

NPRR Comments

NPRR Number	1264	NPRR Title	Creation of a New Energy Attribute Certificate Program
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Submitter's Information	
Name	John Flory
E-mail Address	John.Flory@theallianceriskgroup.com
Company	The Alliance Risk Group
Phone Number	
Cell Number	530-304-8441
Market Segment	

Comments

Dear ERCOT Board,

My company, The Alliance Risk Group, has been consulting with a number of entities in the Hydrogen Marketplace. A recent McKinsey report [Houston as Epicenter of Global Clean Hydrogen Hub](#) identified how Texas could achieve dominance in the clean hydrogen market. NPRR 1264 will significantly help that.

About half of the Texas potential is in international markets. Many of them are moving toward the requirement for hydrogen to demonstrate it can show the hydrogen production is supported by clean electricity (or RECs) on an hourly basis. [EU H2 hourly requirement](#). Domestically, the 45V hydrogen production tax credits require temporal matching, including down to the hourly level by 2028. In addition, the EU and 45V allow for the use of Energy Attribute Certificates for electricity as the way to document the low carbon intensity of the hydrogen procured. Furthermore, the US buyers most likely to pay a price premium for clean hydrogen are the same ones most demanding on hourly matching of hydrogen production.

For these reasons we believe that ERCOT approval of NPRR 1264 will help Texas achieve energy dominance in the clean hydrogen global marketplace.

John Flory

John E. Flory
Executive Managing Director
The Alliance Risk Group, LLC

NPRR Comments

Revised Cover Page Language

No requested revisions.

Revised Proposed Protocol Language

No requested revisions.