

DOCKETED

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EV Infrastructure Needs to Include Pull-through Sites for Vehicle Combinations

I have attached comments and an infographic document.

Additional submitted attachment is included below.



February 17, 2023

California Energy Commission
Sacramento CA 95814

Docket # 22-EVI-05. Project Title:
National Electric Vehicle Infrastructure (NEVI) Funding Program

Dear Energy Commission:

The following are the comments of the RV Industry Association in connection with Docket # 22-EVI-05, Project Title: National Electric Vehicle Infrastructure (NEVI) Funding Program. We write in Support of designing the California NEVI RFP to include 'pull-through' electric vehicle charging sites.

Backdrop

The American-made Recreation Vehicle (RV) Industry is a \$140 billion industry that supports 680,000 American jobs and pays more than \$48 billion in wages and \$13.6 billion in federal, state, and local taxes.

The RV industry's economic impact in California alone is some \$11 billion dollars (Economic Impact attached) with more than 750,000 households in California owning an RV. From a more macro level - the entire Outdoor Recreation Industry - much of which gets towed to recreation sites (RVs, boats, motorcycles and dirt-bikes, ATVs, snowmobiles etc.) has an economic impact of \$862 billion dollars (Department of Commerce's Bureau of Economic Analysis.)

RV ownership is trending younger and more diverse and RV usage is at a record high with 37% of American leisure travelers (that's 67 million Americans!) planning on taking an RV trip this year.

As more EVs hit the market and electrified RVs (eRVs) get closer and closer to the market, it's vital for California to consider how it will accommodate towable travel trailers that are pulled by EVs, large motorhomes towing small EVs, and electric powered motorhomes when deploying EV charging infrastructure utilizing NEVI funding.

Pull through EV Charging Sites are a Necessity

The need for versatile, pull through EV charging sites also includes many other use cases, such as commercial trucking, vehicles towing



boats and other equipment, as well as people with disabilities that need additional access.

It's easier and more cost effective to account for these scenarios now than down the road where retrofitting or installing new pull-through stations to accommodate electric eRVs and other towed vehicles for which a pull-in station is not ideal.

It's important to ensure California is accounting for current and future industry needs and consumer preferences by requiring that at least 50% of all EV charging sites are pull-through.

In a typical EV pull-in site, an RV would likely be required to take up multiple spaces or a towable travel trailer combination would need to decouple, the consumer would need to find a safe place, close by to park the trailer, and then the EV tow-vehicle would utilize a charging space. Neither of these scenarios are ideal for RV drivers or other EV drivers who may be denied a charger that is unavoidably blocked by an RV or other EV combination.

This historic NEVI funding must be used strategically and future needs and planning should be taken into account. Deploying pull-through sites for RVs and other larger vehicles is a smart investment that best serves all EV drivers.

The Federal Highway Administration (FHWA) is providing guidance on the use of NEVI funds and agrees that states should focus on futureproofing for growing demand and higher power levels; that site design should account for medium and heavy-duty vehicles; and that states should account for larger vehicles and vehicles pulling a trailer with pull-through sites...

"Station designs should also consider the potential for future expansions needed to support the electrification and charging demands of medium- and heavy-duty trucks, including station size and power levels. Stations should be designed to allow for future upgrades and updates to power levels and number of chargers..."

Furthermore, FHWA stated that:



"... States are encouraged to consider large vehicles, including medium- and heavy-duty vehicles (such as electric school buses and delivery vehicles) and vehicles with attached trailers. Pull-through

charging stations may provide better access for vehicles pulling a trailer; pull-through charging stations provide ample room to move around a vehicle that may take longer to charge, because they allow vehicles to exit the station without backing up and preclude the need to decouple the trailer to fit within the parking area adjacent to the charger."

The RV Industry Association is preparing a more formal white paper that will provide professionally engineered examples of detailed EV site designs and best practices to accommodate all vehicle types and sizes – including those that will work for eRVs and EVs towing travel trailers that you can use as a tool in your planning process. We look forward to sharing those documents with you in the coming weeks.

As the RFP for the NEVI program is prepared, there should be an opportunity for respondents to improve their scoring ability by incentivizing the inclusion of pull-through sites in any proposed plans. While I am not privy to how RFPs are scored, if a percentage of EV charging stations include pull-through sites, they should score more points. If half (50%) of the sites are pull-through, an extra bonus of X points should be awarded.

The RV Industry Association and our industry's subject matter experts stand ready to work with you to ensure deployed EV infrastructure meets the needs of current and future travelers.

A handwritten signature in black ink that reads 'Jay Landers'. The signature is fluid and cursive, with a large initial 'J' and 'L'.

Jay Landers
Vice President
Government Affairs