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CHBC Comment on 2025 Investment Plan Principles

Additional submitted attachment is included below.

May 15, 2025

California Energy Commission
Docket Number 25-ALT-01
715 P Street
Sacramento, CA 95814

RE: 2025-2026 Investment Plan Principles for the Clean Transportation Program

As a member of the Advisory Committee, please accept comments of the California Hydrogen Business Council (“CHBC”) to the California Energy Commission (“Commission”) on the Proposed Guiding Principles of the 2025-26 Investment Plan Update for the Clean Transportation Program. These comments will be framed by the questions posed in the document found [here](#) online.

What challenges to expanded ZEV adoption should inform the Investment Plan?

In calling for medium-duty (MD) and heavy-duty (HD) investments, the Commission groups MD and HD infrastructure. It is fine to emphasize MD and HD investments, but the Commission should take into account that hydrogen MD and HD infrastructure should be different - MD and HD infrastructure for hydrogen have different size nozzles and different inputs. It is technically correct to group light-duty (LD) and medium-duty infrastructure in the same category as they technically share the same infrastructure. We agree with the final guiding principles statement that LD and MD hydrogen infrastructure should be co-located. Heavy-duty vehicles require heavy-duty infrastructure.

Any other considerations for equitable and expanded ZEV adoption?

There should be emphasis in the principles that hydrogen and battery infrastructure should be put on equal footing - equal investments allow the two technologies to compete fairly and truly equitable zero-emission vehicle (ZEV) adoption. Also, the 15% hydrogen investment requirement should be considered a floor, not a ceiling. Transit agencies are an example of a market that is increasingly choosing mixed fleets or fuel cell buses and hydrogen infrastructure

predominantly to meet both their performance requirements and air quality benefits to the community. They have been operating hydrogen buses in public service for over ten years in California and this is already a proven solution to replace diesel.

Additionally, hydrogen refueling infrastructure doesn't require home charging, so it doesn't have the same environmental justice issues that multifamily housing does. Increased hydrogen investments should be one of the solutions to equity issues creating public refueling infrastructure with direct community benefit.

Notably, industry developments include the Bosch Rexroth and First Element Fuel development of a hydrogen cryopump station to improve performance and reliability of hydrogen refueling infrastructure for all vehicle classes. In California in early May, Hyundai also launched a North American version of its Class 8 fuel cell truck and can address gaps in product availability. The truck market also requires the performance of fuel cell trucks, as refueling times are under 20 minutes, heavier payloads can be moved, and these trucks have an operating range of hundreds of miles. The CTPIP should be structured to give the market a choice, rather than a mandate to force a technology that might not meet customer requirements. Pilot has identified travel plaza and station locations to expand availability of ZEV infrastructure as part of the California hydrogen hub. \$9.8 billion of private investment has been pledged as match hub funding, and it is critical for the CTPIP to maintain support for hydrogen infrastructure to bring these jobs and investments, as well as significant transit investments in hydrogen, to fruition whether or not federal funding is received.

Any comments on shifting toward more DC fast charging?

Fast refueling is not an issue for hydrogen refueling – further investments in hydrogen refueling infrastructure should be made as a solution to long repowering times.

For hydrogen refueling infrastructure, what should the CEC prioritize?

The last paragraph calls for continued investment in LD, MD and HD hydrogen infrastructure - we agree this is a good idea as, again, light-and medium duty vehicles share infrastructure.

The CEC projections for Hydrogen Refueling Infrastructure are much lower than projections from other agencies. We encourage the CEC to align scenarios with the rest of the

state and to develop a statewide deployment scenario for LMD and HD that is more in line with CARB, CTC and ARCHES.

Additionally, we have previously requested that the unexpired funds from the cancelled Shell agreement should be reallocated to the hydrogen refueling category. We request a prompt update on the status of this reallocation.

Considering delays and low LCFS credit prices, we recommend continuing toward the original goal of 200 LD stations but make them more MD compatible. CEC has deployed a LD infrastructure build out through GFO-24-601 but that only provided limited funding (\$500k/station) and limited number of stations (50% had to be in a disadvantaged community).

Finally, several environmental organization representatives have called for only making investments in “green” hydrogen. We urge the Commission to use the same criteria for low carbon-intensity hydrogen used by the Biden Administration in determining eligibility for Inflation Reduction Act tax credits under Section 45V. Battery electric vehicles that draw from the grid are essentially low carbon not no carbon, as the grid is not yet 100% carbon-free. We ask the hydrogen industry not be held to a higher standard than battery ZEVs are.

Thank you for your time and attention to these comments.

Sincerely,

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

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