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California Energy Commission

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Docket #12-HYD-1 Hydrogen and Transportation –DRAFT Solicitation Comment

Hydrogen Frontier Inc. appreciates the opportunity to voice our concerns for the CEC's funding changes for hydrogen infrastructure in California. As both a station operator and developer we intend to share our desires for all stakeholders to consider in the revision of PON structure.

We would like to commend the CEC in to their efforts to allow all stakeholders to participate and have their concerns acknowledged. The CEC has a very difficult responsibility in determining the path we are to proceed on to the successful deployment of hydrogen infrastructure in the state.

With hopes of making a difference we offer these suggestions to focus on the following:

- Section 3-C Operational Data (page 10)
- Section 4 Street Maps (page 17)
- Section 10 Encumbrance Deadlines (page 31)
- Section 12-C #7 Location According to Street Maps scoring value(page 40)
- Section 12-C #8 Location According to Intersection value (page41)

Section 3-C) page 10

“Operational: The proposal must demonstrate that the station will be operational by October 30, 2014 and all work scheduled for completion by April 30,2015 which includes six months of data collection and reporting”

My first concern is six months of data collection needs to be more clearly defined. What format and what type of data? Second is what happens if you don’t make such dates? It is not clear as to what penalties or removal of partial or total funding are involved.

Section 4 Station Location Areas) page 17

To define these areas of first commercialization using this process has inadvertently caused a potential bidding war and consequently higher operation costs to station developer. It is our feeling that with such early commercialization that these areas shouldn’t be defined in such detail, Perhaps future Solicitations could use this mechanism to control station deployment. However the best measure of future station locations will be determined by market demand.

Second, did anyone actually look at possible station locations when they devised this map? I know that for the San Francisco area that there is only one existing station on the Ninth street exit for that entire area!!! What is seen on Google, is what was there six months ago, many sites have changed since then.

Section 10 Encumbrance Deadlines) page 31

Will this date be made available in Final PON solicitation? I did not see where it might be disclosed.

Section 12-C #7 Location According to STREET Maps) page 40

Maximum points of 80 is rather high when the most important, BUDGET is only 60?

I would like to know when this version of STREET in this Draft was available to the public for the first time. Who were the agencies who contributed? Is this the one that will be used in final Draft? It would have been better to use a fictitious areas to introduce this mechanism rather than real potential areas. It is an unfair advantage to contributing stakeholders to have this document prior to it being available to the public.

Section 12-C #8 Location According to intersection) page 41



Again why are we defining in such detail location scoring criteria in such early stages of commercial development? Why 40 points when project team (40) and project implementation (40) is more relevant to success than location from street corner! I really don't understand why we are scoring locations at all. The CEC should determine their preference without prejudice and influence. Then perhaps after NOPA disclose method used to determine choices.

We are pleased to see improvements in this Draft version over past solicitations and look forward to the Final release of hydrogen infrastructure funding opportunities. It is difficult to please everyone but I am glad the CEC is providing the ability for all stakeholders to participate in California's future.

Any question regarding this response can be directed to Dan Poppe at dpoppe@hydrogenfrontier.com

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