



June 6, 2023

Cheryl Laskowski
Branch Chief, Transportation Fuels
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
[submitted electronically]

RE: Electric Hydrogen Comments On May 23, 2023 LCFS Auto-Acceleration Mechanism Workshop

Electric Hydrogen appreciates the opportunity to submit comments to the California Air Resources Board (CARB) on the May 23, 2023 Workshop on the Auto-Acceleration Mechanism for the Low Carbon Fuel Standard (LCFS).

About Electric Hydrogen

Electric Hydrogen (EH2) is a deep decarbonization company pioneering low-cost, high-efficiency, fossil-free hydrogen electrolyzer systems. Focusing on industrial applications of hydrogen in steel, ammonia, and freight transport, our goal is to help eliminate more than 30% of global GHG emissions from hard-to-electrify industries.

EH2 is headquartered in San Carlos, CA, and Natick, MA. We recently announced our 1.2 gigawatt per year factory and will begin scaling our production of PEM electrolyzers later this year.

Electric Hydrogen Supports an Auto-Acceleration Mechanism to Ensure Compliance Targets Push Rapid Decarbonization Forward

EH2 supports the incorporation of a strong CI reduction target of at least 30 percent by 2030 with increasing stringency in subsequent years. As the 2022 Scoping Plan Update makes clear, clean hydrogen has a key role to play in California's efforts to achieve carbon neutrality by 2045 and the LCFS will be instrumental in supporting the necessary rapid scaling of clean hydrogen.

In addition to establishing an ambitious but achievable CI target for 2030, it is crucial to ensure that the LCFS program is designed to be responsive to market conditions in a way that maintains strong and clear support for ongoing investment in the cleanest low-carbon fuels and technologies. A compliance target acceleration mechanism that can automatically adjust to accelerate investment in the event the LCFS program is

over-performing will help ensure that California is maximizing the role that carbon-free hydrogen and other clean technologies can deliver for the state.

Conclusion

EH2 is fully committed to helping California meet its climate goals. We look forward to continuing to work with CARB on this critically important effort.

Sincerely,

/s/ Paul Wilkins

Paul Wilkins

Vice President for Policy and Government Engagement

Electric Hydrogen