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Description:	FEF recommendations for future H2 solicitation
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FIRSTELEMENT FUEL
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December 2, 2025

Mr. Hannon Rasool
California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Hydrogen Refueling Infrastructure Pre-Solicitation Workshop Comments

Dear Director Rasool,

Thank you for organizing the workshop on November 20, 2025 seeking industry input for future hydrogen solicitations, and the CEC's continued support for hydrogen infrastructure. As I have consistently stated, the CEC's support is the main reason FirstElement Fuel (FEF), and indeed the whole hydrogen refueling industry in California, exists. The following recommendations are submitted based on our experience with previous Grant Funding Opportunities (GFOs) and in the spirit of improving our joint desire for successful projects.

As you are aware, the build out of light-duty (LD) hydrogen infrastructure has been stalled due to the historically low and unprecedented Low Carbon Fuel Standard credit prices that have dragged on for over three years. The CEC acknowledged this situation by issuing GFO-24-601 in September 2024 to allow previous awardees to compete for additional funds (up to $500k per station). FEF was successful in securing these additional funds for three stations, but we have other stations that could utilize the same assistance. The GFO was limiting in two significant ways: 1) there was a single applicant cap which only allowed submission of four stations ($2M award maximum), and 2) there was a requirement that 50% of the stations be in disadvantaged communities (DACs). FEF recommends a re-release of a similar LD specific GFO to enable additional support for awarded stations but allow up to *eight stations for a total of $4M*. FEF currently has a dozen stations permitted and "ready-to-go" if provided sufficient capital to build. And all of these stations are within six miles of a DAC, so we further recommend a 50% requirement *within 5 miles of a DAC* to qualify any of these stations.

FEF also recommends CEC allow temporary non-operational (TNO) locations, specifically Anaheim, LAX, and Palo Alto, to be funded as "new" stations, not just refurbishment of the old equipment. In the previous GFO-24-601, TNO locations were only offered $500k to upgrade, however, this is non-economical since the equipment is obsolete and on-going maintenance and refurbishing/remanufacturing of spare parts would be almost impossible. Installing new equipment would provide four times the capacity with greater than 92% uptime as evidenced in our latest generation liquid hydrogen stations. FEF recommends funding of these stations at the $2M level, similar to the grant amounts for new stations in Sacramento and San Francisco.

Finally, FEF recommends providing additional capital if the stations are made medium-duty (MD) capable. MD trucks will have higher capacity tanks (greater than 10 kg), which will require a different fueling protocol and greater station pumping capability. These upgrades will be much higher than the $500k offered in GFO-24-601, and we recommend at minimum $1M for such upgrades per site.

We urge the CEC to continue its support for additional LD infrastructure because those vehicles are currently available and expanding the network enables more economic supply chains that will be needed for the heavier classes. We look forward to working with the Commission to continue transitioning the transportation sector to both battery and hydrogen zero-emission vehicles.

Sincerely,

Matt Miyasato, Ph.D.
Chief Public Policy & Programs Officer