California Hydrogen Business Council

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Director Hannon Rasool
Fuels and Transportation Division
California Energy Commission
Docket Number 25-HYD-01
2526 9th Street
Sacramento, CA 95814

RE: Comments on Hydrogen Refueling Infrastructure Pre-Solicitation Workshop

Dear Director Rasool:

These comments are in response to the November 20 pre-solicitation workshop presentation that framed issues in Docket No. 25-HYD-01, a Hydrogen Refueling Infrastructure Solicitation.

A sustainable hydrogen market ultimately depends on lowering the cost of hydrogen — and the best viable path to reduce cost is scale. Heavy-duty fuel-cell trucking plays an essential role in achieving scale. Heavy-duty trucks consume far larger volumes of hydrogen than light-duty vehicles. High-volume demand enables economies of scale in hydrogen production, delivery, and station operations. As throughput increases, the per-kilogram price of hydrogen falls — benefiting all users of the network.

Large-capacity, multimodal hydrogen refueling stations are critical. These stations serve heavy-duty trucks, and medium- and light-duty vehicles simultaneously. Advantaging such stations would create a unified ecosystem where all vehicle classes benefit from improved infrastructure. We recommend the criteria used for judging proposals be performance based, looking at total dispensing capacity for stations rather than equipment specifications like numbers of tanks or nozzles or lanes. One readily available tool for such measurement is the HyCap model for heavy duty hydrogen credits used for Low Carbon Fuel Standard compliance at the Air Resources Board.

California's deployment strategy should include:

- More stations in Southern California and Northern California urban markets;

- Strategic placement of large-capacity stations along the I-5 corridor connecting NorCal and SoCal — to enable long-haul, zero-emission freight movement and unlock hydrogen volume;
- Consideration if a station is in an area of high hydrogen use in the near term, for example at a port where drayage trucks are used for short-haul operations;
- Flexibility in size of applications whereby applicants can decide the best way to deliver low-cost fuel and trucks on the road without a maximum size of project;
- Flexibility to accommodate stations that can take advantage of low-cost hydrogen - if a small-capacity, single modal station yields a significantly lower price of hydrogen, then it should be strongly considered in the decision process.

CHBC also strongly believes requiring transit agencies to allow public access for their stations to be eligible for funding is misguided. Transit agencies depend on the delivery of liquid hydrogen for their use to fuel transit buses. Having public access to that supply puts a strain on the agencies' needs and will impact the deployment of buses due to the consumption of hydrogen through public access. It also makes operational logistics more complicated, creating safety and liability concerns and adding significant cost to the project to site a public dispenser away from the agency fuel island.

Thank you for your time and attention to these comments.

Sincerely,

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