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July 21, 2017

John Kato
Deputy Director, Fuels and Transportation Division
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**Subject: CHBC SUPPORT for Allocation of AB 8 Funds to Hydrogen
Infrastructure Expansion**

Dear John:

The California Hydrogen Business Council (CHBC) would like to recommend allocation of AB 8 monies that become available this summer to fund additional projects from the list of stations that received a passing score but were unfunded in GFO 15-605.

As you know, the CHBCⁱ is committed to advancing the commercialization of hydrogen in the energy sector – including, transportation, goods movement, and stationary power systems – to reduce emissions and dependence on oil.

Currently, 28 hydrogen fueling stations are open in the State of Californiaⁱⁱ, supporting thousands of fuel cell electric vehicles (FCEVs). However, the CEC/CARB Joint Staff Report indicates a potential lack of H2 fueling capacity by 2021, and need to increase station deployment prior to this time.

Table 5: Stations, Fueling Capacity, and Projected Fuel Demand

	2017	2018	2019	2020	2021	2022
Quantity of Open Retail Stations	50	58	66	74	82	90
Total Nameplate Capacity (kg/day)	9,380	10,820	12,260	13,700	15,140	16,580
FCEV Fuel Demand (kg/day)	4,400	7,200	9,200	12,800	23,700	30,300

Source: ARB

Since hydrogen fueling station deployment can take an average of 24 months, the CHBC recommends using AB 8 funds to expand the fueling station network now to provide customers and auto manufacturers certainty.

Awarding applicants who received a passing score, but were not awarded due to a lack of funds in GFO 15-605, would utilize a proven process in which applicants underwent rigorous review, and provide immediate benefits to the hydrogen and fuel cell industry and the citizens of California.

We also recommend this investment in fuel cell technology to compensate for Electrify America's *California ZEV Investment Plan: Cycle 1*ⁱⁱⁱ, which did not allocate any funding of their \$300,000,000 investment to hydrogen and fuel cell efforts. This is contrary to California's commitment and framework to support emission-free transportation, which has been agnostic in the choice of technologies that offer zero tailpipe emissions, including Fuel Cell Electric Vehicles (FCEVs) and hydrogen.

Keeping California's hydrogen station deployments on track with projected fuel cell electric vehicle rollout will assure that consumer acceptance of zero emission fuel cell stay on pace with the State's policy goals.

We thank you for your efforts and stand ready to support any measures geared towards allocating AB 8 funding to hydrogen infrastructure expansion.

Sincerely,



Emanuel Wagner
Assistant Director
California Hydrogen Business Council

ⁱ The views expressed in these comments are those of the CHBC, and do not necessarily reflect the views of all of the individual CHBC member companies. Members of the CHBC include Advanced Emission Control Solutions, LP, Advanced Power and Energy Program (APEP) - UC Irvine (UCI), Air Liquide Advanced Technologies U.S. LLC., Airthium, Alameda-Contra Costa Transit District (AC Transit), American Honda Motor Co., Inc., Anaerobe Systems, Ballard Power Systems Inc., Bay Area Air Quality Management District (BAAQMD), Beijing SinoHytec, BMW of North America LLC, Boutin Jones, California Air Resources Board (CARB), California Fuel Cell Partnership (CaFCP), California Performance Engineering Inc., CALSTART, Cambridge LCF Group, Center for Transportation and the Environment (CTE), China Hydrogen Fuel Cell Corporation, Coalition for Clean Air (CCA), Community Environmental Services, CP Industries, E4 Strategic Solutions, Eco Energy International LLC, Eldorado National – California, Energy Independence Now (EIN), EPC, Ergostech Renewal Energy Solution, First Element Fuel Inc, FuelCell Energy, Inc., General Motors Corporation, Geoffrey Budd G&SB Consulting Ltd, Giner, Inc., Gladstein, Neandross & Associates (GNA), Golden State EPC, Greenlight Innovation, GTM Technologies Inc., H2B2, H2Safe, LLC, H2SG Energy Pte Ltd, H2Tech Systems, HODPros, Horizon Fuel Cells Americas, Inc., Hydrogenics Corporation, Hydrogenious Technologies, HydrogenXT, Hyundai Motor Company, i-2-m, Idaho National Laboratory, Intelligent Energy, IRD Fuel Cells LLC, ITM Power Inc, Ivys Inc., Johnson Matthey Fuel Cells, Linde North America Inc, Loop Energy, McPhy Energy, Millennium Reign Energy LLC, Montreux Energy LLC, MPL Consulting, Inc., National Renewable Energy Laboratory – NREL, Nel Hydrogen, New Flyer of America Inc, Next Hydrogen Corporation, Noyes Law Corporation, Nuvera Fuel Cells, Pacific Gas and Electric Company - PG&E, Paramount Energy West LLC, PDC Machines, Inc., Planet Hydrogen Inc, Plug Power, Port of Long Beach (POLB), PowerHouse Energy, Powertech Labs, Inc., Proton OnSite, Ramco Consulting Company Inc, Rio Hondo College, RIX Industries, Sacramento Municipal Utility District (SMUD), SAFCell Inc, Schatz Energy Research Center (SERC), Sheldon Research & Consulting, Solar Hydrogen System, South Coast Air Quality Management District (SCAQMD), Southern California Gas Company, Sumitomo Corporation of Americas, SunLine Transit Agency, Tatsuno North America Inc., Terrella Energy Systems Ltd, The Leighty Foundation, TLM Petro Labor Force, Toyota Motor North America Inc., United Hydrogen Group Inc, US Hybrid Corporation, WireTough Cylinders, LLC, Zero Carbon Energy Solutions.

ⁱⁱ <https://cafc.org/stationmap>

ⁱⁱⁱ <https://www.electrifyamerica.com/our-plan>