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| <b>Docket Number:</b>   | 18-ALT-01  |
| <b>Project Title:</b>   | 2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program                     |
| <b>TN #:</b>            | 229349   |
| <b>Document Title:</b>  | Energy Independence Now Comments Re. 2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle . |
| <b>Description:</b>     | EIN Comments on 2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program     |
| <b>Filer:</b>           | System   |
| <b>Organization:</b>    | Energy Independence Now  |
| <b>Submitter Role:</b>  | Public   |
| <b>Submission Date:</b> | 8/9/2019 3:12:15 PM  |
| <b>Docketed Date:</b>   | 8/9/2019   |

*Comment Received From: Energy Independence Now  
Submitted On: 8/9/2019  
Docket Number: 18-ALT-01*

**EIN Comments on 2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program**

*Additional submitted attachment is included below.*



energy independence now

Energy Independence Now  
P.O. Box 351227  
Los Angeles, CA 90034  
(303) 520-6353  
[brian@einow.org](mailto:brian@einow.org)

August 9, 2019

California Energy Commission  
Docket Unit, MS-4  
Re: Docket No. 18-ALT-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

### **EIN Comments on 2019-2020 Investment Plan Update for the Clean Transportation Program**

Energy Independence Now (EIN) appreciates the opportunity to comment on the 2019-2020 Investment Plan Update for the Clean Transportation Program. EIN is an environmental nonprofit organization that advocates for zero-emission fuel cell electric vehicles (FCEVs) and renewable hydrogen infrastructure. EIN was a main architect of the California Hydrogen Highway Initiative, and is the only environmental nonprofit organization focused on advocating for FCEVs. EIN supports the investment the California Energy Commission has provided through the Clean Transportation Program to projects aimed at reducing toxic air pollutants, reducing the dependence on petroleum transportation fuels, and increasing the use of alternative fuels and advanced vehicle technologies. In particular, we would like to highlight the following:

#### **1. Investment Leads to Greater Adoption**

The Energy Commission's annual investment of \$20 million in renewable hydrogen infrastructure has been the catalyst that has sparked California's momentum as the world leader in zero-emission FCEV transportation. California has the most fuel cell electric vehicles in the world with almost 7,000 cars, along with a growing network of 40 stations. As the hydrogen market continues to grow in California, investments from automakers, station developers, hydrogen producers, and fuel distributors will generate new green jobs throughout the state as

well as much needed economic growth and infrastructure that will also support energy storage, deep industrial decarbonization and disaster resilience. The State of California is not only investing in a diverse, clean energy market for consumers, it's investing in green jobs.

## **2. Bloomberg New Energy Finance Presentation**

Unfortunately, the presentation by Bloomberg New Energy Finance (BNEF) provided little insight on the state of hydrogen FCEVs or any alternative transportation technologies besides battery electric vehicles (BEVs). The limited FCEV data in the BNEF presentation was inaccurate and failed to acknowledge data from the California market that is readily available through CEC and CARB reports.. A third party presentation solely reflecting the state of BEVs is shortsighted and can easily be misconstrued as an endorsement that does not accurately reflect the progress or vision of the Clean Transportation Program and the California Energy Commission. The presentation was a missed opportunity to highlight substantial global private and public sector commitments to hydrogen technologies and it failed to accurately portray the progress that hydrogen has made in the transportation sector, including infrastructure development and renewable fuel production. It failed to provide any insight on the use of other alternative and renewable fuels, which missed the mark with a committee designed to explore the application and adoption of a diverse range of initiatives and technologies.

## **3. Co-location of Light/Heavy-Duty Hydrogen Refueling Stations**

We appreciate the Commission's push for more hydrogen refueling stations, which will be key in meeting the growing demand for fuel cell passenger vehicles as well as medium and heavy-duty freight vehicles. However, co-locating hydrogen refueling stations for light-duty vehicles and heavy-duty vehicles should not be mandatory nor a priority in the development of the hydrogen infrastructure network at this time. There is currently no evidence that co-location leads to cost reductions at the station level, as the technical fueling requirements differ between vehicle types and synergies lie more in the context of production and distribution. Furthermore, our community has spent years working with state government, automakers, station developers and fuel providers to identify and prioritize light duty station locations, so while this topic might be worth exploring and workshopping, it's EIN's position that it would be premature to change scoring criteria in the near term to promote co-location.

## **4. Renewable Hydrogen from Landfill Gas**

We understand that current policies are designed to limit new landfill projects. However, the use of biomethane from existing landfills as a feedstock for renewable hydrogen is a responsible and practical use of existing renewable resources for the state. This feedstock allows industry to provide low cost renewable hydrogen to the market, which will help meet growing consumer demand while also helping the state meet its ZEV adoption goals. Utilizing existing landfills as a pathway for renewable hydrogen is the best use of this resource from an economic and environmental perspective. Furthermore, this usage is in line with the CalRecycle program goals to "increase recovery of landfill gas for use as a biomass renewable energy source to replace energy from nonrenewable fossil fuel sources".

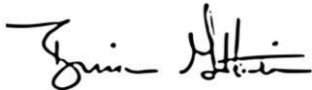
## **5. ZEVs Access for Disadvantaged Communities**

A large portion of Californians do not own a home and live in multi-unit dwellings, and thus do not have easy access to the charging infrastructure necessary to support BEVs. Many people cannot easily absorb the cost of charging equipment or increased electricity use and many are forced to endure long commutes to communities that support higher wages but also suffer from very high housing costs. Providing such communities access to FCEVs, which can be refueled communally and have longer ranges than their BEV counterparts, and incentives to afford the vehicle types that best suit their driving habits helps increase ZEV adoption in the communities that need them the most. Such programs immediately impact the environmental health of communities most affected by greenhouse gases and poor air quality, without sacrificing the commuting habits of residents.

## **6. The Role of the The Clean Transportation Program Members**

It's important to note that the Advisory Committee is made up of organizations who work tirelessly and collaboratively towards air quality improvements and the reduction of greenhouse gases. In such dire times, as climate change becomes more troubling every year and our air quality continues to deteriorate, we need to utilize every tool at our disposal to get ZEVs on the road. We encourage the members of the Advisory Committee and the Commissioners to maintain an open and unbiased approach as we explore the innovative technologies and bold programs that will help us create a healthier California.

Respectfully Submitted,



Brian Goldstein  
Executive Director  
Energy Independence Now