From:	Methanestrategy, NM, NMENV
To:	Kuehn, Elizabeth, NMENV
Subject:	Fw: FCHEA comment on Environment Department draft ozone precursor emissions rules
Date:	Wednesday, September 16, 2020 9:52:27 AM
Attachments:	FCHEA New Mexico Comments September 2020.pdf

From: Connor Dolan <cdolan@fchea.org>
Sent: Tuesday, September 15, 2020 7:51 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] FCHEA comment on Environment Department draft ozone precursor emissions rules

Dear Ms. Bisbey-Kuehn,

Please see the attached comments in support of the proposed draft ozone precursor emissions rules on behalf of the Fuel Cell and Hydrogen Energy Association (FCHEA).

Should you have any questions, please contact me at any time.

Regards,

Connor

Connor Dolan
Director of External Affairs
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1211 Connecticut Avenue, N.W. #650
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Fuel Cell and Hydrogen Energy Association Comments on Draft Ozone Precursor Emissions Rules

September 15, 2020

The Fuel Cell and Hydrogen Energy Association (FCHEA) appreciates the opportunity to provide comment on the New Mexico Environment Department (NMED) draft rules on ozone precursor emissions.

FCHEA represents leading companies and organizations that are advancing innovative, clean, safe and reliable energy technologies. FCHEA's membership includes the full global supply chain of the fuel cell and hydrogen technology industry.

FCHEA strongly supports the proposed draft rules which are inclusive of fuel cells as eligible air pollution control equipment.

Fuel cells are extremely clean and efficient as they generate electricity through an electrochemical reaction, not combustion. Fuel cells are also scalable and able to support a wide range of power applications, from small-scale remote telecommunications towers to multi-megawatt installations for utility substations.

Fuel cell systems generate 24/7, clean, load-following power at close to 100% capacity factors. Compared to other front-of-the-meter distributed energy resources (DER), the combination of fuel cell high efficiency and extremely high capacity factor results in the displacement of more GHG emissions than equivalent-sized intermittent resources.

In addition, the energy density of fuel cell systems significantly reduces the land footprint required for onsite generation, typically only one acre for ten MW of generation, allowing for operation in high density areas and leaving increased acreage available for habitat restoration and preservation.

Thank you for your consideration of our input. Should you have any questions or wish to discuss this comment further, I can be reached at any time by email at mmarkowitz@fchea.org or by phone at 202-261-1331.

Sincerely,

Morry B. Markowitz
President
Fuel Cell and Hydrogen Energy Association