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California Hydrogen Business Council Comments - 2026-2027 Investment Plan Update for the Clean Transportation Program

Additional submitted attachment is included below.

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California Energy Commission
Docket Unit, Docket No. 26-ALT-01
715 P Street
Sacramento, CA 95814

RE: Public Comment on the 2026–2027 Investment Plan Update for the Clean Transportation Program; Docket No. 26-ALT-01

The California Hydrogen Business Council ("CHBC") respectfully submits these public comments to the California Energy Commission ("CEC") regarding the 2026–2027 Investment Plan Update for the Clean Transportation Program. CHBC appreciates the opportunity to comment on proposed Fiscal Year 2026–2027 funding priorities under the Clean Transportation Program, including investments intended to accelerate zero-emission transportation infrastructure, reduce petroleum dependence, improve air quality, and support equitable deployment across California.

Comments of the California Hydrogen Business Council

CHBC supports the continued focus on zero-emission vehicle infrastructure and urges the Commission to ensure that hydrogen infrastructure and workforce needs are fully reflected in the final Investment Plan.

CHBC is the largest hydrogen trade association in the United States, with more than 70 members across the hydrogen and fuel cell supply chain, including project developers, engineering and professional services firms, end users, labor, public agencies, and community stakeholders.

Workforce Development Funding

CHBC recommends that the Commission allocate a portion of Workforce

Training and Development funding to hydrogen workforce and safety training across California regions. Hydrogen technologies and fueling infrastructure are expanding, and California should ensure that operators, maintenance personnel, emergency responders, safety officials, permitting authorities, transit agencies, labor organizations, and community stakeholders have a strong grounding in hydrogen-specific safety considerations. Dedicated training will support safe and reliable infrastructure deployment, improve operational readiness, and build public confidence in hydrogen projects.

The workforce development section of the Investment Plan should extend beyond electric vehicle and charging-focused training. **CHBC respectfully requests that the Commission consider allocating up to $500,000 of Workforce Training and Development funds to support statewide hydrogen safety training**, including regional, in-person sessions in areas such as Los Angeles, the San Francisco Bay Area, and other regions where hydrogen projects are planned or underway. These sessions should be accessible to communities, including tribal communities and disadvantaged communities, that are investing in or evaluating hydrogen infrastructure.

To ensure credibility and consistency, training should be delivered by recognized hydrogen safety authorities, such as the Center for Hydrogen Safety. In-person courses taught by members of the Hydrogen Safety Panel can provide practical, expert-led instruction grounded in real-world project experience and established hydrogen safety practices.

The Center for Hydrogen Safety has previously conducted hydrogen safety training in limited California regions when funding was available. Dedicated Clean Transportation Program support would allow this training to reach more regions, more project participants, and more communities that are preparing for hydrogen infrastructure deployment.

CHBC recommends that the final Investment Plan includes hydrogen workforce and safety training as an eligible and prioritized use of workforce and training funds. This targeted investment would complement infrastructure funding by helping ensure that the people responsible for planning, permitting, operating, maintaining, and responding to hydrogen facilities are prepared to do so safely and effectively.

Alignment of Incentives to Reach Critical Scale

The final Investment Plan should address persistent barriers to zero-emission deployment, including high upfront costs, uncertain operating expenses, and uneven infrastructure availability. For hydrogen, these barriers are intensified when vehicle incentives, station funding, fuel-supply planning, permitting support, and crediting programs move on different timelines. Misaligned programs can delay projects, reduce station utilization, strand public investment, and discourage private capital. CHBC urges the Commission to use the Investment Plan to promote better coordination among CEC infrastructure programs, CARB vehicle and market-development incentives, local air district funding, federal grant opportunities, utility planning processes, and Low Carbon Fuel Standard crediting.

Aligned incentives are especially important for hydrogen because delivered fuel cost and station economics depend heavily on throughput. Vehicles must be deployed where stations are available, stations must have enough committed demand to operate efficiently, and fuel suppliers need confidence to invest in production and delivery capacity. Coordinating infrastructure funding with vehicle vouchers, fleet transition programs, port and freight corridor investments, transit and school bus programs, and clean fuel credit mechanisms can create regional demand density, improve utilization, support more reliable service, and move hydrogen from isolated demonstrations toward commercial scale.

CHBC recommends that the final Investment Plan explicitly identify incentive alignment as a program priority. The Commission should consider synchronized funding windows, compatible eligibility criteria where feasible, recognition of committed vehicle deployments in infrastructure scoring, support for multi-site and corridor-based applications, and mechanisms that allow public funds to leverage private capital. This approach would help California prioritize hydrogen where it can provide the greatest value, including high-mileage fleets, heavy-duty freight, drayage, transit, refuse, public-sector fleets, and applications where fast refueling, long range, payload preservation, and operational resiliency are essential.

Thank you for the Commission’s consideration of these comments.

Sincerely,

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