

**DOCKETED**

<b>Docket Number:</b>	24-ALT-01
<b>Project Title:</b>	2024–2025 Investment Plan Update for the Clean Transportation Program
<b>TN #:</b>	257220
<b>Document Title:</b>	Southern California Gas Company Comments - SoCalGas Comments on the CEC Public Meeting of the CTP Advisory Committee
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Southern California Gas Company
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/21/2024 10:19:39 AM
<b>Docketed Date:</b>	6/21/2024

*Comment Received From: Southern California Gas Company  
Submitted On: 6/21/2024  
Docket Number: 24-ALT-01*

**SoCalGas Comments on the CEC Public Meeting of the CTP  
Advisory Committee**

*Additional submitted attachment is included below.*



Jessi Davis  
Energy and Environmental Manager  
Energy and Environmental Policy  
555 West 5<sup>th</sup> Street  
Los Angeles, CA 90013  
Tel: (323) 519-9040  
*Jdavis6@socalgas.com*

June 21, 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,

Southern California Gas Company (SoCalGas) 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. During the Meeting, CEC staff highlighted that the fiscal year (FY) 2024-2025 CTP's proposed funding allocation for Medium-Duty/Heavy-Duty (MD/HD) Zero Emissions Vehicles (ZEV) Infrastructure is \$55.2 million for hydrogen refueling and electric vehicle (EV) charging, and that \$9.5 million in solicitation funding has been awarded to support hydrogen refueling station operations and maintenance at 45 stations.<sup>1</sup> SoCalGas commends the CEC's focus on and support of hydrogen infrastructure in the transportation sector which will facilitate the implementation of the California Air Resources Board's (CARB) Advanced Clean Fleets (ACF) rule requirements for public and private MD/HD vehicle fleets to begin transitioning toward zero emissions starting in 2024 with a goal of being 100 percent ZEVs by 2045,<sup>2</sup> where feasible.

CEC staff also noted during the meeting that CTP base funding allocations have not yet been determined from FY 2025-2026 to FY 2027-2028 due to the evolving State budget and uncertainty in federal funding. **SoCalGas urges the CEC to renew and maintain CTP funding for MD/HD ZEV Infrastructure throughout these years, in alignment with State clean transportation**

---

<sup>1</sup> CEC, Public Meeting of the Advisory Committee for the CTP, June 7, 2024, presentation slide 26, available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=256726>.

<sup>2</sup> See CARB, Advanced Clean Fleets, accessed June 18, 2024, available at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets>.

**goals.** In addition, SoCalGas recommends the MD/HD ZEV Infrastructure funding focus on hydrogen refueling stations and renewable hydrogen supply and production considerations.

The CEC’s staff report on Senate Bill (SB) 643<sup>3</sup> Report noted there are currently three MD/HD publicly available hydrogen fuel cell electric vehicle (FCEV) refueling stations<sup>4</sup> operational in California, with another 28 proposed stations that were awarded funding and are in varying stages of development.<sup>5</sup> 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.<sup>6</sup> 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.<sup>7</sup> 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.<sup>8</sup> 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**

SoCalGas 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/ Jessi Davis*

Jessi Davis  
Energy and Environmental Affairs Manager  
Energy and Environmental Policy

---

<sup>3</sup> SB 643 requires the CEC, in consultation with CARB and the California Public Utilities Commission (CPUC), to prepare a statewide assessment of the hydrogen fuel cell electric vehicle fueling infrastructure and clean hydrogen fuel production needed to support the adoption of zero emission trucks, buses, and off-road vehicles.

<sup>4</sup> As of report publication on January 24, 2024.

<sup>5</sup> CEC, SB 643: Clean Hydrogen Fuel Production and Refueling Infrastructure to Support Medium- and Heavy-Duty Fuel Cell Electric Vehicles and Off-Road Applications, January 24, 2024, p. 33, available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254100>.

<sup>6</sup> 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.

<sup>7</sup> *Ibid.*, SB 643 Report, p. 46.

<sup>8</sup> 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>.