



National Association of State Energy Officials

November 8, 2024

The Honorable Kristin White
Acting Administrator, Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590

RE: Docket No. FHWA-2024-0028 Request for Information on Medium- and Heavy-Duty Electric Charging Technologies and Infrastructure Needs

Dear Administrator White,

The National Association of State Energy Officials (NASEO) offers our comments in response to the Federal Highway Administration’s (FHWA) Request for Information on Medium- and Heavy-Duty (MHD) Electric Charging Technologies and Infrastructure Needs (Docket No. FHWA-2024-0028). NASEO represents the governor-designated State Energy Directors and their offices from each of the 56 states, territories, and the District of Columbia. Most State Energy Offices play a significant role in electric vehicle (EV) policy and program development and implementation, including charging infrastructure siting and investment, grid planning, as well as public-private partnerships. State Energy Offices are also typically a key supporting agency or state lead for the National Electric Vehicle Infrastructure (NEVI) program and often support state Charging and Fueling Infrastructure (CFI) Discretionary Grant Program applications. NASEO is supporting three pilot states with freight electrification planning and stakeholder engagement.

NASEO wishes to provide input on two areas related to unique MHD EV charger and station needs. NASEO encourages FHWA to:

- 1. fund shared charging sites (i.e., those serving more than one company), and
2. encourage resiliency features at charging stations serving emergency vehicles.

In response to the RFI’s questions regarding public versus private charging requirements (category 1.3), NASEO encourages FHWA to consider making federal funding for MHD EV charging, such as CFI and any future programs to be made available, to not only fund “public” (unrestricted) charging, but also to fund shared sites that serve more than one fleet. This is consistent with the Infrastructure Investment and Jobs Act (IIJA), which states that “funds made available... in this act shall be for projects directly related to the charging of the vehicle and only for electric vehicle charging infrastructure that is open to the general public or to authorized commercial motor vehicle operators from more than one company.”

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However, this IIJA allowance has not been reflected in previous CFI rounds. The inability to fund such shared charging sites will dampen private investment, particularly where and when it is most needed. Given the significant capital investment required (even with public funding support) for high-power, multi-stall MHD charging sites, station developers and their financiers require utilization guarantees from customers that are not in alignment with true “public” (i.e., unrestricted) charging requirements. Additionally, requiring 24/7 unrestricted access to MHD charging sites limits station developers’ and operators’ ability to effectively right-size charger needs and to manage electricity demand. As such, to ensure limited public funds available for MHD EV charging infrastructure are leveraged as quickly and efficiently as possible, these funds should be made available to shared sites (i.e., those serving more than one company) going forward.

In response to the RFI’s questions regarding station development considerations (category 1.2), NASEO encourages charging stations serving MHD vocational vehicles to incorporate resiliency measures for emergency vehicles (e.g., firetrucks, utility trucks, ambulances, etc.) that may need to rely on these stations to charge during or after responding to the scene of an emergency. Resiliency measures may vary, depending on the operational requirements of the vehicles served, but will likely be necessary for private, “behind-the-fence” depot charging sites serving emergency vehicles. Resiliency may be less critical for shared and public MHD charging sites providing charging to commercial fleets and the general public.

NASEO appreciates the opportunity to provide input as FHWA and the Joint Office of Energy and Transportation work to support the development and deployment of EV chargers to meet the anticipated needs of MHD EV original equipment manufacturers, fleet operators, drivers, charging station operators, and electric utilities. We urge a pragmatic approach within the bounds of existing legislation to ensure that electric MHD vehicle fleet operators and charging networks are served by public policies and funding programs.

Best regards,



David Terry, President, NASEO

CC: State and Territory Energy Offices, U.S. Department of Energy, U.S. Department of Transportation