

DOCKETED

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**Comments by the California Hydrogen Business Council on Docket
#19-TRAN-02 Zero-Emission Transit Fleet Infrastructure
Deployment**

Additional submitted attachment is included below.

April 24, 2020

Esther Odufuwa
Energy Commission Specialist 1, Freight and Transit Unit
Advanced Fuels and Vehicle Technologies Office
Fuels and Transportation Division
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-552

Re: Comments by the California Hydrogen Business Council on Docket #19-TRAN-02 Zero-Emission Transit Fleet Infrastructure Deployment

Dear Ms. Odufuwa:

The California Hydrogen Business Council (CHBC)¹ appreciates the opportunity to submit these comments on the Zero-Emission Transit Fleet Infrastructure Deployment solicitation concept. Our comments focus primarily on the need for the Energy Commission to help balance zero emissions transportation funding to support hydrogen fuel cell electric transit fleet technology deployment, which is not currently occurring in other California agency programs and which is urgent to insure the ICT program's success. Specifically, **we ask that the Energy Commission commit to spending the full \$20 million dollars in the solicitation on hydrogen fueling infrastructure for transit fleets.** This is needed to counterbalance the make-ready infrastructure funding for medium and heavy duty grid-charged vehicles available through the Transportation Electrification Framework (TEF), which cannot provide hydrogen fueling with similar opportunities. This amounts to over \$35M in funding for battery-powered transit in PG&E territory alone. With the CPUC unable to fund hydrogen infrastructure and CARB focused on vehicle incentives, the industry is depending on the CEC to counter-balance the TEF funding to allow rational decisions in fleet purchases to provide all Californians with the lowest cost solution, regardless of the funding source.

¹ The CHBC is comprised of over 100 companies and agencies involved in the business of hydrogen. Our mission is to advance the commercialization of hydrogen in the energy sector, including transportation, goods movement, and stationary power systems to reduce emissions and dependence on oil. The views expressed in these comments are those of the CHBC, and do not necessarily reflect the views of all of the individual CHBC member companies. CHBC Members are listed here: <https://www.californiahydrogen.org/aboutus/chbc-members/>

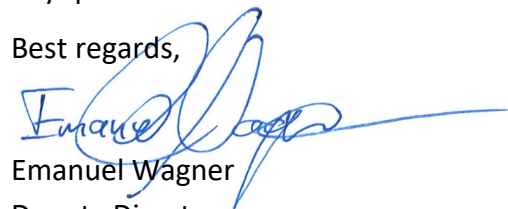
In order to successfully achieve the Innovative Clean Transit regulation goal of 100% zero emissions by 2040 for transit fleets, California must deploy both battery electric and hydrogen fuel cell electric buses, but this will not be possible without expanding support for hydrogen fueling infrastructure. Allocating all the solicitation funds to hydrogen fueling infrastructure would result in a far-reaching expansion of fuel cell electric bus purchases across the state that is projected to bring the costs of hydrogen fuel cell electric buses down by 30%. This would make significant progress in allowing California transit fleets to benefit from the unique advantages of hydrogen fuel cell electric bus technology, such as faster refueling times, smaller station footprints, and higher renewable fuel content.

We also make the following additional recommendations to the solicitation concept:

- **Allow the cost share component of the solicitation to include the capital cost of acquiring buses and the operating, maintenance, project management and fueling costs.** This would be similar to how CARB and FTA treat their grants and would make the parameters of the solicitation far more feasible at a time when transit agencies have lost massive ridership, due to the COVID-19 crisis.
- **Coordinate the timing of the Blueprint solicitation with this solicitation** to maximize efficiency and enable the blueprints to inform the infrastructure grant proposals.
- **Include resiliency in project evaluation**, taking into consideration whether proposals support energy transportation and backup power in the event of a disaster.
- **Expand the timeline for completing stations from 12 to 21 months**, which is more realistic for executing all the tasks required.

We thank you for your consideration of these comments and welcome your contacting us with any questions.

Best regards,



Emanuel Wagner

Deputy Director

California Hydrogen Business Council