



May 26, 2022

Chair Liane M. Randolph
Executive Officer Richard Corey
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

BY ELECTRONIC TRANSMISSION

RE: Accelerating the Light Duty Fuel Cell Market

Dear Chair Randolph and Executive Officer Corey:

We are a collective of energy companies, renewable fuel providers and environmental advocates who are committed to accelerating the growth of a zero emission hydrogen fuel cell market for California consumers. Together, we represent billions of dollars in investments in developing a global hydrogen economy, and share a particular focus on seeing California as a continued launching pad for fuel cell passenger car and trucks.

We believe light duty fuel cell electric vehicles (FCEVs) will fill a significant market segment of ZEV purchasers, particularly those without access to charging at home (including the majority of Californians who live in multi-family housing) or at the workplace. Fuel cell drivers can also fuel within minutes, and at stations with standardized fueling, and we believe this is a convenience that will be central to FCEVs' appeal. We also agree with automakers' assessments that the growth of the fuel cell market for light duty is critical to economies of scale for fuel cell stacks for heavy duty fuel cells.

What is also clear to us is that fuel cells will require reliable public infrastructure before vehicles can be marketed. Although some of our organizations are working on hydrogen infrastructure in

other ZEV states, the fact remains these efforts are still in an early stage, and do not yet match the investments and policy commitments that California has fostered for years.

For these reasons, our coalition strongly supports the proposal put forward by fuel cell automakers to continue to allow FCEVs placed in California to count toward compliance in other ZEV states until those states have sufficient infrastructure in place. We are persuaded that this proposal -- with its sunset in 2030, its cap on compliance usage, and its phaseout once infrastructure is in place in each state -- is a well-bounded approach that will have only a limited impact on other ZEV volumes in those states. At the same time, we believe this provision is a critical factor for automakers to continue to explore and accelerate the FCEV market in California.

We commit our combined efforts to helping to bring a robust and renewably-sourced station network to California and California ZEV drivers and fleets, and urge CARB to continue to provide this important incentive to automakers to expand the hydrogen fuel cell market in California.

Respectfully submitted,

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