



June 6, 2025

Delivered Via Electronic Mail

New Jersey Board of Public Utilities
44 S. Clinton Ave.
Trenton, NJ 08625

Attn:

President Christine Guhl Sadovy
Commissioner Michael Bange
Commissioner Zenon Christodoulou
Commissioner Marian Abdou
BPU Staff

Re: Recommendation to Maintain CHP-FC Program Access During Transition to Replacement Program

Docket Number: Q025040206, Q025040205

Dear President Guhl-Sadovy, Commissioners, and Staff,

We appreciate the opportunity to share our thoughts on New Jersey's Combined Heat and Power – Fuel Cell (CHP-FC) Program. The United States Hydrogen Alliance (USHA) is a non-profit association of members advocating for the development, deployment and utilization of clean hydrogen in all 50 states. We serve the hydrogen industry through state and federal policy advocacy, market development, and community building. Our mission is to leverage the unique attributes of hydrogen to reduce emissions across traditional sectors, increase energy resiliency and diversity, enhance local economies and workforces, and protect the nation domestically and abroad.

We respectfully urge the Board to maintain the current CHP-FC Program and extend its availability to new applicants beyond the current deadline of December 31, 2025. Preserving access to this vital program during the transition to a future framework centered on renewable energy will help ensure continuity for stakeholders and prevent delays in deploying efficient, low-carbon energy technologies.



The CHP-FC Program has played a critical role in supporting resilient and cost-effective energy infrastructure throughout New Jersey. Incentives provided through this program have catalyzed investment in fuel cell and combined heat and power technologies, improving energy reliability and advancing the state's clean energy goals. Closing the program before a successor is finalized could introduce uncertainty and disrupt this momentum at a pivotal time for clean energy development.

To further strengthen the program and maintain its effectiveness, we encourage the Board to consider issuing a generic proceeding to review and update the program's incentive structure in alignment with inflation and evolving market needs. Adjusting the incentive levels would enhance the program's accessibility and better reflect today's project costs, thereby enabling continued investment in these technologies.

We support a thoughtful transition to a new program model and welcome opportunities to participate in stakeholder engagement efforts to help shape a future framework that supports the deployment of clean, distributed energy resources—including hydrogen-powered systems—across the state.

We at the United States Hydrogen Alliance thank you for your time and consideration. Please reach out to us if you have any questions.

Respectfully,

A handwritten signature in black ink, reading "R. Bekemohammadi".

Roxana Bekemohammadi
Founder and Executive Director
United States Hydrogen Alliance