#### Hydrogen: Policy, Regulation and Prospects



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#### MEDICINE HAT NEWS



#### Hydrogen coming fast and here to stay, city officials say

BY COLLIN GALLANT ON MARCH 18, 2022



sector

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Report on regional potential for hydrogen hub is due soon.--NEWS FILE PHOTO

A report into the potential for southeast Alberta to become a hydrogen production hub is due soon, but a council committee Tuesday was apprised of a high level overview of the rapidly advancing

Energy / Columnists / Business

The utility and infrastructure division heard a presentation provided to a group of Alberta engineers and geophysicists

#### Varcoe: Hydrogen has the potential to be Alberta's next oilsands in importance

'This is an opportunity for Alberta to create generational wealth for the province. We have an opportunity to be a leader in clean, affordable energy,' said Associate Natural Gas Minister Dale Nally

Chris Varcoe · Calgary Herald Nov 05, 2021 · November 5, 2021 · 4 minute read · □ 79 Comments

#### Calgary

'Which thing to build?': Montem Resources weighs coal mine versus hydrogen in Alberta

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Montem is considering government's extension of a pause on coal development in some parts of the Rockies

Bob Weber - The Canadian Press - Posted: Apr 08, 2022 8:29 AM MT | Last Updated: April 8



B.C. Energy Minister Bruce Ralston tours Cellcentric's hydrogen fuel cell plant in Burnaby, August 2021. Cellcentric is a German-based partnership of Mercedes Benz and Volvo, developing zero-emission heavy trucks. (B.C. government photo)

#### B.C.'s hydrogen fuel project seeing big investor interest, Horgan says

Dedicated permit office aims to streamline development TOM FLETCHER / Mar. 31, 2022 10:50 a.m. / BUSINESS







### Hydrogen - Outline





### Hydrogen: uses, benefits, challenges



- Most abundant element in the universe;
- In pure form, not widely accessible on earth.

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### Hydrogen: uses, benefits, challenges



- Isolate pure hydrogen through various processes
- Water is a good example
- H<sub>2</sub>O can be separated



# Hydrogen: uses, benefits, challenges

- Benefits
  - "clean" when consumed
  - Can be produced using renewable power

- Challenges
  - Can be hard to effectively store
  - Difficult to transport
  - Costly





Alberta Hydrogen Roadmap

2021



 2021 – Alberta Hydrogen Roadmap published

- Large natural gas reserves
- Lots of CCUS
- Renewable sector
- Has the assets needed to make low-cost hydrogen

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- Roadmap's five key considerations for hydrogen:
- 1. **Clean Hydrogen in Alberta** focuses on assessing the logistical questions associated with hydrogen, such as production, storage, and distribution.
- 2. Carbon Capture Utilization and Storage looks at the interplay between natural gas hydrogen production and the need for CCUS in order to achieve realizable emissions reductions.
- **3. Technology and Innovation** considers the gaps in current technology that need to be addressed to make large scale hydrogen a reality.
- **4. Alberta's Hydrogen Markets** discusses the various markets for hydrogen with an emphasis on domestic (i.e., in Alberta) uses and consideration of potential export markets.
- 5. Alberta's Hydrogen Future considers scenarios for how hydrogen development may unfold over the coming years, and what actions are needed today to give rise to each scenario.

 Natural Gas Steam Methane Reforming ("SMR") is identified as the dominant production method in Alberta. SMR is an industrial thermochemical process that combines hydrocarbons and steam into hydrogen and CO<sub>2</sub> Autothermal Reforming ("ATR"). This process uses natural gas, steam, and oxygen in the reforming process. The resulting CO<sub>2</sub> is pure, making carbon capture more efficient. The Roadmap anticipates ATR will become the dominant method of hydrogen production in Alberta in the near term

HYDROGEN STRATEGY FOR CANADA Seizing the Opportunities for Hydrogen A Call to Action December, 2020

 2020 - Hydrogen Strategy for Canada – Seizing the Opportunities for Hydrogen

- Strategic Partnerships -
- De-Risking of Investments –
- Innovation -
- Codes and Standards –



- Enabling Policies and Regulation -
- Awareness –
- Regional Blueprints –
- International Markets -



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# **Regulatory Framework**

## Hydrogen – Regulatory Framework

- No express legislative framework (i.e., no *Hydrogen Act*)
- Covered off by existing legislative schemes in place
- Type of production is key factor in determining regulatory process that is engaged
- Therefore, hydrogen production follows the process seen in many other types of development

### Hydrogen – Regulatory Framework

	Water Act	
Assessment	As required	Approvals/Authorizations
EPEA Environmental Assessment (Mandatory and Exempted Activities) Regulation Impact Assessment Act		Public Lands Act Historical Resources Act

- Should a project fall more closely in line with oil and gas production methods and distribution, then the legislative requirements associated with the oil and gas industry, such as the *Pipeline Act* and *Oil* and Gas Conservation Act, can be expected to have application.
- In this context, the primary regulator would be the Alberta Energy Regulator ("AER")
- In a power generation context, or in a utility context such as blending with natural gas, application to the Alberta Utilities Commission ("AUC") would be expected.

# **Prospects**

#### Is hydrogen a "silver bullet":

- Alberta's stance on emissions associated with production
- CCUS issues
- Legislative Reform
- Blending of hydrogen with natural gas





Note: SMR = steam methane reforming. \* Turquoise hydrogen is an emerging decarbonisation option.

https://www.weforum.org/agenda/2021/07/clean-energy-green-hydrogen/

""[w]e are agnostic to the colour of hydrogen, as long as it's clean hydrogen... it will be industry that decides the colour of the hydrogen"

Associate Minister of Natural Gas Dale Nally

#### Ambiguous

- "Science based" emissions standards to be developed???
- Consideration of entire emissions profile associated with a given hydrogen energy stream???

#### Defensive

"An emerging narrative against natural gas-based hydrogen production can disrupt Alberta's efforts to build a clean hydrogen economy. As Canadian and global carbon intensity benchmarks and Guarantee of Origin schemes are proposed and developed, Alberta needs to **actively** inform their development with data grounded in robust science". analysis and (emphasis added)



#### CCUS Ris

#### Edmonton

#### Opinion | Carbon captur Alberta learned its lesso

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Politicians tend to use CCS as a distractic says Graham Thomson

Graham Thomson - for CBC News -Posted: Nov 29, 2019 7:00 AM MT | Last Upd



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Steve MacDonald of Emissions Reduction Alberta sp Cement's feasibility study into carbon capture and s



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#### The failure of Alberta's carbon-capture experiment

Sometime later this year, a consortium of oil companies in Alberta will flip the switch on a first-of-its-kind climate change project in Canada. If it works, the Quest project will capture and bury one million tonnes of carbon dioxide (CO2) emissions every year from Shell Canada's Scotford upgrader in Fort Saskatchewan. That's one million tonnes a year for the next 25 years—roughly equivalent to pumping the weight of four Great Pyramids of Giza underground, or, as Shell likes to say, the equivalent of taking 175,000 greenhouse-gas-spewing cars off the road every year.

#### **Steps to take:**

- Carbon Capture & Storage: Summary Report of the Regulatory Framework Assessment, released in 2013
- availability and quantity of pore space for CCUS
- monitoring and liability





"Adoption of clean hydrogen in Alberta has the potential to reduce GHG emissions. Modelling conducted for the Hydrogen Roadmap shows that under a 2030 scenario where hydrogen is widely integrated into Alberta's energy systems at a large scale, the province could reduce GHG emissions by 14 million tonnes per year. This represents a reduction of five per cent of Alberta's 2019 emissions". (emphasis added)

Alberta Hydrogen Roadmap: Executive Summary Ministry of Energy, at pg. 9

#### Legislative Reform

 Alberta does not presently have a dedicated regulatory framework for hydrogen and has instead relied upon an "amalgam of existing environmental and oil and gas statutes and regulations that do not always apply perfectly"

> Brendan Downey et al, "Pathways to Net-Zero: Opportunities for Canada in a Changing Energy Sector", 2021 59-2 Alberta Law Review 225, 2021

 Minor amendments needed, not whole scale new legislation • Gas Utilities Act

(e) "gas" means all natural gas both before and after it has been subjected to any treatment or process by absorption, purification, scrubbing or otherwise, and includes all fluid hydrocarbons not defined by clause:

(i) as oil.



- Blending of hydrogen with natural gas:
  - immediate effect of reducing greenhouse-gas (i.e., the hydrogen aspect of such a blend does not emit GHG)
  - Enbridge Gas Inc., City of Markham Hydrogen
  - ATCO Fort Saskatchewan Hydrogen Blending Project
  - AUC Proceeding 27256 Hydrogen Inquiry
  - B.C. Greenhouse Gas Reduction Regulation

# Hydrogen – Closing



- Hydrogen development has inherent limitations
- Limitations may be temporary, and capable of resolution through advances in technology and other means
- Governmental policies, across Canada, are aligned on the role of hydrogen as a significant tool in achieving decarbonization but differ on some of the more technical aspects of advancing same
- As hydrogen development is scaled-up and new production methods brought online, further consideration of the ability of existing regulatory and legislative regimes to adapt to hydrogen will be need.





