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CTE Comments on the 2018-19 ARFVTP Expenditure Plan

Additional submitted attachment is included below.



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March 21, 2018

Commissioner Janea Scott
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: 2018-19 Investment Plan: Alternative and Renewable Fuel & Vehicle Technology Program

Dear Commissioner Scott:

We are writing to express the Center for Transportation and the Environment's (CTE) support for the 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program. In particular CTE supports the proposal to provide \$92 million for hydrogen fueling infrastructure. However, CTE urges you to expand the use of these funds to bridge the funding gap facing the heavy-duty fuel cell electric vehicle sector, particularly public transit properties.

CTE is a member-based non-profit organization that fosters a collaborative process to advance clean sustainable transportation and energy technologies. Our members include a coalition of industry leaders and end users working toward the commercialization of zero emission transit buses and trucks. We represent vehicle manufacturers, technology companies, fuel cell manufacturers, energy suppliers, research centers, transit agencies, universities, and non-profit organizations.

CTE has worked to expand the network of light-duty hydrogen fueling stations, as well as the development of heavy-duty fueling stations. As you may be aware, CTE worked with Shell Oil to prepare their proposal for building seven light-duty stations that will soon come online, and more recently, we helped them submit a proposal for heavy-duty truck fueling.

CTE has recently embarked on the 100-Bus Initiative to promote the commercialization of fuel cell-electric buses (FCEBs). The initiative maintains the momentum generated by our CARB-funded 20-bus project to build FCEBs for the Orange County Transportation Authority and AC Transit. The primary goal of the Initiative is to drive down the cost of fuel cell electric buses to where they are commercially viable for transit properties. While there are funding programs in place to achieve this goal on the vehicle side, there remains a funding gap in developing the fueling, maintenance, and workforce infrastructure. The 2018-19 expenditure plan should allow fueling infrastructure for heavy duty stations operated by public fleets to be an eligible project.

As the California Air Resources Board (CARB) develops regulations to transition all public transit buses to zero emission by 2040, the CEC's expenditure plan should complement this effort by directing its expertise in developing fueling infrastructure toward heavy-duty hydrogen fueling stations. While CTE supports the 2018-19 expenditure plan, we do encourage your favorable consideration to address the infrastructure gap facing public transit properties.

Sincerely,

Daniel Raudebaugh
Executive Director

Jaimie Levin
Director of West Coast Office