

CEOs Reply Comments, Appendix A

CEOs have made a good-faith effort to comply with the Agencies' request to present our positions using the following template. If any language in Appendix A conflicts with our written comments, the written comments represent our position.

Technology/ Feedstock	Definition	Eligible for CFS compliance? (Y/N/Other)	Method of GHG Quantification (Specify Model or Generic)	LCA Study Period (Yrs)	Baseline	Partial EACs Awarded? ¹	0 EAC Cutoff
CCS	Fossil fuel generation with CCS	Partially, based on % reduction in CO2/MWh considering indirect emissions [except no credit allowed if carbon dioxide is used for enhanced oil recovery]	Determine significant, reasonably attributable CO2 emissions based on engineering study of specific project (no model needed)	N/A	Compared to plant without CCS	See footnote 1	See footnote 1
Primary Biomass	Biomass cultivated and harvested for fuel use	No	N/A	N/A	N/A	N/A	N/A
Waste Biomass	Other biomass	No	N/A	N/A	N/A	N/A	N/A
Waste to Energy	Energy derived from solid waste	No	N/A	N/A	N/A	N/A	N/A
Geothermal	Electricity derived from heat below earth's surface	Yes	N/A	N/A	N/A	N/A	N/A
Green or Pink Hydrogen Production	Hydrogen from wind, solar, hydropower, geothermal, or nuclear energy	Yes, including partial credit when co-firing, based on % reduction in CO2/MWh	N/A	N/A	Compared to plant without hydrogen co-firing	See footnote 1	See footnote 1
White Hydrogen Production	Geologically mined hydrogen	No position					
All Other Hydrogen Production	Agencies' definition	No	N/A	N/A	N/A	N/A	N/A

¹ We are uncertain what this heading is asking for, however we believe the law requires granting partial compliance credit for this technology (for the percentage that can reasonably be deemed carbon-free). We support the use of carbon-free certificates to track the percentage of generation deemed carbon-free under the partial compliance provision.

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Hydrogen- Only Generation with Green, Pink or White Hydrogen	Agencies' definition	Yes, except we take no position on white hydrogen	N/A	N/A	N/A	N/A	N/A
Hydrogen- Only Generation With Partially Emitting Hydrogen	Agencies' definition	No	N/A	N/A	N/A	N/A	N/A
Co-Firing with Fully Carbon-free Resource	Mixed combustion with at least 2 fuels, one of which is fully carbon-free	Yes, partially, based on % reduction in CO2/MWh considering indirect emissions. However, carbon-free hydrogen is the only carbon-free fuel we know of. Biomass, MSW, and RNG are not carbon-free and would not qualify for partial credit.	N/A	N/A	Compared to plant without hydrogen co-firing	See footnote 1	See footnote 1
Co-Firing with Partially Carbon-Free Resource	Mixed combustion with at least 2 fuels, at least one of which is partially carbon-free	No. Partial compliance provision only applies where at least one technology generates without emitting CO2.	N/A	N/A	N/A	N/A	N/A