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Modern Hydrogen Support for CTP Hydrogen Investments

Additional submitted attachment is included below.

ModernHydrogen

June 20, 2024

California Energy Commission
Docket Number 24-ALT-01
715 P Steet
Sacramento, CA 95814

RE: 2024-2025 Investment Plan Update for the Clean Transportation Program

Commissioners:

Please accept the comments of Modern Hydrogen on the Draft Staff Report of the 2024-2025 Investment Plan Update for the Clean Transportation Program.

Modern Hydrogen provides distributed clean hydrogen production and solid carbon capture solutions. Our novel methane pyrolysis technology leverages existing gas infrastructure to produce clean/renewable hydrogen at the point of use and to capture commercially useful solid carbon for permanent sequestration. Our solutions have both strategic and practical advantages for the transportation sector. Pilot projects are currently operating in Oregon, Florida and Washington, with deployments of captured solid carbon for use as an asphalt binder across the U.S. and Canada.

We encourage continued and expanded funding for hydrogen solutions. Clean hydrogen is an emerging low carbon and zero emission approach to diversifying transportation fuel supply. Policy and market support will help to accelerate market development and delivery of benefits of the overall hydrogen economy and clean energy transition. Fuel cell electric vehicles are optimal for many medium- and heavy-duty uses and require additional investments in fueling infrastructure and supply to be practical.

Further, co-located hydrogen production and fueling infrastructure can help achieve clean transportation program goals. We request inclusion of on-site production in the policy definition of hydrogen fueling stations, hydrogen refueling infrastructure and similar derivative terms. Producing hydrogen at the point of use can accelerate transportation decarbonization by reducing fuel supply and logistical risks and costs. And it can reduce vehicle miles traveled (VMT) and related carbon intensity per kilogram of hydrogen dispensed.

Thank you for your consideration of our comments.

Sincerely,

Mothusi Pahl
Vice President, Business Development and Government Affairs

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