

DOCKETED

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*Comment Received From: Teresa Cooke
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CA Hydrogen Coalition Comments

Additional submitted attachment is included below.



November 7, 2025

Commissioner Nancy Skinner
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket 25-ALT-01 (Clean Transportation Program)

Dear Commissioner Skinner,

On behalf of the California Hydrogen Coalition (CHC), we appreciate the opportunity to comment on the 2025-2026 Clean Transportation Spending Plan.

The mission of CHC is to enable California's transition to zero emission vehicles by expanding the availability of reliable, convenient, and affordable hydrogen fueling to support the state's emission reduction goals. Hydrogen powered fuel cell electric vehicles across all classes will be critical for the successful decarbonization of transportation. The California Air Resources Board's Scoping Plan and Mobile Source Strategy as well as the California Transportation Agency's Clean Freight Corridor Assessment each separately validate the need and role for hydrogen broadly.

The Clean Transportation Program (CTP) serves as the state's primary infrastructure funding mechanism and plays a pivotal role in the development of California's hydrogen economy. For these reasons, we want to thank the California Energy Commission (CEC) for committing to reinvest returned hydrogen grant funds to hydrogen projects. With limited funds available for hydrogen infrastructure, we also encourage the CEC to consider the following recommendations as they relate to the spending plan and future grant funding opportunities.

We encourage the CEC to continue balancing the need for stations that serve light, medium, and heavy-duty vehicles. Pre-solicitation workshops provide critical insights from industry that should largely inform grant design. The needs of station developers today are vastly different than they were in 2021, prior to the collapse of the Low Carbon Fuel Standard Program credit price. Flexible operations and maintenance support including the possibility of lowering fuel costs, aligning station geography with market realities, better alignment between grant funding and station capacity, and reducing administrative burdens are appreciated. With limited funding, maximizing every state dollar to secure more private dollars is essential.

The loss of California's hydrogen hub is a tough setback. One percent of California's heavy-duty fleet has transitioned to zero-emissions and this class of vehicles is responsible for much of the NOx and particulate matter affecting Californians. We appreciate the CEC moving swiftly to make budget funds for heavy-duty infrastructure available. Now is the time to leverage the CTP, the Air Board's truck and bus incentives as well as incentives/projects from local air districts and local governments to begin building the backbone of hydrogen powered fuel cell trucking.

To those opposing the development of light-duty infrastructure to support passenger vehicles, some of whom serve on the Clean Transportation Program's Advisory Committee, it is important to acknowledge that only 7% of light-duty vehicles have transitioned to zero-emission. Our shared goals are far from complete. Urging the elimination of light-duty hydrogen fueling, as more vehicles are sold each day, harms the exact communities and households our collective efforts are intended to protect.

The elimination of light-duty hydrogen infrastructure also hurts the transition of medium-duty vehicles. As the CEC and California Air Board have recognized, vehicles in classes 2b-6 predominately use the same retail fueling sites as light-duty vehicles. Because of their large volumes and high utilization demands, medium-duty vehicles are another challenging segment of the vehicle population to decarbonize. Rather than vilify light-duty stations, our collective efforts are better spent collaborating with automakers and municipal fleets on the buildout of new and existing infrastructure that supports their still mandatory zero-emission vehicle transition.

As for the guiding principles around the type of hydrogen used, statute requires preference be given to the least carbon intensive fuel. This approach is best aligned with the Low Carbon Fuel Standard, the state's primary fuels regulation mechanism. Industry should not be faced with competing and conflicting standards.

We appreciate your consideration and look forward to working with the CEC to continue developing the fueling infrastructure needed to support greater fuel cell vehicle deployment.

Sincerely,

Teresa Cooke
Executive Director
California Hydrogen Coalition