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Additional comments on CTP

After reading FirstElement Fuel's letter commenting on the investment plan, I wish to add some additional thoughts. In particular, their reference to the fact that there are three light-duty fuel cell models currently available in California.

I think it is worth explicitly noting that these three models are being offered by Honda, Hyundai and Toyota. In reviewing the California New Car Dealers Association "California Auto Outlook" (April 2025), altogether, Honda, Hyundai and Toyota by registration comprise 31.9% of the California market, and 25.6% of the U.S. market.

If you include BMW, which announced they are coming to market, those numbers rise to 35.7% and 27.9%.

It seems insulting to ignore the level of investment and implementation by these automakers - and others - in fuel cell technology, especially after California and its many climate allies mandated that zero-emission vehicles be brought to market. The seeming indifference - I would describe as intentional indifference, in all honesty - by CEC leadership to their compliance is, at best, frustrating. It's a hell of a market signal to automakers and climate allies who are home to them: thanks, but no thanks.

The cars are great - everyone knows it. I have loved everyone fuel cell car I've driven these last 12 years. The fueling network is challenging, but it can be better when everyone is working together. That can't happen when the lead agency for funding fueling infrastructure sits it out and, at best, observes from the sidelines.

Lastly, and what of the analyses by CARB and UC Davis regarding the need for light-duty fuel cell cars? Do we ignore those? What of the cradle-to-grave analyses by Fraunhofer and, recently, ICCT? Ignore those as well? It takes a lot of effort to ignore the data.

Thank you for the opportunity to share my thoughts and frustrations.

Yours in hydrogen,
Keith Malone
Los Angeles