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Automotive Fuel Cell Cooperation

Cal/EPA Air Resources Board
California Energy Commission
South Coast AQMD
U.S. Department of Energy
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AC Transit
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NFCRC-UC Irvine
NREL
Powertech Labs
Praxair
Sandia National Laboratories
Santa Clara VTA
Southern California Gas Company
SunLine Transit Agency
UTC Power

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 12-HYD-1 "Hydrogen and Transportation"
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED
12-HYD-1

TN # 67177

SEP 17 2012

Input on the DRAFT Solicitation for Hydrogen Fuel Infrastructure

Comments of the California Fuel Cell Partnership

September 17, 2012

Thank you for the opportunity to comment on the draft solicitation for Hydrogen Fuel Infrastructure. CaFCP appreciates the significant work CEC has done to prepare this draft, including the three workshops to gather stakeholder input. We also appreciate the opportunity to provide written input to the 12-HYD-1 docket, including the previously submitted "*A California Road Map: The Commercialization of Hydrogen Fuel Cell Vehicles*" on June 25, 2012, and the CaFCP letter dated August 10, 2012 containing input regarding station performance criteria and other input for developing the draft solicitation. The CaFCP submits the following comments and questions in response to this draft solicitation.

I. Introduction – Section D: Proposal Due Date and Time

Table 1 in the draft solicitation indicates CEC anticipates a subsequent future solicitation. Funding information leads us to believe this could have ~\$11M in available funding (\$29.69 total available funding - \$18.69 available in this solicitation = \$11M). To enable infrastructure developers and industry stakeholders to conduct better long term planning, CEC should provide additional information on this anticipated future solicitation. For example, CaFCP recommends CEC describe this future solicitation as including the Secondary Priority sites submitted by the OEMs and relevant station performance criteria for these sites.

III. Eligibility – Section C: Minimum Technical Requirements

- *1st and 2nd bullets*
Please refer to the August 10, 2012, CaFCP Station Performance Criteria letter, Section C for the recommended minimum daily throughput capacity (140 kg) and peak demand throughput (five 7kg fills per SAE J2601). The daily minimum and peak throughputs in the draft solicitation are well below the minimums recommended by CaFCP based on input from a broad group of automakers and station developers. The performance criteria proposed for this solicitation may be appropriate for connector and/or destination stations, but not the Primary Priority sites identified in this draft solicitation.
- *3rd bullet*
Please refer to the August 10, 2012, CaFCP Station Performance Criteria letter, Section A, for CaFCP's recommendation regarding fueling protocol. Remove "the intent of" from this bullet. CaFCP recommends stations must meet the limits, tolerances, and operating conditions of the vehicle fuel systems listed in SAE J2601 Technical Information Report (TIR).

- *5th bullet*
Please further clarify the requirement that stations must be “operational” by October 30, 2014. Is this the date when stations will be open and accessible to fuel cell vehicle customers? Data collection should be stipulated for the full CEC funded program (rather than just 6 months), to ensure maximum value of public funds. To further support station development and overall consistency during the ramp up to commercialization, CaFCP recommends CEC work with the US DOE National Renewable Energy Laboratory (NREL) for data collection and reporting. NREL has already developed data templates for both state and federal hydrogen programs in cooperation with station providers.
- *7th bullet*
Historically, the 33% renewable requirement has been averaged across all awarded stations (i.e. the responsibility of the grantor to choose projects which satisfy this requirement), and NOT assigned to each individual project. As currently written the draft solicitation could add significant cost to each station, reduce CEC flexibility in awards, and reduce number of stations awarded. In addition, please further define “credits that conform to ARB’s LCFS program.”

III. Eligibility – Section E: Eligible Costs

Please clarify whether the \$200,000 in allowable operations and maintenance costs is included in, or in addition to, the 65% / \$1.5M award cap.

X. Application Requirements – Section J: California Environmental Quality Act (CEQA) Compliance Information

CaFCP recommends that CEC work to identify a pathway which both appropriately satisfies CEQA requirements and puts the least time and cost burden on the project. One approach may be to use previous station CEQA classifications as case studies. As written, this section describes a highly onerous process and may unnecessarily limit good solicitation responses, incur additional costs, and/or impede the goal of reaching 68 stations by January 2016, as identified in *A California Roadmap*.

XI. Application Evaluation – Section B: Stage Two: Technical Evaluation of Applications

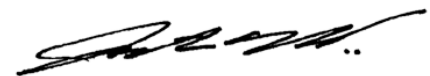
CEC cites an “Evaluation Committee” will be organized, but does not discuss who will be asked to participate in that committee. To increase transparency, CaFCP recommends CEC describe who will be considered for this input and support. Specific suggestions cited by stakeholders during the workshops include ARB, BAAQMD, DOE/NREL, SCAQMD and automakers.

Other

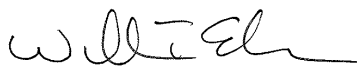
The draft solicitation does not include any hydrogen quality requirements or screening criteria. CaFCP recommends CEC require compliance with SAE J2719. See CaFCP’s August 10, 2012 CaFCP Station Performance Criteria letter, Section G, for specific recommendations.

Thank you again for the opportunity to provide comments for the new hydrogen fuel infrastructure solicitation. Please let us know if you have any questions or need clarification.

Sincerely,



Justin Ward
CaFCP Chair



Bill Elrick
Technical Program Director