

DOCKETED

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Project Title:	Draft Solicitation Concepts for Light-Duty Hydrogen Refueling Infrastructure
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Comment Received From: Jonathan Palacios-Avila
Submitted On: 2/22/2019
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StratosFuel, Inc Draft Solicitation Concept for Light-Duty Hydrogen Refueling Infrastructure Comments

Additional submitted attachment is included below.



California Energy Commission

Dockets Office, MS-4
1516 Ninth Street
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RE: Docket Number 18-HYD-04, Draft Solicitation Concepts for Light-Duty Hydrogen Refueling Infrastructure

Dear CEC Administrators and Staff,

StratosFuel, Inc thanks the CEC for their continuing effort of facilitating funds for retail hydrogen stations. This ongoing leadership of the CEC sets a precedence in the industry for bringing a uniform network of hydrogen stations to the State of California. That being said, in response to the draft solicitation concepts workshop for light-duty hydrogen refueling infrastructure on February 12, 2019, StratosFuel is pleased to provide the following comments:

Match Funding Requirements: Our comments on the match funding requirements is that more clarification be provided under the eligible equipment match costs. For example, does the eligible match for equipment costs include upstream equipment used to support the station, such as tube trailers, production equipment, and trucks? In addition, may equipment that is used to develop a station be eligible as match, or is it strictly equipment used for the production, compression, storage, and chilling of hydrogen at a retail station? Furthermore, there are the miscellaneous cost associated with station equipment, such as shipping and components used to operate and maintain the station over time. We recommend that miscellaneous costs associated with the equipment be included as eligible match.

Renewable Hydrogen: As the State of California continues to implement regulations that further decarbonize our transportation sector, developers as a whole need to follow suit by embracing renewable hydrogen. That is why we support the draft solicitations renewable feedstock requirement and exclusion of landfill gas. We also support the solicitation's requirement of using in-state renewable electricity feedstock sources. It is our recommendation that the CEC also limit other renewable feedstock sources, such as biogas, and other wastes to be sourced in-state or have its first point of interconnection within the metered boundaries of a California balancing authority area.

Furthermore, the CEC has previously awarded over \$11 million towards in-state renewable hydrogen production projects. Companies have also invested millions of dollars in additional capital to develop instate renewable hydrogen production for fuel cell applications. Due to the growing production of in-state renewable hydrogen, we recommend that the Energy Commission consider placing an emphasis on

sourcing renewable hydrogen from in-state production plants.

Thank you for taking the time to review our comments and please free to contact us if any of our comments and recommendations need to be clarified, or if additional information needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Palacios-Avila". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

Jonathan Palacios-Avila

Co-Founder/CEO

StratosFuel, Inc