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**Redwood Coast Energy Authority and Schatz Energy Research Center â€“
Comment to CEC â€“ Draft Solicitation Concepts for Light-Duty H**

Additional submitted attachment is included below.

Redwood Coast Energy Authority and Schatz Energy Research Center – Comment to CEC – Draft Solicitation Concepts for Light-Duty Hydrogen Refueling Infrastructure (Docket #: 18-HYD-04)

Dear Energy Commission Staff,

RCEA and SERC recently completed regional planning through the Energy Commission-funded *North Coast and Upstate Fuel Cell Vehicle Readiness Project*.

We acknowledge and appreciate the ARB and Energy Commission’s identification of multiple allowed development areas in the North State. Our planning project identified Humboldt Bay and Redding as key near term development areas. We also want to note the inclusion of Yreka as a Connector or Destination location on the Map of Area Classifications; our project included an initial evaluation of a Yreka parcel that should be considered for development in the future.

On behalf of our own region, we want to echo the comments that Andy Mutziger of SLOCAPCD submitted to this docket:

- To build on the momentum generated by our planning efforts, financial assistance is necessary to establish infrastructure in the region. Currently, there are no hydrogen fueling stations installed in Northern California to connect the current California network to Oregon.
- As SLOCAPCD stated, “if three installers are selected by the state for building stations over the next five years, and none of them included proposed locations in the [North Coast and Upstate region], then this region may not receive the benefit of grant funding for five years or more.”

We also submit the following comments and suggestions to the Energy Commission in response to the draft solicitation concepts:

- Page 8 and 9:
 - O&M funding should be provided by the Energy Commission for this solicitation or in another concurrent solicitation. The Energy Commission justifies the exclusion of O&M funding from the draft solicitation concepts “due to the potential availability of hydrogen refueling infrastructure credit support” from the LCFS program. With smaller capacities expected in rural areas we are concerned that LCFS credit revenue alone will not be sufficient to cover O&M costs, even with the inclusion of capacity credits. We encourage the Energy Commission to consider providing additional O&M funding to support the development of stations in rural regions where utilization is expected to be low.
- Page 10-11
 - Northern regions exhibit extensive gaps that may be challenged by environmental and infrastructure issues such as road closures, detours, equipment failure, or delivery failure. These geographies may require redundancy or alternative sites during initial build-out to establish sufficient inter-regional fueling resilience.
- Page 14
 - We acknowledge and appreciate that the Energy Commission will include public agency contact information for some station locations. We look forward to providing contact information for a number of agencies in the North State region.

- We recommend adding the following to the existing paragraph about public agency contacts: "The solicitation will also provide contact information for the FCEV Readiness Planning Regions funded under CEC-PON-14-603."
- With coordination and approval from the Government Operations Agency (please contact the Deputy Secretary for Sustainability at GovOps), we recommend including a clause in the spirit of the following paragraph: "In addition, the Government Operations Agency is interested in opportunities to host fueling stations on state-owned land. The intent is to both serve state fleets and provide public access to fueling infrastructure. Contact information will be provided for interested applicants to explore state-owned property locations along with information on state fleets located within the vicinity of those properties."
- Page 31
 - The Energy Commission will evaluate applications "on the degree to which the proposed project [...] provides air quality and employment benefits to California's disadvantaged communities." The Energy Commission does not provide a specific definition of "disadvantaged community" under the draft solicitation concepts, but we encourage the Energy Commission to heavily consider AB 1550 low-income communities as they score applications. CalEnviroScreen is a valuable tool by which to identify disadvantaged communities in metropolitan areas, whereas AB 1550 tends to be a better metric by which to gauge disadvantaged *rural* communities.

Thank you for your consideration, and the opportunity to provide input on the next phase of hydrogen fueling infrastructure.

Sincerely,

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