Bloomenergy®

March 27, 2025

The Honorable Dr. Steven Cliff
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Bloom Energy Comments on the February 27, 2025 Workshop – Carbon Sequestration: Carbon Capture, Removal, Utilization, and Storage Program (SB 905)

Dear Dr. Cliff:

Bloom Energy appreciates the opportunity to provide comments on CARB's continued development of the Carbon Capture, Removal, Utilization, and Storage (CCRUS) Program pursuant to SB 905. We commend CARB for its leadership in advancing carbon management policy and support the agency's thoughtful, stakeholder-driven approach to this important work.

Bloom Energy is a California-based manufacturer of solid oxide fuel cells (SOFC) that deliver highly efficient, distributed, and low-emission power for a wide range of commercial and industrial applications. Our fuel cell systems produce a relatively pure stream of CO_2, making them an ideal early-market platform for cost-effective carbon capture. We are committed to supporting the State's climate goals through scalable solutions for clean and reliable distributed generation, carbon capture utilization and sequestration, and electrolytic hydrogen production.

We strongly support CARB's efforts to establish a robust and inclusive CCRUS framework and encourage the development of a wide array of CCUS and Carbon Dioxide Removal (CDR) protocols to enable innovation and market growth. Broad protocol development will be essential to unlock investment and accelerate deployment across California's dynamic industrial landscape.

As CARB considers CDR protocols, we encourage recognition of biogas with CCUS as a form of carbon removal and support its eligibility for direct air capture (DAC)/carbon removal credits under the Low Carbon Fuel Standard (LCFS).

This recognition would appropriately credit projects that deliver net-neutral or net-negative emissions, help scale near-term carbon removal solutions, and send an important market signal for investment in scalable CDR projects.

We would also like to raise the importance of recognizing that carbon capture technologies are still a rapidly advancing field which will improve with scale and experience. In these early stages of building California's CCUS capacity, the adoption of achievable and flexible capture rate thresholds for the immediate term will maximize the amount of CO_2 that is captured and effectively sequestered.

We also highlight the role of fuel cells as an early market opportunity for CCUS. Bloom Energy's solid oxide fuel cells produce a relatively pure stream of CO_2, making them uniquely well-suited for carbon capture with lower energy and cost penalties compared to other stationary sources. This presents a near-term pathway to deploy CCUS in distributed applications and support decarbonization for utilities, manufacturing, data centers, and other commercial energy users who require reliable and low carbon power solutions.

We appreciate CARB's leadership in advancing carbon management in California and look forward to continued engagement as the SB 905 implementation process moves forward.

Sincerely,

Jimmy Apffel
Government & Public Affairs
Bloom Energy