

Sustaining the Earth

永續地球

October 16, 2013

Clark Strategic Partners

PO Box #17975

Beverly Hills, CA

USA 90209

Web Site: www.clarkstrategicpartners.net

Via Email: docket@energy.ca.gov.

Re: Docket 12-HYD-01

California Energy Commission

DOCKETED

12-HYD-01

TN 72083

OCT. 16 2013

Memo

To:

From: Woodrow W. Clark II, PhD,
Managing Director
Clark Strategic Partners

Date: 15 October 2013

Re: Comments and Ideas for the Hydrogen Refueling Stations (Docket 12-HYD-01)
PON Craft 12-606

First of all congratulations to the staff and team at the CEC (and CARB) for revising and considering a more environmental approach to hydrogen refueling stations in CA. The work and effort from everyone is to be commented and certainly praised as a BIG step in moving CA toward a carbon free emissions program and reduced greenhouse gases --- especially in transportation.

Please note too that it is important to define renewable energy sources for hydrogen; require the stations to educational and information about hydrogen and fuel cells; and for their to be measurement standards that are checked both with a schedule and randomly as to compliance, operation and maintenance.

6. Limit of One Station per Proposal

Recommendation: Have multiple station proposals and aim for 100% renewable sources for hydrogen refueling. If not 100% then at least 3/4ths of the stations.

The basic reasons are the need for cost savings and to focus on electrolyzing the hydrogen for refueling.

8. Single Applicant Cap

Recommendation: Eliminate cap for projects that propose 100% renewable carbon-free hydrogen

13. Renewable Hydrogen Set-Aside Competition

Recommendation: The PON should be 100% Renewable Non-Carbon Hydrogen by funding all 100% Renewable Non-Carbon Hydrogen Fuel Stations .

15. Station Location Area Competition

This is a critical issue and there are several suggestions in the sub-categories:

**C. Primary Priority Station Location Areas:
Need to include in S. California the following**

Beverly Hills/Westwood –

Recommendation: Include these cities and areas which means moving the boundry line east to LaCienega Blvd.

Hollywood/West Hollywood/Melrose –

Recommendation: move line west to LaCienega Blvd.

Pasadena –

Recommendation: Move boundary south a couple of blocks to California Blvd.

San Diego #1

Torrance/Redondo Beach

Westminster/Huntington Beach

Recommendation: Need to add other locations statewide including:

San Francisco-Bay Area

Pacific Palisades, Sacramento, Laguna Beach, Los Altos/Los Altos Hills/Palo Alto, Manhattan Beach/El Segundo, Malibu, Santa Monica, San Jose, and Berkeley/Oakland to the Primary Priority Station Location Areas. These are all areas of significant demographics priority.

D. Secondary Priority Station Location Areas:

Recommendation: Should add “San Luis Obispo” to Secondary Priority Station Location Areas as a station between L.A. and S.F.

F. Station Location Area Competition Guidelines:

Recommendation: Must give preference to 100% renewables.

G. Determining Location of a Proposed Hydrogen Fueling Station

Recommendation: This should not be a factor in dealing with competition.

16. Unassigned Station Competition

Recommendation: The cap should be eliminated for 100% renewable Non-Carbon Hydrogen projects.

Recommendation: Do not penalize applicants for not knowing where proposed stations are to be located since it encourages insider information trading.

Eliminate this rule from proposed stations.

- *Proposed hydrogen fueling stations that fall within the 6 minute drive time from other newly proposed stations will be recommended for funding based on the highest overall final proposal score.*

How far is six minutes, especially in cities like LA, SJ, Sacramento, Stockton and SF?

After 100% Renewable Carbon Free Hydrogen Stations meet minimum eligibility, then preference should be given to 100% Renewable Carbon Free Hydrogen Stations over Fossil Fuel Hydrogen stations.

17. Match Share Funding Requirements

Recommendation: Must be exempt for 100% renewable Non-Carbon Hydrogen, or reduced to 20%.

Proposals with a greater percentage of the total project costs in match share funding will be scored higher than those with lower match share funding. The following applies to match share funding:

Recommendation: Again, this is not fair if you are proposing 100% RH. Must be exempt for **100% renewable Non-Carbon Hydrogen**.

20. Scoring Criteria and Points

Recommendation: Sustainability should be higher and thus raised to market viability - 90 points

Recommendation: Since there are few 100% Renewable non-carbon hydrogen fueling stations, this is going to be hard to measure. This would be unfair if you are proposing 100% RH. Recommend that it is changed to account for this.

Recommendations: Should be determined on a long term basis, otherwise Fossil Fuel hydrogen developers (Industrial Gas Companies) could rig the deal by selling at a loss, since their cost of feed stock is proprietary. Long term, 100% Renewable non-carbon Hydrogen get less costly the more it is used because it is infinite and it can not be depleted. Fossil fuel (natural gas) hydrogen gets more expensive since it is finite and unsustainable. Eliminate the cost/kg as a factor, as well as the hardware for 100% Renewable non-carbon Hydrogen in this pilot plan and use mass production projections. Exempt.

Sustainability (30 points): Proposals will be evaluated on the degree to which...

Recommendation: Should be Higher, raise to 90 points, equal to that of market viability.

21. California Environmental Quality Act (CEQA)

Recommendations: Zero Carbon, Zero Pollution from well to wheel which is 100% sustainable into the future? And 100% Renewable Non-Carbon Hydrogen should be declared Exempt.