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**EIN Comments on Clean Transportation Program Benefits Report and  
Successes for 2019 IEPR**

*Additional submitted attachment is included below.*



energy independence now

July 31, 2019

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 19-IEPR-04  
1516 Ninth Street  
Sacramento, CA 95814-5512

**EIN Comments on Clean Transportation Program Benefits Report and Successes for 2019 IEPR**

Energy Independence Now (EIN) appreciates the opportunity to comment on the Clean Transportation Program Benefits Report and Successes for 2019 IEPR. EIN is an environmental nonprofit organization which advocates for zero-emission fuel cell electric vehicles (FCEVs) and renewable hydrogen infrastructure. EIN was a main architect of the California Hydrogen Highway Initiative, and is the only environmental nonprofit organization focused on advocating for FCEVs. EIN supports the investment the California Energy Commission has provided through the Clean Transportation Program to projects aimed at reducing greenhouse gas emissions, improving air quality, and mitigating California's petroleum dependency. In particular, we would like to highlight the following:

**1. Investment Leads to Greater Adoption**

The Energy Commission's \$200 million investment in FCEVs and renewable hydrogen infrastructure has been the catalyst that has sparked California's momentum as the world leader in zero-emission FCEV transportation. California has the most fuel cell electric cars in the world with almost 7,000 cars, along with a growing network of 40 stations. As the hydrogen market continues to grow in California, investments from automakers, station developers, hydrogen producers, and fuel distributors will generate new green jobs throughout the state as well as much needed economic growth and infrastructure that will support energy storage, deep industrial decarbonization and disaster resilience. The State of California is not only investing in a diverse, clean energy market for consumers, it's investing in green jobs.

**2. Right to ZEV Access and Right to Clean Air**

Beyond the economic impact, continued investment in hydrogen and hydrogen infrastructure is a pathway to zero-emission transportation, as well as cleaner, safer air quality for

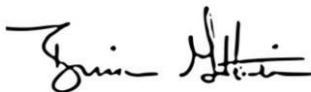
disadvantaged communities. As outlined in our latest report, Electrifying Clean Vehicle Incentives (<https://einow.org/zevincentives>), a sustainable and bolstered hydrogen economy would further allow those who live in multi-unit dwellings, and thus cannot rely on at-home chargers, to partake in this important shift away from carbon-producing fuel. Furthermore, populations directly impacted by poor air quality from freight and diesel output would directly benefit from IEPR's continued support, research and commitment to hydrogen fuel cell technology and vehicles.

### 3. Economic Impact

Last year, we published the Renewable Hydrogen Roadmap (<https://einow.org/rh2roadmap>) which summarizes the economics of renewable hydrogen. A glimpse into an Energy Commission solicitation for renewable hydrogen production shines light on the potential job creation opportunity and economic impact of the public and private sector investments. As noted in our report, "the \$4 million solicitation covers up to 75% of total project cost, requires a minimum daily production capacity of 1,000/kg or about 1/30th of the daily transportation demand for hydrogen that CARB anticipates by 2022. Thus, a roughly \$120m investment would be necessary to fully meet FCEV fuel demand in the short time frame. Without including distribution and feedstock development, this investment would create approximately 1,725 jobs in the next 5 years using American Recovery and Reinvestment Act (ARRA) methodology."

As a follow up to our Renewable Hydrogen Roadmap, EIN is now developing an investor's guide to hydrogen with comprehensive financial, economic and environmental analysis to highlight the positive impact of the developing clean hydrogen marketplace. While this research is just getting under way, we have already begun to engage businesses that are either actively developing hydrogen infrastructure to serve the California market or that are currently making plans to do so. The first three companies that we have engaged highlighted plans to invest approximately \$1.2b in this area over the next 5 years. Our outreach list includes 60 companies, all members of the Hydrogen Council, collectively representing \$2.89 trillion in revenue and 4.2 million jobs around the world. The hydrogen revolution isn't simply a California experiment, rather a vital part of our clean energy future. California simply will not meet its clean transportation goals without a successful market for FCEVs, which owes much of its current success to CEC programs. This market is poised for success and California's continued investment in and support of the FCEV market will enable the State to meet its environmental and air quality goals while unlocking billions of dollars in investment in our clean energy future.

Respectfully submitted,



Brian Goldstein  
Executive Director, Energy Independence Now