

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-TRAN-03
<b>Project Title:</b>	2024 Zero-Emission Vehicle Infrastructure Plan
<b>TN #:</b>	262336
<b>Document Title:</b>	Tim McRae Comments - CHBC Comments on ZEV Infrastructure Plan
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Tim McRae
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/25/2025 11:21:10 AM
<b>Docketed Date:</b>	3/25/2025

*Comment Received From: Tim McRae  
Submitted On: 3/25/2025  
Docket Number: 24-TRAN-03*

## **CHBC Comments on ZEV Infrastructure Plan**

*Additional submitted attachment is included below.*



February 7, 2025

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California Energy Commission  
Docket Number 24-TRAN-03  
715 P Street  
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## **RE: Comments on 2024 Draft Zero-Emission Vehicle Infrastructure Plan**

Please accept these comments from the California Hydrogen Business Council (“CHBC”) to the California Energy Commission (“Commission”) on the 2024 Draft Zero-Emission Vehicle Infrastructure, which presents itself as the deployment plan to complement the Clean Transportation Program Investment Plan. These comments focus on two primary areas: 1) eligibility of hydrogen infrastructure for funding alongside electric charging infrastructure investments, and 2) the inappropriate grouping of medium-duty investments with heavy-duty investments for hydrogen refueling infrastructure.

### **Hydrogen Infrastructure Funding should match Electric Charging Funding**

The Draft recommends continuing with hydrogen infrastructure funding at \$15 million a year in Slide 13, compared to \$37 million a year for light-duty (LD) battery charging and \$40.2 million a year for medium- and heavy-duty (MDHD) battery charging. This imbalance only minimally meets the mandate of AB 126 that the Commission allocate 15 percent of the Clean Transportation Program annual funds to hydrogen fueling stations.

AB 126 should be considered an investment floor, not a ceiling. The Commission should equally allocate funding to electric and hydrogen infrastructure by allowing both eligibility in each category. This level playing field allows competition and the market to decide where to allocate funds, not the Commission.

In addition, the amount allocated to hydrogen will not allow the achievement of the 200-station goal set by the Executive Order B-48-18, nor does it represent the infrastructure necessary to provide cost share and support for the California ARCHES hydrogen hub. The ARCHES hub plans workforce development and deployment of 1,000 hydrogen fueled buses and 5,000 hydrogen fueled trucks, in large part in disadvantaged communities that are also

disproportionately impacted by diesel produced air pollution. The ARCHES funding does not include hydrogen refueling infrastructure funding, therefore the Commission should allocate more funding to support these and other committed deployments of hydrogen buses and trucks.

### **Medium-duty and heavy-duty hydrogen investments should be separate**

For hydrogen infrastructure, LD and MD vehicles share infrastructure, not MD and HD. MD vehicles include work trucks, vans, and utility vehicles, which refuel at public fueling stations, or behind that fence at a, say, UPS depot. These vehicles have differently-sized nozzles and different inputs for MD vehicles than for HD vehicles.

Unfortunately, the presentation slides 16 and 32 group MD with HD hydrogen infrastructure. The Commission should create categories for dedicated HD infrastructure to support hydrogen infrastructure that can refuel trucks and buses, each applications where vehicles compete successfully with electric trucks on issues including range, weight, and vehicle cost.

CHBC urges the Commission to make these revisions before the final Plan is adopted.

Sincerely,

A handwritten signature in blue ink that reads "Katrina M. Fritz". The signature is stylized with a large, looped 'K' and a cursive 'Fritz'.

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