



FUEL CELL
PARTNERSHIP

DRIVING FOR THE FUTURE

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June 19, 2015

California Air Resources Board

Richard W. Corey

Executive Officer

Re: Suggested modifications Low Carbon Fuel Standard regulatory language
1001 I St
Sacramento, CA 95812-2815

Dear Mr. Corey and CARB LCFS staff:

The California Fuel Cell Partnership is pleased to provide input on the suggested modifications to the LCFS regulatory language¹ for 15-day comments. We appreciate the inclusion of hydrogen as a low carbon transportation fuel for credits, including those under the Renewable Hydrogen Refinery Credit Pilot Program. The monetary value of these credits will support the sustainability of hydrogen as a renewable fuel and energy storage medium. With the proposed LCFS language revision and CPUC requiring energy storage for renewable electricity, California is sending a vital signal and builds confidence among all early market participants.

Please consider the following comments for consistency across zero emission vehicle technology platforms and enabling transportation fuels:

- a. *Throughout the document, include stronger encouragement and support of renewable content based hydrogen as a fuel or energy storage medium.*
- b. *“Electric Vehicle (EV)” (30) (p7) definition should also include Fuel Cell Electric Vehicles.*
- c. *Include definitions for “Fuel Cell Electric Vehicle” and “Battery Electric Vehicle” as “Plug In Hybrid Electric Vehicle” is also defined, and “FCV” and “BEV” are included as Acronyms under (b) (p14).*
- d. *Consider including a definition for “Renewable Hydrogen”, as this is used extensively on p93ff.*
- e. *Add “Hydrogen fueling” as one of the “Transaction Types”, this will cover all hydrogen fuel cell vehicle applications, including hydrogen fuel cell forklift fueling (p12-13).*
- f. *An EER Value for electricity in forklifts and hydrogen in fuel cell forklifts is included, as well as light duty fuel cell vehicles, but no specific EER Values for fuel cell transit buses and a variety of different fuel cell vehicle platforms in the medium- and heavy duty applications category, like the variety of EER Values in the Heavy-Duty Electricity fueled vehicle platforms (Table 4, p32).*

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Automotive Fuel Cell Cooperation

Cal/EPA Air Resources Board

California Energy Commission

Office of Governor Edmund G. Brown Jr.

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BAE Systems

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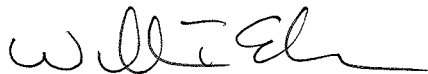
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g. "Hydrogen for fuel cell electric forklifts" is mentioned as an option to report for to receive transportation fuel credits (p103), but not hydrogen for fuel cell transit buses, other light-medium- and heavy duty fuel cell vehicle platforms, and off-road applications.

Thank you for your leadership in helping develop a sustainable market for fuel cell electric vehicles and hydrogen as a fuel, and for the opportunity to provide comments. Please do not hesitate to contact me at (916) 371-2396 or belrick@cafcp.org if you have any questions or require clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Elrick". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bill Elrick
Executive Director

cc: Justin Ward, CaFCP Chair

ⁱ As posted at: <http://www.arb.ca.gov/regact/2015/lcfs2015/regorderfinal.pdf>