## **Energy - Docket Optical System**

From: Colin Armstrong [carmstrong@htec.ca]
Sent: Wednesday, October 16, 2013 2:10 PM

To: Energy - Docket Optical System

Subject: Docket 12-HYD-01

**Attachments:** P1010631.JPG; P9260803.JPG

Categories: Ready to Docket

California Energy Commission

DOCKETED

12-HYD-01

TN 72099

OCT. 16 2013

Topic - Mobile Fuelling Station

Our experience designing, installing, operating, and the mobile refueller for BC Transit's FC bus program along with a container based station in Vancouver, suggest the following items should be considered prior to issuing the PON.

Total allowable foot print – including protective barriers, dispensers, h2 supply, power supply.

Capacity – the challenge is more on consecutive days since hydrogen will need to be brought to site.

Power – this can be large and we had lots of debates whether a diesel generator was acceptable. Perhaps fixed stations need to have suitable plug available. Or maybe demand that an onboard fuel cell is required.

Definition of Mobile – does a 20ft ISO container as shown count that is dropped on site for example?

How many different places/jurisdictions will it need to be deployed? – it typically takes a reasonable effort to convince local authorities that it is acceptable. You may need stations to get pre-approval of space and setup at site. Bollards and setbacks are a challenge. We used mobile highway type barriers.

How often and how fast a response time is required – will operators be given \$x per setup and per day and per kg of H2 dispensed, and is this part of the \$1 million. Who pays and how much – station operators? Who decides when needed?

Emergency Response Plans – station operators will need to incorporate into their plans but who writes/administers/owns.

Hydrogen Price – how is this accounted for. As a cost to proponent? Including shipping and cylinder rental.

Noise - what is acceptable?

Recommendation – do not include a mobile refueller request in the PON. The system for BC proved to be too expensive to deploy for the amount of hydrogen dispensed. I would suggest considering 2 alternative plans:

- 1. Fining operators for every customer that comes to a station and does not get a fill.
- 2. Creating a central number that drivers can call anytime for support whether if a station does not work or other. That operator can then direct the call to maintenance personnel or other. They can also track complaints.
- 3. It would seem to make sense to have a mobile refueller that can drive up to a vehicle on the side of the road to fill if empty. But I would suggest that would be problematic and offering free towing would be much more cost effective.
- 4. Change the mobile refueller request to a request for Network Support Services for say five years for the above items and others such as a fuelling station location app.

Please do not hesitate to contact me if you require further clarification or information. Attached are a couple pictures for reference.

Good luck,

Colin

Colin Armstrong P.Eng. President

## **HTEC Hydrogen Technology & Energy Corporation**

315 Mountain Hwy. North Vancouver B.C. Canada V7J 2K7

direct: (604) 998-4147 (604) 351-0298 HTEC office: (604) 904.0412 (604) 986-0525

www.htec.ca

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