



Corporate Electric Vehicle Alliance

April 20, 2023

Re: Major Fleet Operator Recommendations for State Electric Vehicle Charging Infrastructure Deployment & Design

Dear [State Department of Transportation],

We write in follow-up to our [July 2022 letter](#) on behalf of the [Corporate Electric Vehicle Alliance](#) (the Alliance), led by Ceres – a coalition of 32 major companies and fleet operators that represent over \$1.1 trillion in annual revenue and collectively own, lease, or operate more than 2.5 million fleet or networked vehicles in the United States; and [NAFA Fleet Management Association](#) (NAFA) – an association of more than 2,000 individual fleet manager members who come from corporations, public safety, education, government agencies (federal, state, and municipal), utilities, and any other entity that uses vehicles in its normal conduct of business or moves people or goods from one place to another.

Our Ask

With the U.S. Federal Highway Administration's (FHWA) February 2023 finalization of [minimum standards](#) for the National Electric Vehicle Infrastructure (NEVI) Formula Program, **we urge you to continue to consider commercial and public fleets in your build-out of electric vehicle (EV) charging infrastructure across the state and remind you that the final NEVI standards are merely a baseline for success (for both publicly- and privately-funded infrastructure).** As a reminder:

Goals:

Alliance members share a common goal of electrifying their U.S. transportation, logistics, and networked fleets, as well as reducing their transportation emissions footprint and are actively working to transition to EVs. In fact, over the next five years Alliance [members plan to collectively procure more than 330,000 zero emission vehicles \(ZEVs\)](#) in the U.S. market alone. NAFA members support the accelerated transition to EVs as a critical part of the strategy for sustainability and the reduction of vehicle emissions. To succeed, however, real-world factors must be addressed to transition fleets toward full electrification.

What We Need:

The availability of strategically placed, cost-effective, reliable, and interoperable public EV charging infrastructure is essential for trips that take commercial and other fleet operators substantial distances from their fleet depots or homes. The same Alliance survey cited above found that the majority of vehicle charging will take place at private locations (26% at fleet depots and 42% at employee homes); however, on-road charging will account for the remaining 32% of charging needs and is a critical element of a successful EV transition, in particular for regional and long-haul freight movement, and fleet movement within urban, suburban and rural areas.

While EV charging infrastructure investments made through the NEVI Formula Program are a promising step towards widespread charging availability in the U.S., there is much more to be done to create a cost-effective, equitable, and resilient charging network for commercial and public fleets.



Corporate Electric Vehicle Alliance

We hope the Alliance and NAFA's previously provided [Charging Infrastructure Recommendations \(July 2022\)](#), which include the siting, interoperability, and electrical capacity needs of major U.S. fleets, will provide critical guidance as you work to invest funding from the NEVI Formula Program and beyond.

In addition, we encourage eligible public and tribal governments within the state to take advantage of funding opportunities offered under the [Charging and Fueling Infrastructure \(CFI\) Discretionary Grant Program](#). With \$700 million available to awardees in the current round of funding (FY22-23), these grants are a fantastic opportunity for public and tribal entities to address regional EV charging system gaps and deploy charging infrastructure in communities and along corridors most impacted by transportation emissions.

Medium- and Heavy-Duty Vehicles (MHDVs)

While the final NEVI standards do not include specific requirements to support charging of MHDVs, these vehicles represent [only 5% of the vehicles on the road but currently account for 21% of transportation GHG emissions](#) and are therefore critical levers in improving public health and reducing transportation emissions in the state through electrification. Further, MHDVs typically run on diesel fuel, the top source for criteria pollutants like nitrogen oxides (NOx) and PM2.5 that are most threatening to human health. These emissions disproportionately impact the health of traditionally low-income and BIPOC communities situated near fleet depots, major transportation corridors, distribution centers, and ports.

As such, we urge you to incorporate [provisions](#) (including those that ensure access rights) that support the charging of these critical vehicle classes in future NEVI State Deployment Plans and in all other siting plans for new charging infrastructure in the state.

According to the American Lung Association's 2022 [State of the Air](#) report, a national shift to 100% zero-emission passenger vehicles by 2035 and 100% medium- and heavy-duty trucks by 2040 would generate over \$1.2 trillion in public health benefits between 2020 and 2050.

Thank you for your time and consideration of our recommendations.

Sincerely,

Sara Forni

On behalf of the [Corporate Electric Vehicle Alliance](#), led by Ceres
Director of the Corporate Electric Vehicle Alliance

Sincerely,



Corporate Electric Vehicle Alliance

Bill Schankel
Chief Executive Officer
NAFA Fleet Management Association