones, similar to refilling fossil fuel storage containers for traditional generators.

C. Hydrogen fuel cells are the obvious choice over diesel generators to protect the environment and public health.

Whereas diesel generators are noisy and emit criteria pollutants and air toxics, hydrogen fuel cells are quiet, zero emissions and emit low heat, making them the far more sustainable and

[2] Ibid, referencing Survey of Reliability and Availability Information for Power Distribution, Power Generation and HVAC Components for Commercial, Industrial and Utility Installations, Hale/Arno, IEEE Industrial and Commercial Power Systems Technical Conference, 2005

healthy choice. This is especially important in California, where several regions consistently fail to meet air quality standards, disadvantaged communities suffer cumulative impacts of diesel and other pollutants, and where many parks and residential areas would need the protection of low impact back up generation. Hydrogen also has far lower greenhouse gas emissions than diesel, even when produced conventionally.[3] When produced using a renewable feedstock, like electricity or biogas, hydrogen can be greenhouse gas-free over its lifecycle.

D. Hydrogen fuel cells have a long, successful track record in the telecommunications industry.

Hydrogen fuel cells have served thousands of telecommunications locations, utility, railroad and government communications requirements for many years. Encouraging their use now is neither experimental, nor imprudent. Their established track record should be one more reason to support widespread adoption in lieu of polluting diesel alternatives.

III. CONCLUSION

The CHBC appreciates your consideration of these comments and hopes you will use the information we have shared to refine the Proposed Decision by encouraging hydrogen fuel cells as a more beneficial technology option compared to diesel generation.

Dated: July 1, 2020

Respectfully submitted,

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[3] https://www.fueleconomy.gov/feg/fcv_benefits.shtml