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10-ALT-01

DATE Mar 28 2011

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March 28th, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-ALT-1
1516 Ninth Street
Sacramento, CA 95814-5512
[docket@energy.state.ca.us]

RE: Comments on 2011-2012 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program, February 18, 2011 Draft Staff Report

CEERT thanks CEC staff for the opportunity to comment on the February 18th, 2011 version of the "2011-2012 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program, Draft Staff Report." We commend the staff for its excellent work on the Draft Investment Plan and offer a few comments on the draft plan below.

Plug-in Electric Vehicles

We applaud the CEC's inclusion of funding to encourage and support the establishment of regional coordination amongst regional government entities and other active stakeholders in order for them to develop regional PEV strategic plans and best practices and guidelines for EVSE deployment. CEERT looks forward to working with the CEC in support of this effort and will help to facilitate the dissemination of guidelines and best practices developed in those regions already leading the way in such efforts with any new regions just beginning to develop PEV strategic plans. We encourage the Energy Commission to include provisions that would allow it to increase the funding level for this part of the program if the \$1 million budget were to become oversubscribed.

Hydrogen Infrastructure

CEERT appreciates the considerable rigorous work CEC staff have undertaken in working with transit authorities, auto manufacturers, hydrogen fuel providers and the California Fuel Cell Partnership (CaFCP) to fund the deployment of hydrogen fueling infrastructure (including funding to develop and establish retail fuel quality standards for hydrogen) under the 2008-2010 and 2010-2011 Investment Plans. As we noted during the March 7th, 2011 Advisory Committee meeting, we remain concerned about the differences in perspective

between the Energy Commission staff, auto manufacturers and the CaFCP over the level of funding needed to support the market launch of fuel cell vehicles (FCVs) in 2014 (and subsequent years) as discussed in the 2011-2012 Draft Investment Plan. We understand that the auto manufacturers and the CaFCP are requesting that an additional \$10 million for FCV fueling infrastructure be added to the proposed \$3 million in funding for hydrogen transit infrastructure under the February 18th Draft 2011-2012 Investment Plan. CEERT understands that hydrogen fuel providers are also recommending that there be additional infrastructure funding beyond what has been allotted in the February 18th Draft 2011-2012 Investment Plan.

CEERT believes that FCVs are an important technology that will be critically important in enabling California to meet its long-term air quality and climate goals. CEERT advocates for policies and investments needed to support the deployment of FCVs and looks forward to working with all of the stakeholders in order to help develop a consensus on the needed levels of future funding for hydrogen fueling infrastructure – in conjunction with other complimentary policies – sufficient to ensure the successful market launch of FCVs in California during 2015-2017.

Sincerely,

A handwritten signature in black ink, appearing to read "John Shears". The signature is fluid and cursive, with a large loop at the beginning.

John Shears
Research Coordinator
Program Lead for Clean Transportation and Alternative Fuels
Center for Energy Efficiency and Renewable Technologies

Cc/ Jim McKinney
Charles Smith
Tim Olson
Leslie Baroody
Peter Ward
Tobias Münch