



September 17, 2012

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



Please find below our comments regarding your draft PON “Draft Solicitation (for comment), Alternative and Renewable Fuel and Vehicle Technology Program, Hydrogen Fuel Infrastructure” of 9-7-2012.

1. Limiting the locations to the maps contained in Attachment 11 of the draft PON and heavily weighting the scoring criteria on these very specific geographies may have the following impact:
  - a. Reducing the potential sites to a very limited number may create a narrow market for H2 station developers by making it difficult to identify viable stations and obtain competitive lease arrangements with retail station owners. This may result in high costs for site development and land leases directly affecting the station operating costs, which would eventually be passed to the consumer.
2. Average daily capacity should be based on an average fill, not a maximum of 7kg. If the average tank size is approx 5.5kg the average fill should be no more than 85 to 90% of that. A 7 kg fill specification will unnecessarily increase infrastructure capital costs making it more expensive for the consumer.
3. The project readiness scoring criteria seems to limit the diversification goal since those companies that have been receiving state funding for stations in the past or participated in the recently cancelled PON will have done much of the work mentioned. Allowing 60-90 days for application submission is a way to minimize this and ensure diversity.

Air Liquide Industrial US LP

Attention: Bob Oesterreich  
2700 Post Oak Blvd  
Houston, TX 77056