

I am a FCEV owner/driver in Santa Barbara and professionally involved in planning for hydrogen vehicle infrastructure and renewable hydrogen production. Specifically, I recently served as a Project Coordinator for the Tri-Counties Hydrogen Readiness Plan prepared for the Ventura/Santa Barbara/San Luis Obispo Counties, funded by the California Energy Commission.

I previously submitted comments to CARB as input for the VW Investment Plan (Attachment 1). Like others, I was extremely disappointed that the initial VW Investment Plan released by CARB did not factor in those comments, and was completely silent on hydrogen as a ZEV investment pathway, even though this is an integral and vital component of the California ZEV strategy. I strongly support the comments made by NEL (Attachment 2), which drew attention to the obviously self-serving bias of Electrify America, in blatant disregard of California citizens' expectations of the Settlement.

The Supplement issued by Electrify America includes two pages that address hydrogen, but once again, it demonstrates the same bias as the original plan, and a basic lack of awareness of the importance of hydrogen for ZEV transportation, and the specific infrastructure needs that apply to hydrogen which are so different from electric vehicles.

As a resident of Santa Barbara, I am poignantly aware that the growth of the FCEV market here is currently impeded by the lack of a second hydrogen refueling station in the area to provide additional capacity and redundancy for the one existing station. If one other new station were supported in this area, I am convinced this would be sufficient to entice FCEV manufacturers to bring vehicles to the local dealerships, which in turn would be a key turning point for unlocking sales potential in this progressive community. No amount of promotion would significantly change FCEV sales here until that happens.

The logic to dismiss the need for hydrogen infrastructure funding as expressed in the Electrify America Investment Plan Supplement is fundamentally flawed – both in terms of its FCEV sales projections and “7% refueling surplus” in 2020. This shows a complete misunderstanding of the difference in the ZEV transition strategies needed for FCEVs when compared with PEVs.

In addition to the Mirai hydrogen vehicle that we own as a family, we have a Nissan Leaf, which we have enjoyed driving over the last five years. In that respect, I wish to say that we have NEVER charged this vehicle at a public charging station, and have always been satisfied with overnight charging (at 110V) at home. However many additional charging stations the VW Investment Plan may fund in California, I am convinced that it would not be guaranteed to change consumer behavior and the choices new vehicles buyers will make.

A majority of PEVs for sale today have a very limited range, and any driving beyond that range (in a single day) is almost certainly going to be done on gasoline, and not after re-charging at a public station. In this respect, the additional fast charging may benefit a small number of pure electric vehicles, but it is not at all a critical “gap” that can facilitate greater uptake of ZEVs and Partial ZEVs in general.

I support the intent of the Investment Plan to support the promotion of hydrogen vehicles along with PEVs, but there is opportunity to make a much greater contribution to the adoption of FCEVs through funding even a small number of stations.

In conclusion, I want to express extreme disappointment with this Supplement to the VW Investment Plan and with CARB for not negotiating a settlement that is more in line with state policies on ZEVs in general. I strongly encourage the CARB Board of Directors to give more consideration to the limitations of the VW Plan in this regard, and insist on at least a portion of funding for hydrogen refueling stations.

Sincerely,

A handwritten signature in black ink, appearing to read "Ivor John", is centered below the text "Sincerely,".

Ivor John, PhD

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Santa Barbara