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Docket Number:	24-ALT-01
Project Title:	2024–2025 Investment Plan Update for the Clean Transportation Program
TN #:	257198
Document Title:	San Diego Gas & Electric Comments - H2 Infrastructure Support
Description:	N/A
Filer:	System
Organization:	Melanie Davidson
Submitter Role:	Public
Submission Date:	6/20/2024 5:07:02 PM
Docketed Date:	6/21/2024

*Comment Received From: Melanie Davidson
Submitted On: 6/20/2024
Docket Number: 24-ALT-01*

San Diego Gas & Electric Comments - H2 Infrastructure Support

Additional submitted attachment is included below.



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June 20, 2024

Commissioner Patricia Monahan
California Energy Commission
Docket Unit, MS-4
Docket No. 24-ATL-01
715 P Street
Sacramento, CA 95814-5512

Subject: Comments on the CEC Public Meeting of the Advisory Committee Clean Transportation Program Investment Plan

Dear Commissioner Monahan,

San Diego Gas & Electric (SDG&E) appreciates the opportunity to provide comments on the June 7, 2024 California Energy Commission (CEC) Public Meeting of the Advisory Committee Clean Transportation Program (CTP) Investment Plan. SDG&E commends the CEC's focus on and support of hydrogen infrastructure in the transportation sector which will critically support the implementation of the California Air Resources Board's (CARB) Advanced Clean Fleets (ACF) rule requirements toward zero emission vehicles.

SDG&E service territory is home to many fleets impacted by ACF who have vehicles and operations that are not suited for battery electric vehicle technology. Unfortunately right now, fleets that require hydrogen fuel cell electric vehicle solutions are severely challenged by the lack of public fueling infrastructure. Currently, SDG&E service territory has only two public light duty hydrogen fueling stations, and one of them has been out of service since the fall of 2023. **There is not a single public medium/heavy duty fueling station in SDG&E territory, nor any under construction.**¹

Further, SDG&E territory is home to one of the nation's busiest land ports with Mexico, the Otay Mesa Border. Enabling affordable access to hydrogen fueling infrastructure for fleets at the border is critical to support trade, commerce, and clean air in our region.

SDG&E urges the CEC to renew and maintain CTP funding for MD/HD ZEV Infrastructure throughout FY 2025-2026 to FY 2027-2028, in alignment with State clean transportation goals.

¹ Hydrogen Fuel Cell Partnership, [Stations Map | Hydrogen Fuel Cell Partnership \(h2fcp.org\)](https://www.h2fcp.org), visited June 20, 2024.

The CEC conducted an initial statewide assessment of MD/HD hydrogen FCEV refueling infrastructure necessary to meet California’s clean transportation goals and produced scenarios of infrastructure needs using data from CARB, the Alliance for Renewable Clean Hydrogen Energy Systems (ARCHES), and the CEC’s Demand Forecast.² The scenario results indicated that anywhere from 117 to 2,157 hydrogen refueling stations are needed in California to support the State’s clean transportation goals by 2035.³ While this range is broad, what is certain is that hydrogen FCEVs will play an important role in meeting the State’s goal of 100 percent MD/HD ZEVs by 2045.⁴ It is clearly in the public interest that CTP funding continue to support the development of these stations in future years, with necessary adjustments in funding made as the ZEV market develops and the number of stations needed becomes clearer.

Conclusion

SDG&E appreciates the opportunity to comment in support of the CEC’s continued efforts to advance clean transportation goals across the State. We recommend that CTP Investment Plan allocation decision for the upcoming fiscal years continue to make important investments in supporting the development of hydrogen refueling infrastructure in accordance with supporting the State’s clean transportation and decarbonization goals. Thank you for your consideration of our comments.

Respectfully,

/s/ Melanie Davidson

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² Using data from the 2022 CARB Scoping Plan, the ARCHES partnership, the California Transportation Commission’s analysis for SB 671, and a 2022 energy demand planning scenario from the CEC.

³ *Ibid.*, SB 643 Report, p. 46.

⁴ CARB, “California approves groundbreaking regulation that accelerates the deployment of heavy-duty ZEVs to protect public health,” April 23, 2024, available at: <https://ww2.arb.ca.gov/news/california-approves-groundbreaking-regulation-accelerates-deployment-heavy-duty-zevs-protect>.