

DOCKETED

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Funding Public Transit Hydrogen Fueling Stations

Additional submitted attachment is included below.



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March 16, 2020

Esther Odufuwa
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California Energy Commission
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RE: Docket #19-ALT-01 – 2020-2023 Investment Plan Update for the Clean Transportation Program

Dear Ms. Odufuwa:

We are writing to express the Center for Transportation and the Environment's (CTE) support for expanding the CEC's commitment for heavy-duty fleet infrastructure funding for public transit infrastructure. Specifically, we are advocating for Concept 2, referenced in the handout from the March 3rd workshop, that calls for allocating medium and heavy-duty funding for zero-emission infrastructure deployment for transit fleets.

CTE has worked to expand the development of heavy-duty hydrogen fueling stations, and has recently commissioned two high capacity hydrogen fueling stations at AC Transit and the Orange County Transportation Authority. These stations have spurred significant interest from public transit operators in Fuel Cell Electric Bus (FCEB) technology, as they grapple with compliance with the Innovative Clean Transit regulation. As many as 18 transit agencies recently submitted to CEC (Docket #19-TRANS-02) letters of support for hydrogen fueling infrastructure.

With California transit agencies working under the mandate of the ICT regulation to transform their fleets to Zero-Emission by 2040, they need infrastructure funding for both Battery-Electric Buses (BEBs) and FCEBs to accomplish this transformation. While subsidies for electric charging infrastructure are aided by utility ratepayers as a result of SB 350, the availability of grant funds to assist with the construction of hydrogen infrastructure for transit have been eliminated from further CARB grant opportunities. Concept 2 under consideration by the CEC is the only potential funding opportunity for hydrogen infrastructure.

As the CEC prepares for the release of a \$47.5 million grant funding opportunity, CTE strongly urges the Commission to allow for competitive applications to build heavy-duty hydrogen fueling stations and upgrade maintenance facilities to support the deployment of FCEBs at public transit properties. These funds could be leveraged through CTE's 100-Bus Initiative proposal to drive down the cost of FCEBs by an additional 30%, leading to higher demand, expanded supplies of hydrogen, and reductions in energy prices. Therefore, CTE urges your favorable consideration of dedicating funds for infrastructure deployments for transit fleets, as proposed in Concept 2.

Sincerely,


Jaimie Levin
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