

California Energy Commission

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**American Honda Motor Co., Inc.**

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September 5, 2012

Mr. Pat Perez  
Deputy Director, Fuels and Transportation Division  
California Energy Commission  
1516 Ninth Street, MS 44, Sacramento, CA 95814-5512

Dear Pat:

As you know, Honda is a strong supporter of fuel cell electric vehicles (FCEVs). We believe that FCEVs, powered by hydrogen, can be an important part of achieving California's goal to dramatically lower greenhouse gas emissions from transportation.

Honda was first to market, leasing the FCX (our first generation vehicle) in 2002 and then the FCX Clarity (our second generation vehicle) in 2008 to retail customers in the Southern California area. The FCX Clarity is a purpose-built FCEV, and achieves a 240 mile range using 35 MPa (5,000psi) hydrogen storage. This range and early market achievements were possible by leveraging the more prevalent and mature 35 MPa stations that were available at the time Clarity was launched (even while 70 MPa standards were being developed).

During this early stage of hydrogen technology, it was necessary that all fueling stations accommodate both 35 MPa and 70 MPa pressures, even though it was acknowledged that additional infrastructure costs would result. At that time both were appropriate and necessary.

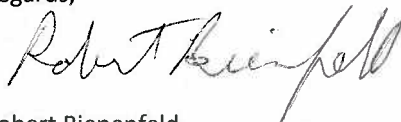
Honda is now working on our third generation fuel cell vehicle, and we plan to adopt the 70 MPa onboard storage standard. Honda's next fuel cell vehicle is expected mid decade. Based upon this new direction, our existing plans for continued FCX Clarity deployment, and the aggressive hydrogen station build plan that is under consideration by the Energy Commission and others, Honda believes it is important to advise you of our plans.

We believe that stations constructed after the end of this year (with the exception of currently funded West Los Angeles stations and future San Diego / Agoura Hills stations) will no longer need to offer 35 MPa refueling for Honda. Existing stations, along with those currently under construction, coupled with those noted above should be adequate to meet both the coverage and capacity needs of this generation of FCX Clarity customers.

This information could lead to the elimination of the 35 MPa requirement for future stations, possibly resulting in station design simplification and lower cost. There may be other reasons to maintain the 35 MPa requirement; that decision should not be solely based upon Honda's needs.

Please feel free to contact me if you have any questions.

Regards,



Robert Bienenfeld  
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Product Regulatory Office  
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cc: Jim McKinney, CEC, Analisa Bevan, CARB, Catherine Dunwoody, CaFCP  
Steve Ellis, Honda