Thank you for the opportunity to review the Cal/EPA Draft Fuels Guidance Document. CaFCP recognizes the hard work that went into this document and appreciates the chance to provide input. We suggest the following sections be updated with current information as follows:

1. Section II, Fuel Matrix: There is a hydrogen pipeline in Southern California.

<http://www1.eere.energy.gov/hydrogenandfuelcells/pdfs/hpwgw_airprod_remp.pdf>

1. Section III, Fuel Definitions: The industry accepted fuel standard for fuel cell vehicles is SAE J2719:

<http://www.sae.org/servlets/productDetail?PROD_TYP=STD&PROD_CD=J2719&HIER_CD=TEVFC&WIP_SW=YES>

1. Section IV, H2 Requirements: Hydrogen is produced economically on a commercial scale. The DOE has reported that delivered hydrogen produced from natural gas can meet the cost target of $3/gge.

<http://www.hydrogen.energy.gov/pdfs/review08/pd_0_dillich.pdf>

1. Section IV, H2 Requirements: CDFA is planning to reference the ASTM quality methods, some of which have been published, others are under development with an expected publish date of 2010. <http://www.astm.org/COMMIT/SUBCOMMIT/D0314.htm>
2. Section IV, H2 Requirements: The Cal Fire section appears to be cut and pasted from the Liquid Biogas section. CaFCP recommends referring to the ICC and NFPA codes (NFPA 55, NFPA 52) pertaining to hydrogen.