

FirstElement Fuel

Good morning, Matt Miyasato with FirstElement Fuel. I want to thank staff for providing the opportunity for us to provide our comments today. FirstElement Fuel, we are the largest retail hydrogen station provider in the United States, and indeed the world. We want to applaud the staff for including the hydrogen refilling infrastructure, the HIR strategy within the rulemaking, similar to what's been successfully done in California. However, we would urge you to reconsider both the capacity cap, and 50% capacity crediting for both the light duty, and medium and heavy duty. As we learned in California, our original deployments with the small amount of incentive fundings that was offered really just deployed small stations that became unsustainable from a business perspective. The stations were fairly small, 250 kilograms, so about half the size that you're proposing, but even now today, we are not deploying any stations that are smaller than 1,200 kilograms per day. That is a four-dispenser liquid hydrogen delivery station that provides a customer experience that's very similar to what they're doing now in gasoline. It makes the transition rather seamless for them as they visit a refueling depot. Similarly, for heavy-duty, the 2,300 kilograms per day that your staff is suggesting is even smaller than what ARB is suggesting, California Air Resources Board. They're proposing a 3,000 kilogram per day with a 50% capacity cap. Even that we believe is too small. The industry is coalescing around at least a 6,000 kilogram per day station. That's just due to the size and throughput that you would expect from a well-used truck refueling outlet. We're happy to work with staff on the strategies for limiting over generation, because we totally understand and get the impulse to start small and build, and that's exactly what California did. However, those initial stations that were put out are just too small to be sustainable from a business perspective. We urge you to consider upping both, well, the capacity cap, and also the credit generation. We'll be happy to work with you on that. We'll be submitting our written comments, which will have my contact information. Again, thank you for the time today, and we look forward to working with you.