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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,

Thank you for the opportunity to submit comments to the California Energy Commission regarding the Hydrogen Refueling Infrastructure Solicitation (Docket 25-HYD-01). On behalf of Hago Energetics, I respectfully urge the Commission to consider broadening the definition of a hydrogen refueling station within this solicitation to explicitly include mobile hydrogen refueling stations that can be replenished directly from distributed renewable sources such as dairy farms, landfills, and wastewater treatment plants.

As California advances toward statewide decarbonization, the ability to deploy flexible, modular fueling solutions will be essential—especially in regions where traditional fixed stations are cost-prohibitive or slow to develop. Mobile hydrogen stations can help accelerate hydrogen adoption far beyond high-traffic corridors by enabling localized fueling that is both cost-effective and scalable.

We specifically request that the CEC:

1. Expand eligibility to include mobile refueling stations capable of supporting transportation fleets without requiring permanent on-site infrastructure.
2. Recognize distributed biogenic-derived hydrogen sources—from dairy digesters, landfill gas systems, and wastewater facilities—as qualified feedstock streams for renewable or low-Cl hydrogen delivered to mobile stations.
3. Allow mobile stations to serve rural and disadvantaged communities as eligible deployment locations under this solicitation.

This expanded definition aligns strongly with California's goals for equity, climate resilience, and renewable fuel diversification.

Benefits to Rural Disadvantaged Communities

Many rural communities in California, particularly in the Central Valley and Inland Empire, have been historically underserved by clean fuel infrastructure. Mobile hydrogen stations will:

- Bring clean refueling directly to agricultural regions and rural fleets
- Eliminate the need for major capital investments in pipelines or permanent structures
- Enable job creation tied to local hydrogen production and servicing
- Reduce air pollution in communities disproportionately impacted by heavy-duty diesel emissions

By enabling mobile deployment, the CEC can ensure the benefits of hydrogen infrastructure extend beyond major metro areas and into communities that have long carried the burden of environmental injustices.

A Cost-Effective and Rapid Deployment Pathway

Mobile hydrogen stations provide an immediate bridge solution:

- Faster permitting and siting compared to fixed stations
- Lower upfront capital cost
- Redeployable assets that can shift with market demand
- Seamless integration with distributed renewable hydrogen production

California needs more than just large urban stations—it needs flexible, distributed infrastructure capable of maturing the hydrogen economy statewide.

Hago Energetics stands ready to collaborate with the Commission to demonstrate how mobile, biogenically sourced hydrogen systems can strengthen the state's clean transportation network and accelerate equitable adoption.

Thank you for your leadership and consideration of these comments. We appreciate the opportunity to participate in Docket 25-HYD-01 and welcome further engagement.

Sincerely,

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