



**COMMENTS OF HYDROGEN ENERGY CALIFORNIA ON CAISO'S REVISED
STRAW PROPOSAL TO MODIFY THE DEFINITION OF
REGULATORY MUST-TAKE GENERATION**

Hydrogen Energy California LLC (HECA or Project) continues to strongly support the California Independent System Operator's (CAISO's) proposed revision to the definition of "*Regulatory Must Take Generation*." The development of HECA, and similar projects, depends upon the ability to ensure delivery of a steady, reliable stream of carbon dioxide (CO₂) to be used in the enhanced oil recovery (EOR) process. Without this capability, the project cannot and will not be developed. CAISO's proposed changes would guarantee the Project's ability to self-schedule energy in a predictable manner, ensuring that the Project could meet its EOR CO₂ obligations. CAISO's revised straw proposal will support the development of carbon capture and sequestration projects in California, consistent with clearly articulated state policy.

Respectfully submitted,

A handwritten signature in cursive script that reads "Evelyn Kahl".

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