



Comments to Draft PON for Hydrogen Fueling Infrastructure

Thank you for the opportunity to provide comments to the draft PON for an upcoming hydrogen fueling infrastructure.

Section II-B – Maximum Award Amount and Funding Cap: A disadvantage of a flat cost share level is the loss of the incentive provided in PON-09-608, where lower cost stations received greater cost share. Earlier solicitations also provided means to qualify for as much as 75% cost share; the buy-down of station capital cost is a key incentive to reduce the cost of hydrogen to consumers at the fueling station and maximize the use of CEC funds. The lower cost share increases the required match funding by \$6 million (from under \$10 million to almost \$16 million) if all \$29.68 million were obligated during this round. At this stage, this added risk to and burden on the private sector may limit the interest in this solicitation and result in fewer stations.

Regarding the funding cap, it is not clear whether the two set-asides (renewable hydrogen and non-road stations) are part of the 40% limitation. Please provide clarification.

Section II-D – Non-Road Station Set-Aside: The draft solicitation states that projects need to co-locate with an existing non-road hydrogen station. We request that new non-road stations also be considered provided that CEC funding is limited only to the on-road contribution to the project.

Section III-A – Eligible Applicants: We suggest that, in the interest of public safety, the language in this section be modified to reflect that “eligible applicants are defined as a team with experience in design, planning, constructing, testing, operating **AND** (*emphasis added*) maintaining **HYDROGEN** (*emphasis added*) fueling stations.” Given the extent of the work to develop codes and standards specific to the safe siting, installation and operation of hydrogen fueling systems, the applicant should have adequate experience in all of the elements related to their proposed hydrogen fueling solution. Gaseous station experience is not directly applicable due to differences in properties of hydrogen when compared with other gases (for example, wider flammability limits and the heating of hydrogen during the fueling process due to the reverse Joule-Thomson effect). (This comment also applies to Section XII, Table 6 – Technical Screening).

Section III-B – Eligible Projects: Under Item 4, we believe that, based on Section II-C, this element should be modified to include both off-site and on-site production of renewable fuel.

Section III-C – Minimum Technical Requirements: Air Products asks that the Commission to consider allowing an applicant of multiple stations to meet the renewable

hydrogen requirement by averaging the renewable content over the network of proposed stations provided that renewable hydrogen is used over the network of proposed stations. This will lower the cost of fuel to consumers while meeting the objective of introducing renewable hydrogen into the supply chain.

Section III-D – Multiple Applications: This section along with the requirements of Section IX indicates that applicants will need to supply an original document plus 3 copies for each station of the main body (application form plus statement of work) and the appendices/ resumes for each station. It appears that the Commission is planning to negotiate one grant agreement for an applicant that is selected for multiple stations; we ask that the PON allow for a single proposal for multiple stations with budget sheets that reflect (1) the entire project and (2) a scenario with one station and all other associated supply costs.

Section XI-C.2 – Market Visibility: Regarding the first paragraph, please specify a metric that applicants should use in assessing the change in capacity over time.

Also, if a station meets the minimum capacity of 50 kg/day and cannot be expanded, at that site, does this station meet the overall requirements of the AB118 program and this solicitation?

Section XIII—H – Disposition of Applicant’s Documents: No definition of the term “work example” is provided. We propose that business confidential information related to the Business Plan (Section X-I) be treated as a work example that will be returned whether or not an applicant is selected under a Notice of Proposed Award. The business plan requirement as written could limit participation.