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*Comment Received From: SYMBIO North America Corp
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**SYMBIO North America Comments on Zero Emission Vehicle-
Related Manufacturing**

Additional submitted attachment is included below.

November 16, 2021

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Docket No. 21-TRAN-05, Zero Emission Vehicle-Related Manufacturing

Dear Energy Commission Staff,

First of all, thank you for the panel opportunity and this opportunity to submit feedback on the CEC manufacturing grants. Symbio North America, a fully owned US subsidiary of Symbio SAS, a French hydrogen joint venture company of Michelin and Faurecia, is excited and prepared to expand our technology development and manufacturing capability in California, bringing world-class hydrogen fuel cell technology to support the clean air goals in US. We have plan in place to invest in establishing our manufacturing footprint in California and we look forward to any opportunities to collaborate with the government in expanding that capability and to create a healthy zero emission workforce. Below are our comments and feedback which we hope CEC will consider:

1. For proposed eligible activities, please consider include equipment for R&D and product development as allowable items for subsidy to encourage technology advancement which has a direct impact on manufacturing; and
2. For proposed evaluation criteria (Financials), to attract foreign investment to California, bring in new technologies from other countries, to encourage job creation and to stimulate competition that spurs innovation, please consider accepting audited financial statements of the parent company for any new entities or subsidiaries recently registered in California and yet to establish 3 years financial history in US. A newly established entity with strong financial backing from established parent company tends to demonstrate faster initial growth in terms of hiring and spending compared to established companies. It also helps to ensure supplier diversity and minimizing risk of over-concentration of a few established suppliers. If needed, parent company can be the financial guarantor to the applicant or consider use of performance bond or milestone reimbursement.

I would be happy to discuss, clarify or expand on the above if needed. I can be reached at rob.delcore@symbio.one. Thank you once again for the opportunity to provide our comments and feedback.

Sincerely,



Rob Del Core
General Manager
SYMBIO North America Corp