



Hydrogen Frontier
403 Gardena Blvd #B
Gardena, CA 90248
(951) 741-3631

Hydrogen Frontier Inc.

California Energy Commission

DOCKETED
12-HYD-01

TN 72101

OCT. 16 2013

Response and Concerns to CEC Draft Solicitation

California Energy Commission 10/16/2013

I have reviewed the Draft and have some concerns I would like to share with you.

In order as it appears on Draft

8. Single Applicant cap. My problem with this is it should be “single technology provider”. We are trying to increase competition and encourage more technologies to participate “Market Diversity”. It is easy for one technology provider to obtain operators/ applicants and game the system for larger portion of funding.

11. B Protocols. I would like to see other protocols as well like MC method included. I would like for you to look into this potential monopoly of having only this one protocol.

11. E Dual Pressure. This is confusing I think you really mean B70 fills? We haven’t been and don’t need to precool 35 Mpa. The only car company who uses this pressure is Honda and they have announced that their next generation cars will be 70 Mpa. So my question is what is the correct specification?

14. Mobile Fueler. I think this is a great idea. However I don’t believe it will meet the same performance specs as a fixed station. So maybe we can clarify performance specs for Mobile Fuelers?

15. Station Locations. I have been fighting this concept for years. This only works when we have a larger baseline of stations. We have less than 5 working stations right now! We have funded stations that

haven't even started the permit process. I can see we need to start somewhere but to restrict stations by a defined location is not looking to the future, remember we are building these for 2015 all areas will need stations. In short it we should be defining locations on what municipalities will be able to provide expedited permitting services. Those are the locations we should concentrate first.

The last PON had defined areas called polygons and most all stations and shaded areas were in residential neighborhoods. We don't build stations in residential neighborhoods and yet a main artery serving that area (not in shaded area) was not considered! We suffered with no viable sites to work with many areas did and will not see hydrogen stations.

We are competing with Compressed Natural Gas and E85 which currently have the same model to install equipment on existing Stations; we need to diversify types of locations.

17. Match Share. Seems to me we are penalizing "Unassigned Stations" twice. First by bonus points, 20 for priority and 15 for secondary locations and then on top of that a match share of 30 %! Again we are building stations and need them everywhere and I believe we are early to start specifically determining where stations should be built and penalizing with match share reduction.

18. O & M Costs. I think it is imperative to have full transparency for all expenses if the State is willing to support this

20. Scoring. Market Viability 90 points??? This whole section is pure conjecture. Nobody knows how many cars will be using their station! What it should be based on is station performance vs. cost per kg dispensed. Then we need to define station performance as the ability to dispense hydrogen at how many: Kg/ hr, Kg/ 2 hrs, Kg/ 6 hrs, Kg/ 12 hrs, Kg/ 24 hrs.