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Pilot Travel Centers - US Department of Transportationâ€™s Charging and Fueling Infrastructure Grant Program

Please see the attached document for Pilot Travel Centers' response to U.S. Department of Transportationâ€™s Charging and Fueling Infrastructure Grant Program comment invitation from the CEC.

Additional submitted attachment is included below.

Pilot Travel Centers are committed to alternative fuel projects and will work to ensure the successful deployment of critically needed corridor refueling infrastructure that will accelerate the transition to zero emissions vehicles for long-term sustainability. If there are any questions regarding the contents of this response, please do not hesitate to contact us. Thank you for your consideration for this important and transformative project.

1. Please disclose your business type and vehicle class, if applicable. Are you a driver, fleet operator, truck stop operator, charging and/or hydrogen fueling provider, 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"), North America's largest operator of travel centers, has decades of expertise with medium and heavy duty (MHD) fueling infrastructure reliability, accessibility, and convenience. As one of the leading suppliers of fuel and the largest operator of US travel centers, Pilot has the fourth largest tanker fleet with more than 1,500 trucks that supply DEF, bio, and renewable fuels. Pilot's trucks are primarily class 8 with a few outliers in vehicle classes 4-6. This has laid the critical foundation for the company's ability to integrate ZEV infrastructure and advanced transportation technologies. These funding programs, in conjunction with this CEC funding, will help Pilot continue to roll out a diversified fuel supply to its 70,000 fleet customers and 1.3 million daily guests across 870 locations nationwide.
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> Pilot has a strategic plan to develop at network of H2 refueling stations and MHD charging stations across California in the next 5 years- and the availability of CFI funds in the state would align with these plans at fueling and travel centers. The team from Pilot has spent decades analyzing fleet fueling patterns and working with their customers to understand where they need to stop and purchase fuel. It would be highly beneficial for these California CFI funds to support this existing infrastructure network- aligning existing fueling patterns, leveraging public funds for publicly accessible stations, and creating equitable access for those fleets that cannot afford their own stations.

2. The purpose of this RFI is to help inform the CEC's application to the Federal Highway Administration (FHWA) for federal funding. If awarded, the CEC will release a competitive grant funding solicitation to provide funding to end recipients who would develop and construct the zero-emission MDHD infrastructure. Would you consider applying for CFI grant funding for site development if the CEC is awarded funding?

> Yes, Pilot Travel Centers would consider applying for CFI grant funding. The Pilot team, leveraging this potential funding source, will utilize its combined technical skillset and breadth of experience to construct H2 fuel and or EV charging station(s) that are sustainable and reliable. From supply chain management and permitting to operations and maintenance, Pilot's project team has the resources of a multibillion-dollar company and the granular understanding of on-the-ground realities to construct and operate successful alternative fuel stations. These projects will benefit from protocols and procedures Pilot has put in place for more than 60 years, including its

Support Service Centers and Travel Centers, which offer best-in-class operational oversight and customer service. Stations will be designed for operational resiliency and long-term reliability to reduce emissions from MHD transportation. Pilot's intention is to leverage their expertise to build stations with 99.9% uptime.

3. Do you already operate or plan to use zero-emission 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 MDHD vehicles as desired.

Pilot rates their planned used of ZEV MDHD vehicles at a 5. Pilot's Southern California fleet, which operates roughly 50 tanker trucks in the South Coast Air Basin moving fuel from various distribution sites to Pilot Travel Centers, has already purchased 5 fuel cell electric trucks (FCETs). These FCETs will not only utilize the H2 refueling stations for fueling, they will also haul hydrogen from production facilities to the various travel centers. As part of their regional station development strategy, Pilot plans to eventually transition a larger share of the regional fleet to FCETs. An estimated 10-12 FCETs will act as the baseload for the California hydrogen refueling stations and will also act as a signal to other fleets that FCETs have broken into the MHD trucking market.

4. For drayage fleet operators and drivers: Not Applicable to Pilot

5. For EV charging and hydrogen fueling providers, describe:
   a. Your organization's business model for public charging/hydrogen fueling offerings.

With 870 locations nationwide, Pilot has deep experience with site development, permitting, and infrastructure deployment in a strong safety culture, each of which will prove critical to the successful completion of the project and safe deployment of the H2 refueling and EV charging station technology. Pilot's project team has not only the resources of a multibillion-dollar company to secure the necessary equipment, facilities, and resources, but also the understanding of challenges and barriers related to high-flow H2 fueling and high-powered EV charging.

By building proposed alternative fuel stations directly adjacent to a Pilot Travel Center, every fleet that uses the facility for traditional fueling or amenities will observe real ZEV fueling. This market exposure cannot be overlooked, and Pilot intends to capitalize on it through a variety of marketing strategies that could include a wrapped station, wrapped fueling trucks, and significant signage.

Pilot expects its alternative fuels business to fit into its existing offering by providing the same variety and quality of service its customers have come to expect. Pilot will begin by offering a host of current customer pricing models while remaining open to adapting alternative practices to best fit consumer demands. While Pilot owns and operates the station and all

equipment, use will be supported by Pilot's own fleet of trucks in addition to near-term additions from OEMs and other fleet customers.

Other advantages to Pilot's business model include:

- Site control of the land required to build out the hydrogen fueling station (HRS), which will expedite the development of the project in conjunction with public funds
- Possession of Conditional Use Permits (CUP) which allows for heavy duty commercial fueling on-site;
- A team of experienced fleet and alternative fuel experts to seamlessly engineer, permit, construct, commission, and operate alternative fuel facilities;
- An organization seen as a leader in the alternative fuel market that is committed to building out a network of HRS in Southern and Central CA;
    - A leader in EV charging with more than 40 high-powered light duty EV charging stations nationwide
    - A team that is highly experienced with federal construction projects, including substantial experience with the National Electric Vehicle Infrastructure program
    - Partnerships with leading ZEV original equipment manufacturers (OEMs) such as Volvo and Pilot's partnership to expand fueling options for the Volvo VNR electric Class 8 vehicle
- Publicly accessible fuel facilities that will be available 24 hours a day and seven (7) days a week (24/7), which will empower disadvantaged and small owner-operator fleets to transition out of diesel and into clean, ZEV
- Ability to scale hydrogen to meet the market's needs through partnerships with multiple hydrogen fuel providers; and,
- An existing fleet ready to deploy FCETs and use the proposed fueling site.

b. Mechanisms your organization might leverage to provide affordable charging and fueling services to drayage fleet operators.

Pilot has the ability to offer bulk purchasing agreements to fleet operators, and is prioritizing the partnership with drayage companies in their strategic buildout of this network. Pilot is working to specifically target the Ports of LA and LB, build connectivity with the Mexican border via Otay Mesa corridor, and supply freight lanes along the I-10 and I-15 corridors. Pilot can work with existing drayage fleet customers as well as OEMs to provide a letter of support from operators who intend to purchase ZEV and the fuel with which to power them.

c. The scope of services, facilities and amenities provided at your recharging/ refueling locations.

Beyond just publicly accessible fueling stations, Pilot Travel Centers are open to the public 24/7. The Travel Center boasts a variety of amenities that professional drivers rely on, including but not limited to:

- Full-service restaurants
- Convenience store open 24/7
- Restrooms and showers
- Premium Wi-Fi
- Driver's lounge
- Public laundry
- Truck parking spaces
- ATM
- CAT Scale

d. The anticipated site size, parking configuration (e.g., pull-through), total number of charging stalls capable of simultaneous charging, and total number of truck parking spaces that are not dedicated to charging or refueling.

At the designated locations, Pilot intends to provide a total of two (2) pull-through H2 fueling lanes equipped with a single-sided, dual hose dispenser per lane to accommodate projected use from project commissioning. The hydrogen dispenser includes two hoses, one 700 bar target fill pressure that follows the SAE J2601 fueling protocol (up to 3.6 kg/min flow at 700 bar), and one 350 bar target fill pressure that follows the same protocol, but with a flow rate of up to 7.2kg/min at 350 bar. These dispensers will have a total fuel dispensing rate of up to eight (8) kg/min or 480 kg/hour (4 kg/min or 240 kg/hr each). The modular cabinet includes a card reader within the dispenser (CRIND) and both dispensers will sit underneath a canopy.

For EV charging locations, Pilot is exploring a two (2) to five (5) stall pull through design. Pilot is continuing to monitor developments in EV charging technology including commercial deployments of megawatt charging, integration of battery storage, and on-site power generation solutions. At this time, Pilot expects that MHD charging would be a minimum of 350 kW per stall.

Pilot Travel Centers are designed with ample overnight parking. In cases where the existing Travel Center would not support the current use case of diesel refueling and truck parking, Pilot explores developing directly adjacent lots to be used for alternative fuels.

e. How your organization approaches right-sizing infrastructure for near-term market demand and future-proofs infrastructure to be responsive to evolving needs.

Early Pilot sites will be equipped with two (2) H2 fueling lanes which can be expanded to four to accommodate additional traffic as the market grows, and with two (2) to five (5) EV charging stalls depending on the identified market demand in the area. Pilot is investigating options such as battery storage and on-site power generation to manage common MHD deployment concerns like power availability and demand charges. Pilot will manage the frequency of LH2 deliveries based on site demand. During the first year, LH2 deliveries are

anticipated to be at least once per day, or every other day and can be refilled more frequently based on demand. Pilot will source hydrogen from multiple supplies, which will ensure the station's ability to fuel fleets is not disrupted by supply chain issues affecting one hydrogen supplier or another.

6. What distance should separate stations to support zero-emission drayage truck activities around California ports? Provide a description of a 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 does not recommend applying an arbitrary and unnecessarily prescriptive distance requirement between refueling stations. Instead, CFI funds would best be used to support investments in the transition from existing, traditional fueling sites to zero emissions infrastructure. The private market leaders, like Pilot, have decades of experience on customer refueling patterns and freight lane analysis to support these investments. Let the market decide the best location to make the business case for alternative fuels stations.

Pilot's proposed infrastructure will be invaluable for all fleets that have routes at California ports, especially those unable to afford to construct their own private facilities. That is, Pilot will be proud to share its alternative fueling solutions with disadvantaged fleet operators who will transition away from gas- and diesel-powered trucking. Pilot offers multiple payment options at their sites across the U.S. and will also do so at Port-adjacent locations. The proposed project will be inclusive, as Pilot will welcome these fleets to access alternative fuels to support their day-to-day operations.

Pilot's intended target customer base for the alternative fuels market is its existing customer base, which varies from some of the largest fleets in Southern California to independent owner operators. When developing alternative fuels stations, Pilot will leverage the strength of its existing footprint, logistics network, and relationships to provide customers with the level of high-quality service they have come to expect at each Pilot location. Pilot has a flexible business model which allows for continued success in providing traditional fuels as well as additional growth from integrating alternative and renewable fuels.

Pilot's innovative fuel project will power ZE trucks traveling on roadways around the Ports; traversing Interstates; and idling throughout California. The site will fuel ZE trucks to deliver social, economic, and environmental benefits to the Port's communities. Elevating this triple bottom line is central to this project, as Pilot looks forward to making a lasting, intergenerational impact.

7. If possible, provide any general cost estimates for MDHD charging and/or hydrogen fueling stations you have designed, built, or have experience with, including charger power levels and number of stations installed. Please provide a range of public cost-share as a percentage of the total project cost necessary to support more public charging stations to serve zero-

emission trucks along drayage corridors. For example, should the publicly funded cost share be 50% CEC/federal and 50% private/other?

- Provide cost estimate for the station

  Pilot Company is not prepared to share our cost estimates in public comments at this time. Pilot will finance project construction with equity capital. Pilot plans to offset costs with state and local grants and incentives where available/applicable. Regarding offtake agreements, Pilot will design such agreements for the base refueling center for local on-road drayage traffic. Pilot will provide foundational infrastructure to help catalyze the market's transition from renewable diesel to hydrogen and electricity. Pilot has a high degree of confidence in this transition, under the proper commercial lease structure and construction will not be contingent on take-or-pay agreements from drayage operators, many of whom will not have the credit rating to support this type of contractual agreement.

- Provide recommendation on cost share

  Pilot recommends an 80/20 cost-share split between CFI funds and applicants, respectively. There are several reasons why Pilot urges the CEC to consider a lower requirement for cost share for hydrogen refueling stations over electric. There is a higher relative cost of planning, building and commissioning a hydrogen refueling station over electric as well as H2 being a more nascent market. Furthermore, H2 currently is higher priced as a transportation fuel and the lower cost share requirement for station operators will help this reach cost parity more quickly for fleet customers.

8. Use the maps in the "**Corridor Segments**" section to identify areas where you expect to need zero-emission truck infrastructure in the next three years (2024-2027). These Corridors have been selected to align with the National Zero-Emission Freight Corridor Strategy, the California Transportation Commission's SB 671 Clean Freight Assessment and to complement California, Washington and Oregon's Tri-state application.

   a. You can pinpoint sites where you plan to build stations, or where you would like to see a station as a driver.
   b. If possible, please provide specific details for each location, including the preferred location, the number of stations, the type of fuel (hydrogen or electric), power levels (if applicable), and vehicle class.
   c. Identify any corridor segments you think should be considered that have not been included and how they align with the National Zero-Emission Freight Corridor Strategy.

      All locations are in consideration for hydrogen and or EV fueling stations, and will serve ZEV classes 4-8. Sites currently under consideration from Pilot include:

Station address	Corridor Segment	Number of Lanes/Capacity
951 Work St, Salinas, CA 93901	Outside but Nearby Ports of Oakland Corridor	Hydrogen 24 kg/min or 240 kg/hr each; EV charging to be determined
2275 Sperry Ave, Patterson, CA 95363	Outside but Nearby Port of Stockton Corridor	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined
2828 El Centro Rd, Sacramento, CA 95833	Port of Stockton Corridor	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined
15100 Thornton Rd, Lodi, CA 95242	Outside but Nearby Port of Stockton Corridor	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined
345 Roth Rd, Lathrop, CA 95330	Outside but Nearby Port of Stockton Corridor	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined
1501 Jack Tone Rd, Ripon, CA 95366	Port of Stockton Corridor	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined
14320 Slover Ave, Fontana, CA 92337	Ports of Los Angeles and Long Beach Corridor Segment Group	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined
10951 Cedar Ave, Bloomington, CA 92316	Ports of Los Angeles and Long Beach Corridor Segment Group	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined
2300 E Steel Rd Unit E, Colton, CA 92324	Ports of Los Angeles and Long Beach Corridor Segment Group	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined
11053 Riverside Dr, Riverside, CA 92509	Ports of Los Angeles and Long Beach Corridor Segment Group	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined
1497 Piper Ranch Rd, San Diego, CA 92154	Port of San Diego Corridor Segment Group	Hydrogen 4+ kg/min or 240 kg/hr each; EV charging to be determined

9. If you represent a utility: Not Applicable to Pilot

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