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California Energy Commission
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California Energy Commission
Dockets Office, MS-4
Sacramento, CA 95814

Via email: docket@energy.ca.gov

RE: Docket No. 13-IEP-1A Draft 2013 IEPR

Lucas Advocates is please to submit these comments, on behalf of our client, ClearEdge Power.

ClearEdge Power is a company headquartered in Sunnyvale, CA with manufacturing and office facilities in Hillsboro, OR and South Windsor, CT. ClearEdge Power is producing fuel cell systems for clean, distributed energy generation that scale from 5kW to multiple megawatts with 7.8 megawatts currently installed with another 2 megawatts to be deployed in California.

Fuel cells provide a critical opportunity for both the State and businesses to use the cleanest, most efficient energy generation equipment to convert low cost natural gas to continuous heat and power. Fuel cell systems are significantly cleaner than other sources powering the current California electric grid. When utilized in combined heat and power applications, fuel cells improve air quality over time by reducing carbon dioxide releases by 554 metric tons and nitrogen oxide emissions by 1.27 metric tons annually, allowing these systems to be strategically sited, without permitting, within non-attainment zones to help meet capacity needs. Fuel cell systems also conserve water compared to central generation, making them a logical fit for areas where water usage and air emissions are limited, such as LA County or the South Coast Air Basin.

California's long-term procurement planning strategy should include stationary fuel cell systems in the wake of the San Onofre Nuclear Energy Station (SONGS) shut down and the retirement of other conventional power generation assets due to limitations on greenhouse gas emissions under AB32. Fuel cell systems help reduce the strain on the electric grid by providing power and heat directly to the end user, increasing power reliability and decreasing the need for costly transmission infrastructure. As a preferred resource, fuel cells with heat recovery meet several State goals and needs simultaneously. Most notably, installed fuel cell capacity will contribute to the State's goal of 6500 megawatts of CHP by 2030 by way of the CHP settlement proceeding, can help all investor and municipal owned utilities meet their resource adequacy requirements, and will increase the overall efficiency and energy usage within the electric power, industrial and commercial business sectors.

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We see a clear opportunity for the State to include stationary fuel cells as part of the integrated resource plan as a preferred resource within the State's long term procurement planning proceeding to meet environmental goals and supplement power demand in urban and environmentally protected areas.

Thank you for the opportunity to provide comments. If you would like to discuss this matter further, please contact Mikhael Skvarla or me at 916-444-7337. Thank you.

Sincerely,

Robert W. Lucas

cc: Stephanie Bailey, CA Energy Commission
Katrina Fritz, ClearEdge Power
Lisa Ward, ClearEdge Power