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Toyota Comments on the 2018-2019 Investment Plan Update for the ARFVT Program

Additional submitted attachment is included below.



Toyota Motor North America, Inc.
1630 W. 186th Street
Gardena, CA 90248

March 22, 2018

California Energy Commission
1516 9th Street, MS-4
Sacramento, CA 95814

RE: Docket No. 17-ALT-01, 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program.

Dear Chairperson and members of the Commission:

On behalf of Toyota we sincerely appreciate the leadership of the Commission and support of ARFVTP staff to update the 2018-2019 Investment Plan. We support the Governor's Executive Order to provide \$900 million for ZEV infrastructure through 2025 and the goal to build 250,000 charging stations and 200 hydrogen fueling stations.

Toyota has sold and leased over 3300 Mirai FCVs in California since launch, and this would not have been possible without California's support to build the early retail fueling network, and the collaborative process between automakers, station developers, and the state.

To expand FCV sales, it is critical to accelerate the build-out of hydrogen stations as part of a state-wide comprehensive network designed to balance coverage and redundancy. We support the proposed increase to the 2018~2019 hydrogen allocation of \$92MM, and recommend maximizing the number of stations planned in the next funding solicitation.

The approach to build 200 retail hydrogen fueling stations throughout the state should enable policies that support the transition to greater private investment to achieve commercial scale, and the goal to achieve a robust and economically sustainable consumer demand for vehicles.

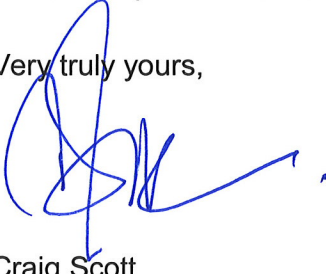
To realize these goals, we recommend consideration of the following:

- Development of a multi-year scalable block grant solicitation process to promote long-term business planning and volume procurement of standardized equipment that will facilitate the necessary cost reductions for mass-market adoption
- Evaluation of proposals for a holistic network of stations that enable cost reductions from an integrated and scalable production and supply chain efficiencies

- Alignment between OEM customer markets and the site locations proposed by the station developers to maximize the FCV sales volume potential and coverage expansion

Thank you for your leadership on this critical issue. As a leading manufacturer of advanced technology vehicles, Toyota looks forward to a continuing dialogue with you and other stakeholders on the planning and development of a successful hydrogen program.

Very truly yours,



Craig Scott
Director of Advanced Technologies
Corporate Strategy & Planning
Toyota Motor North America