

December 7, 2012

**Re: Comments to CEC PON 12-606**

Powertech appreciates the opportunity to provide comments on the CEC hydrogen fuel infrastructure solicitation. Powertech is providing the fueling station equipment to Hydrogen Frontier as part of this solicitation.

Powertech has the following comments:

**III Eligibility**

**B Eligible Projects**

1. Bullet point 5 states that the station must be located inside the polygon boundaries of a Station Location Area listed in Table 2. Would the CEC consider applications outside these areas if they are within a reasonable distance of the shaded areas? For example, in the Mountain View area, on one side of W Middlefield Road, the value is 10 points and on the other side of the road it is not even eligible. Is it at least possible to give these areas in white (or not shaded areas) some score so that they could at least be reviewed under this solicitation?
2. Will there be another solicitation in the near future that covers some of the areas that were previously awarded in the last PON such as Lake Forrest or Huntington Beach?
3. Would the upgrade of existing stations that are outside the designated areas be considered? For example, 35 MPa stations that could be upgraded to include 70 MPa and meet the technical requirements of this PON.

**C Minimum Technical Requirements**

1. Section 8 states that only "Small hydroelectric (30 megawatts or less)" is considered a renewable electricity source. However, if hydro-electricity exceeding 30 MW comes from a large pre-existing lake (i.e. the power generation did not result in any change in the original lake dimensions), then shouldn't this also qualify as a renewable electricity source? Specifically, I am referring to Niagara Falls, where Lake Erie is the powerhouse reservoir.
2. Is there potential to increase the percent coverage by 10% (total project coverage of 75%) for projects that use 100% renewable hydrogen?

Thank you again for the opportunity to provide comments.

Sincerely,



Angela Das, P.Eng.