

DOCKETED

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**Nathan Okawa, Comments on 2025â€“2026 Investment Plan Update
for the Clean Transportation Program**

Additional submitted attachment is included below.

November 7, 2025

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Energy Commission Docket 25-ALT-01

**Re: Comments for 2025-2026 Investment Plan Update for the Clean
Transportation Program: Proposed Guiding Principles**

Dear Commissioner Skinner and Energy Commission Staff,

First, I would like to thank you and your staff for their work in funding the existing hydrogen refueling infrastructure within the State of California. I grew up in Southern California in the 1960's and remember the terrible smog and never thought it would be possible to see the mountains in LA on most days. This was before CARB was established in 1967 and the CEC in 1974, and I appreciate your continuing work to improve the air quality and health of the people of California.

I would like to comment on the upcoming funding for EV and hydrogen infrastructure from a consumer's perspective. I own a Mirai and despite problems with the fueling infrastructure and fuel availability last year and continuing to the present, I also purchased a Hyundai Nexo fuel cell car in September- because I believe in the future of hydrogen and the increasing production of green hydrogen in industry and transportation, as does the CEC (1). I also joined the California Hydrogen Car Owners Association (2) and took part in a hydrogen fuel cell car rally this past September that took me from San Ysidro at the Mexican border to the Golden Gate Bridge and onward to the steps of the State Capitol in Sacramento. From there we traveled via road and car carrier through the "hydrogen station deserts" of northern California to Oregon, where we displayed our cars at the Renewable Hydrogen Alliance conference in Portland, Oregon and spoke with attendees. We traveled to central Washington State and visited Lewis County Transit in Centralia, Washington. They are commissioning New Flyer hydrogen fuel cell buses and are in the process of building a hydrogen production facility. We then drove to the Douglas County Public Utility District headquarters in East Wenatchee, where we refueled at the first public hydrogen dispenser in the State of

Washington at \$4 per kilogram. Their 5MW hydrogen production facility started production just last month on National Hydrogen Day (3) and it was a marvel to see. We then took our fuel cell cars on ferries and refueled at HTEC stations in Victoria and Vancouver, British Columbia. HTEC also commissioned their new green hydrogen production plant two weeks ago in Vancouver (4). We held a ceremony at the Lion's Gate Bridge in Vancouver with members of the Canadian Hydrogen Association, completing our "Water-to-water" trip, and for three of our members, a trip from across Baja California at the U.S.-Mexico border to British Columbia, Canada, actually completing the dream of a BC to BC trip in fuel cell vehicles.

Hydrogen in transportation can and does work, but because there has never previously been demand for renewable hydrogen and refueling station infrastructure, there is need and will continue to be a need for support using public and private funding, until the industry reaches a critical tipping point in California and becomes sustainable on its own. The experience of light duty hydrogen fuel cell car owners is a cautionary tale for the MDHD hydrogen build-out, and the State, CARB and CEC needs to provide resolute support for this technology in order for it to develop, or risk stranding significant past investments and negatively affect thousands of owners who made a financial commitment based upon promises made for the developing hydrogen infrastructure in the State and the number of stations to be built.

I make the following recommendations and observations based upon my speaking with over 100 fuel cell cars owners this year at stations from San Diego to San Jose and Sacramento, having attended in-person and virtual CARB and CEC meetings this year, and my own opinions:

1. The equipment at many of the currently operating stations is aging and needs or will need upgrading, and that should be taken into consideration for future funding.
2. Prior shortages of hydrogen fuel and station reliability issues in the past 4 to 5 years has given LD fuel cell vehicles a bad reputation and has led to declining sales and leases. Station reliability has been improving overall, but every station must be consistently reliable over an extended period- in order to improve the ownership experience. CARB and the CEC should monitor station reliability and

conduct independent customer satisfaction surveys and include both of these data points in public annual reports.

3. Persistently high fuel prices has also affected ownership, and will affect the success of fuel cell trucks, unless increased production in conjunction with increased demand leads to fuel price reductions.
4. The failure of SB 419 to pass, which was to temporarily exempt retail hydrogen from California sales tax was expected, but I hope there will be support to reintroduce this exemption as part of the regular budgetary process in the next fiscal year State budget- to give LD FCEV owners immediate price relief and also support the introduction of Class 8 fuel cell trucks, since the transportation industry operates on thin profit margins and hydrogen fuel needs to be cost competitive with diesel fuel.
5. The CEC needs to take into consideration the evolving state of electric vehicle charging when making current and future public investment decisions. Tesla has been building new charging stations, as have Rove, Electrify America, Walmart and others. New stations should have a minimum of 6- 10 dispensers to minimize waiting times and be located where there is demand for DC fast charging, which is in areas with high numbers of renters. Level 1 and possibly level 2 chargers at multi-family dwellings and workplaces make good use of scarce public funds due to the lower cost of the equipment and installation. The recently released NEVI funding led to an increase in construction of electric charging stations along transit routes, but any additional funding should carefully examine demand, in order for those stations to be economically viable and make good use of public and private funds. I reference the comments submitted by ChargePoint in this docket as making relevant points in this discussion. I make these comments because I also own an EV and support low carbon transportation and investments in both EV and FCEV infrastructure funding. Please reference the 2025 ICCT report (figure 1) on lifecycle carbon emissions that shows that carbon emissions from FCEVs are comparable to PHEVs and BEVs depending upon the fuel source (5). BEVs and FCEVs are complementary in the effort to decarbonize transportation and both should be supported.

6. Hydrogen fuel requirements for sustainability should not be held to a higher renewable level than that of the overall electrical supply in California, something that environmental and electrical vehicle groups bring up in their arguments against the use of hydrogen. The transition to renewable hydrogen and increasing production is still developing, as has the development of new technologies for hydrogen production, such as solar PV fields for electrolytic hydrogen using waste water (Chevron Lost Hills Field), electrochemical hydrogen production, the use of biogas feedstock and methane pyrolysis. Electrification AND the use of hydrogen is needed to decarbonize transportation, and both should be supported.
7. Simplify the convoluted GFO application process and provide funding to reopen Temporarily Non-Operational (TNO) hydrogen refueling stations (HRS) such as LAX, Lawndale, Fairfax, Hawaiian Gardens, and La Mirada and complete stations such as Fontana that are already partially built. The CEC needs to work with the OEMs and fuel vendors to discuss build-out and funding of stations in underserved areas, such as San Francisco, Sacramento, San Diego and metro Los Angeles, while pausing the ambitious goal of 100 HRS until the time that demand justifies this number of stations. Current owners of FCEVs need to be supported with stations where owners currently live, as well as select new stations which would provide backup for areas served by only one station and increase the ability for FCEV owners to travel around the State.
8. Future stations should be co-located near transit corridors and transit centers and be multi-modal to accommodate LD-MD as well as HD vehicles. Appropriately planned, these new multi-modal stations would be able to accommodate MD, HD and LD vehicles, increasing the station count for LD FCEV owners.
9. There needs to be coordination between the activities of CARB, CEC and ARCHES to maximize the public investments and development of lower carbon means of transportation, and more outreach and transparency with the public about what is happening with the hydrogen refueling infrastructure regarding the number of stations, reliability, availability of fuel and the future direction of pricing.

I believe the next few years will be critical for the survival of the LD HRS and the LD FCEV market, and it will depend upon CEC funding and must be executed with a sense of urgency- the public who owns these cars are depending upon current and future CEC actions. Please don't abandon these thousands of owners.

Respectfully,

Nathan Okawa
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Gardena, California 90249

1. CEC website [Hydrogen Vehicles & Refueling Infrastructure](#)
2. [California Hydrogen Car Owners Association](#)
3. [Douglas County PUD Hydrogen Facility Opens](#)
4. [Burnaby Clean Hydrogen Production Facility](#)
5. [ICCT Report 2025 Life-cycle greenhouse gas emissions from passenger cars](#)