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*Comment Received From: Pilot Travel Centers LLC  
Submitted On: 6/10/2024  
Docket Number: 24-EVI-01*

## **Pilot Travel Centers LLC Tri-State CFI RFI Response**

Document Attached

*Additional submitted attachment is included below.*



**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?**

Pilot Travel Centers LLC (“Pilot Company”) is a truck stop operator, a driver fleet operator of over 1,000 Class 8 vehicles driving more than 120 million miles per year, and an EV charging network operator. Pilot Company does not qualify as a small, veteran-owned, women-owned, or minority-owned business.

Pilot Company is the largest operator of travel centers in North America with more than 750 locations in 44 states, serving 70,000 fleet customers and 1.3 million guests per day. Pilot Company has more than 60 years of experience in providing high quality fueling services for both light-duty and medium- and heavy-duty (MDHD) vehicles, with DC fast charging now available for light-duty vehicles at 40 locations nationwide.

**2. Would you consider applying for CFI grant funding for site development if the tri-state agencies are awarded funding?**

Yes, Pilot Company would be interested in opportunities to partner with the tri-state agencies on adding zero-emissions MDHD fueling infrastructure to our existing network of Pilot and Flying J Travel Centers.

**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.**

5. In 2024, Pilot Company purchased five zero emission fuel cell electric hydrogen trucks to add to our Southern California Fleet, demonstrating that Pilot Company is already leading in the zero-emissions transition both for our own operations and to support our travel center customers. Pilot Company is continuing to explore adding additional zero emissions vehicles to our fleet.

Pilot Company currently serves over 70,000 fleet customers, including Fortune 500 fleets like Amazon and PepsiCo, who have publicly announced their commitment to and investment in fleet electrification. Volvo and Pilot Company have also publicly announced a partnership to expand fueling options for the Volvo VNR Class 8 Electric Vehicle.



Pilot Company's primary goal is to continue to serve customers with the best possible fueling experience, which includes meeting the needs of fleets who are transitioning to zero emissions vehicles.

**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?**

Pilot Company's goal is to best serve the needs of our customers. Our team regularly communicates with fleet customers, OEMS, and zero-emissions experts and thought-leaders to solicit feedback on future fueling needs and how we can best serve those needs at Pilot and Flying J Travel Centers. Pilot Company expects that public charging infrastructure will be needed to support all MDHD transportation types, especially during market transition when fleets may not be able to invest the upfront capital required for dedicated behind-the-fence fleet charging.

Pilot Company locations could potentially serve both en route and overnight charging. For en route charging, sites would be configured with high-powered fast charging and pull-through stalls for easy turnover. Since Pilot Travel Centers are open and staffed 24 hours a day and have well-lit parking areas with ample lighting and security, it is not uncommon for long-haul guests to stay overnight in their vehicles. However, overnight charging would lend itself to different equipment (lower power) and site configurations than en route 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?**

Pilot Company's current priority is for a site configuration that enables en route charging. At Pilot Company's existing 40 light-duty EV charging locations, the company has installed two Delta 350 kW high-powered dual-port EVSE with dynamic powersharing capabilities. This enables a maximum power output of 350 kW when two vehicles are charging and up to 175 kW when four vehicles are charging simultaneously. The power output of these charging stations is also sufficient for charging electric Class 8 trucks. Pilot Company's experience with high-powered fast charging has prepared the company for potential MDHD deployments, but Pilot Company is still investigating the optimal power level and number of charging ports for MDHD applications.



Although Pilot Company is less likely to install public overnight charging at its locations, the configuration would differ from en route in power output (overnight charging would be lower) and number of stalls (which would depend on demand for this service). An additional configuration that Pilot Company is exploring is co-locating hydrogen and electric refueling to be able to serve all zero-emissions MDHD vehicles at a single station.

**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.**

Pilot/Flying J Travel Centers typically have existing pull-through configurations for MDHD diesel fueling to streamline traffic flow and maximize safety for drivers and other guests. For the same reasons, Pilot Company would likely design MDHD charging sites with pull-through stalls whenever possible. Pilot/Flying J Travel Centers are currently configured to easily serve light-duty, medium-duty, and heavy-duty vehicles with traffic flows that safely separate the heavy-duty vehicles. Pilot Company is currently building over 2,000 charging stalls that can serve light and medium duty vehicles, with these charging stations located in the front parking lot that is physically separated from the heavy-duty parking area.

**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.**

Pilot Company's existing network of travel centers is tailored to the needs of fleet customers with high quality fueling stations at regular intervals along major corridors. Co-locating zero-emissions fuels at locations that are familiar to drivers and fleet operators would make the energy transition more manageable.

Pilot Company would encourage the tri-state to not be overly prescriptive with location spacing and would instead encourage allowing partnerships of fuel providers, fleets, and OEMs to propose which locations best fit current market needs at the time of application. Pilot Company is in regular communications with OEMs and fleets to understand battery capabilities, potential technology advancements, and real-world driving experiences. This information can be used to help inform location spacing that truly suits customer needs. For example, if customers are experience range issues over a cold mountain region, Pilot Company could propose additional locations to meet the need in that area. If there is overly prescriptive guidance that requires certain spacing, that reduces the ability for



customers and fuel providers to propose what is necessary for zero emissions fuel adoption. Pilot Company would recommend allowing maximum flexibility for the market to propose what is currently needed in terms of locations, distance between locations, fuel types, and the number of ports and power rating at each location.

**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?**

Pilot/Flying J Travel Centers are currently configured to support MDHD vehicle traffic with dedicated truck parking and fueling areas that include overflow parking. Travel centers also have a wide range of 24/7 on-site amenities, such as quick-serve restaurants, retail, drivers' lounges, showers, clean 24/7 restrooms, on-site repair services, and CAT scales. Pilot Company currently has a reservation system for prime truck parking (non-EV) and would potentially extend this capability to MDHD charging.

**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.**

Pilot Company is not prepared to publicly share data on potential configurations and associated cost estimates. Pilot Company recommends a cost share of 80% of costs provided via CFI grant funding and 20% provided by non-federal sources for both capital and operations and maintenance costs. This approach aligns with existing federal and state programs. Pilot Company would also encourage that eligible costs include site improvements such as battery storage and/or on-site power generation.

**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 below) you anticipate needing EV charging in the next three years (2024-2027). 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.**



Pilot Company is not prepared to publicly share our desired site characteristics or potential MDHD charging locations. The below list includes all Pilot/Flying J Travel Centers along the I-5 corridor and notes if they are in an identified segment:

- Pilot Travel Centers #372: 31642 Castaic Rd, Castaic, CA 91384 (CA Segment 3)
- Flying J Travel Center #616: 42810 Frazier Mountain Park Rd, Lebec, CA 93243 (Outside of Segment)
- Pilot Travel Center #154: 14808 Warren St, Lost Hills, CA 93249 (CA Segment 2)
- Flying J Travel Center #1080: 2275 Sperry Ave, Patterson, CA 95363 (Outside of Segment)
- Flying J Travel Center #1017: 345 Roth Rd, Lathrop, CA 95330 (Outside of Segment)
- Flying J Travel Center #617: 15100 Thornton Rd, Lodi, CA 95242 (Outside of Segment)
- Pilot Travel Center #168: 30035 County Road 8, Dunnigan, CA 95937 (Outside of Segment)
- Pilot Travel Center #1019: 4444 Commerce Ln, Orland, CA 95963 (CA Segment 1)
- Pilot Travel Center #137: 395 E Vista Dr, Weed, CA 96094 (Outside of Segment)
- Pilot Travel Center #391: 1600 E Pine St, Central Point, OR 97502 (Outside of Segment)
- Pilot Travel Center #233: 800 John Long Rd, Oakland, OR 97462 (Outside of Segment)
- Pilot Travel Center #386: 4220 Brooklake Rd NE, Brooks, OR 97305 (Outside of Segment)
- Pilot Travel Center #584: 12334 Ehlen Rd NE, Aurora, OR 97002 (OR Segment 1 )
- Pilot Travel Center #151: 2430 93rd Ave SW, Tumwater, WA 98512 ( WA Segment 2)
- Pilot Travel Center #1103: 2430 WA-530, Arlington, WA 98223 (WA Segment 1)
- Pilot Travel Center #583: 5670 Barrett Rd, Ferndale, WA 98248 (WA Segment 1)

**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.**

N/A