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California Energy Commission
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Mr. Pat Perez
Deputy Director
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California Energy Commission
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The South Coast Air Quality Management District (SCAQMD) appreciates this opportunity to comment on the CEC's draft hydrogen fuel infrastructure solicitation. The CEC is earnestly working to gather consensus for the state funding of hydrogen stations, and this effort is commendable.

SCAQMD staff have the following comments regarding the draft solicitation:

1. For any stations that will be deployed in our region (8 of the 12 maps in Attachment 11), the SCAQMD anticipates, if needed, being a major co-funding partner. However, it is difficult and awkward to pre-select vendors as part of their proposal to you. It would be better and more efficient if the SCAQMD could participate with the CEC on the review of the proposals so we could jointly identify entities for funding.
2. We believe that some funding should also be allowed for on-going operations and maintenance of existing stations, not just newly funded or upgraded stations. In order to maintain station operations through 2015 and beyond, some of the stations funded last year and even earlier with CARB and AQMD support, may need supplemental operational funding until the vehicle volumes increase.
3. We do not agree that each station needs to demonstrate 33% renewable hydrogen and recommend the CEC follow the CARB strategy of meeting a 33% renewable requirement on aggregate. Requiring each and every station funded to provide 33% renewable hydrogen will drive up the costs of the station, requiring more public dollars. The SCAQMD supports renewable hydrogen just not at this early stage.
4. SCAQMD staff also suggests that CEC provide clarification regarding "public accessibility," specifically if the CEC requires a strategy to site certify the dispensers to sell hydrogen by the kilogram. We welcome this clarification or other strategies to allow for the sale of fuel without fueling agreements.

5. Finally, we urge the CEC to consider the stakeholders' input regarding the location and performance criteria. During the workshops, there was ample discussion of different types of stations and throughput requirements for each type. These clarifications do not appear to be captured in the proposed solicitation, specifically 50 kg/day appears too small except for connector stations.

We would be happy to discuss these recommendations in more detail with CEC staff. Thank you in advance for your consideration of our comments, and we look forward to working with you to deploy hydrogen stations in the South Coast Basin.

Sincerely,

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