



California Trucking Association
4148 E. Commerce Way * Sacramento, CA * 95834
www.caltrux.org

American Trucking Associations
950 North Glebe Road, Suite 210 * Arlington, VA * 22203
www.truckline.com

January 13, 2016

Ms. Marijke Bekken
California Air Resources Board
1001 I Street
Sacramento CA 95812

Submitted Electronically: http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=techfuel-report-ws&comm_period=1

RE: Comments on the California Air Resources Board's Draft Technology Assessment: Medium- and Heavy-Duty Fuel Cell Electric Vehicles

The California Trucking Association (CTA) and the American Trucking Associations (ATA) are pleased to have the opportunity to review and comment on the California Air Resources Board's Draft Technology Assessment: Medium- and Heavy-Duty Fuel Cell Electric Vehicles.¹ We appreciate staff's efforts in preparing the assessment and view the draft as a starting point for a discussion of this technology. The following comments reflect the experience and viewpoint of the trucking industry as they pertain to this technology and should be reflected in the assessment.

General Comment: While both CTA and ATA support incentive based pilot-projects and demonstrations, and note the impressive amounts of technical detail in the document, the assessment could better capture the immense current and future technological and market barriers to widespread commercial deployment of hydrogen fuel cell (HFC) trucks. Data gaps include:

- Current and future costs of commercially available HFC trucks.
- Cost and availability of low-carbon intensity hydrogen fuel sources
- Infrastructure needs and costs

There is also little discussion about the policy implications of fueling pathways such as on-site distributed production from reformed natural gas, which would be accompanied by many of the same GHG barriers as discussed in the natural gas technology assessment.

It would be useful for both stakeholders and policymakers to understand what fueling pathways would actually meet future GHG targets so that the relative cost-effectiveness of both potential criteria pollutant and GHG reductions could be assessed.

¹ CTA serves the commercial motor carrier industry in California and the companies that provide products and services to the trucking industry. ATA is the national trade association representing the American trucking industry and is a united federation of motor carriers and suppliers, state trucking associations, and national trucking conferences.

P. ES-4: It would be helpful to note the varied cost of hydrogen production depending on method/inputs and the ARB's expectation of carbon intensity by pathway when discussing cost-competitiveness compared to diesel fuel.

P. ES-4: While the cost of hydrogen fueling stations is briefly discussed on P. V-3, we would recommend including generally accepted cost forecasts, such as NREL's, in the summary².

If you have any questions regarding these comments, please contact us at your convenience.

Respectfully,



Chris Shimoda
Director of Policy
California Trucking Association



Mike Tunnell
Director, Energy and Environmental Affairs
American Trucking Associations

² <http://www.nrel.gov/docs/fy13osti/56412.pdf>