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CALSTART Comments to the CTP Investment Plan Update

Please find attached CALSTART's comments to the revised staff draft report for the 2024-2025 Clean Transportation Program Investment Plan Update.

Additional submitted attachment is included below.



October 16, 2024

SUBJECT: COMMENTS RE: Clean Transportation Program

On behalf of CALSTART, I would like to thank the California Energy Commission (CEC) for the opportunity to provide updated comments on the 2024-2025 Investment Plan Update for the Clean Transportation Program Staff Report.

**Clean Transportation
Technologies and Solutions**

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CALSTART continues to advance the clean transportation market across key sectors, providing services in technology development, assessment, and market acceleration, and supporting policy initiatives that spur industry growth. As a coalition of industry leaders, CALSTART plays a pivotal role in removing barriers to deploying cutting-edge clean transportation technologies. From collaborative public-private initiatives to innovative policy advocacy, our efforts consistently drive the widespread adoption of zero-emission vehicles (ZEVs)

We value our long-standing partnership with the state of California in implementing incentive programs that accelerate ZEV market adoption and help consumers and fleets transition to cleaner alternatives. With over a decade of experience, CALSTART recognizes the critical components for successful ZEV deployment, including program design, technical assistance, and infrastructure development.

Hydrogen's Role in Achieving Clean Transportation Goals

As the number of ZEVs increase in California's light-duty (LD) and medium- and heavy-duty (MDHD) vehicle sectors, sustained investment in infrastructure is essential to support the State's ambitious clean transportation goals. Regulations such as Advanced Clean Cars II, Advanced Clean Fleets, and Advanced Clean Trucks will continue to increase the number of ZEVs on the road, making robust infrastructure build-out crucial for achieving California's carbon neutrality targets by 2045.

While CALSTART appreciates the proposed funding allocation in the staff report, we believe it is critical to address the cap on hydrogen infrastructure funding, set at \$15 million for both LD and MDHD vehicles. Hydrogen fuel presents a unique opportunity to complement battery electric vehicles (BEVs), particularly for MDHD applications such as drayage, transit, and port/off-road activities, where its long range (400+ miles) and user-friendly, quick-refueling capabilities (10-30 minutes) have proven advantageous. Feedback from heavy-duty fleet operators continues to highlight hydrogen's vital role in meeting their operational needs.

Given that hydrogen fueling infrastructure requires longer build times and significantly higher costs compared to electric charging stations, it is crucial to maintain a diversified approach to ZEV infrastructure investment. We recommend the inclusion of hydrogen in the "Medium- and Heavy-Duty Charging Infrastructure" category in Table ES-2 of the report, to ensure that hydrogen infrastructure is eligible for a share of the \$38.2 million allocated for this purpose. As we focus on multi-fuel sites (hydrogen, electric, other) it's important to ensure the funding available for such projects considers the total cost to install hydrogen fueling infrastructure plus the total cost to install electric charging infrastructure.

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Combining \$15 million for both LD and MDHD hydrogen infrastructure may curtail the potential for hydrogen in the MDHD sector, where individual station builds can cost between \$8 million and \$20 million depending on site complexity. The significant cost of individual components such as compressors, liquid hydrogen storage, and utility upgrades—each exceeding \$1 million—makes the current funding structure insufficient to meet MDHD hydrogen infrastructure needs.

Thank you for your consideration of these comments. We look forward to continued collaboration with the CEC to ensure a diversified, resilient ZEV infrastructure that supports California's ambitious clean transportation goals.

Thank you,

Nicole Hutchinson
State Policy Director
CALSTART