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Suggested Concept - FREIGHT ZERO-EMISSION VEHICLE INFRASTRUCTURE DEPLOYMENT FOR VEHICLE DEMONSTRATIONS

Please see attachment.

Additional submitted attachment is included below.



November 7, 2019

RE: California Energy Commission (CEC) Staff Workshop on Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure: Solicitation Concepts: Public Comments

Docket Number: 19-TRAN-02

Dear CEC Staff,

Oberon Fuels (Oberon) respectfully submits these comments in response to the CEC's recent workshop, held on Oct. 25, 2019, in which staff presented five concepts for developing solicitations for competitive funding for medium- and heavy-duty zeroemission vehicles and infrastructure.

Our comments focus on recommending staff's Solicitation Concept #1 be modified to address a critical need in the state—increased production of renewable hydrogen:

- Make it specific to renewable hydrogen.
- Focus on innovative fuels/vehicle demonstrations.
- Expand beyond freight movement support.
- Require (as opposed to encourage) benefits to disadvantaged communities (DACs).
- Provide up to \$10 million total in available competitive grant funding to be awarded to qualified projects under this solicitation concept.

As such, the attached embodies what we think Concept #1 would look like, as modified to emphasize the key elements noted above (also known as "Concept 1.1").

Thank you for your favorable consideration of our recommendations as well as your ongoing leadership on this critically important issue.

Sincerely,

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Attachment

Oberon's Suggested CONCEPT #1.1: FREIGHT, ZERO-EMISSION VEHICLE INFRASTRUCTURE DEPLOYMENT FOR VEHICLE DEMONSTRATIONS

PURPOSE OF SOLICITATION

This is a competitive grant solicitation. The California Energy Commission's (Energy Commission's) Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP) would provide availability of up to \$10,000,000 in grant funds for projects that will support the deployment of innovative renewable hydrogen fueling infrastructure for medium- and heavy-duty (MD/HD) advanced on-road vehicle technologies within the California transportation system.

This solicitation may complement California Air Resources Board solicitations for advanced vehicle demonstrations within the port and freight system or can be a standalone project.

ELIGIBLE APPLICANTS

This competitive grant solicitation is open to owners and operators of transportation facilities, including but not limited to railyards, warehouses, distribution centers, agricultural centers, airports, seaports and depots, as well as renewable hydrogen producers.

At a minimum, all eligible Applicants must include the following in their proposed project:

- 1) an original equipment manufacturer (OEM) **or** a technology integrator working with an OEM; and
- 2) committed end-user fleet operator partners.

PROJECT REQUIREMENTS

All projects must be for zero-emission freight transportation projects. To be eligible, infrastructure projects must:

- Be either new or upgrades to existing fueling infrastructure for hydrogen fuel-cell transportation vehicles.
- Be used to refuel Class 3 through Class 8 vehicle(s) having gross vehicle weight rating (GVWR) of 10,001 lbs. or greater located in California.
- Demonstrate on-road vehicle technologies to prove or validate their technical or market viability prior to commercial production and/or sale.
- Provide minimum of 12 months data collection. Applicants shall describe plans for securing advanced technology vehicles that will enable collection of 12 months refueling events for the deployed infrastructure.

1) Eligible Projects:

• Innovative renewable hydrogen fueling infrastructure for MD/HD vehicles.

2) Ineligible Projects:

- Low-NOx engine or propulsion system or propulsion technology
- Hybrids
- Paper studies (e.g., feasibility studies)





- Surveys
- Research
- Case studies
- Transit fueling infrastructure
- · Commercially available technologies

DISADVANTAGED COMMUNITIES (DACS)

Projects covered by this solicitation must achieve reductions in GHG and pollutant emissions that benefit DACs. All applications must identify and describe how the project benefits DACs.

The Office of Environmental Health Hazard Assessment (OEHHA) in the California Environmental Protection Agency (CalEPA) has developed the California Communities Environmental Health Screening Tool: CalEnviroScreen Version 3.0 (CalEnviroScreen 3.0)2. The Energy Commission will use the CalEnviroScreen 3.0 tool to verify DACs, defined as scoring in the top 25 percent scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations. All applications must use the CalEnviroScreen tool to identify and verify how their projects provide maximum benefits for DACs.

Note: CARB demonstration projects will be required to be located in DACs; therefore, if an applicant wants to use CARB funds for vehicles, they must meet CARB's requirements.

MATCH FUNDING REQUIREMENTS

Applications must include at least 25 percent of total allowable project costs as match share. Public Agency applicants do not have a minimum match share requirement

