DOCKETED	
Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	258114
Document Title:	Modern Hydrogen Comments - Modern Hydrogen Comment Letter MDHD ZE Infrastructure
Description:	N/A
Filer:	System
Organization:	Modern Hydrogen
Submitter Role:	Applicant
Submission Date:	7/29/2024 11:46:36 AM
Docketed Date:	7/29/2024

Comment Received From: Modern Hydrogen
Submitted On: 7/29/2024
Docket Number: 19-TRAN-02

Modern Hydrogen Comment Letter MDHD ZE Infrastructure

Additional submitted attachment is included below.

ModernHydrogen

July 29, 2024

California Energy Commission
Docket Number 19-TRAN-02
715 P Steet
Sacramento, CA 95814

RE: Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Commissioners:

Please accept the comments of Modern Hydrogen on Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure proposed programs within the Clean Transportation Program.

Modern Hydrogen provides distributed clean hydrogen production and solid carbon capture solutions. Our novel methane pyrolysis technology leverages existing natural gas infrastructure to produce low carbon intensity hydrogen at the point of use and to capture solid carbon for commercial use. Project pilots are currently operating in Oregon, Florida and Washington.

We encourage continued and expanded funding for hydrogen infrastructure solutions as a decarbonization strategy. Fuel cell electric vehicles are optimal for many medium- and heavy-duty uses and require additional fueling infrastructure and fuel supply to be practical, reliable and economical.

Specifically, we request the inclusion of onsite production technologies in all infrastructure programs. Onsite production can significantly reduce vehicle miles traveled per kilogram of delivered hydrogen. This lowers carbon intensity and reduces supply chain risk and delivery costs, particularly for remote locations. Distributed models can also accelerate hydrogen availability with lower finance and permit complexity as compared to large-scale centralized production.

Further, we request support for all low carbon intensity technologies, based on well-to-wheel emissions. Modern Hydrogen technology does not require new renewable power generation, depend on additional electrical grid delivery capacity, or consume scarce and valuable water. Our approach produces solid carbon, rather than gaseous carbon dioxide, which greatly simplifies and streamlines the carbon management process. Most importantly, our solution accelerates the energy transition to meet California's net zero targets by utilizing existing infrastructure and workforce skills immediately to produce clean hydrogen ubiquitously.

Thank you for your consideration of our comments and your work to deliver clean energy for all.

20300 Woodinville Snohomish Rd, Suite B
Woodinville, WA 98072

Sincerely,

Mothusi Pahl
Vice President, Business Development and Government Affairs
Modern Hydrogen