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Comment Received From: Paul Fukumoto

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FuelCell Energy, Inc. Renewable Hydrogen Production Concepts

Additional submitted attachment is included below.

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August 15, 2017

John Kato, Deputy Director Fuels and Transportation Division California Energy Commission Dockets Office, MS-4 Docket No. 17-HYD-01 1516 Ninth Street Sacramento, CA 95814-5512

Subject: Comments on Draft Solicitation Concepts for Renewable Hydrogen Transportation Fuel Production Facilities and Systems, Docket No. 17-HYD-01

Dear John,

FuelCell Energy is pleased to provide comments on draft solicitation concepts for renewable hydrogen production facilities and systems, Docket No. 17-HYD-01.

FuelCell Energy suggests that the Renewable Production Capacity under Minimum Technical Requirements be modified to include medium and heavy-duty fuel cell vehicles. Trucks deliver goods used by the public and buses provide essential transportation for many. Including all fuel cell vehicles intended for use on public roads will significantly reduce emissions, especially in disadvantaged communities. The inclusion of all fuel cell vehicle types used on public roads will also enable greater local off-take of the renewable hydrogen produced at a particular site, greatly reducing hydrogen delivery miles and minimizing carbon emissions from delivery. The renewable hydrogen fueling of medium and heavy-duty fuel cell vehicles may require the inclusion of non-public stations.

FuelCell Energy also suggests that the California Environmental Quality Act (CEQA) allow for an extension matching the estimated CEQA timeline provided by the local lead agency. The CEQA process often requires public comment and outside agency approval, such as by the California Coastal Commission. The CEQA process can sometimes take more than 6 months if the proposed project is in a difficult permitting area such as a disadvantaged community. Thus, extensions may be necessary.

Thank you for your consideration of these comments.

Sincerely

Paul Fukumoto

Director Business Development

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