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Comment Received From: John Ackler
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CTP Investment Plan Comments

Please see the attached letter.

Additional submitted attachment is included below.

CALIFORNIA LEGISLATURE

STATE CAPITOL
SACRAMENTO, CALIFORNIA
95814

June 21, 2024

Ms. Patty Monahan
Commissioner, California Energy Commission
715 P Street
Sacramento, CA 95814

Commissioner Monahan,

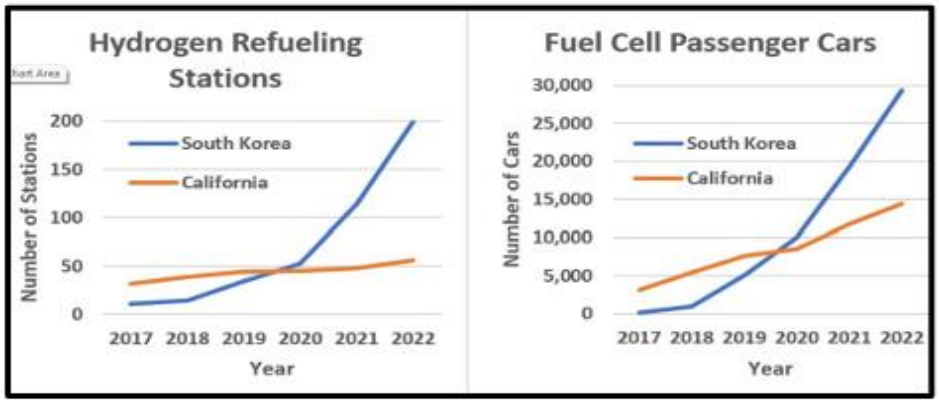
Thank you and the staff at the Energy Commission for their dedication to supporting the buildout of fueling infrastructure for zero emission vehicles. The success of the Clean Transportation Program is a critical element in broad-based consumer adoption of both battery and fuel cell electric vehicles. As it relates to fuel cell electric vehicle infrastructure, we encourage the Commission to bring greater urgency to the redistribution of funds to support light- and medium-duty fueling infrastructure.

California's current network of 55 available fueling stations is placing a significant strain on our 13,000 fuel cell vehicle drivers.[1] Overcrowding at first-generation, pilot-scale, stations never intended to handle this level of demand is creating long wait times and fuel shortages. Stations funded under GFO-19-602 have stalled or funds have been returned. These issues are leading to vehicle returns and slowing of sales.[2]

Medium-duty vehicle manufacturers including Ford, General Motors, and Stellantis have repeatedly noted the current capacity limits on light-duty hydrogen stations are a barrier to vehicle deployment and because of the different fueling protocols for heavy-duty vehicles, those stations are not an option. Honda has also returned to the passenger fuel cell market with their new CR-V hybrid. The current and *planned* capacity of hydrogen fuel in California is not sufficient for the number of vehicles on the road, and we join the community of fuel cell drivers, automakers, and station developers whose real-world experiences provide such evidence.

As it stands today, California has the highest station to fuel cell vehicle ratio in the world, 191:1. China has the greatest number of stations in the world – 320 – and a vehicle size very similar to California's (13,624), a ratio of 42:1. Japan has 164 stations and 7,619 vehicles, a ratio of 46:1. Germany has 95 stations and 2,201 vehicles, a ratio of 23:1. It is worth noting that the European Union has also adopted a requirement that hydrogen fueling stations, serving all vehicle classes, be built every 125 miles.[3]

[1] 2023 Annual Hydrogen Evaluation Report (AB 8 report), page xiii
[2] Ibid, page xiii
[3] 2023 Integrated Energy Policy Report, page 75



As illustrated above by the Air Resources Board research, there is a direct correlation between infrastructure availability and vehicle adoption. To that end, we are deeply concerned about the adequacy of hydrogen infrastructure in this state and invite you to consider the following recommendations.

- Reallocate the full $40.2 million in Shell monies to developers with more than two stations for approved and funded stations awarded in GFO-19-602 in addition to the remaining and unawarded funds from GFO-22-607. Redistributing the returned Shell monies would offset the difference between LCFS values and inflation rates of 2020 with the much lower LCFS rates of today and significantly higher inflation. These funds should also support the upgrade of planned stations to support medium-duty vehicle fueling needs.
- Deliver on the 200-station goal called for in Executive Order B-48-18. The 2023 Clean Transportation spending plan eliminates all funding indefinitely for light-duty infrastructure which runs contrary to the aforementioned. It is unacceptable for California's passenger vehicle fueling network to cap out at 129 stations and do so nearly a decade later than estimates used for vehicle deployment showed.

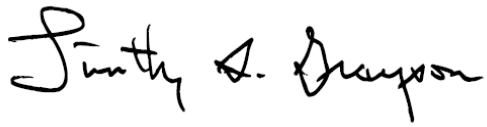
We do not believe all passenger vehicles will or can be served by battery electric applications. Too many drivers will need access to quick, centralized refueling, long ranges and larger vehicle sizes, as supported by the Air Resources Board in its Mobile Source Strategy.[4] California is not building a zero-emission vehicle fueling network with these families in mind and for these reasons, we ask the Energy Commission to consider these recommendations and share its plan to resolve these issues.

Sincerely,

Senator Bob Archuleta
California Senate, District 30

Assemblymember Sharon Quirk-Silva
California Assembly, District 67

[4] 2020 Mobile Source Strategy



Assemblymember Timothy S. Grayson
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Senator Tom Umberg
California Senate, District 34

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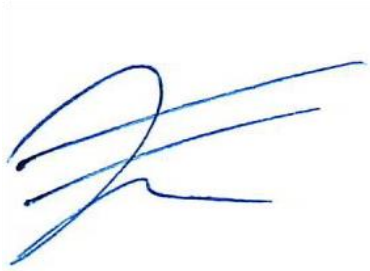
Assemblymember Mike A. Gipson
California Assembly, District 65



Assemblymember Juan Carrillo
California Assembly, District 39

Assemblymember Cecilia Aguiar-Curry
California Assembly, District 4