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Comment Received From: Brian Goldstein
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RE: 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program.

Additional submitted attachment is included below.

energy independence now

March 21, 2018

California Energy Commission
Docket No. 17-ALT-01
1516 9th Street, MS-4
Sacramento, CA 95814

RE: 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program.

Dear Commissioner Janea A. Scott,

On behalf of Energy Independence Now (EIN), our Board of Directors, thousands of supporters, and hydrogen vehicle and infrastructure stakeholders, I am writing in support of the California Energy Commission's (CEC) overall investment plan for 2018. We are grateful for the Energy Commission's strong support of a robust hydrogen fuel cell electric vehicle infrastructure and we applaud the Commission's 2018 allocation of $92M to support hydrogen electric vehicles and infrastructure as an integral part of California's efforts to improve air quality and mitigate greenhouse gas emissions. EIN submits the following comments on the "2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program," with a focus on further developing a conducive environment for hydrogen fuel cell electric vehicles (FCEVs).

1. **Hydrogen Infrastructure**. EIN lauds CEC's continued support for hydrogen stations and renewable hydrogen production. The proposal for 200 stations will strengthen California's FCEV market and diversify the state's station network. While the 2018 budget proposal reflects the need for hydrogen stations through the 2023 timeframe in California, further research is needed to identify the appropriate number of hydrogen stations and the renewable hydrogen production capacity to meet the goal of 5 million ZEVs by 2030.
2. **Education & Outreach.** The Energy Commission should invest in education and outreach programs to help reach and inform new drivers and policymakers of the benefits and viability of FCEVs and renewable hydrogen.
3. **Low Carbon Fuel Production/Supply.** Renewable hydrogen production should remain a priority of the CEC to ensure that there is sufficient hydrogen to meet overall demand in the coming years, to promote the use of renewable feedstocks in fuel production and to diversify the supply chains for fuel. Investing in multiple renewable hydrogen production projects will help the hydrogen sector meet California's renewable power and transportation requirements. The Commission should look for opportunities to invest in renewable hydrogen research and development.
4. **Advanced Freight & Fleet Technologies (Medium/Heavy-Duty Vehicles).** Hydrogen fuel cell technology has proven to be beneficial and optimal for

medium to heavy-duty vehicles. Such vehicles make up of 3% of the registered vehicles in California but produce 22% of the state's GHG emissions. There is an opportunity for FCEVs to make a huge impact on air quality and GHGs with the appropriate attention by the Commission and industry.

5. **Emerging Opportunities.** – The Energy Commission and the private sector should continue to support and invest in research for financing mechanisms to support private market investment in renewable hydrogen production and infrastructure developments.
6. **Community Readiness Planning.** The hydrogen fuel supply chain and infrastructure are currently vulnerable to distribution challenges as well as the constraints of individual production facilities. The Energy Commission should dedicate the remaining $1.8M towards a renewed effort in hydrogen infrastructure readiness planning and renewable hydrogen production readiness planning.
7. **Environmental Justice (EJ) Communities.** The Energy Commission should develop programs designed to expand FCEV adoption and implementation in EJ communities through incentive programs for low-income consumers and the commercial enterprises that impact these communities.
8. **Research.** The hydrogen sector benefitted from the Innovative Mobility Services ZEV grant. The Energy Commission should extend the program and funding for studies to create similar programs that will help expand consumer access to FCEVs.
9. **Mobile Refueler.** Such programs and capabilities will help expand fuel access to drivers and offer flexibility to serve locations when demand is high (such as, disaster zones, seasonal destinations like ski resorts and national parks during peak season.)
10. **Transparency and Collaboration.** As the demand for FCEVs continues to grow, the Energy Commission should make public their metrics and data from state investment programs. Other states and countries can benefit and learn from our efforts in California, especially how such programs can impact job creation, tax revenue, GHG reductions, health savings, economic development, etc. This data will empower policymaker decisions to further support ZEV programs in California by providing information that shows the impact of these programs on the communities that they represent.

Thank you for your consideration of our comments. I would be happy to speak with you or your staff further if you have any questions.

Sincerely

Brian Goldstein
Executive Director