



California Energy Commission  
Dockets Office, MS-4  
Ninth Street Sacramento, CA 95814-5512

RE: Docket No. 12-EPIC-01 - EPIC Second Investment Plan

Dear Sirs;

Please accept these comments of FuelCell Energy, Inc. to your EPIC Second Investment Plan Draft dated March 21, 2014.

FuelCell Energy is a leading manufacturer of Direct FuelCell stationary fuel cell systems. Direct FuelCell<sup>®</sup> power plants are generating ultra-clean, efficient and reliable power at more than 50 locations worldwide. FuelCell Energy systems are providing ultra-clean baseload distributed generation to utilities, industrial operations, universities, municipal water treatment facilities, government installations and other customers globally and in California.

The draft plan reflects the significant efforts by the CEC to identify funding initiatives for projects that provide the highest value to California's electric ratepayers. Many well thought out areas have been identified and addressed. We propose that an additional area be considered:

Rapid Load Response Hybrid Fuel Cell Systems that provide Transmission/  
Distribution system relief, critical facility hardening during grid disruptions, and can utilize Hydrogen storage for peaking, demand response, and /or Hydrogen vehicle refueling.

A Rapid Load Response Hybrid Fuel Cell System would address CEC strategic initiatives 2, 3, 4, 5, and 10. It would improve CHP systems (generation), provide additional peak power for demand side system management, provide firming power for intermittent renewable generation, provide congestion relief to the transmission/ distribution system, and make power available during grid disruptions.

Such a system would require initial funding for applied R & D and Pilot Scale Testing, but because all the individual subsystems have been proven, would be quickly ready for a full scale demonstration. Because it would address (or support) all of the sub initiatives in strategic objective 3, we believe that it would merit an added section 3.6.



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Additionally, as the system would also address multiple areas within strategic initiatives 2, 4, 5, and 10, it is deserving of significant funding due to the high potential for ratepayer benefits.

The addition of this area will enhance the plan and offer the potential for significant benefits to electric ratepayers. We look forward to working with you to move this plan forward.

Respectfully Submitted,

Frank Wolak  
Vice President - Government Business  
FuelCell Energy, Inc.