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SoCalGas Comments on Docket 19-TRAN-02

Additional submitted attachment is included below.

Kevin Maggay
Energy and Environmental Affairs

555 W 5th Street
Los Angeles, CA
90013-1011

tel: 213-244-8192

email: KMaggay@semprautilities.com

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Subject: Comments on Staff Workshop for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure Solicitation Concepts (Docket No. 19-TRAN-02)

SoCalGas appreciates the opportunity to comment on the California Energy Commission's (CEC) Staff Workshop for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure solicitation concepts (Solicitation) (Docket No. 19-TRAN-02) and materials presented at the October 25, 2019 Solicitation Workshop. Greenhouse gas and criteria air pollutant emission reductions in rail and marine applications have traditionally been difficult to achieve due to the nature of their operations and types of equipment used. SoCalGas believes that hydrogen as a fuel in these applications has significant potential to reduce emissions and is willing to support efforts that advance the commercialization of fuel cells and other low-carbon technologies to reduce emissions in rail and marine applications. To that end, SoCalGas would like to submit the following comments for consideration.

Hydrogen Mobile Fuelers Should be Eligible for Funding. Concept #1: Freight, Zero-Emission Vehicle Infrastructure Deployment for Vehicle Demonstrations cites mobile refuelers as an "ineligible project" under this concept. Freight facilities including, ports and railyards, rely heavily on diesel mobile refuelers for its existing operations. Mobile refuelers allow operators the flexibility to bring the fuel to a piece of equipment rather than bringing each piece of equipment to a designated fueling site. Rubber tired gantry (RTG) cranes, for example, are large diesel-powered pieces of equipment that can be over 80 feet wide. Transporting an RTG crane to a fueling station would be a significant logistical challenge for operators, which would likely require shutting down parts of a facility to transport the equipment. A mobile refueler would be able to bring hydrogen fuel to the equipment instead. SoCalGas recommends that mobile refuelers be an eligible project under this solicitation concept.

During the Workshop, CEC staff indicated that mobile refueler design would not be eligible for the Solicitation. There are no hydrogen mobile refuelers that have been designed specifically for freight facilities. In order to maximize the efficiency and effectiveness of a hydrogen mobile refueler in this sector, several performance criteria will have to be analyzed. Mobile refuelers at freight facilities are unique in many cases. For example, diesel mobile refuelers at freight facilities have extended hoses that are sometimes 75 feet long to reach multiple pieces of equipment and hard to reach equipment. A new hydrogen mobile refueler would have to be designed to have the appropriate capacity and pressure to

serve the extended hose. Therefore, SoCalGas recommends that design of mobile refuelers be included in the solicitation.

CEC Should Decrease the Data Collection Period to Six Months. At the Workshop, CEC staff proposed a 12-month data collection period for projects. SoCalGas recommends this period be decreased to six months. These are advanced technology projects that often experience delays and down time, which can extend the overall project period. Potential delays and the extended data collection period may cause a project to extend beyond the allowable grant term, which may disrupt project payments and closeout.

Thank you again for the opportunity to comment on the Solicitation and we look forward to working with the CEC on this effort.

If you have any questions, please feel free to contact me.

Sincerely,

Kevin Maggay
Energy and Environmental Affairs