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## **National Electric Vehicle Infrastructure Formula Program Recommendations**

The Infrastructure and Investment Jobs Act (IIJA) allocates \$5 billion to establish the NEVI Formula Program, which provides funds to States to create a national EV charger network. This program will use predetermined formulas based on the state's needs to determine charger placement in alternative fuel corridors. ZETA is pleased to offer the following recommendations relating to the guidance for electric vehicle charging infrastructure deployment.

[Link to ZETA's full comments dated August 19, 2022.](#)

- **Maintain the 5-year requirement for States to maintain EV charging infrastructure and require grant applicants to present a plan for ensuring stations are operable for 7-10 years.**
  - Ensuring stations are operable for their full useful life will maximize capital investment and provide more certainty for customers.
- **Amend the “qualified electrician” definition so that any certified electrician with demonstrable experience installing electrical equipment of at least 150kW be included.**
  - Only two pathways to qualification would limit entry to the broader EVSE workforce, risking delays to equipment installation.
- **Provide clarity on program income to avoid State DOTs regulating rates of return in a way that is out of step with prevailing market economics for charging infrastructure hardware, software, electricity, and ongoing services.**
  - The proposed approach would invite price regulation for charging stations which is inappropriate, as these are discrete retail businesses competing in the private market.
- **Align data reporting with the California Air Resource Board’s annual EVSE Standards or DOE’s Alternative Fuels Data Center requirements, focus reporting at the station level, and require annual reports instead of quarterly.**
  - Current CARB and DOE reporting requirements are already familiar to the industry and aggregating data at the station level is sufficient to protect customer privacy and limit burden on industry. Requiring annual data submissions rather than quarterly would relieve burden on State DOTs.