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Project Title:	Hydrogen Refueling Infrastructure Solicitation
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Document Title:	Docket 25-HYD-01- CTE Recommenda;ons for Realloca;on of Returned Funds from CEC GFO-19-602
Description:	Comments on proposed reallocation of returned funds from CEC GFO 19-602
Filer:	Jaimie Levin
Organization:	Center for Transportation and the Environment
Submitter Role:	Other Interested Person
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CENTER FOR TRANSPORTATION AND THE ENVIRONMENT

December 4, 2025

Director Hannon Rasool
Fuels and Transportation Division
California Energy Commission
2526 9th Street
Sacramento, CA 95814

RE: Docket 25-HYD-01- CTE Recommendations for Reallocation of Returned Funds from CEC GFO-19-602

Director Rasool,

Thank you for the opportunity to provide additional feedback on your proposed reallocation of funds from GFO 19-602. Following my oral comments during the November 20 workshop, I would like to reiterate several recommendations.

Public Access to Transit Refueling Stations: You should consider removing this requirement for several reasons. Transit agency operating divisions are usually located in industrial-zoned areas that are not very accessible to the general public. There is no safe access to an operating division for non-employees. Private vehicles entering a busy bus yard with 40- and 60-foot buses moving around could cause an accident. This would require extensive insurance coverage and pose significant liability risks if an accident occurs. It's very unlikely that a public transit agency would accept liability or risk disruptions to operations due to an incident.

Transit buses only require 350-bar pressure for refueling, not the 700-bar pressure used for light-duty vehicles. Installing 700-bar fueling at a transit station could increase costs by approximately $2 million in costs for dispensers, compression, storage, and pre-cooling systems.

DAC Locations: Requiring HD stations to be in Disadvantaged Communities may not effectively serve those communities' environmental needs. The primary goal is to reduce emissions from mobile sources, including trucks that operate through and around neighborhoods near ports and warehouses in the Central Valley. Stations should be evaluated based on how effectively they support drayage and regional truck traffic, enabling a transition from diesel to fuel cell trucks. Stations serving trucks from maritime ports or warehouse districts could be located along a major highway corridor outside the DAC.

An "Ecosystem" Approach to Deploying Trucks and Stations: In 2020, CARB and CEC combined funding resources and issued a joint GFO to support zero-emission truck and station deployments. This led to the NorCAL ZERO project, which deployed 30 Class 8 fuel cell trucks

and constructed a large HD refueling station at the Port of Oakland capable of refueling 200 trucks daily. Collaborative efforts to deploy trucks alongside stations have proven successful by combining state funding to synchronize vehicle deployment with station and fuel availability—the Ecosystem approach. CTE strongly recommends CEC collaborate and coordinate with CARB, CalSTA, and other agencies to leverage your respective budgets and support larger projects that can more effectively accelerate the commercialization and widespread adoption of advanced technologies.

Sincerely,

Jaimie Levin
Director of West Coast Operations
2001 Addison Street, Suite 120
Berkeley, CA 94707
(510) 851-0625