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Docket Number:	24-ALT-01
Project Title:	2024–2025 Investment Plan Update for the Clean Transportation Program
TN #:	257272
Document Title:	California Hydrogen Business Council Comments to the 2024-2025 Investment Plan Update for the Clean Transportation Program
Description:	N/A
Filer:	System
Organization:	Katrina M. Fritz
Submitter Role:	Other Interested Person
Submission Date:	6/21/2024 12:46:26 PM
Docketed Date:	6/21/2024

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Submitted On: 6/21/2024
Docket Number: 24-ALT-01*

**Comments to the 2024-2025 Investment Plan Update for the Clean
Transportation Program-KMFritz**

Additional submitted attachment is included below.

June 21, 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

As a member of the new Advisory Committee, please accept my comments on the Draft Staff Report of the 2024-2025 Investment Plan Update for the Clean Transportation Program.

As noted in my comments during the June 7th Advisory Committee Meeting, the Investment Plan should reflect the fueling pathway that is being proposed by infrastructure providers, which is to locate fueling for medium-duty vehicles with stations serving light-duty passenger vehicles. From the technical perspective, the hardware and fueling protocols for light-duty and medium-duty stations are more similar than those for the heavy-duty truck fueling stations. Additionally, medium-duty vehicles, such as the work trucks used in the trades, do not return to a fleet yard but go home with their users, and are fueled at public retail stations. Major vehicle manufacturers like Ford and the Stellantis auto maker group are preparing to produce trucks, such as the Dodge Ram 5500 HFCEV, as early as next year (2025)¹. As we have witnessed with the light-duty fueling network and vehicle rollout, the infrastructure and capability to fuel must be in place before the vehicles are on the road. AB 126 requires \$15 million/year be used to develop medium-duty hydrogen fueling infrastructure², and it is critical to prioritize awards that are either on hold or are in jeopardy due to the current budget deficit for funding in 2024-2025.

To that end, the unexpired funds from the cancelled Shell agreement for light-duty stations should be returned and utilized as intended for light duty stations. The recommendation to the Commission is to distribute those funds to awardees in the original grant requests (GFO-19-602)³. Further, the Commission should consider adjusting any caps placed on awardees such that the intended infrastructure is implemented. It is imperative that the State reach its 200-station goal, at minimum, as outlined in Executive Order B-48-18⁴; however, please note CARB's Hydrogen Station Self-Sufficiency

¹ [https://www.aventurachryslerjeepdodgeram.com/stellantis-announced-ram-hydrogen-powered-vehicles-to-start-with-us-commercial-consumers/#:~:text=Most%20notably%2C%20Ram%20Truck%20may,as%20next%20year%20\(2025\).](https://www.aventurachryslerjeepdodgeram.com/stellantis-announced-ram-hydrogen-powered-vehicles-to-start-with-us-commercial-consumers/#:~:text=Most%20notably%2C%20Ram%20Truck%20may,as%20next%20year%20(2025).)

² <https://ww2.arb.ca.gov/sites/default/files/2023-12/AB-8-Report-2023-FINAL-R.pdf>

³ <https://www.energy.ca.gov/solicitations/2019-12/gfo-19-602-hydrogen-refueling-infrastructure>

⁴ <https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/39-B-48-18.pdf>

Report which highlights that the required amount of State support is more for fewer stations to support less vehicles on the road.⁵

Investment signals for the industry are key to a successful market launch, and AB 8 was one of those signals. However, the current plan does not forecast funding for the coming years of 2025, 2026, or 2027, which is not a positive signal for a burgeoning industry. Enabling the infrastructure will enable the build out and up of the supply chain for all vehicle types: light-, medium-, and heavy-duty. The mandated low- and zero-emission heavy-duty fleets are being deployed today in California, which has been enabled by State-level infrastructure. However, deployment will not continue if there is a significant pullback in infrastructure support. Again, if there is no fuel, the vehicles cannot and will not come and decarbonization targets will not be reached.

Regarding workforce development, there is a need for more trained technicians in California as developers are now competing for talent. The recommendation to the Commission is that additional funds to the \$3 million are allocated for such workforce development. A well-trained, robust workforce lends to the overall safety and compliance for the hydrogen infrastructure and the industry.

California is an example and a model for the rest of the country, and the world, with bold targets for emissions reductions and low carbon energy⁶. To meet those goals, green molecules are needed alongside electrification and the use of hydrogen and fuel cells are also necessary to meet our deep decarbonization objectives.

Sincerely,



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⁵ https://ww2.arb.ca.gov/sites/default/files/2021-10/hydrogen_self_sufficiency_report.pdf (page 5)

⁶ <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>