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*Comment Received From: Teresa Cooke
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CA Hydrogen Coalition Comments

Thank you for your review and consideration.

Additional submitted attachment is included below.



November 20, 2025

Director Hannon Rasool
Fuels and Transportation Division
California Energy Commission
2526 9th Street Sacramento, CA 95814

RE: Docket 25-HYD-01, Hydrogen Refueling Infrastructure Solicitation

Director Rasool,

On behalf of the California Hydrogen Coalition (CHC), we appreciate the opportunity to submit written comments regarding the upcoming hydrogen refueling infrastructure solicitation, 25-HYD-01. These written comments align with CHC's verbal comments made during the November 20th pre-solicitation workshop.

CHC's goal is to support the California Energy Commission (CEC) in the development of a solicitation that will drive a strong response from industry. This is a challenging time for the clean energy sector, but we urge the CEC to turn these lemons into lemonade. Now is the time to make critical gains in fueling infrastructure. Ultimately, our zero emission vehicle goals are only as strong as the fueling network that supports them.

To that end, CHC encourages heavy emphasis on multi-modal stations serving light, medium, and heavy-duty fuel cell electric vehicles. A minimum of \$6 million for each is an appropriate match and is consistent with the 60% public/40% private split under the Carl Moyer program.

Technical elements of this solicitation are equally important. Developers must have absolute certainty around station up-time requirements. The consequences of non-compliance are serious with projects of this size and while all strive for 100%, minimum standards must be disclosed upfront. We also request the CEC eliminate the cap on the number of stations any one developer can be awarded. For heavy-duty stations, we request the CEC temporarily eliminate its requirement for agreements with fleet operators. Regulatory circumstances have changed significantly and surely there are other metrics we can use to determine the value of a fueling station in a particular area.

Station developers and automakers are also seeking appropriate flexibility around station locations as it relates to projects in disadvantaged communities. Statute specifies that 50% of projects directly benefit or serve disadvantaged communities, it does not require projects to be in disadvantaged communities. Hydrogen's centralized refueling model already lends itself to serving a broad nearby community so we request the CEC change its station guidelines to be within 5 miles of a disadvantaged community or be allowed to practice discretion for major freight corridors just outside of a disadvantaged community. This allows station developers to site stations closer to market demand, bringing us closer to a self-sufficient fueling industry. Providing this flexibility also dramatically opens the number of eligible station sites thus allowing developers to select the best fit based on land costs, electric connectivity, traffic flow and community support. To those who object,

why would they fight to keep hydrogen stations in disadvantaged communities while objecting to the impact of hydrogen in disadvantaged communities. We hope this set of circumstances, which are unique to hydrogen, justifies consideration for modest flexibility.

CHC also requests the CEC consider investments that will allow station developers to harden the current fueling network. Previous improvement grants have been greatly appreciated and effective. We urge the CEC to limit to the extent possible restrictions on how funds may be spent. For example, in the past we have seen improvement solicitations limit equipment to 40% of funds, which we do not think is advisable at this time. New technology upgrades that improve station performance and/or further reduce greenhouse gas emissions should be eligible as well. These funds can provide capital for critical performance equipment that may not be commercially viable today but need to be for the fueling network of the future. Temporarily non-operational stations in key regions need to be brought back online to support drivers. First generation, low-capacity stations in key regions also need to be replaced to better serve drivers. We suggest \$2 million to replace stations.

The CEC might also consider additional gap grants that allow station developers to bring to market stations scored and funded in 2020 when LCFS credits were significantly higher, and inflation and supply chain issues challenged all clean technologies.

We appreciate the CEC's consideration of the recommendations above. CHC believes all these elements are needed to unlock the full potential of hydrogen mobility and we look forward to working with the CEC on this solicitation and those to come.

Sincerely,

Teresa Cooke
Executive Director
California Hydrogen Coalition