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Filer:	Marianna Brewer
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December 3, 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

Dear Director Rasool,

GTI Energy is pleased to provide the following recommendations based on our experience with the implementation of heavy-duty hydrogen-fueled class 8 truck, switcher locomotive, and port equipment pilots for freight movement.

As an independent not-for-profit organization serving the research, development, and training needs of electric and gas utility, transportation, and energy markets, GTI Energy works to scale impactful solutions that shape energy transitions by leveraging gases, liquids, infrastructure, and efficiency. With over 80 years of experience, GTI Energy is dedicated to meeting the nation's energy and environmental challenges by developing technology-based solutions for consumers, industry, and government.

We offer the following recommendations to address technology needs of difficult-to-decarbonize freight movement sectors:

1. Locomotives in switcher- and short-line rail service and port equipment are fueled using a "wet hosing" delivery approach, where fuel is trucked in, and vehicles are fueled where they are "parked" after operational shifts. These (varying) parking locations depend on daily space availability on the tracks or within the port facility. To facilitate vehicle fueling for these markets, high-performance (>5 kg/min/fueling position) mobile H35 and H70 fueling solutions are essential and ought to be considered for inclusion in this funding solicitation.
2. Allocate funding for rail-specific fueling infrastructure to resolve the infrastructure gap created by the termination of the agreement ARV-21-023.
3. Include a "one (1) locomotive" vehicle deployment requirement option as a minimum private or shared-access requirement for rail industry serving fueling infrastructure applicants.

We appreciate the California Energy Commission's consideration to include the above recommendations to accelerate the feasibility of hydrogen locomotives and heavy-duty port equipment, which will

significantly reduce emissions from freight movement and achieve a clean energy-powered logistics and industrial system.

Sincerely,

Nico Bouwkamp
Business Development Manager H2
LCES Mobility
GTI Energy

