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Nikola Corporation Comments to Docket No. 18-HYD-04, Draft Solicitation Concepts for Hydrogen Refueling Infrastructure

Additional submitted attachment is included below.

Friday, February 22, 2019

To the California Energy Commission,

Re: Docket No. 18-HYD-04, Hydrogen Draft Solicitation Concepts

Nikola Corporation would like to comment on the following concepts from the draft:

No. 4 Eligible Costs

The growth of a hydrogen refueling infrastructure is also dependent on heavy duty vehicles. Any equipment expenditures for the production, storage and dispensing of hydrogen to any type of vehicle, light and heavy duty, should be eligible costs. For example, Nikola stations will support light and heavy duty fueling development which will increase overall hydrogen demand while increasing the impact of emission reductions for the program.

No. 32 Evaluation Process, Evaluation Criteria, and Points

Nikola suggests that funding be awarded in tiers. Applying a tiered approach to funding awards will provide a platform for new market entrants such as participation of women, minority, disabled veteran, etc. business enterprises. The awards should be structured to provide funding based on both merit and need.

It would be proposed more funding allotted to small businesses and less funding to established large, profitable businesses that and have access to capital resources. The goal is to provide more funding for projects of smaller, innovative businesses vying to enter the market. It can be implemented in such a way that it would 'level the playing field' and spur competition while increasing demand base. This action would also increase the impact of awards by providing funding to more businesses overall.

A tiered funding approach applied to the scoring of applicants would result in more awards, encourage market growth and spur competition. A funding level cap or tiered cost share percentage based on size of businesses and access/availability of capital cost resources should also be considered.

These actions support:

- Fairness – Increase funding accessibility to all Californians.
- Inclusion – Small businesses make up a significant portion of the U.S. economy.
- Job Creation – Projects can create jobs for residents of the under-served communities.
- Diversity of Ideas – Great ideas occur in a variety of areas.
- Diversity in Communities' Needs – Needs vary widely from one area to the next (air quality, socioeconomic, etc.).

Thank you for your consideration,

