Mercedes-Benz



Mercedes-Benz
Research & Development
North America, Inc.

Group Research & Advanced
Engineering USA Division
A Daimler Company

September 17, 2012

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

Subject: Submittal by Mercedes-Benz Research & Development North America, Inc. – Input for docket number **12-HYD-1,** Hydrogen and Transportation-DRAFT Solicitation Comment

To Whom It May Concern:

Since 2005, Mercedes-Benz Research & Development North America has leased fuel cell vehicles in the State of California and presently leases over forty B-Class F-Cell vehicles to private individuals in Southern California. Through our vehicle operation, we have collected a multitude of knowledge and data on customer behavior related to vehicle operation and hydrogen refueling.

Therefore, we suggest a few minor modifications to the Hydrogen and Transportation-DRAFT Solicitation based on our experience and market research. These suggestions also acknowledge the voice and feedback of our F-Cell customers and ensure the utmost level of success of this solicitation and future vehicle operation within California.

We are pleased that the Energy Commission chose to heed the advice of the CaFCP OEM Working Group and have incorporated the aggregated OEM hydrogen station priority locations directly into the draft solicitation using the maps produced by UC Irvine. Locating stations in the identified areas supports the execution of our early commercialization plans.

Our suggestion concerns station performance. The performance criteria language in the draft solicitation needs to set specifications that are able to kick-start the commercialization of hydrogen fuel cell vehicles. The stations must provide H70 Type A fueling performance as defined in SAE TIR J2601. This allows comparable fill times to conventional passenger cars which our customers expect and for stations to easily meet the hourly peak station demand in prime areas.

In addition, the performance requirements for stations in prime areas should be much higher than the minimum values given in the draft solicitation in order to meet the initial customer demand. Specifically, these stations must be able to fuel at least 10 cars per hour during peak times (50 to 70 kg/hour) and provide at least 150 kg over a 12 hour period. Stations not meeting these performance targets will not meet customer expectations and may struggle in the market jeopardizing the success of hydrogen technology.

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Therefore, we also suggest that the Qualifications of the Weight for Solicitation Section XII-9 be increased from 2 to 7 in order to show the proper level of importance for station performance in the solicitation,. The current draft solicitation weight of 2 greatly undervalues station performance, and ensures high customer frustration with the station and likely low customer utilization.

Thank you for your consideration and support. If there are any questions or need for any additional information, please contact me by phone (310-549-9646) or by e-mail (rosario.berretta@daimler.com)

Sincerely,

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