



March 14, 2013

California Energy Commission
Dockets Office, MS-4
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Re: Docket Number 12-ALT-02

Dear CEC Commissioners and Staff,

Thank you for the opportunity to comment on the 2013-14 Revised Staff Draft Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program. Energy Independence Now believes that the CEC has developed a well-balanced plan that reflects our State's priorities, leverages near term opportunities, and sets the table for long-term success.

In particular, we want to voice our strong support for the \$20 million directed towards hydrogen fueling infrastructure. This investment reflects the broad consensus that it will be very difficult to meet our 2050 climate goals without hydrogen and fuel cell electric vehicles (FCEVs).

As you are aware, 2013-14 is a critical time period for automakers pursuing FCEVs: they can only invest in commercial FCEV production for California if they have confidence that supporting infrastructure will be in place. Thanks to the CEC's leadership, the planned 2013-14 Hydrogen allocation sends the critical signal to automakers that California is serious about FCEVs.

At the last two Advisory Committee meetings, the Committee discussed the use of metrics for making investment decisions. While we agree that metrics can be a helpful tool for the CEC to use, we fear that over-reliance on metrics can misdirect the program. For example, a 'dollar per ton of CO₂ reduced' metric would likely overvalue current mature technologies and undervalue long term zero-emissions vehicles related (i.e., plug-in and hydrogen) investments. We believe that it is critically important for the AB 118 program to invest in both near and longer-term technologies, and that the current plan represents an appropriate balance.

Again, thank you the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Tyson Eckerle".

Tyson Eckerle
Executive Director
ARFVT Advisory Committee Member

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