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October 26, 2024

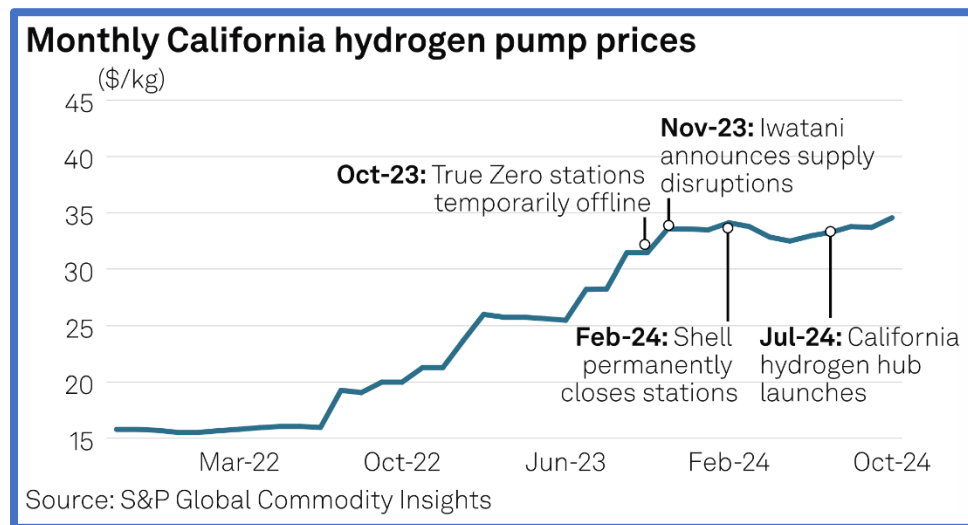
Tai Milder, JD - Director
Division of Petroleum Market Oversight
California Energy Commission
715 P Street
Sacramento, CA 95814

By Email and USPS

Re: Alternative Fuel – Hydrogen Fuel Cost – Senate Bill 2 (2023)

Dear Mr. Milder:

As reflected in this graph, hydrogen prices at the pump have increased by 115% over the last two and one-half years, trivializing any increases seen in gasoline and diesel prices during the same time period.



But first, if I could introduce myself: I am the President of the [California Hydrogen Car Owners Association](http://www.chcoa.org) (CHCOA). We are a group of hydrogen car drivers who believe in the positive role that these cars can play in the nation's green energy future. Our Association, which started a little over a year and a half ago, has grown to 202 volunteer members and includes current and former lawmakers, hydrogen industry and agency representatives, research scientists and many folks who have driven these cars for as long as they have been around.

As you know, Section 25371.3 of Senate Bill 2 (2023) states,

*“On or before December 31, 2024, the commission and the State Air Resources Board, taking into account findings of the assessment conducted under Section 25371, shall prepare a Transportation Fuels Transition Plan. The commission and the State Air Resources Board shall determine the contents of the report, but the report shall include, at a minimum, a discussion of how to ensure that the supply of petroleum and **alternative transportation fuels is affordable**, reliable, equitable, and adequate to meet the demand for those transportation fuels described in the most current scoping plan approved by the State Air Resources Board under Section 38561 of the Health and Safety Code.”*

(Emphasis added)

The most current Scoping Plan approved by the State Air Resources Board under Section 38561 of the Health and Safety Code is the *2022 Scoping Plan for Achieving Carbon Neutrality*. The 2022 Scoping Plan includes hydrogen as an alternative transportation fuel.

The purpose of this letter is to confirm that a discussion of hydrogen, as an alternative transportation fuel, is included in the upcoming December 31 report. The California Air Resources Board is in the process of considering amendments to the Low Carbon Fuel Standard (LCFS) program and the Board is scheduled to vote on policy changes on November 8. Hydrogen car owners are keenly interested in your analysis of the role that LCFS credits, and other drivers, have on the cost of this fuel at the dispenser.

We very much look forward to the discussion relative to ensuring that transportation hydrogen is affordable, reliable, equitable, and adequate to meet current and future demands.

Sincerely,

A handwritten signature in blue ink that reads "Gregory R. Cane". The signature is fluid and cursive, with the first name "Gregory" being more prominent.

Gregory R. Cane
California Hydrogen Car Owners Association