

Attn: California Energy Commission
Re: Docket No. 15-HYD-01 1516

California Energy Commission

DOCKETED

15-HYD-01

TN # 76143

AUG 28 2015

From:
Powertech Labs Inc.
Ashley Tyndall, P.Eng
Engineer, Hydrogen Fueling Stations
Ashley.Tyndall@powertechlabs.com
604-590-6613

Powertech Labs has provided the following feedback and comments from a Station Manufacturer's perspective.

Section 10: Minimum Technical Requirements

A: "Stations shall provide a method of continuously monitoring the gas stream.....to ensure that hydrogen meets SAE J2719..."

From our experience this requirement will increase both the cost of the dispenser and the footprint as the monitoring equipment will need to be close to the nozzle. We recommend revisiting this requirement and suggesting the requirement of something along the line of constant filtration at the dispenser.

F: "Dual Dispenser Pressure Requirements"

Removing the need for the 350 bar nozzle will reduce the cost of the station and potentially the footprint of the dispenser. As a station manufacturer, we see this as a way to potentially get more stations funded. Having the need for 700/350 bar stations at strategic locations (such as connector stations) could still serve a purpose. If there was an issue with the 700 bar then the customer can get a partial fill to allow them to get to the next closest 700 bar station.

Section 19: Critical Milestones

We strongly recommend having an equipment purchase milestone. Unfortunately due to the limited vendors available we are subject to their deliveries. Speaking from experience we've had issues with vendors honoring their quoted deliveries, as well as developers placing PO's within a realistic time frame to meet CEC deadlines. The late deliveries affect the fabrication, thus affecting the site install. We would recommend setting an Equipment PO milestone related to the commissioning date to ensure the PO's placed with sufficient time to build before the CEC deadline.

While we like the milestone requirements – we do need to be protected for equipment purchases if the CEC decides to cancel the project due to a missed milestone or any other reason. We would not want to be left with stranded equipment.

Section 21: Hydrogen Refueling Station Upgrades

We recommend providing a list of stations that are eligible for upgrades.

Section 24: Evaluation Process, Scoring Criteria and Points

We would like to see Qualifications of Applicant/Project Team, Innovation and Sustainability weighted higher. Qualifications should be more in line with performance section in terms of points. We also agree with the safety planning pass/fail comments brought up during the August 13/14 meetings.