

CALIFORNIA AIR RESOURCES BOARD ZEV AIRPORT SHUTTLE BUS

**COMMENTS OF SAN DIEGO AIRPORT PARKING COMPANY (SDAP) ON
CARB PROPOSED REGULATION OF ZERO-EMISSION AIRPORT SHUTTLE
REGULATION**

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Company
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May 24, 201

I. 15-DAY COMMENTS

A. LCFS

Fleets that do not own the infrastructure or that use other hubs will not be able to generate credits. Fleets that are small will have a hard time monetizing the credits when volumes are low as brokers are only interested in high volumes of credits.

B. COST ANALYSIS WITH LCFS CREDIT

ARB has incorrectly demonstrated the cost models including Cost over the Lifetime, Cost to Business over Regulation Lifetime, Local Governments over Regulation Lifetime by using an assumption of LCFS credits; however, this model is not accurate and thereby an alternative without the LCFS should be modeled due to item A statement above. For example, in San Diego, currently the approved PYD CPUC pilots and the PR CPUC pilots are all infrastructure that is owned by SDGE and thereby the credits are not accessible to the fleets under this model. The same will apply if the EVSE is owned by the EVSP, for example with the VW programs, infrastructure if installed under these programs will not be owned by the fleets, which in these cases changes the results in each of the analysis. There is no standard today in the commercial sector as to these installations and ownership models.

C. Class 2b and Class 3 Vehicles 8,500 to 14,000 GVWR

At SAN Airport, per the 2018 data, the vehicle count and trips by the Class 2b and Class vehicles are the majority and thereby are significant. The Class 2b and Class 3 vehicles for the Off Airport Parking, Hotel and Off Rental Car Shuttles make up 66% of the 109 total shuttles, these operations are all private entities and for which ARB was not successful with obtaining a response by the private sectors in their survey thereby the report is not accurate and thereby attempts to rely on the EMFAC report and survey assumptions. Below are the facts at the San Diego Airport for these private shuttles operations that will be impacted by this measure but because of the Class 2b and Class 3 vehicles not being included in the measure there is missed opportunities to achieve the reduced air pollution; moreover, this could be an opportunity to include these sectors that could support the air quality goals and greatly impact the results. Without the support of a measure shuttle operations in the Class 2b and 3 will not have the support of reliable and safe product without ARB including this class of MD vehicles to be part of the measure and to be compliant certified vehicles for all of the same reasons that the over 14,000 GVWR shuttles and technology will be required to provide.

GT: Mode	Shuttle Count (over 14k GVWR):	Van Count (under 14KGVWR):	Trip Count Annually:
Hotels and Courtesy	29 (27%)	29 (27%)	107,600
Off Airport Parking	8 (7%)	36 (33%)	193,100
Off Rental Car Shuttles	0 (0%)	7 (6%)	13,000

D. 17 Cents per kWh average

Airport shuttle operators in San Diego and other operators that will be in other utility tariffs cannot install sub-meters will installing infrastructure. Thereby any load associated with the current business operation after the installation of EVSE charging and it's charging power is missing from the cost analysis. Additionally, small operators' tariffs are not included in your analysis. SDAP is providing its current

kWh rate as supporting documents to validate that it's kWh rate in the AP TOU rate averages 27 cents per kWh. It appears that these small business commercial rates and other business loads were not included in your analysis which creates an incorrect average as any existing load that is new is impacted by Peak demand due to charging patterns for Airports cannot be scheduled.

CONCLUSION

SDAP has shared facts in the foregoing comments and has provided evidence from the EV fleet end user experience that supports the need for compliance by all modes and the effects of the cost impacts in CARB's analysis --- which is not correct. SDAP expects a benefit with a reliable product and other fleets when adopting expect and require the same. Addressing the emerging technology changes and lessons learned can only be comprehended by actual on the ground experience. SDAP specifically request all classes of vehicles at the airport should be required to meet the measure whereby all vehicles should be ZEV certified which should determine that all vehicles will be reliable and safe.

Respectfully submitted,

/s/ Lisa McGhee

Dated: May 24, 2019

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Appendix:

2018 Summer: 32.7 cents per kWh



ACCOUNT NUMBER 9404 582 206 0
 SERVICE FOR
 DAVID J MCGHEE
 S D AIRPORT PARKING CO
 2771 KURTZ ST
 SAN DIEGO, CA 92110

DATE MAILED Jul 19, 2018
 sdge.com

Page 1 of 5

Savings Alert: California is fighting climate change and so can you! Your bill includes a Climate Credit from a state program to cut carbon pollution while also reducing your energy costs. Find out how at EnergyUpgradeCA.org/credit.

Account Summary

Previous Balance			\$501.99
Payment Received	07/05/18	THANK YOU	- 501.99
Current Charges			+ 610.63
Total Amount Due			\$610.63

.7% Delayed Payment Charge Due If Paid After Aug 13, 2018.

Summary of Current Charges

(See page 2 for details)

	Billing Period	Usage	Amount
Electric	Jun 17, 2018 - Jul 17, 2018	1,865 kWh	610.63
Total Charges this Month			\$610.63

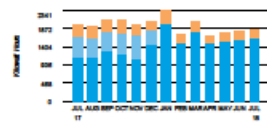
Regulatory Notices

- All customers are required to pay a Competition Transition Charge as part of the charges above, including those who choose an electric service provider other than SDG&E.

DATE DUE Aug 3, 2018

AMOUNT DUE \$610.63

Electric Usage History (Total kWh used)



1,865 kWh used

- 62.3 Daily avg kWh
- 66.6 Daily avg kWh last month
- 4.7% Change in daily avg kWh from last month
- 9.9% Change in daily avg kWh from last year
- 12.1 Max monthly demand
- 15.3 Max annual demand
- 30 Days in billing cycle

PLEASE KEEP THIS PORTION FOR YOUR RECORDS. (FAVOR DE GUARDAR ESTA PARTE PARA SUS REGISTROS.)
 PLEASE RETURN THIS PORTION WITH YOUR PAYMENT. (FAVOR DE DEVOLVER ESTA PARTE CON SU PAGO.)



SERVICE ADDRESS: 2771 KURTZ ST SD 92110

Save Paper & Postage
 PAY ONLINE
 sdge.com

ACCOUNT NUMBER
 9404 582 206 0

DATE DUE Aug 3, 2018

AMOUNT DUE \$610.63

Please enter amount enclosed.

\$

Write account number on check and make payable to San Diego Gas & Electric.

DAVID J MCGHEE
 2771 KURTZ ST
 SAN DIEGO CA 92110-3109

SAN DIEGO GAS & ELECTRIC
 PO BOX 25111
 SANTA ANA CA 92799-5111

0 2 20000940458220600000610630000061063

SAN Trips 2018

SDIA TRIPS COUNTS 2018

MODE	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec	TOTAL
Courtesy	9,087	8,543	9,275	9,306	9,497	8,950	8,692	8,741	8,683	9,574	8,684	8,586	107,618
Off-Airport Parking	15,116	14,528	16,037	16,154	17,005	16,398	16,970	16,951	16,165	16,577	15,768	15,448	193,117
Taxi	44,634	52,309	50,585	51,422	51,871	46,802	43,835	42,451	45,319	52,694	50,084	31,201	563,207
Vehicle-For-Hire	4,650	4,013	4,593	4,558	4,546	4,581	4,586	4,121	3,933	4,142	3,724	3,177	50,624
TOTALS	73,487	79,393	80,490	81,440	82,919	76,731	74,083	72,264	74,100	82,987	78,260	58,412	914,566

TNC (PUs & DOs)	147,103	139,422	156,453	160,380	172,730	165,666	355,313	376,606					1,673,673
TNC Pick Ups Only									172,162	181,701	175,377	150,696	679,936
TNC Drop Offs Only									190,408	213,074	199,846	190,676	794,004
TOTALS	147,103	139,422	156,453	160,380	172,730	165,666	355,313	376,606	362,570	394,775	375,223	341,372	3,147,613

SAN Vehicle Counts 10-2018

as of October 31, 2018

MODE	COMPANIES	VEHICLES
CHARTER	379	930
TAXI	194	366
HOTEL/MOTEL	30	58
OFF-AIRPORT PARKING	7	44
VFH	4	59
TNC	5	N/A
TOTAL	619	1457



SAN Vehicle Counts per Public Request 2-2017

MODE	AFV	NON-AFV	Grand Total
Charter/Limo	69	1,031	1,100
Courtesy	7	48	55
Off Airport Parking	45	4	49
Rent-a-Car		7	7
Taxi	355	11	366
Vehicle for Hire	60	18	78
Grand Total	536	1,119	1,655

SDCRAA Contracts	AFV	NON-AFV	Grand Total
ACE PARKING - SHUTTLE OPS	31	0	31
SP+ Transportation (RCC)	25	0	25
Grand Total	56	0	56