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CTE Comments

On behalf of CTE please find the attached comments.

Additional submitted attachment is included below.

March 18, 2022

Hannon Rasool
Deputy Director, Fuels and Transportation Division
California Energy Commission
1516 9th Street
Sacramento, Ca 95814

Re: CEC 19-TRAN-02 -- February 28 Staff Workshop

Dear Deputy Director Rasool:

On behalf of the Center for Transportation and the Environment (CTE), I am submitting these comments for your consideration for the Medium-and Heavy-Duty Zero-Emission Vehicles and Infrastructure workshop held on February 28. While CTE lends its support for the comments submitted by the California Fuel Cell Partnership and others, there are two points we would like to emphasize.

The funding provided in the 2021-22 budget along with the proposed funding in the 2022-23 budget provides a unique opportunity to launch a statewide network of heavy-duty fueling and charging stations. However, it is critical that the funds are administered equitably. CTE urges the Commission to place funding for hydrogen on an equal footing with battery-electric. CTE supports the proposal to dedicate $1.6 billion for hydrogen infrastructure, which includes $1 billion for a heavy-duty hydrogen network and $300 million dedicated to public transit hydrogen fueling needs. In particular, transit fueling infrastructure funding should not be limited to permanent stations, but also portable technologies (like NICE America's portable fueler) to enable these agencies to get started faster and at a cheaper cost as they initiate pilot deployments.

While fuel cell electric transit buses and trucks are becoming reliable and commercially available, funding should continue for prototype/demonstration vehicles that expand and support advanced designs, such as new applications like fuel cell electric over-the-road coaches. There will be a need to develop a reliable zero-emission option for three-axle coaches, which require a completely different integration than a transit bus, to accommodate bigger fuel cells and increased storage of hydrogen enabling coaches to operate at freeway speeds (60 to 70 mph) over longer distances (50 to 70 miles).

The heavy-duty truck and bus sector is the foundation for both battery electric and fuel cell electric applications by developing the technology through fleet applications, building fueling/charging infrastructure, and ensuring the availability of fuel supply with increase production. The funding provided by the CEC and CARB is an investment that fuels consumer

choice and economic development, and therefore the funding should be balanced. CTE remains committed to working with the Commission on developing a balanced and comprehensive strategy for both zero emission technologies.

Sincerely,

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