



April 22, 2026

Rajinder Sahota
Chief, Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments Related to Cap & Invest 15-day Amendment Noticed April 14, 2026

Dear Ms. Sahota,

The Clean Hydrogen Buyers Alliance (CH2BA, www.ch2ba.org) is pleased to provide these comments regarding the proposed 15-day amendments to the California Air Resources Board's (CARB) rulemaking for the Cap-and-Invest (C&I) regulation. CH2BA appreciates CARB's leadership in stimulating market frameworks for reducing GHG emissions. Given recent policy and international events, we believe that including low-carbon hydrogen in the manufacturing decarbonization incentive is wise for economic development, security and climate objectives. To help achieve these objectives, CH2BA will continue helping companies in market transactions for the purchase of low-carbon hydrogen.

CH2BA is a non-profit corporation helping buyers to procure and use low-carbon hydrogen and its derivatives such as ammonia. In this capacity CH2BA also works with hydrogen producers and developers to leverage market solutions in growing low-carbon hydrogen volumes and accelerating the flywheel of economies of scale. Our constituents/members are primarily based on the Pacific Coast and Gulf Coast of North America. But we also have links to Europe and Asia.

Some of CH2BA's most significant contributions to effective market solutions to date include:

- The white paper, "Accelerating the Hydrogen Market: Establishing a Commodity Benchmark" under the advisement of a Blue-Ribbon committee.
- Helped the North American Energy Standards Board (NAESB)¹ to develop a standard hydrogen contract that supports transactions in Hydrogen Energy Attributes Certificates (H2 EACs) which may be bundled with, or unbundled from, the physical molecules. The NAESB contract recognizes CARB's LCFS (along with the Open Hydrogen Initiative) as a protocol for substantiating the carbon intensity of the EACs and executing low-carbon hydrogen transactions – either inside or outside California.
- Developing early transactions in such EACs to support robust book-and-claim transactions, which are particularly important for low-carbon hydrogen given the uneven availability of delivery infrastructure.

Thanks again for CARB's global leadership in market-based initiatives for climate. CH2BA looks forward to collaborating with CARB and businesses to leverage the manufacturing decarbonization incentives and other market mechanisms to accelerate the use of low-carbon hydrogen in California – with a global ripple effect.

Sincerely,

A handwritten signature in blue ink that reads "John E. Flory".

John E. Flory
President,
Clean Hydrogen Buyers Alliance
John.Flory@CH2BA.org
www.CH2BA.org

¹ As you may know, over 90% of the physical wholesale natural gas transactions in North America are executed on a NAESB contract. Since natural gas is the primary feedstock today for hydrogen, a NAESB standard hydrogen (and soon ammonia) contract makes it faster and easier to execute many transactions in low carbon hydrogen.