

From: "Catherine Dunwoody" <CDunwoody@CAFCP.org>
To: <maddy@energy.state.ca.us>
Date: 3/1/2007 3:55:04 PM
Subject: Comments on draft 1007 report

DOCKET 06-AFP-1	
DATE	MAR 0 1 2007
RECD.	MAR 2 2 2007

McKinley, here are the general comments I will make tomorrow at the workshop:

1. Well to Wheels report

- a. Section 3.7 needs to distinguish between FCVs and ICEVs as they are two very different vehicle technologies.
- b. Figure 3-25 and 3-26 state results for 2012 vehicle stock. However, the vehicles used to arrive at the EER in this study are early prototype vehicles and not representative of 2012 FCVs (this is well-stated in the TTW report section 3.2.6.) See comment 2b, below.
- c. Figure 3-25 -- What assumptions were made to yield a "H2, NG SR, LH2:FCV" MJ/mi value greater than gasoline vehicles? In other WTW studies (e.g. ANL/GM), the energy use for hydrogen is only about 2/3 that for gasoline vehicles. The WTT report doesn't clearly state what assumptions were made to yield such a dramatically different result.
- d. Figure 3-26 -- What assumptions were made to yield "H2, NG SR, LH2:FCV" GHG emissions being about 400 g/mi, when other WTW studies show them to be significantly less? For example, in the ANL/GM study they are about 230 g/mi. The WTT report doesn't clearly state what assumptions were made to yield such a dramatically different result.
- e. Table 3-19 -- The GHG impact of FCVs and ICEVs are listed as the same (40 - 50% reduction from conventional vehicles when H2 comes from natural gas). Given that the EER for an FCV is higher than for an H2 ICE, the GHG reduction should be greater for FCVs than for H2 ICEs.

2. Tank to wheels report

- a. Section 3.2.6 needs to distinguish between FCVs and ICEVs as they are two very different vehicle technologies.
- b. Page 3-13: The EER of 2.0 is attributed to the CaH2Net Blueprint Plan, which is based on work that is now about 3 years old. The 1007 process should re-evaluate this result. I believe there is more current data from OEMs, including at least one value based on EPA certification.

Thanks, and I'll see you tomorrow!

Catherine

CC: "Adam Gromis" <AGromis@CAFPC.org>