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## Green Hydrogen: An assessment of near-term power matching requirements

Tradeoffs between annual and hourly matching approaches

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# Context for these materials

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## Executive summary

- U.S. Inflation Reduction Act (IRA) legislation made a strong commitment to decarbonization via clean hydrogen but did not fully define qualification for the production tax credit (PTC)
- Green hydrogen (produced from electrolysis) has a decarbonization potential of 9-30+ kg CO<sub>2</sub>/kg H<sub>2</sub>
- Realization of this decarbonization potential in the near term is contingent on PTC requirements

Temporal power matching requirements (annual vs hourly) evaluated here against four principles:

- I. Ensure total carbon emissions from green  $H_2$  production do not exceed IRA specified limit on a lifetime basis
- II. Foster clean H<sub>2</sub> industry growth to drive decarbonization, jobs creation, and technology leadership
- III. Protect energy consumers from adverse externalities of green H<sub>2</sub> buildout (e.g., power cost and reliability)
- IV. Enable simplicity in PTC qualification/criteria to support equitable outcomes and access to the incentive

(I. Carbon emissions) While achieving long-term decarbonization will ultimately require hourly matching, analysis suggests an annual matching approach with modest conditions can produce green hydrogen aligned to IRA limit across the U.S. for new green hydrogen assets through 2032

- Includes base assumptions of additionality and same-grid deployment of supporting renewable energy
- Analysis calculates anticipated emissions for annual matching on an hour-by-hour basis across the U.S.
- Incorporating modest conditions for renewables overbuild capacity, resource mix, and electrolyzer shutdown during peak-load hours, annual matching is expected to yield net negative emissions (-0.5 to -1.8 kgCO<sub>2</sub>/kgH<sub>2</sub>)

(II. Industry growth) A near-term hourly matching requirement expected to result in higher costs, slowing deployment and technology maturation

- Costs to achieve hourly matching expected to more than double green H<sub>2</sub> price net of PTC in 2030
- Price premium for hourly matching likely to make green H<sub>2</sub> non-economical for most applications through 2030
- Each Mtpa of new green hydrogen production capacity anticipated to yield \$20-22 billion in investments, 40-60,000 jobs, and 6-10 Mtpa abated CO<sub>2</sub> emissions

(III. Externalities) Basic annual matching is disadvantaged on cost and reliability externalities while annual with conditions and hourly matching mitigate challenges of increased variable renewable energy

(IV. Simplicity) Annual matching is simplest and in practice today; hourly matching requires complex optimization to implement and hourly resolution to validate

Green hydrogen (H<sub>2</sub>) is a significant decarbonization opportunity

#### Emissions intensity (kg $CO_2$ /kg $H_2$ )



 Displacement of grey hydrogen for processes already using hydrogen today (refining, methanol, ammonia, etc.) expected to transition first given highest breakeven cost and simplicity of the transition Note: IRA = Inflation Reduction Act Source: U.S. Gov.; IEA; SP Global; BCG analysis

## U.S. Inflation Reduction Act (IRA) builds on prior commitments to green $H_2$



1. Grey hydrogen carbon intensity typically in the range of ~9-10 kg  $CO_2$  / kg  $H_2$ ; Taking the lower limit of the range, 95% corresponds to 0.45 kg  $CO_2$  / kg  $H_2$  which is the limit listed in the U.S. 45V legislation. 2. At the time of this report, US treasury in the process of defining nuanced rules for distribution of PTC Note: PTC = Production Tax Credit ;  $H_2$  = Hydrogen Source: U.S. Government

## Option space for near-term U.S. green $H_2$ PTC qualification/validation



#### **Additionality**

Should the electricity source be newly constructed?

#### New capacity

Carbon-free energy capacity built specifically for the clean hydrogen project

#### New or existing

Supports repurposing of existing assets for greater carbon impact but can leave gaps that are filled by carbon intensive power



#### Location

Should the electricity be deliverable to the electrolyzer?

#### Local grid connection

Ensures deliverability such that the clean energy added in part offsets the new electrolyzer load<sup>1</sup>

#### In the United States

Supports emissionality<sup>2</sup> approach and investment in the American economy and infrastructure

#### Anywhere

Focuses on global decarbonization and fully supports emissionality<sup>2</sup>

## Significant implications for end cost of $H_2$ and focal point of this analysis



#### Matching<sup>3</sup>

Does the electricity need to be produced when it is consumed?

#### A Annual

Total MWh of renewable energy produced over one year matches total MWh used to produce hydrogen

#### **B** Annual w/ conditions

Annual matching with some added assumptions, e.g., overbuild, targeted shutdown, resource mix<sup>4</sup>

#### C Hourly

For each hour of the year, MWh of renewable energy generation equal MWh used to produce hydrogen

In future state, hourly matching will be necessitated by high grid penetration of RE

Legend Sase assumption for this analysis

1. Lack of physical connection requirement could lead to unfavorable buildout of new fossil generation 2. Emissionality concept focuses on realized decarbonization benefit via the highest rate of kg CO<sub>2</sub> displaced per USD spent rather than decarbonizing any one specific power load 3. Other time resolutions (e.g., quarterly, monthly) are under consideration in the EU; this analysis focuses on the 'bookends' that are the focus of current U.S. debate. 4. Further defined on subsequent page Note: Pertains to individual green H<sub>2</sub> production facilities seeking to claim IRA PTC Source: BCG analysis

## Additional conditions considered for annual matching approach

Rational actors may naturally implement overbuild and shutdown conditions



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#### Principles to consider when setting green H<sub>2</sub> qualification requirements



#### To be effective, policy should consider impacts across all four principles

1. Assumes that graduated IRA PTC credit already accounts for differential benefit of downstream decarbonization when displacing other energy forms Source: BCG analysis

#### Annual matching emissions impacts assessed based on hourly grid mix

Annual matching decarbonization approach relies on decarbonizing other loads on the grid



1. Carbon imbalances may also emerge from second-order effects such as differences in carbon intensity of the fossil generators being displaced during periods of net generation vs net load for the green  $H_2$  project Source: BCG analysis

## Modeling framework used to assess emissions impact on an hour-by-hour basis



Carbon intensity of overall grid within the respective hour

 Neglects any local transmission constraints and focuses on full region fossil generation, assuming that interconnection and curtailment costs will be sufficient to make installations non-economical where such constraints exist
 Note: RE = Renewable energy; CFE = Carbon-free energy (CFE)
 Source: BCG analysis

## Evaluated emissions impacts at the regional level across various conditions

Analyzed emissions impacts at the regional level U.S.-wide

- Grid mix, generation forecasts through 2040<sup>1</sup>
- 20 unique sub-regions
- Full 8760 hourly data



A Annual matching Base case

#### Assumed...

- 10-year project lifetimes consistent with duration of PTC
- 2030 Commercial Operating Date (COD)
- 500 MW electrolyzer capacity added per region
- 100% solar capacity added to support electrolyzer load

#### Assessed impacts of...

**B** Annual matching

(with conditions)

- **Targeted shutdown** (5%) of green H<sub>2</sub> electrolyzer, removing load in expensive, carbon intensive hours
- Overbuild of renewables (10%), adding excess renewable energy to the grid to cover impacts of "saturation hours"
- Wind-solar resource mix<sup>2</sup> (i.e., 100% wind, 50-50% wind-solar) to better distribute generation throughout the day

#### Emissions investigation focused on annual matching; by default, hourly matching assumed to have negligible carbon emissions

1. Forecasts from NREL Cambium, mid-case; include anticipated impacts of IRA on wind solar deployment, but do not include anticipated impacts of clean H<sub>2</sub> PTC 2. Some regions not forecast to have wind resources based on resource quality: FL, GA, AL, MS, LA, AR, TN, KY Note 8760 = number of hours in a year Source: NREL (https://www.nrel.gov/disclaimer.html); BCG analysis

Commercial Online Date (COD)

Scenario assumptions

## Base case annual matching predominantly yields H<sub>2</sub> above IRA threshold

Emissions intensity by region (2030)



## With conditions, several scenarios with net negative average $H_2$ emissions



1. NREL model forecasts no wind buildout in: FL, GA, AL, MS, LA, AR, TN, KY. 2. Defaults to 100% solar for regions with no predicted wind resources Note: Analysis assumes 70% electrolyzer efficiency and LHV H<sub>2</sub> of 120 MJ/kgH<sub>2</sub> (48 kWh / kg H<sub>2</sub>) Source: NREL CAMBIUM 2022 (https://www.nrel.gov/disclaimer.html); BCG analysis

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## Achievable H<sub>2</sub> capacity for annual matching with conditions

**Green hydrogen production capacity before exceeding 0.45 kg CO<sub>2</sub>/kg H<sub>2</sub>** (Viable capacity in GW, 2030)

#### Scenario



Aggregate capacity corresponds to...

~**7 Mtpa green H**<sub>2</sub> (40 GW of electrolyzer capacity)

With opportunity for...

~60 Mtpa abated downstream carbon emissions<sup>1</sup>

1. Assuming carbon abatement of ~9 kg CO<sub>2</sub>/kg H<sub>2</sub> produced consistent with displacing grey H<sub>2</sub>; opportunity for higher carbon impact in some applications Source: NREL CAMBIUM 2022 (https://www.nrel.gov/disclaimer.html); BCG analysis

## Model indicates available capacity for low carbon $\rm H_2$ under 'annual matching with conditions' exceeds anticipated 2030 demand^1

Total green  $H_2$  capacity that can be built below 0.45 kg  $CO_2/kg H_2$  (Mtpa)<sup>2,3</sup>



1. Viable capacity of electrolyzer deployment constrained by 0.45 kg  $CO_2$  / kg  $H_2$  requirement for full PTC 2. Estimated green  $H_2$  capacity at which annual matching approach crosses 0.45 kg  $CO_2$ /kg  $H_2$  for the present model in each region independently 3. Assumes 2030 COD 4. Total inclusive of blue  $H_2$  (via fossil fuels with accompanying carbon capture and sequestration, CCS) and electrolytic green hydrogen;

Source: DOE National Clean Hydrogen Strategy & Roadmap, BCG analysis

#### Deep dive | Observations and implications of emissions analysis

- A Base Case: Annual matching policy with no conditions creates significant geographic constraints for green hydrogen deployment in the U.S. (based on 500 MW electrolyzer capacity supported by 100% solar in each region)
  - In 16 of 20 regions<sup>1</sup> analyzed, 2030 COD projects do not qualify for full PTC (\$3/kg H<sub>2</sub>) for emissions below 0.45 kg CO<sub>2</sub>/kg H<sub>2</sub>
  - Overall average projected emissions intensity of 2.8 kg CO<sub>2</sub>/kg H<sub>2</sub> (3.5 kg CO<sub>2</sub>/kg H<sub>2</sub> average in 16 regions that do not qualify)
  - Across advantaged regions, U.S. may be able to deploy up to ~10 GW<sup>2</sup> of electrolyzer capacity (~2 MTPA of H<sub>2</sub>) at/under 0.45 kg CO<sub>2</sub> / kg H<sub>2</sub>
  - Top five emissions intensive regions include RMPA (7.9 kg CO<sub>2</sub>/kg H<sub>2</sub>), NWPP (7.6), CAMX (6.4), MROE (6.4), and SRMW (3.0) no level of green hydrogen production is viable in these regions if targeting full PTC under annual matching
- B.1 Shutdown OR Overbuild: Stipulating either a 5% targeted electrolyzer shutdown during peak load hours or 10% renewable capacity overbuild can cut overall average emissions intensity in half to 1.4 and 1.0 kg CO<sub>2</sub> / kg H<sub>2</sub>, but still falls above the 0.45 kg CO<sub>2</sub>/kg H<sub>2</sub> IRA PTC target
  - Of the 20 regions, 8 remain above the 0.45 kg CO<sub>2</sub>/kg H<sub>2</sub> limit under both conditions; NEWE is the only differential region between both scenarios, falling below 0.45 kg CO<sub>2</sub>/kg H<sub>2</sub> for 10% overbuild but not for 5% shutdown
  - U.S. may be able to deploy up to ~24 GW (~4 MTPA of H<sub>2</sub>) for 5% shutdown or ~26 GW (~5 MTPA of H<sub>2</sub>) for 10% overbuild at/under 0.45 kg CO<sub>2</sub>/kg H<sub>2</sub>
- B.3 Shutdown AND Overbuild: Combination of 5% shutdown and 10% overbuild results in a nationwide average carbon displacement of -0.4 kg CO<sub>2</sub>/kg H<sub>2</sub>, unlocking deployment in all regions east of Rockies except for MROE and SRMW
  - Six regions remain above the 0.45 kg CO<sub>2</sub>/kg H<sub>2</sub> limit with an average expected emissions in those 6 regions of 3.0 kg CO<sub>2</sub>/kg H<sub>2</sub>
  - Projected 2030 COD U.S. electrolyzer capacity rises to ~40 GW (~7 MTPA of H<sub>2</sub>)
- B.4 Resource Mix (+ Shutdown + Overbuild): Adding resource mix conditions to mitigate intermittency with complementary resources (e.g., wind + solar) lowers projected nationwide average emissions intensity to -1.8 kg CO<sub>2</sub>/kg H<sub>2</sub> for 50/50 wind and solar
   B.5 Southeastern H.C. Generated to be average by the solar by
  - Southeastern U.S. forecasted to have little to no wind resource availability but already below the 0.45 threshold with 100% solar
  - Projected 2030 COD U.S. electrolyzer capacity rises to 70+ GW<sup>3</sup> (12+ Mtpa of H<sub>2</sub>) given stabilizing effect of resource mix
  - Wind is needed to bring Pacific Northwest below the 0.45 threshold

1. Generating and Emissions Assessment regions (NREL) 2. Assumes each region is loaded with the maximum amount of electrolyzer capacity before exceeding 0.45 kg CO<sub>2</sub>/kg H<sub>2</sub> 3. Modelling assumptions/limitations for local linearity of emissions impacts anticipated to breakdown at >10% of peak load Note: COD = Commercial operation date; PTC = Production tax credit

Source: NREL (https://www.nrel.gov/disclaimer.html); BCG analysis

B.2

## Expected net cost of green $H_2$ vs alternatives



1. Plant gate costs, does not include transport and storage; based on PEM electrolyzer CAPEX (\$1,800 in 2025 and \$1,200 in 2030), OPEX (2% of CAPEX), and energy costs. Ranged by PJM (high) and ERCOT (low) electricity costs 2. Assuming \$3 PTC for green H<sub>2</sub> and \$0.60 for blue H<sub>2</sub> 3. Contingent on realization of scale effects on production costs 4. CAPEX based on 100% capacity factor, energy cost based on projected minimum PPA price for renewables 5. 5% curtailment and 10% overbuild, assuming 2023 REC price reported by S&P 6. CAPEX based on 80% capacity factor, energy cost based on solar, wind, and storage mix 7. Assuming annual matching; hourly matching would result in 50-100% increase in cost 8. Costs expected to stagnate due to technology maturation Source: LBNL, NREL (https://www.nrel.gov/disclaimer.html), BCG analysis

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## Implications of green H<sub>2</sub> matching approaches on economically viable demand



Breakeven production<sup>1</sup> cost of hydrogen by application ( $\frac{1}{2}$ , 2030)

Economically accessible demand<sup>2</sup> (Mtpa)

Power matching approach expected to be the difference between limited green  $H_2$  deployment and significant cross-industry applications in 2030

1. Excludes hydrogen delivery costs associated with transportation, storage, etc. 2. Represents total economically viable demand; does not account for technology readiness, deployment time, supply chain limitations, etc. Source: BCG NAMR H<sub>2</sub> Applications Economics Model

### Economic impacts of each matching strategy



1. Represents total economically viable demand. Does not account for technology readiness, deployment time, supply chain limitations, etc. 2. Assuming 50-50 wind-solar mix with wind capacity factors of 40% and 25% for wind and solar respectively, 48 kWh/kg  $H_2$  electrolyzer efficiency, unit capex of \$1200/kW, \$1000/kW, and \$800/kW for electrolyzers, wind, and solar respectively; total capital investment of \$20-22B per Mtpa of  $H_2$  3. Per Mtpa of  $H_2$ , estimates 40-60k direct and indirect jobs creation of which ~20k are direct construction jobs, ~1k are direct O&M jobs, with the balance as indirect jobs; uses construction and O&M jobs factors of 0.7 and 0.1 for hydrogen and 1 and 0.05 for supporting wind/solar, and indirect jobs factor of 1-2 4. Highly dependent on end use case and lifecycle emissions; if displacing grey  $H_2$  with fully carbon free  $H_2$ , yields downstream decarbonization of ~6 Mtpa  $CO_2/Mtpa H_2$  for base annual matching, ~9.5 for annual with conditions, and ~9 for hourly matching Source: Los, B., et al. (2020). The Employment Impact of the NortH2 Project; BCG NAMR  $H_2$  Applications Economics Model

## Reliability and cost externalities associated with green H<sub>2</sub> buildout



#### **Reliability externalities**

Effect of increased variable renewable energy sources on grid performance

Generation variability

Variability in wind/solar generation increases magnitude of need for dispatchable generation to cover fluctuation in load/supply

**Network congestion** High resource regions attract concentration of renewable generation and can overload grid in peak generation hours



#### **Cost externalities** Effect of increased load and generation capacity on end price for power customers

**Compensation for dispatchable generation** Increased capacity payments required to maintain sufficient amounts of dispatchable generation to cover increased variability

**Higher peak load** Added load during peak load hours drives up marginal price of power and overall costs

#### Grid infrastructure buildout

Additional transmission and distribution infrastructure required to connect new generation sites to load centers

#### Relative impact on externalities across matching strategies

		A Annual matching	B Annual matching (w/ conditions <sup>1</sup> )	C Hourly matching
Reliability externalities	Generation variability	Incentivizes development of cheapest renewable resource available with no incentive for adding storage	Conditional mix of wind/solar generation yields a more consistent generation profile	Matches load to generation dynamically so as not to impact normal grid supply demand balance <sup>1</sup>
	Network congestion	Adds load and generation capacity to the network	Adds load and generation capacity to the network	Adds load and generation capacity to the network
Cost externalities	Compensation for dispatchable generators	Increase in payments necessary to maintain dispatchable generation availability	Resource mix lessens need for dispatchable generation with more stable profile	No net impact on existing generation profiles and load balancing
	Higher peak load	Increases total load on grid during peak demand hours without adding a balance of RE	Shutdown of the electrolyzer during periods of peak load relieves grid pressure	Load/generation balancing does not increase net need for generation
	Grid infrastructure buildout	New grid infrastructure to support geographically diverse generation sites and new loads	New grid infrastructure to support geographically diverse generation sites and new loads	New grid infrastructure to support geographically diverse generation sites and new loads
			Legend Altigated	Partially mitigated <b>Detrimental</b>

## Matching approaches assessed against implementation and validation simplicity

	A Annual matching	B Annual matching (w/ conditions <sup>1</sup> )	C Hourly matching
	Low complexity	Moderate complexity	Moderate - high complexity
Implementation	<ul> <li>Technology: Required technology (load/generation metering) already in use</li> </ul>	<ul> <li>Technology: Required technology (dynamic load shifting) still in development</li> </ul>	<ul> <li>Technology: Required technology (resource mix optimization, dynamic load shifting, etc.) still in development</li> </ul>
What is the complexity of execution in practice?	Data: Annual load and generation data readily accessible	Data: Hourly grid load/cost not reported by some regulated utilities	• Data: Hourly load and generation data not widely reported
	Crediting: Annual generation crediting     Default additionality assumption     purchased credits would not be f	Crediting: No standardized crediting     instruments for hourly generation	
<b>Validation</b> What is the complexity of proving compliance?	Low complexity <ul> <li>Uses existing annual consumption and generation statistics</li> </ul>	<ul> <li>Moderate complexity</li> <li>Requires hourly reporting to validate shutdown timing</li> </ul>	<ul> <li>Moderate complexity</li> <li>Requires hourly load and generation profiling</li> <li>Requires enhanced data management/reporting</li> </ul>

1. Constraints primarily related to implementation of targeted shutdown during high-cost / peak load hours Note: REC = Renewable Energy Certificate; Validation for hourly matching may take place at a periodic cadence (e.g., annually)

Note: REC = Renewable Energy Certificate; Validation for hourly matching may take place at a periodic cadence (e.g., annually) Source: BCG analysis

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## Summary | Evaluation of matching options against principles



1. For example, in California, which is forecast to have ~90% carbon free generation by 2030 2. On an aggregate annual basis, decarbonization potential under annual matching with and without conditions is likely larger than hourly given the lower cost and thus creates more economically viable demand to generate realized downstream decarbonization Source: BCG analysis

## Appendix

## Generating and Emissions Assessment (GEA) regions in NREL Cambium model



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Cambium's GEA regions are 20 regions covering the contiguous United States. They are based on the EPA's eGRID regions, but they are not identical to them due to the geographic structure of the models in the Cambium workflow" );

## NREL mid-case renewables capacity forecast through 2040



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### Renewables forecast comparison (I of II)



1. NREL mid-case forecast 2. Assumes that governments address policy, regulatory, and implementation challenges within the 12-24 mo. report publication; Note: Historical data from EIA. Total 2030 capacity calculated by summing annual additional capacity reported for 2023-2030 for some sources; linearized for simplicity of comparison Source: ACP, BloombergNEF (BNEF), EIA, SEIA, IEA, NREL CAMBIUM (https://www.nrel.gov/disclaimer.html), Wood Mackenzie (WoodMac)

Post-IRA forecasts

## Renewables forecast comparison (II of II)

Total incremental capacity of wind and solar 2023-2030 in the U.S. (GW)



## Hourly matching requirement significantly increases power cost

## Hourly matching, carbon-free energy price vs. electrolyzer capacity factor<sup>1</sup>



1. Linear optimization of wind, solar, and storage based on full 8760 profile data to assess effective coverage 2. Difficult to achieve in practice due to scale of storage required

Source: LBNL, NREL (https://www.nrel.gov/disclaimer.html), BCG analysis

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## Deep dive | Green hydrogen cost assumptions and breakdown



1. Based on 2021 PPA price for solar and wind in ERCOT, including transmission and delivery charges, projected for 2025 and 2030 2. Assuming PEM electrolyzer 3. Optimization performed to balance CapEx against higher energy costs for higher capacity factors Source: NREL (https://www.nrel.gov/disclaimer.html), LBNL, BCG analysis

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