FUEL CELL NET ENERGY METERING GHG EMISSION STANDARDS

November 28, 2017

Governing Legislation

Assembly Bill 1637 (Low, 2016):

- Effective January 1, 2017
- Extends the CPUC's Fuel Cell Net Energy Metering (NEM) program tariff through 2021
- Increases individual system eligibility to 5 MW, and extends overall program cap to 500 MW over existing installed capacity
- Directs ARB to establish annual GHG emission reduction standards for "customer-generators" participating in Fuel Cell NEM program
- GHG standards are to reduce emissions relative to grid resources, including renewable resources, and account for both procurement and electrical grid operation

Fuel Cell NEM Background

- Program designed to continue market growth for on-site fuel cell electrical generation
- Oversight by CPUC with IOU program administration
- Customer-generators receive generation rate credits and avoid "nonbypassable" utility charges for onsite energy consumption
- Incentives amount to approximate \$200k/MW of installed capacity
- Historical annual growth of about 8 MW of installed capacity (total of 97 MW to date)

Fuel Cell NEM Background Cont'd

- Eligible fuel cell technologies must reduce GHG emissions and meet ARB's Distributed Generation (DG) Certification Program requirements for criteria pollutants
- Program works in tandem with CPUC's SGIP, which provides financial incentives for various DG technologies
- Prior legislative directive to use the GHG standard developed for the SGIP for the Fuel Cell NEM (350 kg CO2/MWh)

Key Considerations

- Marginal energy resource mix and displacement assumptions
- Role of renewable resources in the resource mix
- Line Losses
- Grid response to small load changes
- Utility procurement considerations and RPS program progress
- Interpretation of "emission reduction versus grid resources"

Stakeholder Feedback

- Base standard on model that predicts marginal mix
- Include line loss savings
- Revise testing parameters



Emission Standards

- Based on CPUC's Avoided Cost Calculator
- Includes line loss savings

Year	Annual GHG Emission Standard (kg CO2e/MWh)
2017	375
2018	364
2019	353
2020	342
2021	337

Recommended Test Procedures

Staff will include advisory test methods for carbon dioxide and methane in the staff report:

- Carbon Dioxide: ARB Test Method 100
- Methane: ARB Test Method 100

Regulation Development Schedule

Ongoing

Fall 2017

Winter 2017

Spring 2018

Discussions with CEC and CPUC staff

Conduct public workshop

Start of formal 45-day public review period for proposed regulation

ARB Board Meeting

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