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Clean Transportation Program Investment Plan Comments

Additional submitted attachment is included below.

PROVIDENCE
ENTERTAINMENT

To: California Energy Commission

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These comments are in addition to our comments made at the Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan on May 8, 2026.

Thank you for allowing our organizations to submit addition comments on the Clean Transportation Program Investment Plan.

We are wondering, where is the urgency?

If you believe Harvard, The University of Birmingham, University College London and the University of Leicester then there's the equivalent of a COVID pandemic every 9 to 10 months in the world, or a 911 type of disaster 55 times a week, every single week of this year. That 167,307 deaths per week.

https://www.ucl.ac.uk/news/2021/feb/fossil-fuel-air-pollution-responsible-1-5-deaths-worldwide#:~:text=The%20research%2C%20led%20by%20Harvard,in%20the%20journal%20Environmental%20Research.

https://www.nrdc.org/stories/fossil-fuel-air-pollution-kills-one-five-people#:~:text=Scientists%20have%20known%20for%20years,twice%20that%20of%20previous%20estimates.

https://hsph.harvard.edu/climate-health-c-change/news/fossil-fuel-air-pollution-responsible-for-1-in-5-deaths-worldwide/#:~:text=The%20study%20was%20supported%20by,Twice%20Previous%20Estimate%2C%20(Bloomberg)

How is the California Energy Commission going to protect this pale blue dot?

The state of California is not just a leader in clean transportation, it was and is instrumental in engendering hydrogen fuel cell adoption around the world. As the 4th largest economy with leadership roles in tech, film, agriculture, aerospace, defense, advanced manufacturing, tourism and global trade, a state with the highest peaks, the lowest valleys, the most cars and trucks, it is imperative that California continue its role as the premier state in terms of electric transportation in order to show the world and states like Texas, with 25% fewer vehicles than in this great state, that California will be first to the finish line in terms of 100% EVs on the road.

Surely the state can afford to add a hydrogen fuel cells as an option for consumers of transportation in the great state of California. To quote Larry Burns, VP of General Motor's Research and Development: "Quite honestly, no other technology offers this exciting potential. "

In April of 2008, Larry Burns, stood in front of you and begged for 40 stations in a concentrated area like Los Angeles so they could seed their FCEV SUVs to California drivers. He assured you when he said, "I want to emphasize that… we have not discovered anything yet to suggest mass volume cannot realized with this technology. And with the global car park rapidly approaching a billion vehicles mass volume is the only goal that matters from an energy and environmental perspective. "

The global car Parc today is 1.76 billion vehicles. Mr. Burns goes on to say, "It's great to have small numbers of these vehicles running around, but be very very clear, the mission is to heavily penetrate the 70 million cars and trucks that are built worldwide each year with this technology."

In 2025 there were 96.4 million vehicles built globally.

https://www.gartner.com/en/newsroom/press-releases/2025-12-04-gartner-forecasts-116-million-electric-vehicles-will-be-on-the-road-in-2026#:~:text=Electric%20Vehicles%20in%20Use%20to,Expert%20Take%3A

He also said, "One of the most serious business issues that's facing General Motors today is our product's, a near total dependence on petroleum as a source of energy. "

This is the quote that opens our documentary, At War with the Dinosaurs.

Surely the Energy Commission can see what's happening with oil and gasoline today. It was just reported today that American's have now paid an extra 44 billion dollars more since the start of the war with Iran than they would have paid when the price gasoline wasn't so high.

https://fastforward.com.cy/economy/fuel-costs-americans-have-paid-extra-40-billion#:~:text=The%20FastForward%20News%20Team,the%20air%20traffic%20control%20system.

Spirit Airlines just shuttered because the price of jet fuel doubled in a matter of days. Their expenses went up 10 to 15 million of dollars a week. JetBlue and Frontier are also asking the government for relief. Proof that this can work in the automotive space proves it can work in aviation, marine, long term storage.

https://www.techechelon.com/post/spirit-airlines-shuts-down-after-fuel-price-surge-collapses-restructuring-plan#:~:text=Spirit's%20collapse%20comes%20after%20the,prices%20of%20%242.24%20per%20gallon.

BEV's are now competing with data centers. A single big AI data center uses as much electricity as a small city, around the clock. America was not wired for that. The cost of reserving future power, meaning the price paid to power plants just to "reserve" capacity for the future, to be available to run, has jumped from $29 to $329 in two years. That is more than ten times higher. And if you order one of the giant step-down substation-Class transformers that large BEV charging infrastructure needs to plug into the grid, you now wait up to four years to get it. You can thank data centers for that.

Please ignore the skepticism, ignore the fear that you are hearing from battery electric vehicle proponents. China is doing this. At the end of 2025 China had 40,000 fuel cell electric vehicles, FCEVs and 574 refueling stations. Their target is 100,000 FCEVs by 2030. End user hydrogen

prices are currently $4.80 per kilogram and below $3.50 per kilogram by 2030. Regions with high renewable energy potential target $2.10 per kilogram. In December 2025 alone, Chinese manufacturers, logistics operators and regional governments delivered 700 hydrogen fuel cell electric trucks and buses across multiple provinces and ordered 1400 additional units because of expanding refueling infrastructure and dedicated corridors.

https://www.all-about-industries.com/new-fuel-cell-initiative-from-beijing-a-465c02bfc59ede1d8ebf366041e20962/#:~:text=By%202030%2C%20100%2C000%20fuel%20cell,the%20official%20news%20agency%20Xinhua.

Toyota ,who manufactured 10.5 million cars last year, are waiting to see what you do. Drivers are desperate for stations and a coherent, seamless, functional network of stations and would be ecstatic to have gen3 and 4 stations with 95% uptime. Why are drivers blaming Toyota for what's happening here? Because Toyota has gone out on a limb, putting as many high end Lexus style fuel cell vehicles into the market as they possibly can and, every single Toyota Mirai, Hyundai NEXO and Honda CRV driver can see that the cars are real and ready for mass adoption.

Even more automakers are waiting in the wings. They just need the stations. BMW, GM and Daimler and Volvo will tell you this today. They have made this comments publicly and privately. They just need the stations. Deprioritizing light duty vehicles sidelines the aforementioned OEMs plans for the last 20 years and next 100, not to mention other OEMs with FCEVs not yet deployed.

https://www.press.bmwgroup.com/global/article/detail/T0452048EN/hydrogen-high-tech-at-the-bmw-group:-start-of-series-production-in-2028-is-getting-closer?language=en#:~:text=%E2%80%9CThis%2C%20together%20with%20the%20development,Group's%20technology%2Dopen%20approach.%E2%80%9D

https://www.cbtnews.com/gm-ends-next-gen-hydrogen-fuel-cell-development-to-double-down-on-ev-future/#:~:text=According%20to%20the%20U.S.%20Department,or%20faster%20EV%20charging%20locations.

Why are the automotive OEMs doing this? They're doing that because they understand energy density, the seamless transition from fossil fuel vehicles to fuel cells. You're essentially swapping out gasoline for gaseous hydrogen with no hit to driving range because of cold or warm weather, humidity, weight, size, charge time, or mountains, that BEVs suffer from.

Drivers love the vehicles BUT need a reliable, inexpensive, pervasive network with 95% uptime. The cars are real but limited infrastructure is THE bottleneck to mass adoption.

Gaseous hydrogen, which BMW, Toyota and Mazda have been burning in a standard internal combustion engines reinforce the idea that we can leave the shackles of gasoline far quicker than anyone has previously envisioned.

Hydrogen is the future of transportation.

Commercial aircraft, marine ships and trains will never run on batteries.

Battery only proponents love to say, "the market has spoken, nobody wants hydrogen fuel cell vehicles." However, the handful of people that have these vehicles, more than 19k registered with the DMV at the height of driving consumers, love the vehicles.

Honda Clarity owners were on their second of third vehicle. We found one complaint in hundreds of interviews with Mirai owners. (Space for a 200+ person in the back seat). But all FCEV drivers agree, the fueling infrastructure is unreliable, incredibly expensive, and sparse. It was initially almost entirely focused on the gaseous hydrogen deliveries to first and second stations. You can change all of that. You can add more stations, drive down the price of green hydrogen by driving up demand.

Over 90% of the hydrogen dispensed for FCEVs in the state of California is renewable. You can't say that about BEVs. If you're charging off the grid you're filling your vehicle with fossil fuels.

And the market has spoken, Ford recorded roughly $19.5 billion in asset write-offs, their EV sales cratered toward the end of 2025, with the F-150 Lightning seeing a 72% drop in deliveries. GM reported a $7.6 billion total loss in 2025 related to downshifting its EV production. In a significant reversal of its "all-electric by 2035" rhetoric, GM announced it would reintroduce plug-in hybrids.

https://enkiai.com/ev/ev-manufacturing-crisis-2026-why-automakers-are-reversing/#:~:text=Ford's%20pivot%20illustrates%20the,scale%20back%20its%20EV%20plans.

https://acceleratingtozero.org/progress-update-automakers-shifting-to-a-decade-of-flexibility/#:~:text=Ford%20recorded%20a%20historic%20%2419.5,margin%20ICE%20trucks%20and%20SUVs.

This is a second year of decline for Tesla. In 2025 they are down roughly 9% from 2024 deliveries. The European market dropped as much as 40% compared to previous years.

https://www.honestjohn.co.uk/the-latest-tesla-statistics/#:~:text=Tesla%20reported%20a%2013%25%20drop,below%20analyst%20expectations%20of%20377%2C592.

Broader market Indicators show unsold BEVs have piled up on dealer lots. The "early adopter" phase is over and the "mass market" is proving much more sensitive to price and charging convenience, meaning range anxiety. Tesla's core narrative has pivoted away from being a "car company" and toward being an AI and robotics firm.

https://sqmagazine.co.uk/tesla-statistics/#:~:text=Shanghai%20Megafactory%20shipped%20the%20first,regional%20slowdown%20in%20early%202025.

https://www.rac.co.uk/drive/electric-cars/choosing/tesla-data-statistics-and-projections/

Not to mention the complete shift in lifestyle required under battery electric vehicle ownership.

When the largest vehicle manufacturer in the world ten out of the last 15 years, consecutively for last five years, tells you the direction they want to proceed, we should listen. BMW, Daimler, and Hyundai and are considered Premium mass-market, mass-market and a volume leader, respectively. California is arguably their most critical stronghold in North America. OEMs just based on their numbers but they have an outsized impact (seeding) in the state of California.

https://www.motor1.com/news/784354/toyota-best-selling-car-brand-2025/#:~:text=The%20Breakdown,held%20onto%20it%20ever%20since.

https://www.dealmoon.com/en/nissan-falls-out-of-top-10-2025-global-auto-sales-ranking-toyota-tops-sales-charts-for-6th-consecutive-year/5591007.html#:~:text=Toyota%20Group%20continues%20to%20hold,been%20highly%20successful%20in%20North

https://en.moneyandbanking.co.th/2026/222357/#:~:text=Toyota's%20total%20sales%2C%20including%20the,also%20setting%20a%20new%20record.

https://en.moneyandbanking.co.th/2026/222357/#:~:text=Toyota's%20total%20sales%2C%20including%20the,also%20setting%20a%20new%20record.

https://elischolar.library.yale.edu/cgi/viewcontent.cgi?article=10332&context=ypfs-documents#:~:text=Toyota%20Passes%20General%20Motors%20As,first%20time%20in%2077%20years.

California is a critical stronghold for automotive OEMs in North America. 70 FCEVs can be put on the road for each Tesla long range BEV based on scare mineral content. And should be prioritized for disadvantaged, low income and air quality compromised communities because fuel cells clean the air as you drive. BEVs do not.

The 4th largest economy can flip the funding levels between BEVs and FCEVs to give consumers choice in the type of EV they desire.

In the time it took us to say this, 15 people died prematurely from air pollution. During the time you took to have the meeting on the 8th over 2700 people died from complications from air pollution. Air knows no boundaries or geographic limitations.

Help us get to a tipping point with hydrogen fueling infrastructure. Look at the big picture.

Build the stations.

Kind regards,

The Team at Providence Entertainment and At War with the Dinosaurs.