Federal Highway Administration Electric Vehicle Charging Program: Energy Marketers of America Comments Addressing Competitive Grant Program

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The Energy Marketers of America ("EMA") submitted January 28th comments to the United States Department of Transportation Federal Highway Administration ("FHWA") addressing:

. . . the development of guidance for implementation of the National Electric Vehicle Formula Program and the Charging and Fueling Infrastructure Grant Program . . .

EMA is a federation of 47 state and regional trade associations representing energy marketers throughout the United States.

The Arkansas Oil Marketers Association is a state chapter of EMA.

Energy marketers represented by EMA are stated to own and operate approximately 60,000 retail motor fuel locations across the country.

The Infrastructure Investment and Jobs Act enacted in the Fall of 2021 provides $7.5 billion in funding for the states to deploy an electric vehicle formula program ("EV charging program"). $2.5 billion is set aside for a competitive grant program to build out infrastructure along alternative fuel corridors including:

- EV charging
- Hydrogen
- Natural Gas
- Propane

FHWA had requested comments from stakeholders to help it develop guidance for implementation of the:

- National Electric Vehicle Formula Program
- Charging and Fueling Infrastructure Grant Program

EMA notes by way of introduction that its members:

. . . have extensive experience in consumer habits and needs, as wells as operation and maintenance issues associated with vehicle refueling.

The association asks that the FHWA utilize this expertise/experience as it addresses implementation of the EV charging infrastructure.

EMA themes expressed in the comments include, as to the National Electric Vehicle Formula Program:

- The distance between publicly available EV charging infrastructure (There needs to be a better understanding of EV charging habits.)
- Connections to the electric grid, including electric distribution upgrades; vehicle-to-grid integration, including smart charge management or other protocols that can minimize impacts to the grid; alignment with electric distribution interconnection processes, and plans for the use of renewable energy sources to power charging and energy storage
- The proximity of existing off-highway travel centers, fuel retailers, and small businesses to EV charging infrastructure acquired or funded under the Program
- The need for publicly available EV charging infrastructure in rural corridors and underserved or disadvantaged communities
- The long-term operation and maintenance of publicly available EV charging infrastructure to avoid stranded assets and protect the investment of public funds in that infrastructure
- Fostering enhanced, coordinated, public-private or private investment in EV charging infrastructure
- Meeting current and anticipated market demands for EV charging infrastructure, including with regard to power levels and charging speed, and minimizing the time to charge current and anticipated vehicles
- Any other factors the FHWA should consider in developing the EV charging program guidance.

The themes addressing the Charging and Fueling Infrastructure Program include:

- The plan for installation of EV chargers must take into consideration anticipated EV population trends. (Technology for chargers and EVs is changing quickly.)
- Important to make the best use of resources by understanding the potential quantity and trends of EVs in a particular area.
- Fire risk and hazards associated with failure of an EV battery while charging is a major concern.
- Uniform codes (i.e., fire codes, building codes) addressing public and commercial EV chargers are needed.

A copy of the comments can be downloaded here.