



DRIVING FOR THE FUTURE

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UTC Power

January 7, 2013

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 12-ALT-02  
1516 Ninth Street  
Sacramento, CA 95814-5512

California Energy Commission

**DOCKETED**

**12-ALT-02**

**TN # 69076**

**JAN 9 2013**

Commissioner Peterman:

Thank you for the opportunity to comment on the draft 2013-2014 Investment Plan (Docket 12-ALT-02). The California Fuel Cell Partnership acknowledges and appreciates the work that has gone into developing this latest investment plan, and we appreciate CEC's previous and ongoing support for developing hydrogen fueling infrastructure. CEC's leadership plays an integral role in the success of the early commercial market for fuel cell electric vehicles (FCEVs).

CaFCP members recently published and submitted to the docket a plan, [A California Road Map](#), which outlines the requirements for market launch of fuel cell vehicles in 2015. As discussed during the summer 2012 CEC hydrogen workshops, a network of 68 hydrogen stations statewide is vital to enabling consumer FCEV sales. Existing retail-oriented hydrogen stations, stations funded from the previous NOPA awards (2008-2010 Investment Plan) and the anticipated stations from PON-12-606 will likely achieve about half of the stations required.

CaFCP members agree with the \$20M in funding for hydrogen infrastructure in the 2013-2014 Investment Plan. This funding is necessary to establish a station network that will support the commercial launch of FCEVs and help meet California's environmental and energy independence goals. Hydrogen infrastructure is not home or fleet based; it requires an established and publicly accessible retail infrastructure before people will purchase or lease a vehicle. *A California Road Map* outlines why initial public investments, such as the funding proposed in this investment plan, are necessary and can be accomplished in an efficient and effective manner.

As noted in the draft investment plan, current PON and *A California Road Map*, some of the existing hydrogen stations were early demonstration stations and not designed for retail customers, making the proposed funding even more critical as these developmental stations are replaced with a more appropriate and customer friendly network. We hope that CEC staff will keep this in mind, and reference Table 6 of *A California Road Map* to guide investment decisions.

On page 30 of the plan, the second paragraph incorrectly cites CaFCP, and possibly the OEM Workgroup, with identifying a need for 45 stations by the end of 2014. The road map identifies the need for 68 stations by January 2016, but does not specify how many stations are needed prior to 2016. In addition, CaFCP's analysis is based on a six-minute travel time for stations within the early cluster communities, not eight minutes as cited on page 30.

We credit CEC for working with stakeholders and making improvements in each subsequent plan. While the ensuing PONs will provide greater detail, the draft 2013-2014 Investment Plan appropriately highlights the need to consider larger hydrogen stations, provide operations and maintenance support in the early years and leverage co-located opportunities to include light-duty FCEVs if locations are within the priority areas identified in *A California Road Map*. We also welcome the opportunity for community readiness funding to support hydrogen commercialization as local support will be necessary for success.

CEC continues to demonstrate California's leadership in nurturing alternative fuels and advanced vehicle technology, and positions the state to benefit from the environmental, economic and energy independence opportunities that fuel cell electric vehicles offer. Thank you again for the opportunity to provide comments. Please do not hesitate to contact me or staff if you have any questions or require clarification.

Sincerely,



Catherine Dunwoody  
Executive Director