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Docket Number:	22-EVI-03
Project Title:	National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans
TN #:	243988
Document Title:	TravelCenters of America comments on NEVI Deployment Plan
Description:	N/A
Filer:	Spencer Kelley
Organization:	TravelCenters of America
Submitter Role:	Public
Submission Date:	7/11/2022 1:22:54 PM
Docketed Date:	7/11/2022



June 24, 2022

Elissa Konove, Undersecretary
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Steven Keck, Acting Director
California Department of Transportation
1120 N Street
Sacramento, CA 95814

Drew Bohan, Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: TravelCenters of America Comments on 22-EVI-03 NEVI Deployment Plan Development

Dear Ms. Konove, Mr. Keck, and Mr. Bohan:

TravelCenters of America (TA) respectfully submits the following suggestions in response to the California Department of Transportation's (Caltrans) and California Energy Commission's (CEC) joint request for feedback on the deployment of EV charging infrastructure (EVSE) under the Infrastructure Investment and Jobs Act's National Electric Vehicle Infrastructure (NEVI) Formula Program. As you finalize the state's NEVI Deployment Plan, we thank you for recognizing this as a critical opportunity to strategically invest the allocated public funds, leverage California's impressive ongoing and planned public and private investments in public EVSE, and drive policies that will spur greater private sector investment and participation in the development of successful, sustainable EV fast charging infrastructure in California (State), as well as the workforce needed to build and maintain this critical infrastructure.

We are highly supportive of the current draft of the Plan but would urge Caltrans and CEC to deploy more robust investment in rural communities, many of which are Justice40 communities through which drivers often travel on vacations and longer road trips. Additionally, we encourage Caltrans and CEC to maximize this round of NEVI funding by including segments of the State's highway infrastructure that will support multiple users across light-, medium-, and heavy-duty transportation. TA recommends the State consider expanding eligible NEVI Built-Out Corridors to allow applicants to capture the full scale of their proposed and planned investments in statewide charging infrastructure as they seek to compete for funding to support rapid EVSE deployment.



TA believes that our suggestions will enable California to partner with existing retail fuel service providers across the state to establish and promote a competitive EV charging market, offer robust growth in alternative fuels, and meet the needs of communities, businesses, and travelers.

If investments are made without incentivizing and capitalizing on existing refueling infrastructure, the Plan could result in less desirable charging station locations, fewer amenities for consumers, and reduced consumer demand interest in the adoption of EVs, which could lead to a less reliable and enjoyable driving experience.

About TravelCenters of America (TA)

TA is the nation's largest publicly traded full-service travel center network. Founded in 1972, more than 18,000 team members serve motorists and professional drivers at 276 locations in 44 states, principally under the TA[®], Petro Stopping Centers[®], and TA Express[®] brands. In addition to providing diesel and gasoline, services and amenities include truck maintenance and repair; full-service and quick-service restaurants; travel stores; well-lit, safe car and truck parking; free wi-fi; and additional services dedicated to providing a superior experience for guests.

TA has a strong presence in California and is well qualified to help the State achieve its alternative fuel goals. With thirteen locations from Indio to Redding, TA is conveniently and strategically located along the I-5, I-10, I-15, and SR-99 corridors. In addition, TA's specialized business unit, eTA, is focused on providing sustainable energy options for professional drivers and motorists and has valuable experience with EV fast chargers for passenger cars and medium- and heavy-duty trucks. Indeed, TA has already partnered with the state of California and local agencies to initiate the build-out of charging infrastructure for light-, medium-, and heavy-duty vehicles, demonstrating innovative and advanced charging systems, microgrids, and traffic flow models to enhance the EV driver's experience.

TA is interested in further partnering with California to lower the transportation sector's carbon footprint and increase access to safe, reliable, and convenient public high-power DC fast charging (DCFC) stations. We successfully provide the services that motorists want and believe that California can be most successful in implementing the NEVI funding program by making the charging experience for electric vehicles as similar as possible to today's existing refueling experience. For best results, California should strongly consider mirroring current consumer fueling experiences and habits in designing and implementing the Plan, much as it has done in the past with other charging corridor funding programs.

The Role of Fuel Retailers

We urge Caltrans and CEC to consider policies necessary to maintain a sustainable and competitive market for private investment in EV charging infrastructure in California. We believe the California Plan should prioritize private entities that offer the amenities, safe facilities, and reliable infrastructure maintenance desired by EV drivers. This is an important consideration in maintaining the long-term success and sustainability of California's EV infrastructure as we collectively seek to achieve the State's goal of deploying 37,500 DCFC stations by 2030.

The best way to develop a robust charging network is through a competitive, market-based approach that meets the needs of today's drivers and incentivizes private investment. Fuel retailers with full-service amenities are best equipped to facilitate a faster, more widespread and cost-effective transition to alternative transportation energy. TA's travel centers address the state's NEVI requirements with well-known, easily accessible locations no more than a mile from Alternative Fuel Corridors, providing 24/7 location convenience as well as food and beverage options, restrooms, and security.

Prioritizing Resilient Grid Solutions and Systems Powered by Renewable Energy Sources

The lack of grid resiliency and the risks associated with increased electricity demands from the growth in EV adoption are significant concerns that should be addressed. California can use the transition to alternative energy resources to enhance grid resiliency and address the vulnerability of the grid from capacity limitations,

aging equipment, Public Safety Power Shutoff events, and other weather and climate volatility perspectives. The State should give priority to applicants and sites that seek to closely coordinate among site hosts, utilities, infrastructure providers and network operators, advanced energy technology developers, workforce development groups, and community-based organizations. This is an opportunity to encourage private investment that both scales charging infrastructure and solves grid resiliency issues. The State could attract the necessary private investment if it reduces the risk and cost of lengthy easement/right of way challenges and accelerates the permitting process. Taking the steps to ease the bureaucratic road-blocks would help ensure the timely development of safe, cost-effective, accessible, reliable, and resilient EVSE networks available to all drivers in California.

TA has a plan for deploying clean power generation and microgrids onsite that would help alleviate the challenges placed on grid capacity and aging equipment. Additionally, TA has developed strong relationships with utility, technology, infrastructure, workforce development, and community partners, such as Southern California Edison, EVgo, ChargerHelp!, and AB 617 groups across California. These relationships will help facilitate the rapid deployment of reliable, high-powered EVSE with the amenities and facilities drivers desire and rely upon, particularly on longer trips. We encourage California to emphasize and prioritize partners who can help the State deliver renewable-powered solutions that enhance grid and site resiliency while promoting greater collaboration with utility, industry, workforce development, and community stakeholders.

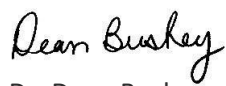
Future-Proofing by Considering Medium- and Heavy-Duty Truck Alternative Fueling

We encourage Caltrans and CEC to build a Plan that looks toward the future of alternative energy refueling, including the medium- and heavy-duty (MDHD) truck sector. In addition to sites that mirror the existing customer experience, we also encourage the State to consider sites with large lot sizes, which will be needed to accommodate multiple alternative fueling options (e.g., electric, hydrogen, etc.) and can accommodate both passenger and MDHD vehicles. Selecting sites with future funding for the MDHD vehicle classes in mind will position California to continue leading the way in the future of the green transportation economy. Moreover, prioritizing sites offering future charging for light-, medium-, and heavy-duty vehicles could leverage investment in upstream infrastructure upgrades, reducing the cost and time of deploying these complementary networks that are critical to decarbonizing the transportation sector and achieving the State's climate goals.

We applaud Caltrans and CEC for developing such a comprehensive NEVI Deployment Plan with strong commitments to public engagement, equity, and underserved and rural communities. We appreciate the opportunity to comment on California's critically important NEVI Deployment Plan and look forward to working with Caltrans and CEC as they design these programs to facilitate greater investment in EV charging across California.

Please contact me at any time if you have questions or if we can assist in any way to help California achieve the State's sustainability goals.

Sincerely,



Dr. Dean Bushey
Senior Vice President, Sustainability