

DOCKETED

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FirstElement Comments on Workshop Concepts

Additional submitted attachment is included below.

FIRSTELEMENT FUEL

FirstElement Fuel Inc. | 5281 California Ave, Suite 260, Irvine, CA 92617 | 949-205-5553

July 29, 2024

Mr. Hannon Rasool, Director
California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure Workshop Comments

Mr. Rasool and CEC Staff,

Thank you for the opportunity to comment on the concepts presented at the Subject workshop, July 16, 2024. FirstElement Fuel (FEF) is the market leading retail hydrogen refueling station (HRS) provider in California, which by default makes us the leader in the United States and even the world, due to the support provided by the California Energy Commission (CEC). Your dedication and implementation of California's vision for zero-emission transportation are unparalleled, and these concepts are another example of thoughtful efforts to ensure infrastructure is available for light-duty fuel cell vehicles and medium- and heavy-duty fuel cell trucks. Our comments for the following concepts are presented below.

Concept 1, CRITICAL PATHS

Building the first-ever, high-flow HD HRS at the Port of Oakland as part of the NorCal Zero project has taught us valuable lessons regarding the equipment and costs for a retail HD station. Although we fully intend to optimize the design and garner further efficiencies for the next generation of HD HRS, the award of \$6M for 2 sites is quite low. This is likely only one-fifth to one-sixth the cost of the station capital required for a three-dispenser station. We recommend you increase the funding amount to at minimum 50% of capex per station and reduce the minimum to a single station. Further, we recommend relaxing the 1 linear mile requirement from a corridor's off-ramp to at least 5 miles since some warehousing operations are not within that restrictive distance.

Concept 4, ZEV Port Infrastructure

As mentioned for Concept 1, the proposed funding of \$3-5M for a single station is too low and should be increased to approximately \$6-8M per station to achieve a 50% cost-share for capex. Further, the requirement of 5-8 dispensers is quite large considering there is only one commercial HD truck manufacturer today (Nikola). We recommend considering a pumping capacity or a minimum number of trucks/day rather than a dispenser requirement. In addition, we encourage the CEC require a minimum number of equipment/trucks that will utilize the HRS that could be phased in over the life of the project to ensure adequate demand at the station.

Concept 5, LD Hydrogen Refueling Infrastructure

This welcome concept demonstrates the CEC's commitment to LD drivers. As we already have several stations targeting the Sacramento and San Francisco region, our only questions are regarding (1) the time frame for Funding Lane 2, specifically how long does the \$500k per station cover, and (2) how many stations are allowed under this Funding Lane given the 45% applicant cap?

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We appreciate the opportunity to comment on these funding concepts and are happy to provide greater clarification on our recommendations. We look forward to the answers regarding Concept 5 and the solicitations being released later this Summer and Fall.

Sincerely,



Matt Miyasato, Ph.D.
Chief Public Policy & Programs Officer