

**DOCKETED**

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## **Hyundai Comment on CTPIP**

*Additional submitted attachment is included below.*

California Energy Commission  
Docket Number 25-ALT-01  
715 P Steet  
Sacramento, CA 95814

November 7, 2025

**Re: California Energy Commission 2025-2026 Investment Plan Update for the Clean Transportation Program**

Hyundai Motor North America (HMNA) respectfully submits the following comments to the California Energy Commission 2025-2026 Investment Plan Update for the Clean Transportation Program:

As a multinational vehicle manufacturer with over 200,000 employees, a presence in 193 countries, a sophisticated and vertically integrated worldwide supply network, and vast experience in the hydrogen fuel cell technology space, Hyundai is uniquely qualified to deliver true solutions necessary to accomplish the State of California's climate and clean air goals.

Since 2020, Hyundai has delivered over 3,500 fuel cell commercial vehicles worldwide, including more than 250 heavy-duty XCIENT Fuel Cell trucks, along with a range of transit and coach buses. In California, Hyundai has deployed 35 XCIENT Fuel Cell trucks through two major initiatives: 30 trucks as part of the NorCAL ZERO Project and 5 additional trucks supported by the U.S. Environmental Protection Agency's Targeted Airshed Grants (TAG) program. Further expanding its clean logistics footprint, Hyundai has introduced 21 XCIENT Fuel Cell trucks to support operations aligned with the launch of production at Hyundai Motor Group Metaplant America in Georgia.

In October 2025, Hyundai Translead was appointed as the official distributor of Hyundai's XCIENT Fuel Cell Trucks in North America, with a particular focus on California. This marks a significant step forward in delivering sustainable and innovative solutions, providing customers with direct access to zero-emissions, hydrogen-powered trucks – that are available for deployment right now, and backed by Hyundai Motor Group's parts and service network.

Hyundai Translead has also been an active participant in the recent ARCHES RFQ to deploy up to 5,000 Trucks and are fully focused on delivering thousands of fuel cell electric heavy-duty trucks to the California market over the next 8 years. As a 51-affiliate strong group, Hyundai is determined to provide additional solutions, such as fuel cell power packs for forklifts and container handlers (port decarbonization), fuel cells in maritime applications and stationary power generators for backup power or decentralized EV charging.

Despite the recent setbacks in Federal Funding for ARCHES, as well as the repeal of EPA waivers for heavy-duty trucks, and the elimination of the Advanced Clean Truck (ACT) rules, Hyundai remains committed to hydrogen technology and will continue to invest it for the long term.

The two keys to unlocking an accelerated heavy-duty truck rollout are: (1) a stable and predictable funding mechanism for the CARB's HVIP Program, with a dedicated carve out for hydrogen; (2) dedicated funding to build out heavy-duty hydrogen infrastructure in key locations, mostly around ports. In both programs, there should be emphasis that hydrogen and battery infrastructure should be put on equal footing - equal investments allow the two technologies to compete fairly and truly equitable zero-emission vehicle (ZEV) adoption.

Best Regards,

*Eugene A. Litvinov*

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