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**Comments of the California Hydrogen Business Council on 2021 -
2022 Investment Plan Update for the Clean Transportation Program**

Additional submitted attachment is included below.

May 14, 2021

California Energy Commission (CEC) Docket Unit, MS-4
Re: Docket No. 21-ALT-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Comments of the California Hydrogen Business Council on 2021-2022 Investment Plan Update for the Clean Transportation Program (21-ALT-01)

The California Hydrogen Business Council (CHBC)¹ welcomes the opportunity to comment on the 2021-2022 Investment Plan Update for the Clean Transportation Program, 21-ALT-01. The CHBC supports the continued development of the state's hydrogen refueling infrastructure to help the state achieve its air quality and carbon-neutral goals.

The CHBC recognizes much private investment is due to California's support for hydrogen fuel cell electric transportation through impactful policy. Examples of policies that have accelerated private investment include AB 8, the Clean Vehicle Rebate Project (CVRP), the Clean Transportation Program (CTP) funding of hydrogen fueling stations, the Low Carbon Fuel Standard (including the infrastructure capacity credit), the ZEV Executive Orders, and the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), among others. There is no doubt that such state actions have been key to the hydrogen and fuel cell industry's exponential growth. To ensure California retains its longstanding position as a global environmental leader, California must catch up and exceed global efforts to expand the fuel cell electric vehicle (FCEV) market and the hydrogen refueling stations necessary to serve a growing decarbonization transportation shift.

To date, the state can record some tangible decarbonization results, including more than 10,000 FCEVs on California roads and 46 hydrogen refueling stations (HRS) open and operating with another 62 in

¹ The CHBC is comprised of over 120 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 help the state meet its decarbonization goals. **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/>

development². Signals from international markets suggest that with sustained policy support, there will be many more FCEV models available for consumers and commercial fleets in the near term. BMW, for example recently announced the model X5 would be available as a FCEV in 2022.³

The CHBC points out that California's current pace of FCEV and HRS deployment is not keeping pace with the rest of the world. Global investment in FCEVs and HRS is accelerating. In terms of international investment plans for FCEVs and HRS, Japan plans to have 800,000 fuel cell vehicles, 1,200 fuel cell buses, 10,000 fuel cell forklifts, and 900 hydrogen refueling stations by 2030.⁴ South Korea plans to produce 6,200,000 fuel cell electric vehicles and build 1,200 refilling stations across the country by 2040⁵. The city of Beijing aims to have over 10,000 fuel cell vehicles on the road and build 74 hydrogen filling stations by 2025⁶.

California's 200 HRS by 2025 was established in 2018 under Governor Brown's Executive Order B-48-18, well ahead of the release of newer FCEVs becoming available, innovations in HRS technology that have lowered overall HRS costs and increased capacity⁷, and prior to accelerated global investment. While 200 HRS is a laudable goal and may have been aspirational in 2018, such is not the case today.

The CHBC respectfully recommends the CEC take note of global investment, and, in the context of the Clean Transportation Planning process, reassess the current goals for HRS. The state needs every ZEV available to meet our collective goals.

Thank you for your consideration of these comments.

Sincerely,



William "Bill" Zobel
Executive Director
California Hydrogen Business Council

² https://cafcp.org/sites/default/files/h2_station_list.pdf

³ <https://www.drivespark.com/four-wheelers/2021/bmw-x5-hydrogen-fuel-cell-vehicle-to-be-launched-in-2022-034114.html>

⁴ Hydrogen Markets in Japan, Leader Associates, 2021

⁵ <http://www.koreaherald.com/view.php?ud=20190117000468>

⁶ <https://www.reuters.com/article/us-china-hydrogen-beijing-idUSKBN2BV1I5>

⁷ <https://ww2.energy.ca.gov/2020publications/CEC-600-2020-008/CEC-600-2020-008.pdf>