



May 26, 2020

Richard Corey  
Executive Officer  
California Air Resources Board  
1001 I St. 6<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: Support for Fuel Cell Net Energy Metering Greenhouse Gags Emission Standards**

Dear Mr. Corey:

I am writing on behalf of Bloom Energy to support the proposed modifications to the Fuel Cell Net Energy Metering Greenhouse Gas Standards Regulation. We appreciate the thoughtful and deliberative approach taken by the Board and staff to develop stringent standards that provide clarity to the market and policymakers that fuel cells will continue to always provide cleaner power than the grid electricity they displace.

Bloom Energy continues to believe that the original staff proposal from October 2019 provides the most reasonable methodology to estimate future emissions from the electricity sector under the state's existing suite of climate and energy policies. Nonetheless, we understand the Board directed staff to develop a proposal to use fuel cells to achieve even greater emissions benefits moving forward. The most recent proposed amendments strike the right balance, by applying a more stringent standard from 2020 forward, and in a manner that strengthens the standard in a constant, linear fashion each year.

As we continue along our shared path to make ever cleaner, affordable and reliable power ubiquitously available, Bloom Energy looks forward to working with CARB on additional policies to support the widespread availability of renewable gases, including biogas and hydrogen, so that we can make zero-carbon – and even negative-carbon – energy widely available to anyone who wants it.

Sincerely,

Erin Grizard  
Senior Director, Policy and Government Affairs