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Port of San Diego Response to RFI Medium- and Heavy-Duty Zero Emission Vehicle Public Charging (Docket #19-TRAN-02)

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Thank you for the opportunity to respond to this RFI. In 2024, Port of San Diego entered into an Exclusive Negotiating Agreement with Skychargers LLC to design, build, operate, and maintain a publicly facing zero emission (ZE) truck stop to serve medium and heavy-duty vehicles. The proposed truck stop is currently under CEQA environmental review. Since the truck stop is not yet operational, many of these questions are difficult to answer. In lieu of specifically answering your questions, please accept the following paragraphs that explains some of the considerations Skychargers and the Port have made in the design and operations of the proposed ZE truck stop. The following project description may be familiar as the CEC awarded Skychargers a \$10 million grant for the project in August 2024.

The proposed ZE truck stop would be constructed on approximately 4.8 acres in National City, CA, located adjacent to the Port's designated truck route and less than a mile west of Interstate 5 approximately 10 miles north of the Southern Border with Mexico. The proposed project would contain 38 electric vehicle supply equipment (EVSEs) pieces, or chargers, for trucks with trailers, and 32 EVSEs for truck cabs only (as this pertains to Question 15, a mix of "pull through" and "tractor only" spaces is key to maximize space). A total of 70 trucks would be able to be charged simultaneously. 12 dual-port EVSEs would have 350 kW of power for "opportunity charging" and the remaining 23 dual-port EVSEs would have 150kW of power suitable for overnight charging. Both "opportunity charging" and "overnight charging" would be available for reservation. Up to 30 trucks are anticipated to use the site during the initial operating year. Additionally, EVSEs will be available onsite to support public charging for truck fleets and passenger vehicles, or "first-come-first-served" charging, as described in the RFI.

When developing "public" charging locations, CEC should consider routes with connectivity to existing truck routes; the location of existing diesel truck stops, that are strategically located near existing truck routes is a helpful guide. These existing diesel truck stops will likely transition to serving ZE trucks in the future. (Question 1)

Both "first-come-first-serve" and "reservation" charging models are critical to support the growth in adoption of ZE vehicles; operators need confidence that they will be able to charge their vehicle and having the ability to reserve a charging space alleviates concerns. It is important to keep in mind that staying flexible is key – as market demand increases, more or less spaces for "reservation" charging may be required. (Questions 2 & 3)

The Port's proposed ZE truck stop includes a "trucking-as-a-service" model to encourage local fleets to adopt the new technology; the Port anticipates this model will still provide enough public opportunities to charge on site. This circumstance, of course, may change as adoption increases. (Question 5). Skychargers' proposed operation model accounts for a certain percentage of chargers be available to the public and reservations; this percentage will likely fluctuates based on the site, day of the week, time, and as adoption increases. Similar to restaurants, some tables are reserved for reservations, but there are always a few left available for walk-ins. The preferred configuration would be a site where all chargers can be reserved but can also be used on a first-come-first-served basis if a charger is not reserved or in use. However, reservations should always get priority. If a "first-come-first-serve" charger is in conflict with a reservation, they should be given advance notice of how long they have to charge until the truck holding the reservation arrives to charge. Folks making reservations should be required to arrive within a 30-minute window, otherwise they must forfeit their reservation. (Questions 6, 8, 9, 10 and 16)

The ideal reservation system or process would be something that all fleets and all vehicles, regardless of manufacturer, could access, something easily downloaded onto a smart phone. It should also be based on duty cycle. (Questions 7 and 13) A reservation system provides a benefit to the state because it alleviates range anxiety and encourages folks to adopt ZE technology that helps meet state climate goals and improve public health. Business can't have uncertainty – provides certainty to commercial truck operators. (Question 11)

The Port plans to require onsite personnel 24/7 to support public charging. (Question 12)