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Utilities, Energy, and Technology Committee  
State House Station  
Augusta, Maine 04333

Maine State Legislature, Joint Committee on Utilities, Energy, and Technology  
LD 1850: a 131st Legislature's #BeltwayOfBills snookering Maine bill

Re: LD 1850; **ONTP**: hydrogen as an energy storage system, and this within the concept of a 'green' hydrogen economy is a blacker-than-black snookering.

Chairpersons Lawrence and Zeigler, and Honorable Members of the Joint Committee on Utilities, Energy, and Technology:

Summarizing, rather than repeating my introduction from the written testimony dated April 28, 2023 for the public Hearing on LD 1775 held on May 2nd, I am Greg Robie, a Mainer-from-away.

As I concluded that oral testimony in reply to Rep. Foster, the interests pushing this legislation are thirty years ahead of us in this regulatory process that LD 1850 is part of. My concluding warning was intended in terms of the future regulatory framework that is being developed (inclusive of the 131st's #BeltwayOfBills snookering Maine). I have continued to dig into the hydrogen economy meme since then. LD 1850 is premature. It further modifies the regulatory framework in ways that counter the both the referenced greenhouse gas reduction goals, and as the very purpose by which the MPUC is authorized (and as amended in 2021).

**Title 35-A MRS §101. Statement of purpose**

The purpose of this Title is to ensure that there is a regulatory system for public utilities in the State and for other entities subject to this Title that is consistent with the public interest and with other requirements of law and to provide for reasonable licensing requirements for competitive electricity providers. The basic purpose of this regulatory system as it applies to public utilities subject to service regulation under this Title is to ensure safe, reasonable and adequate service, to assist in minimizing the cost of energy available to the State's consumers, to ensure that the rates of public utilities subject to rate regulation are just and reasonable to customers and public utilities and to reduce greenhouse gas emissions to meet the greenhouse gas emissions reduction levels set forth in Title 38, section 576-A.

Hydrogen is not identified as a greenhouse gas under either Maine or Federal law. It did not exist in the 1990 CO<sub>2e</sub> emission that act as a baseline for Maine's Climate Goals and emission reductions. It currently has a CO<sub>2e</sub> of 11 as an unregulated GHG. The DEP rulemaking done on greenhouse gases does not include hydrogen (06-096 C.M.R. chapters 167 & 168). Hydrogen is

an energy storage system because contains less energy that its production utilizes to create it – whether that production is by electricity or from natural gas and/or oil. With the rollout of the alleged ‘clean’ hydrogen economy, it is poised to become a significant and exponentially expanding GHG. It’s CO<sub>2</sub>e impact due, to how aggressively it chemically joins the hydroxal radical in air ( $H_2 + 2(OH) = 2H_2O$ ). With each OH that oxizes hydrogen, that is one less for methane to bump into to start a six step chemical process in our atmosphere, or a decade long process by which CH<sub>4</sub> ends up as CO<sub>2</sub>. Hydrogen does not build up in the atmosphere. Currently it is 0.00005%, or 5 in 10,000,000 molecules in each breath are hydrogen.

FWIW:

The referenced “purpose” concerning Chapter 32 is specious because the chapter has no defined purpose.

An Act To Promote Solar Energy Projects and Distributed Generation Resources in Maine” is now being rationalized to expand IOUs to be integral to energy storage resources that will leak hydrogen. A CO<sub>2</sub>e that is assigned because what it does to the CO<sub>2</sub>e of methane. The CO<sub>2</sub>e of methane has evolved from a CO<sub>2</sub>e of 20 (~2000), to 25(~2009) to 36 (~2015) and this over 100 years (of which it is for almost 9 decades it is CO<sub>2</sub>with a CO<sub>2</sub>e of 1), suggests the CO<sub>2</sub>e of hydrogen will increase [at least] comparably.

Rationally, hydrogen needs to be un-hyped and soberly regulated before more snookering is facilitated in Maine. “Dirigo” needs to apply to our State’s policies that relate to hydrogen. Currently, the cart of hydrogen is before the horse of responsible governance ... here and everywhere. An “I follow” is a weird way for the historic North Star of our Nation to be harnessed to New York’s now extra-national financial institutions. It is snookering.

Thank you for your time and consideration/reconsideration. I am a happy to answer any questions this written testimony may engender.

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Greg