California Hydrogen Business Council

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California Air Resources Board
Sacramento, CA 95814

RE: Comments on staff proposed changes to ACF

Dear Air Resources Board staff:

Please accept these comments from the California Hydrogen Business Council ("CHBC") to the California Air Resources Board (CARB) regarding staff proposed changes to the Advanced Clean Fleets rule (ACF). CHBC represents 100 businesses and organizations involved in the production, distribution, and use of hydrogen.

CARB staff propose to make compliance with ACF more flexible for state and local government fleets by modifying several exemptions to make them easier to access for public agencies. CHBC believes this new assessment of exemptions should also include the flexibility of allowing Hydrogen Internal Combustion Engines (H2ICE) to be recognized in ACF.

H2ICE products have launched elsewhere in the world, including in India. They have not been deployed in the U.S. due to lack of policy support. H2ICE is a decarbonized clean air technology, in production and available today. If supported by CARB, these decarbonized engines could be adopted in the near term across California and the U.S.

It is timely for California to support H2ICE technology. This is in line with CARB's direction to reevaluate the inclusion of renewable natural gas, a low NOx/low Carbon technology, under the Advanced Clean Trucks (ACT), Advanced Clean Fleets, and Clean Truck and Bus Voucher Incentive Project (HVIP) programs. Additionally, manufacturers can use plug-in hybrid vehicles to help meet their zero emission vehicle sales requirements under the Advanced Clean Cars II (ACCII) and ACT regulations, and fleets can use plug-in hybrid vehicles to help meet their zero emission vehicle purchase requirements within the ACF regulation. H2ICE falls into the same category of technologies that are near-zero emissions (there is a small amount of NOx emitted), such as renewable natural gas and plug-in hybrid vehicles, that receive partial credit in these CARB programs.

We encourage CARB to not view technologies as exclusive of each other – battery, fuel cell, or H2ICE – but rather to focus on the objective of deep decarbonization. If CARB promotes H2ICE ***and*** fuel cells, it can increase hydrogen production volumes and decrease the cost, which in turn can unlock hydrogen as a solution across sectors. The 2022 Scoping Plan calls for 1,700 times the amount of renewable hydrogen to be deployed to meet California's greenhouse gas goals – the main barrier to doing so is the fuel cost. Allowing H2ICE vehicles to be part of the answer can address this ongoing problem.

H2ICE is a solution that works today. In light of recent federal actions, California must actively pursue a comprehensive suite of decarbonization solutions in the ACF regulation to maintain its position at the forefront of climate leadership.

Best regards,

Tim McRae
Vice President for Public Affairs