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Additional submitted attachment is included below.

Consolidated Metco Response to the Request for Information Project Proposal Ideas and Considerations for California, Oregon, and Washington’s Medium- and Heavy-Duty Joint Application for the U.S. Department of Transportation’s Charging and Fueling Infrastructure Discretionary Grant Program — Docket #24-EVI-01

Please find below the comments of Consolidated Metco (ConMet) to The California Energy Commission (CEC) in partnership with the California Department of Transportation (Caltrans), the Oregon Department of Transportation (ODOT), and the Washington State Department of Transportation (WSDOT) Request for Information to support potential medium- and heavy-duty corridor projects under the U.S. Department of Transportation’s Charging and Fueling Infrastructure Discretionary Grant Program (CFI Program) issued on May 10, 2024.

This RFI seeks feedback on the following questions (you need only to answer questions applicable to you or your organization):

1. **Please disclose your business type and vehicle class, if applicable. Are you a driver, fleet operator, truck stop operator, installer, manufacturer, utility, public agency, or other? Are you part of a small, veteran-owned, woman-owned, or minority-owned business?**
 - a. Primary Business Purpose: Electrification Solution Manufacturer
 - b. Primary Region of Operation: Urban and Rural, Short and Long-Haul Operations primarily on the West Coast
 - c. Type of Business: OEM Supplier
2. **Would you consider applying for CFI grant funding for site development if the tri-state agencies are awarded funding?**
3. **Do you already operate or are you planning to use zero-emission battery electric MDHD vehicles in the next five years? Please use a 1-5 rating scale where 1= least likely and 5= most likely. Please add additional information regarding your (planned) use of zero-emission battery electric MDHD vehicles as desired.**

We do not operate zero-emission battery electric MDHD vehicles. We provide an in-wheel electric power source that generates energy allowing transport refrigeration units (TRU) on trailers to operate 100% zero-emission. Our customers would benefit from additional infrastructure for the trailers as well as the tractors. TRUs need power all the time to ensure the refrigerated goods (food, medicine etc.) stay at the correct temperature.

4. **What type of MDHD ZEV public charging do you anticipate being most important in the next three years (2024-2027) – en route or overnight charging? For what purposes do you anticipate needing public charging infrastructure – drayage, last-mile, delivery, long-haul freight, other?**

In addition to both en route and overnight charging, having chargers available for trailers to accommodate zero-emission refrigerated trailers is imperative. TRUs require 24-hour refrigeration, even when stopped unlike tractors, especially during mandatory rest times. As states like California begin to regulate TRUs, states will need to account for the additional grid load to charge not only the tractor but also the trailer at rest stops. TRUs have their own diesel engine, with systems like ConMet’s we are able to electrically power the TRU while driving but depending on the length of the stop may require the trailer to be plugged in to charging.

5. **From 2024-2027, what is your first priority for power level and number of charging ports for public en route charging at a station? For public overnight charging? Do you have a second or third configuration preference?**

In addition to needing extra capacity to charge a trailer, their plugs are different than a tractor. There is industry discussion over which plug should be standard for electric trailers moving forward. The ConMet system currently utilizes an AC standby 480v 3phase that most TRUs currently already have to both charge the battery and activate the TRU. While looking at the number of charging ports and where they are, it is imperative that trailers are not overlooked in the future planning.

6. **Please identify the percentage of pull-in or pull through parking preferred and other desired station configurations at a given site. Describe the vehicle class and vocation considered when making this recommendation if it differs from the information provided in question 1.**
7. **What distance should separate charging stations to support zero-emission trucks along the I-5 corridor? Provide description of typical route or use-case considered when making this recommendation. Describe the vehicle class and vocation if it differs from the information provided in question 1.**
8. **What amenities are you seeking at a charging facility? Is there a desire for additional parking at a facility beyond charging stalls? Is there a desire for reservation options?**

Yes, any longer parking (such as when the driver makes a mandatory 8 hour stop) will require charging infrastructure for the electric TRU function.
9. **If possible, provide any general cost estimates for MDHD charging stations you have designed, built, or have experience with, including charger power levels and number of chargers installed. Please provide a range of public cost share as a percentage of total project cost that would be necessary to support more public charging stations to serve zero-emission trucks along freight corridors.**
10. **Use the maps under the “Corridor Segments” section below to identify locations within the National Zero-Emission Freight Corridor Strategy hubs along I-5 (identified in the map segments 4 below) you anticipate needing EV charging in the next three years (2024-2027)8. You may identify sites where you plan to or would be interested in building charging stations or where you would like to see charging as a consumer. Please detail preferred locations across California, Oregon, and Washington. For each location, please provide desired site characteristics including number of chargers, power levels, type of charging desired (overnight or en route), and vehicle class and vocation if the information differs across locations or differs from the information provided in the questions above.**
11. **If you represent a utility, please use the maps under the “Corridor Segments” section below to identify locations within the National Zero-Emission Freight Corridor Strategy hubs along I-5 (identified in the map segments below) where there may be capacity for 5 megawatts or more of power in the next five years. This information may be considered in the development for future Requests for Proposals**