

**From:** [salim@hydrogenfueling.co](mailto:salim@hydrogenfueling.co)  
**To:** [CleanH2standard](#)  
**Subject:** [EXTERNAL] Comments on Draft Clean Hydrogen Production Standard - From PowerTap Hydrogen Fueling Corp., Aliso Viejo, CA  
**Date:** Monday, November 14, 2022 8:53:42 PM  
**Attachments:** [image003.png](#)

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Dear Hydrogen and Fuel Cell Technologies Office Personnel,

Below, please find several comments to the Draft Clean Hydrogen Production Standard:

- We suggest the following:
  - Adding ammonia, syngas, and other wasted resources that are hydrogen carriers to the definition of Clean Hydrogen.
  - Including gaseous, liquid, and solid hydrogen in the definition of Clean Hydrogen.
  - Granting credit for:
    - Use of co-products such as O<sub>2</sub> not currently accounted for in statute or law, but a factor in R&D and innovation. This could be in the form of either investment or production tax credits or considered for R&D
    - CO<sub>2</sub> off-take for commercial or on-site uses. reuse of the typically wasted resource of low-level heat (200°F to 300°F)
    - Dilute H<sub>2</sub> streams from which H<sub>2</sub> are uneconomical to extract.

Each of these additions are inputs and/or outputs of clean hydrogen in current practical application and R&D efforts in industry and academia and should be accounted for and incentivized as appropriate.

Please advise of any questions or points of discussion by email at [salim@hydrogenfueling.co](mailto:salim@hydrogenfueling.co) or by phone at (949) 456-5583.

Thank you,

**Salim Rahemtulla**

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