DOCKET
09-ALT-1
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These comments are in response to docket number 09-ALT-1 and the Advisory Committee Meeting for AB118 2010-2011 Investment Plan.

There is a "fueling deficit" reference on page 34 that relies on the demand versus supply for all geographic areas in California. This is misleading. One can only consider supply versus demand cluster by cluster. In addition, the supply must be in place 12-18 months prior to the FCV's being deployed to allow OEM's to plan where they will deploy FCV's.

Hydrogen infrastructure funding should be based on a number of criteria, including station performance (daily capacity, number of cars that can be fueled in one hour, the time to fuel one car and multiple cars back-to-back), location/accessibility, cost, longevity (how long before the station is over capacity), technology reliability, operator commitment and experience, ability to actually deliver on what is stated in a proposal.

There is a reference to 12 month timeline to complete a station. This statement is inaccurate because a station builder/operator cannot control the permitting process, hence cannot promise a lead time including lead time. Any timeline referenced or included in scoring criteria should consider permitting can take many or few months and should not be included in the project timeline for scoring purposes.

The Oakland station is included in the hydrogen supply yet it is not a public nor an auto fueling station. No semi-public or private or "poor performing" stations should be included in supply calculations. If these are included, the CEC is communicating that poor performing or poorly located stations are as good as well located or high performing stations. This is not an appropriate message to send.

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