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CHC comments regarding the CFI West Coast Truck Charging and Fueling Corridor Project

Additional submitted attachment is included below.

February 27, 2025

Hannon Rasool
Director
Fuels and Transportation Division
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Comments Regarding 24-EVI-01 – Joint Workshop on California Charging and Fueling Infrastructure (CFI) Formula Program Concepts

Dear Mr. Rasool,

The California Hydrogen Coalition (CHC) appreciates the opportunity to provide comments on the U.S. Department of Transportation's Charging and Fueling Infrastructure (CFI) Grant Program and California's proposed West Coast Truck Charging and Fueling Corridor Project. Our coalition is dedicated to enabling California's transition to zero-emission vehicles (ZEVs) through the expansion of a reliable, convenient, and affordable hydrogen refueling network that supports the state's ambitious emission reduction goals.

Hydrogen fuel cell vehicles (FCEVs) offer one-to-one replacements of gasoline and diesel vehicles while providing long-range capability, rapid refueling, and scalability for medium- and heavy-duty applications. However, these advantages are contingent upon a robust and accessible hydrogen refueling infrastructure.

Concerns Regarding Hydrogen Station Allocations in 24-EVI-01

We are concerned by the proposed plan's allocation of only one hydrogen station in California, while significant resources are directed toward electric charging infrastructure. This imbalance in infrastructure funding perpetuates a pattern that has consistently deprioritized hydrogen fueling, despite hydrogen's critical role in decarbonizing commercial transportation, particularly for medium- and heavy-duty vehicles (MDHDs).

We strongly urge the California Energy Commission (CEC) to prioritize hydrogen infrastructure investment using the CFI funds, particularly in regions where hydrogen refueling remains a significant gap along key freight corridors like Interstate 5, Interstate 710, and other major goods-movement routes.

Key Technical Considerations and Recommendations

1. Hydrogen Refueling Station Requirements

One of the bigger mistakes of the initial hydrogen deployment is undersized stations. The lessons of the past should not be repeated and to that end CEC should not offer grants for heavy-duty stations with only 1,000 kg of capacity. The LCFS amendments (Section 95486.3 and 95486.4) outline updated credit

generation requirements for hydrogen refueling infrastructure (HRI). In alignment with these amendments, we recommend that the solicitation:

- Ensure and appropriately fund station capacities of at least 3,000 kg/day, with reasonable redundancy.
- Require compliance with the SAE J2601-1 category D and the ability to easily and cost-effectively upgrade to SAE J2601-5 standards for fast-fill hydrogen dispensing to support the upcoming certification of high-flow heavy-duty hydrogen dispensers.
- Require SAE J2719 fueling quality protocol.
- Support third-party validation of station operability with HySTEP, including connectivity to the Station Operational Status System (SOSS) to ensure transparency and reliability.
- Encourage the ability to dispatch service support and require remote monitoring of station operations.
- Must have a hydrogen supply and delivery agreement-based demand rather than nameplate capacity of the station.

2. Need for a Travel Stop-Type Station with Heavy-Duty and Light/Medium-Duty Lanes

The CEC should require that funded hydrogen stations feature a "travel stop" design, ensuring:

- Dedicated lanes for heavy-duty (HD) refueling, supporting long-haul trucking operations.
- Publicly accessible refueling lane for light- and medium-duty (LMD) FCEVs, ensuring compatibility with LCFS incentives for both HD and LMD hydrogen infrastructure.
- Flexible station design that allows future upgrades, including capacity expansion and integration of new dispensing technologies (SAE J2601-5).

3. Mitigating Commercial Risks for Hydrogen Station Developers

The requirement for a minimum of two dispensing platforms in 24-EVI-01 is unclear. Without a corresponding fuel demand, this requirement introduces unnecessary financial risk, discouraging private investment in hydrogen infrastructure. CEC should focus on station capacity that aligns and allow developers to design equipment to meet those needs.

We urge the CEC to:

- Modify station design requirements to align with LCFS credit-generating thresholds rather than imposing arbitrary hardware minimums. Allow the station developers to design a station that is flexible for today and scalable for the future.
- Provide sufficient incentives to bridge early commercialization challenges, ensuring hydrogen infrastructure achieves financial self-sufficiency.

Conclusion

Given the current 24-EVI-01 limitation to only one hydrogen refueling station, we strongly urge the CEC to select sites that fill critical infrastructure gaps and ensure funding supports scalable hydrogen deployment in California's most freight-heavy corridors.

The CHC remains committed to collaborating with the CEC to develop a more effective hydrogen solicitation strategy that aligns statewide climate goals, industry needs, and equitable ZEV infrastructure investment. We appreciate your consideration and welcome any opportunity to discuss these recommendations further.

Sincerely,

/s/

Teresa Cooke
Executive Director
California Hydrogen Coalition