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Prologis Mobility RE Docket 24-EVI-01

Additional submitted attachment is included below.

June 28, 2024

Sarah Sweet
Federal Liaison
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Docket #24-EVI-01, Considerations for the California Energy Commission Zero-Emission Medium- and Heavy-Duty Drayage Infrastructure Application for the U.S. Department of Transportation's Charging and Fueling Infrastructure Discretionary Grant Program

Thank you for the opportunity to provide input to the California Energy Commission (CEC) Request for Information (RFI) to support potential medium-and-heavy-duty (MHD) drayage truck infrastructure project under the U.S. Department of Transportation's Charging and Fueling Infrastructure (CFI) Discretionary Grant Program. The proposed project would install electric truck charging and/or hydrogen truck refueling stations to support zero-emission MHD drayage trucks at California ports including the State's seaports and land ports of entry along the California-Mexico border. The establishment of MHD battery electric charging and hydrogen fueling stations along routes serving the ports and drayage activity is in direction alignment with the Joint Office of Energy and Transportation's National Zero Emission Freight Corridor Strategy. Thank you in advance for considering our recommendations, and we welcome the opportunity to elaborate on our responses. Please reach out to Katie Lee Cox, Director, Incentives and Community Partnerships (Kcox2@prologis.com), for more information or to discuss our comments in further detail.

1. About Prologis Mobility

Prologis Mobility's business is helping transform the fleet and logistics industry and enabling our customers to transition to zero-emissions through industry-leading electric vehicle (EV) charging technology and solutions. The opportunity for us to help our customers with this transition is significant, and we are developing dedicated charging infrastructure at Prologis Mobility sites to support their medium- and heavy-duty (MHD) fleets across last mile, drayage, and other applications. In addition to providing charging solutions at our own properties, we offer electrification services at non- Prologis Mobility buildings and are developing multi-fleet charging hubs serving areas with dense concentrations of warehouses.

Prologis is the global leader in logistics real estate, with a portfolio of over 1.2 billion square feet across four continents and approximately 2.8% of global GDP flowing through our properties each year. Prologis leases modern warehousing and distribution facilities to customers, which include manufacturers, retailers, transportation companies, third-party logistics providers, and other enterprises. Our large, flat rooftops have enabled us to build out commercial solar installations to serve onsite and offsite load with clean energy and battery storage, helping our customers reduce their emissions and placing us second in the U.S. for corporate on-site solar.

Prologis Mobility seeks to expand its zero-emission vehicle (ZEV) transition support by establishing a national network of company-owned and operated, public charging stations for M/HD applications. Prologis Mobility' robust real estate portfolio provides a unique opportunity to expeditiously establish charging hubs in many of the target areas identified in phase 1 of the National Zero-Emission Freight Corridor Strategy. Establishing charging hubs in New York is a top priority for the first phase of our public charging hub strategy.

2. Would you consider applying for CFI grant funding for site development if the CEC is awarded funding?

We would consider applying for CFI grant funding for site development if the CEC is awarded funding. We have ambitious goals to support public MHD ZEV charging and hydrogen fueling, and CFI funding would enable us to deploy more charging and fueling infrastructure at an accelerated rate by de-risking investments and supporting development in underserved communities.

3. Your organization's business model for public charging and/or hydrogen fueling offerings.

Whether fleets are located at a Prologis Mobility warehouse or third-party facility, Prologis Mobility's comprehensive platform is designed to meet fleets zero emission needs for all vehicles with a simple charging-as-a-service model. We invest in state-of-the-art infrastructure, expedite, and simplify project implementation and ensure consistent, reliable, and efficient fleet operations when and where customers need them. This includes handling real estate, charging equipment, onsite make ready and incentive program development. Prologis Mobility ZEV charging hubs enable fleets to tap into plug-and-play EV charging with no upfront cost (i.e., no capital costs), straightforward pricing per-kilowatt hour, simple contracts, and dedicated chargers. This includes operations and maintenance, network management and 24/7 services. We also manage electricity, grid connections, energy management, and load optimization.

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

We understand that cost is a critical factor for drayage fleet operators as they consider transitioning to zero-emission vehicles. Prologis Mobility is dedicated to offering competitive pricing for EV charging services by leveraging several key strategies. We prefabricate much of our EV charging infrastructure offsite, which significantly reduces on-site build time and associated costs. This approach minimizes disruptions at the installation site, accelerates project timelines, and lowers labor expenses. As a result, we can offer more affordable charging solutions to our customers.

Unlike traditional single-project investments, we invest in large portfolios of EV charging projects across our portfolio. This strategy allows us to achieve economies of scale, reducing the overall cost per project. Additionally, our organization benefits from a low cost of capital, enabling us to finance these projects more efficiently. The savings achieved from these practices are directly passed on to drayage fleet operators, making our charging services more cost-effective. Our belief in the long-term growth of the EV market drives us to take on some speculative risk by developing EV charging hubs ahead of full market demand. This forward-looking approach ensures that we are well-positioned to meet future needs while keeping current costs low. Our low cost of capital further supports this strategy, allowing us to absorb initial risks and provide affordable charging solutions from the outset.

Our infrastructure solutions are designed to maximize efficiency and minimize costs. Our modular, skid-mounted charging stations can be rapidly installed and easily integrated into existing sites. These stations are not only cost-effective but also allow for the seamless addition of battery energy storage systems (BESS). By integrating BESS, we can leverage peak shaving and load shifting capabilities. This means we can store energy during off-peak times when electricity rates are lower and use it during peak demand periods, reducing overall energy costs. The savings from these practices are again passed on to our customers, ensuring that drayage fleet operators benefit from lower operating expenses.

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

Prologis Mobility ZEV charging hubs prioritize customer safety and convenience in their design. Each site is well-lit, accessible to the public, free of obstructions or obstacles, and includes emergency shutdown switches with the appropriate guards and covers. Each site uses point of sale systems that accept, read, and processes credit cards, debit cards, fueling cards, gift cards, as well as wireless transactions from contactless cards and mobile devices. Since charging may take more or less time, depending on drivers' needs, Prologis Mobility will also build and provide comfortable, safe, and convenient seating, waiting, and restroom areas for patrons.



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

Our sites typically range in size from 2 to 4 acres, providing ample space to accommodate both current and future EV charging demands. The configuration of our sites is thoughtfully designed to optimize space and facilitate efficient charging operations. While we rarely implement a pull-through parking design, our sites are configured to allow for future reorientation to include pull-through charging. This includes laying conduit that supports both pull-in and pull through charging. This flexible design approach ensures that our sites can be adapted to meet the evolving needs of the industry as the megawatt (MW) charging standard for electric trucks becomes more ubiquitous.

To promote safety, we have traffic directors onsite to assist with truck maneuvering as drivers pull in and out of parking stalls. These traffic directors are trained professionals who guide drivers, helping them navigate the charging area safely and efficiently. The presence of traffic directors significantly enhances safety at our EV charging sites. By providing real-time guidance and oversight, traffic directors help prevent accidents, reduce congestion, and ensure that the flow of traffic is orderly and efficient. This proactive approach to safety not only protects drivers and their vehicles but also contributes to a positive and stress-free charging experience.

Our commitment to delivering high-capacity charging solutions is reflected in the design and infrastructure of our sites. We aim to electrify most stalls at each site. Each site is designed to support a charging capacity ranging from 5 MW to 15 MW. This robust capacity allows us to accommodate a high volume of electric trucks, while our future-proofed design allows for the reorientation of stalls to include pull-through charging as the MW charging standard becomes widely adopted. We are prepared to transition our sites to pull-through parking once MW standard is ubiquitous, ensuring that our infrastructure remains adaptable and capable of meeting future industry requirements.

7. What distance should separate stations to support zero-emission drayage truck activities around California ports?

A crucial aspect of supporting the transition to zero emission trucks is the strategic siting of charging and fueling infrastructure. We recognize the burden on the drayage fleet operator community when asked to deviate from their existing travel routes and activity hubs. To facilitate the transition to electric trucks, it is essential to align EV charging infrastructure with these established routes. Drayage fleet activity is typically clustered in specific industrial areas. Therefore, our EV charging and hydrogen fueling infrastructure should complement these clusters, providing convenient and accessible charging and fueling solutions where they are most needed. By focusing on these high-activity zones, we can provide efficient and cost-effective charging and fueling solutions that seamlessly integrate into existing logistics and transportation networks.

8. If possible, provide any general cost estimates for MHD 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?

MHD charging stations can range between \$1000-4000/kW installed capacity depending on site conditions, amenities, utility regulations, real estate cost, and distributed energy resources involved. In the current state of the market CEC/federal cost share should range between 50% - 80% grant funded.

9. 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).

Prologis Mobility's customers include some of the largest fleets in the nation. We seek to support these fleets ZEV transition by establishing a national network of MHD public charging hubs. We have already started coordinating with many of these fleets to confirm demand for public MHD charging stations and identify strategic locations as part of our broader national charging network efforts. Of the corridor segments identified in the RFI, the following segments have the highest demand from fleets and is where we would focus our initial deployment efforts.

- **I-580:** From the I-238 interchange in Ashland to the I-5 Interchange in Tracy
- **US 101/SR 134:** From Exit 68 in Ventura to the I-5 interchange in Glendale
- **I-405:** The I-10 interchange in Los Angeles to the I-5 interchange in Irvine
- **I-10:** The I-405 interchange in Los Angeles to Exit 88 in Calimesa
- **I-110:** From the I-10 interchange in Los Angeles to the SR-47 interchange in San Pedro
- **SR 60:** From the I-10/I-5/US 101 interchange in Los Angeles to the I-10 interchange in Beaumont

- **I-710:** From Valley Blvd in Alhambra to W Ocean Blvd in Long Beach

We continue to engage fleets and are supportive of exploring deployment efforts in other areas throughout the state as additional high demand locations are identified.