DOCKETED	
Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	241033
Document Title:	California Hydrogen Business Council Comments
Description:	N/A
Filer:	System
Organization:	California Hydrogen Business Council
Submitter Role:	Public
Submission Date:	12/21/2021 12:20:56 PM
Docketed Date:	12/21/2021

Comment Received From: California Hydrogen Business Council
Submitted On: 12/21/2021
Docket Number: 20-TRAN-04

20-TRAN-04 Comments CHBC

California Hydrogen Business Council's comments on 20-TRAN-04 Workshop on Clean Transportation Program Funding 101.

Additional submitted attachment is included below.

CALIFORNIA HYDROGEN BUSINESS COUNCIL
Hydrogen Means Business in California!

18847 Via Sereno
Yorba Linda, CA 92886
Phone: (310) 455-6095 | Fax: (202) 223-5537
info@californiahydrogen.org | www.californiahydrogen.org

California Energy Commission
Docket No. 20-TRAN-04
715 P Street
Sacramento, CA 95814

December 21, 2021

RE: 20-TRAN-04 – Workshop on Clean Transportation Program Funding 101

The California Hydrogen Business Council (CHBC)[1] appreciates the opportunity to respond to the Workshop on Clean Transportation Program Funding 101 ("Workshop"). It is encouraging to see a commitment from the CEC to increase funding for zero-emission vehicle investments, however, more work must be done to ensure parity of technologies and a funding program that matches California's needs. Setting aside funding specifically for fuel cell electric vehicles (FCEV) and supporting hydrogen fueling infrastructure will ensure the state fills the gaps of meeting our zero-emission, air quality, and decarbonization goals.

FCEVs through the light, medium, and heavy-duty space are long-range, lightweight, and require quick refueling--similar to the refueling experience of today's gas and diesel-powered vehicles.[2] Therefore, FCEVs offer solutions to passenger and fleet drivers whose lifestyle and duty cycles are not served by the charging experience of battery electric vehicles (BEV) or the weight of a BEV.[3]

As a tool for reaching the state's zero-emission, air quality, and decarbonization goals, FCEVs offer great promise. First, although hydrogen is only required to be 40 percent renewable to receive funds through the Low Carbon Fuel Standard (LCFS)[4], there are currently thirteen 100 percent renewable

[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/

[2] https://afdc.energy.gov/vehicles/fuel_cell.html#:~:text=Unlike%20conventional%20internal%20combustion%20engine,a%20tank%20on%20the%20vehicle..

[3] https://www.energy.gov/sites/default/files/2014/03/f9/thomas_fcev_vs_battery_evs.pdf.

[4] https://ww2.arb.ca.gov/resources/documents/lcfs-zev-infrastructure-crediting.

stations[5] and on average, 90 percent of the hydrogen dispersed in 2020 was renewable.[6] The electric grid, which powers the charging system of BEVs, was only 33 percent renewable on average in 2020. This is not to say improvements on renewable content cannot be met for both FCEV and BEV but mounting funding for one type of technology that is not accessible for all Californians and is behind in renewability as compared to FCEVs is not the solution to meeting the state's goals. Both technologies serve a purpose in improving air quality and reducing carbon output, so both technologies need to be funded in relation to that purpose.

Unfortunately, the Workshop's 2021-2023 Zero-Emission Investments Funding prioritizes BEVs inexplicably over FCEVs notwithstanding the role FCEVs will play in meeting California's climate goals. In the Workshop, light-duty hydrogen fueling infrastructure received 77 million dollars as compared to 314 million dollars for charging infrastructure. The 690 million dollars set aside for medium and heavy-duty zero-emission vehicles and infrastructure did not identify which technology would be receiving what percentage of the 690 million dollars; the CHBC respectfully recommends the CEC consider allocating these funds equally to reflect the needs of both technologies. Finally, the Workshop categorized hydrogen production and infrastructure technologies under the "Natural Gas R&D Program" on page 19 of the presentation instead of the "EPIC Program," where hydrogen plays a role in the 2021-2025 Electric Program investment Charge Program (EPIC). Removing hydrogen from the EPIC program on the presentation harms public perception during workshops and adds to confusion about hydrogen's eligibility for state programs. The CHBC respectfully recommends this presentation slide be edited to reflect hydrogen's place in the 2021-2025 EPIC Program.

The CHBC looks forward to continued improvement of the Clean Transportation Program Funding allocation and respectfully recommends consideration of the aforementioned amendments.

[5] https://cafcp.org/stationmap.
[6] https://ww2.arb.ca.gov/sites/default/files/2021-09/2021_AB-8_FINAL.pdf.

Respectfully Submitted,

Sara Fitzsimon Nelson, J.D.
Policy Director
California Hydrogen Business Council