



ZERO EMISSION  
TRANSPORTATION  
ASSOCIATION

August 27, 2025

U.S. Department of Transportation  
1200 New Jersey Ave. SE  
Washington, DC 20590

**RE: Docket No.: FHWA-2025-0010**  
**National Electric Vehicle Infrastructure Formula Program Guidance**  
*Submitted via Rulemaking Portal: <http://www.regulations.gov>.*

The Zero Emission Transportation Association (ZETA) is an industry coalition representing approximately 50 companies spanning the electric vehicle (EV) supply chain end-to-end, including critical mineral and material producers, cell and battery manufacturers, vehicle manufacturers, charging companies, electric vehicle supply equipment (EVSE) providers, utility companies, and battery recyclers.

We would like to express our gratitude to the U.S. Department of Transportation (DOT) for inviting public input for the newly released guidance around the next phase of the National EV Infrastructure (NEVI) program. ZETA thanks the Department for the opportunity to submit our comments on this important guidance.

ZETA and our member companies appreciate the opportunity to work with the Trump Administration to support DOT's mission to deliver the world's leading transportation system. This NEVI guidance is critical to unlocking the funds necessary for the U.S. to continue to build world-class EV charging infrastructure that can support our growing electric vehicle fleet. We look forward to discussing these policies in future conversations with your staff. If you have any questions or concerns, please contact me at [al@zeta.org](mailto:al@zeta.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Albert Gore".

Albert Gore  
Executive Director

## **Overview of the NEVI program**

A ubiquitous, reliable network of chargers along federal highways and in communities throughout America is necessary to support consumer adoption of this continually advancing technology. As the first federal initiatives to establish an interconnected EV charging network across every state, maintaining robust funding for the NEVI Formula Program is critical to continue building out our charging networks across the country. The fast-expanding U.S. production capacity for EVs, batteries, and critical minerals and materials has been a major contributor to not just growth in the automotive sector, but also toward more secure domestic supply chains.

As of July 2025, there are nearly 80,000 public charging locations overall, representing over 245,000 public charging connectors.<sup>1</sup> This is more than double the 95,000 public connectors in 2021, representing significant growth in public charging over just three-and-a-half years. This success is thanks in part to the hard work of both the public and private sectors. However, significantly more is required; according to the National Renewable Energy Laboratory (NREL) and in recent consultations with industry experts, around 170,000-185,000 fast chargers need to be deployed by 2030 to meet the demands of the U.S. EV fleet.<sup>2</sup> Around two-thirds of EV fast chargers required by decade's end must be built out in the next four-and-a-half years.

According to the analysis group Paren, which tracks the U.S. charging infrastructure network, 2025 is expected to be a record year for EV supply equipment (EVSE) deployment, with an estimated growth rate for public charging of 20 percent year-on-year.<sup>3</sup> However, charging rollout varies significantly depending on the state, with large differences between regions of high and low population density. Out of economic necessity, most private sector EVSE deployment occurs in places where the near-term cost of buildout will be absorbed by higher utilization. Paren's report notes that, "The real issue is not just 'more' but siting stations to both fill charging deserts in rural areas and reduce congestion in the busiest urban markets. Private industry will solve the latter issue, but programs such as [NEVI] are key to building out charging stations in areas without chargers but may have very low utilization." To fill in these gaps, federal programs like NEVI remain necessary to achieve full rollout of EV charging across the country.

ZETA believes that federal charging programs should complement private sector investment and focus on filling gaps in charging coverage, such as lower population density areas that are less economically feasible for the private sector to develop. In addition, we recommend that the Department consider the issue of charging congestion in certain areas, as well as the unique challenges for medium- and heavy-duty EV charging, as DOT works with Congress on upcoming surface transportation legislation.

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<sup>1</sup> Alternative Fuels Data Center. ([DOE](#))

<sup>2</sup> NREL. June 2023. "The 2030 National Charging Network." ([NREL](#))

<sup>3</sup> US EV Fast Charging — Q2 2025 report. 7/28/2025 ([Paren](#)).

ZETA would welcome the opportunity to continue engagement with the Department, to provide recommendations on how to increase transparency and efficacy throughout the program, which will best ensure federal funding is utilized in an efficient manner where the need is greatest.

### **Owner-Operator Language**

The newly released guidance encourages States to select charging locations where the charging station operator is also the site host (i.e. the property owner).<sup>4</sup> ZETA urges the Department to prioritize selection of charging locations that fill important gaps in charging coverage and continue to deliver the world's leading transportation system, regardless of property ownership interests. EV charging companies are focused on delivering reliable and safe charging experiences for consumers at scale. Site owners are not always the experts on charging compared to charging network operators. ZETA respectfully disagrees with prioritizing site ownership for charging locations, over more pertinent qualifications such as consumer charging needs for that location. ZETA urges the Department to encourage States to select locations that fill critical gaps in public charging coverage and improve EV charging infrastructure, as opposed to giving priority where the station operator is the property owner.

### **Tech-neutral approach to EV charging connectors**

ZETA urges that the FHWA continues to utilize a ‘technology-neutral approach’ to the EV charging connectors used by NEVI-funded charging infrastructure sites. This is an approach articulated in the Infrastructure Investment and Jobs Act (IIJA). The IIJA requires the NEVI Program to deploy “non-proprietary charging connectors that meet applicable industry safety standards,” that are “open to the general public or to authorized commercial motor vehicle operators from more than one company.”<sup>5</sup> Currently, the program guidance does not directly modify the charging connector requirements under Title 23 CFR 680.106, the minimum technical standards for NEVI. To ensure the efficient deployment of infrastructure that meets market needs at lowest cost, the technical standards guidance must be updated to align with the underlying law, which takes a technology neutral approach. The guidance should continue to allow for maximum flexibility for charge point operators, while allowing industry trends to drive the type of EV chargers deployed to meet driver expectations and needs.

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<sup>4</sup> National Electric Vehicle Infrastructure Formula Program Interim Final Guidance, p. 4-5. August 11, 2025.

<sup>5</sup> Infrastructure Investment and Jobs Act (IIJA) Public Law 117-58 Section 11129; 49 CFR 1.81.