



October 26, 2018

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Nichols,

Thank you for the opportunity to provide comment on Electrify America's Cycle 2 Investment Plan. Since 2000, Nuvera Fuel Cells has provided power systems for a wide variety of on- and off-road vehicles, including automobiles, marine vessels, locomotives, and forklifts. We are currently working with our parent company, Hyster-Yale Group (a global industrial truck OEM), to develop and demonstrate a fuel cell-powered laden container handler at the Port of LA as part of a project funded by CARB. Both Nuvera and Hyster-Yale Group believe strongly that ports are an excellent market for our products in California and worldwide, and intend to offer multiple integrated fuel cell vehicle platforms for this and similar markets. Unlike batteries, fuel cells are able to meet the demands of vehicles with intensive duty cycles without negatively impacting payload, lifting capacity, or productivity at terminal operations.

The most important aspect of commercialization of fuel cell vehicles and equipment for ports, public transit, freight, and other sectors in which diesel engines play a significant role is access to renewable hydrogen fuel at a cost that is at parity with diesel. Far greater investment in hydrogen infrastructure for both on- and off-road applications is required in order to achieve this target and ensure the sustained commercial availability of these technologies.

Electrify America's Cycle 2 Plan has no provision for investment in hydrogen fueling infrastructure. This should be considered unacceptable. By curtailing the availability of vital zero-emissions alternatives to diesel technologies, it does significant disservice to all Californians, particularly the residents of communities in urban areas, along freight corridors, and in proximity to seaports – all of which are concentrated sources of NOx emissions from diesel combustion. We urge the California Air Resources Board to reject Electrify America's singular focus on battery charging technology and insist it provides significant resources to build out California's hydrogen fueling infrastructure.

Please do not hesitate to contact me if there is any further information I can provide.

Best regards,

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