

**DOCKETED**

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*Comment Received From: CA Hydrogen Car Owners Assn (CHCOA)*  
*Submitted On: 11/24/2025*  
*Docket Number: 25-HYD-01*

## **Pre-application Workshop for New Funding Solicitation**

Please see attached comments.

*Additional submitted attachment is included below.*



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November 24, 2025

Mark Johnson  
Tomas Ortiz  
Kristi Villareal  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

Re: Comments: Hydrogen Refueling Infrastructure Pre-Solicitation Workshop

Dear Mr. Johnson, Mr. Ortiz and Ms. Villareal:

I would like to start with a sincere thank you for hosting the workshop of November 20. The online meeting was everything that we hoped that it would be. It provided industry leaders and drivers an opportunity to provide candid views on how best to utilize CTP hydrogen refueling infrastructure funds. Since its formation, the California Hydrogen Car Owners Association (CHCOA) has advocated for:

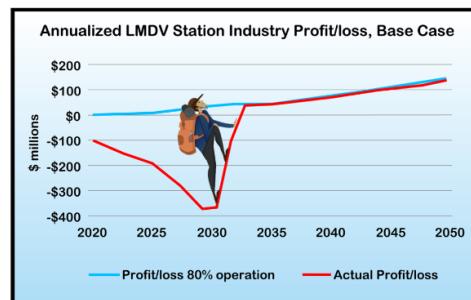
- lower fuel costs at the dispenser,
- a greater number of stations, and
- improved station reliability.

We were pleased that commenters also focused on these goals.

#### Lower Cost of Hydrogen at the Dispenser

It is no secret that transportation-hydrogen in California has seen some tough times in recent years. As a result, we see that a great despondency has come over many hydrogen car owners. Almost without exception, the high cost of fuel is identified as a main reason by those that have decided to give up on driving an FCEV.

We understand from your comments at the Workshop that LCFS Gap Matching may not be a workable solution for reducing costs at this time. While this may be the case for this method of reducing fuel costs, we encourage your office to work closely with industry stakeholders in the near-term to find other ways to use CTP funds to address this important issue.

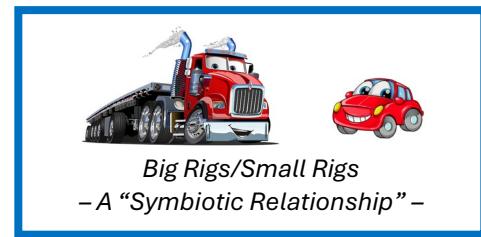


Climbing Out of the Valley of Death

Graph by ITS UC Davis - Climber by CHCOA and pngtree.com

## Station Construction

While acknowledging a real need for more light-duty stations, CHCOA strongly supports the concept of mixed-use facilities. As stated similarly in numerous studies, “*There appears to be significant value in having FCEVs in both light-duty and medium/heavy-duty applications, from the point of view that both types of vehicles are capable of helping to build large hydrogen markets.*” ([Fulton, et al - UC Davis, 2023](#))



During the Workshop, some commenters indicated that they would like flexibility in the use of funds to bring non-operational (or poorly operational) stations back to a higher operating standard. One example provided was to upgrade fueling equipment from gaseous to liquid hydrogen. We support this (and similar) use of these funds because, in most ways, changing from gaseous to liquid equipment is creating a new station.

Clearly, CEC staff has the unenviable task of balancing the competing priorities from those of us in transportation-hydrogen. Also, we understand that it is likely difficult for transit agencies to provide a fueling position for light and medium-duty FCEVs. Having said that, we would encourage you to prepare the solicitation in such a way that bonus points can be given for those transit agencies that find a way to incorporate LD/MD hydrogen dispensers into their project.

## Project Management

To ensure the best outcomes, CEC staff should continue to work closely with awardees to track project progress. As a minimum, weekly meetings should be held during the construction phase in order to review progress, discuss challenges, and plan for the upcoming week. If problems arise, CEC and awardees must work cooperatively toward a solution. In the unlikely event that awardees do not adhere to minimum project criteria, provisions in the contract should allow for claw back of funds.

Thank you for the opportunity to provide comments relative to the expenditure of hydrogen refueling infrastructure funds.

Sincerely,  
Greg Cane, President



California Hydrogen Car Owners Association (CHCOA)