



California Fuel Cell Partnership
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September 1, 2017

California Air Resources Board
Industrial Strategies Division – Transportation Fuels Branch
1001 I Street
Sacramento, CA 95814

RE: Low Carbon Fuel Standard pre-rulemaking August 2017

Dear LCFS team,

The California Fuel Cell Partnership (CaFCP) is pleased to submit this letter to provide general input for consideration in the LCFS pre-rulemaking process.

California Fuel Cell Partnership's mission is to support its members with the rollout and commercialization of hydrogen fuel cell electric vehicles and fueling infrastructure. As part of this commercialization effort, CaFCP members are actively developing fuel production and distribution processes, to make hydrogen fuel available for an increasing number of private, public and commercial FCEV users.

Due to the very early commercialization stage of fuel cell vehicles and hydrogen, rules and regulations should facilitate the development of additional and renewable hydrogen fuel production processes wherever possible, and allow for the cross-boundary use of available energy resources between the conventionally separated utility and transportation realms. Examples of this are grid connected electrolyzers and directed biogas reformation to produce hydrogen fuel for transportation using sources that are typically used by utilities for stationary applications. In this way, all otherwise stranded renewables can be used, particularly with an increase of renewable generation capacity. Such a system approach would be similar to what U.S. DOE's H2@SCALE initiative pursues by tying together the electricity grid with value added applications in industry and transportation.

Finally, it would be beneficial for the LCFS team to refine the program to incentivize expanded hydrogen production to enable scale and cost reduction; two areas that will facilitate the growth of ZEV technologies and help meet 2050 and nearer term goals.

Thank you for your consideration. If you have any questions about hydrogen production and fuel cells for transportation, please do not hesitate to contact me at (916) 375-8050 or nbouwkamp@cafcp.org.

Sincerely,

Nico Bouwkamp,
Technical Program Manager

Air Liquide
Automotive Fuel Cell Cooperation
Cal/EPA Air Resources Board
California Energy Commission
Mercedes-Benz
GM
Honda
Hyundai
Nissan
Office of Governor Edmund G. Brown Jr.
South Coast AQMD
Toyota
U.S. Department of Energy
U.S. Environmental Protection Agency
Volkswagen
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Ballard Power Systems
Bay Area Air Quality Management District
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CALSTART
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