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)

REPLY COMMENTS OF THE NATIONAL FUEL CELL RESEARCH CENTER ON THE PROPOSED DECISION ADOPTING WIRELESS PROVIDER RESILIENCY STRATEGIES

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I. Introduction

In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the National Fuel Cell Research Center (NFCRC) respectfully submits reply comments to parties on the Administrative Law Judge's Proposed Decision (PD) Adopting Wireless Provider Resiliency Strategies, issued June 11, 2020.

II. REPLY COMMENTS

The NFCRC appreciates the opportunity to participate in this proceeding and submit these reply comments to parties and the Commission on the Proposed Decision.

Summary of Replies:

1. **Further defining the timeline for a transition to clean energy generation resources that is requested in the Resiliency Plans could have an immediate impact on the health and air quality of Californians.**
2. **Fuel cell systems are already exempt from air district permitting requirements and can readily be designed into and installed at many critical wireless sites in Tier 2 and Tier 3 high fire threat districts both this year and in 2021.**
3. **Releasing a Proposed Decision for wireline sites could further support an initial transition to clean energy in 2021, or sooner with commercially available fuel cell solutions developed for wireline applications and already deployed in wireline networks in California.**

A. Communications Resiliency Plans

In response to Public Advocates, the NFCRC supports the need for a timeline to transition to clean backup power generation. Public Advocates recommends a "proposed timeline by which the provider will install clean energy generation backup at 25%, 50%, 75%, and 100% of their sites"[1] which the NFCRC finds reasonable for planning fuel cell installations over the next several years. An increased use of clean energy generation resources over time would also be consistent with objectives of California policy such as SB 100[2], Commission equity requirements, the joint Commission and California Energy

[1] Public Advocates Opening Comments at A-4.

[2] Senate Bill No. 100, Chaptered September 10, 2018, Section 2, 399.11: (b) Achieving the renewables portfolio standard through the procurement of various electricity products from eligible renewable energy resources is intended to provide unique benefits to California, including all of the following, each of which independently justifies the program: **(3) Reducing air pollution, particularly criteria pollutant emissions and toxic air contaminants, in the state.**

Commission Disadvantaged Communities Advisory Group (DACAG)[3] and the AB 617 goal of reducing "emissions of toxic air contaminants and criteria pollutants in communities affected by a high cumulative exposure burden,"[4] Californians living and working in High Fire Threat Districts are already at disproportionate risk from the wildfire air quality and related health impacts and the transition to clean energy generation resources for widespread backup power should remain a Commission priority. The Resiliency Plans should reflect consistency with these policies and the commitment to local communities to prefer commercially available clean energy solutions such as fuel cells.

B. Air District Permitting

Some of the providers express concern over the need for a significant volume of waivers that would be required to operate diesel generators at wireless sites, as well as (according to ExteNet) "restrictions such as run-time may preclude to limit the use of [diesel] generators to ensure service resiliency for multiple long lasting commercial power outages."[5] To address this issue, the Wireless Infrastructure Association (WIA) suggests that the Commission "waive AQD Requirements for emergency backup generators at telecommunications sites."[6] The NFCRC would like to reply that both zero-emission hydrogen and low-emission natural gas fuel cell systems are exempt from air

[3] Formation of the DACAG was called for in Senate Bill 350, the Clean Energy and Pollution Reduction Act of 2015. The 11-member group meets several times a year to review CEC and CPUC clean energy programs and policies to ensure that **disadvantaged communities, including tribal and rural communities**, benefit from proposed clean energy and pollution reduction programs: https://www.energy.ca.gov/about/campaigns/equity-and-diversity/disadvantaged-communities-advisory-group

[4] Assembly Bill No. 617, Nonvehicular air pollution: criteria air pollutants and toxic air contaminants. Chaptered July 16, 2017.

[5] ExteNet Opening Comments at 5.

[6] Wireless Infrastructure Association Opening Comments at 7.

district permitting due to their absence of criteria air pollutant emissions, and encourages the Commission to not waive permitting requirements when other options are available. The use of fuel cell systems would also avoid any issues of diesel generators with local noise ordinances referred to by ExteNet,[7] as fuel cell systems have a very low noise profile - an average of ten decibels lower than diesel generators in all cases.

C. Wireline Proposed Decision

The NFCRC also supports the Public Advocates recommendation for both "a proposed decision that outlines backup power requirements for wireless providers serving areas outside of High Threat Fire Districts no later than September 1, 2020"[8] and "a proposed decision that outlines backup power requirements for wireline providers no later than September 1, 2020."[9] The NFCRC posits that in concept, the installation of backup power at wireline sites should be no different than at wireless sites. The expectation for a dial tone during emergency events, to support E-911 communication and emergency responders is just as important with wireline communications as it is with wireless communications. The NFCRC suggests that speedy progress in this area as well would further add to the resiliency of communities impacted by outages.

[7] ExteNet Opening Comments at 6.
[8] Public Advocates Opening Comments at A-6.
[9] Id.

III. Conclusion

The NFCRC appreciates the opportunity to submit reply comments to stress that fuel cell systems are commercially available and are being widely used by telecommunication and cable companies for extended runtime clean backup power generation. These systems would address both a scaled clean energy conversion implementation, and the air quality needs of providers and local communities.

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Respectfully submitted,

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