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Response Letter to Hydrogen Refueling Infrastructure Pre-Solicitation

Additional submitted attachment is included below.

December 4, 2025

Hanoon Rasool, Director
Fuels and Transportation Division
California Energy Commission

**RE: Hydrogen Refueling Infrastructure Pre-Solicitation Workshop
(Docket #: 25-HYD-01)**

Director Rasool:

On behalf of the California Transit Association, I write to you today in response to the ***Hydrogen Refueling Infrastructure Pre-Solicitation Workshop***.

As the statewide organization that represents California's transit industry, including more than 85 transit agencies in state, the Association appreciates the California Energy Commission's (Commission) continued attention to our industry's funding priorities and its clearly articulated commitment to assisting transit agencies in their transition to zero-emission buses – regardless of the fuel path they choose. This attention and support is critical as transit agencies work to implement the California Air Resources Board's Innovative Clean Transit (ICT) regulation, which requires that they transition to zero-emission buses by 2040.

Through this letter, I voice our support for the Commission advancing a future hydrogen infrastructure solicitation that invests new, flexible funding in the buildout of hydrogen refueling infrastructure, including for medium- and heavy-duty fleets. State investment in such infrastructure will help ensure that transit agencies can sustain and accelerate their adoption of zero-emission buses and achieve early compliance with the ICT regulation. While I offer our support for this investment, I voice our concerns with the Commission's proposal to require that public entities, like public transit agencies, make at least 25 percent of the infrastructure funded by the General Funding Opportunity (GFO) open and accessible to the general public without restriction. We understand that this proposal is being advanced to help maximize the public benefit of this limited state investment. That said, such a requirement is likely to create new liability and

infrastructure reliability challenges for public transit agencies that maintain closed access facilities – at times, in remote locations – to protect public safety and limit vandalism of their assets. Additionally, such a requirement fails to take into consideration that most transit agencies procure hydrogen to meet their service needs only, basing procurements on their historic and projected demand. Such a requirement would force transit agencies to procure hydrogen by additionally speculating on demand from other fleet owners and private parties. If such demand isn't accurately estimated, it could result in transit agencies having insufficient hydrogen supply to meet their needs. We encourage that this requirement be removed from the proposal and that the Commission further engage transit agencies to ensure that the proposal's requirements meet their needs.

In closing, we appreciate the opportunity register these comments. We look forward to continuing to engage with you, your staff, and your partner agencies to further the state's goals of widespread transportation electrification.

Please feel free to contact me at 916- 446-4656 x1034, if you have any questions about this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MP', with a long, sweeping horizontal line extending to the right.

Michael Pimentel
Executive Director