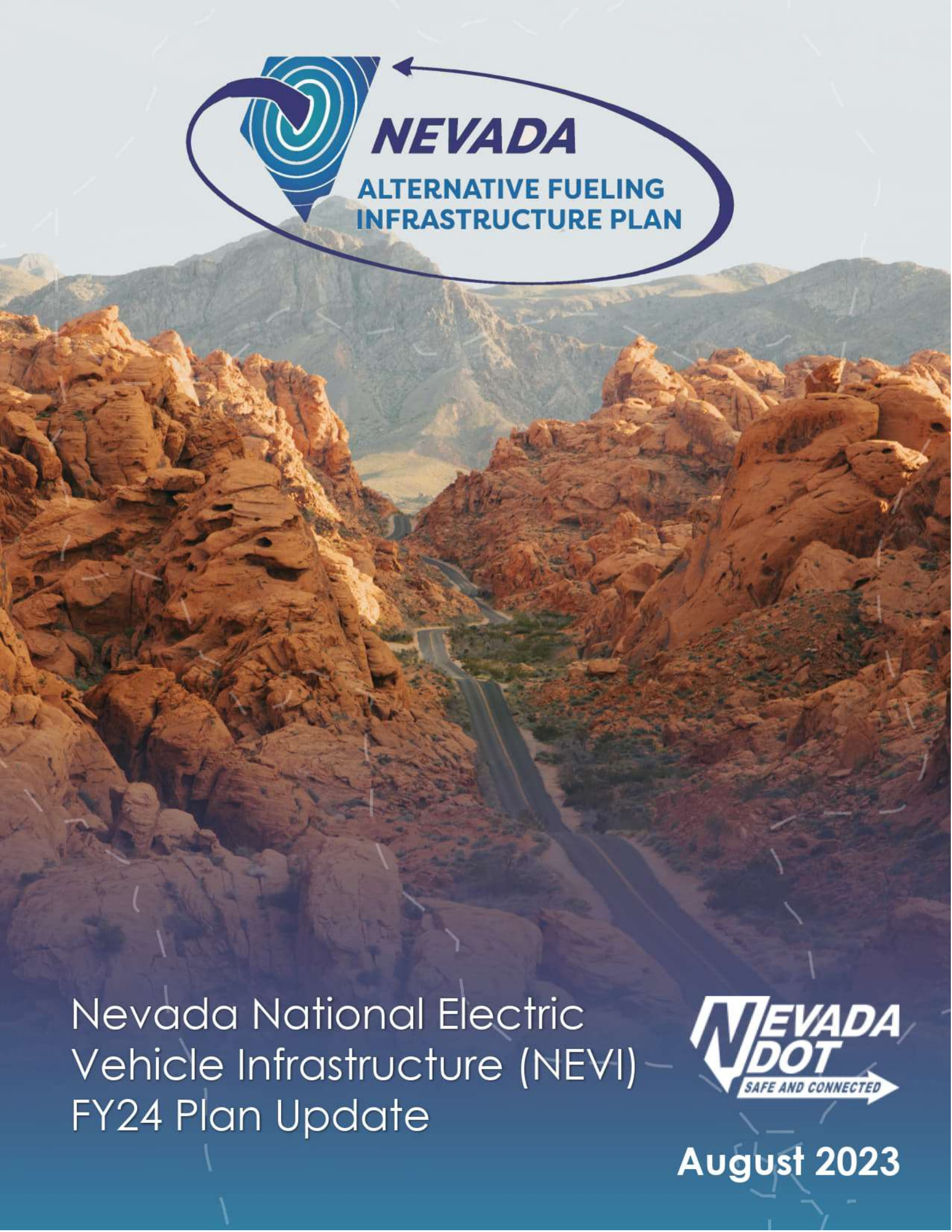

Nevada National Electric Vehicle Infrastructure (NEVI) FY24 Plan Update

NEVADA DOT
SAFE AND CONNECTED

August 2023

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Acronyms

ADA	Americans with Disabilities Act
AFC	Alternative Fuel Corridor
CCS	Combined Charging System
CFR	*Code of Federal Regulations*
DAC	disadvantaged community
DCFC	direct current fast charger
ERTEP	Economic Recovery Transportation Electrification Plan
EV	electric vehicle
EVSE	electric vehicle supply equipment
FHWA	Federal Highway Administration
Final Rule	National Electric Vehicle Infrastructure Standards and Requirements Final Rule
FY	fiscal year
GHG	greenhouse gas
I-	Interstate
KW	kilowatt(s)
MAUT	multi-attribute utility theory
MODA	multi-objective decision analysis
NDOT	Nevada Department of Transportation
NEVI	National Electric Vehicle Infrastructure
NOFO	Notice of Funding Opportunity
PCI	payment card industry
PII	personally identifiable information
RFI	Request for Information
US	U.S. Highway

Introduction

This 2023 National Electric Vehicle Infrastructure (NEVI) Plan Update reflects progress made since the initial NEVI plan submittal in August 2022, and outlines anticipated plans for the next year.

Nevada has worked diligently to strategically deploy electric vehicle (EV) charging infrastructure under the NEVI program. The purpose of this State Plan Update for EV Infrastructure Deployment is to highlight changes and updates to the base plan previously submitted to the Joint Office of Energy and Transportation, detail progress made since the last plan submittal, including impacts of the NEVI Standards and Requirements Final Rule (Final Rule) and latest NEVI guidance, and outline anticipated plans for the next year.

Updates from the Prior Plan

Table 1 summarizes sections that were updated from the previous plan.

Table 1. Updates from the Prior Plan

Plan Section		Updates since 2022 Plan
1	**Introduction**	Yes
2	**State Agency Coordination**	Updated recent outreach efforts
2A	Memoranda of Understanding with Other Agencies	Utility agreement progress with NV Energy
2B	Interagency Working Group	Stakeholder outreach meetings
3	**Public Engagement**	
3A	Community Engagement Outcomes Report	Public outreach webinar
3B	Tribal Engagement	Coordination with NDOT Tribal Liaison
3C	Utility Engagement	Feedback from utility meetings with NV Energy and rural utilities
3D	Site-Specific Public Engagement	Combined into Utility Engagement section
4	**Plan Vision and Goals**	Revised to reflect a more detailed approach with the latest guidance
5	**Contracting**	
5A	Status of Contracting Process	Developed Draft Guidebook for Implementation Process. Contracting will begin in the fall.

Plan Section		Updates since 2022 Plan
5B	Awarded Contracts	-
5C	Scoring Methodologies Utilized	-
5D	Plan for Compliance with Federal Requirements	-
6	**Civil Rights**	Minor updates
7	**Existing and Future Conditions Analysis**	Minor updates
7A	Alternative Fuel Corridor (AFC) Designations	Same as last year
7B	Existing Charging Stations	A new station in Carson City, Tesla conversion addressed
8	**EV Charging Infrastructure Deployment**	New deployments identified
8A	Planned Charging Stations	NV Energy is advancing plans for stations. Additional NEVI deployments are planned on US 95, US 50, and US 93 to supplement planned interstate deployments.
8B	Planning Toward a Fully Built Out Determination	Nevada's intent for exception requests, concerns over the latest rulemaking guidance on existing stations
9	**Implementation**	Draft guidebook, and will supplement it over the next year
10	**Equity Considerations**	
10A	Identification and Outreach to DACs in the State	Outreach to peer agencies to identify ongoing efforts. Plan for expanded outreach in Year 3.
10B	The process to Identify, Quantify, and Measure Benefits to DACs	Refined strategies slightly and continue to monitor progress.
11	**Labor and Workforce Considerations**	Added research on existing workforce programs available
12	**Physical Security and Cybersecurity**	Reference to Final Rule
13	**Program Evaluation**	No major changes, minor updates to adjust to Final Rule compliance efforts
14	**Discretionary Exceptions**	New exceptions in addition to maintaining the same exceptions from the 2022 plan

Plan Section	Updates since 2022 Plan

NDOT = Nevada Department of Transportation
US = U.S. Highway

State Agency & Public Utility Coordination

Memoranda of Understanding with Other Entities

To develop a cohesive and agreed upon plan within the state, NDOT is collaborating with Nevada Power Company and Sierra Pacific Power Company (collectively, NV Energy) to develop a formal agreement for NEVI implementation and EV charging station deployment. NV Energy is Nevada's largest public electric utility, and selected NEVI sites fall within NV Energy's service territories. Through collaboration, NDOT and NV Energy can properly plan for the strategic and efficient deployment of EV charging infrastructure in the state.

NDOT is also working with various state agencies to develop the plan, but NV Energy is a key collaborator for deploying the NEVI program in Nevada.

Interagency Working Group

NDOT established a working group of many stakeholders in the baseline plan. The group will continue to meet regularly through 2027. Participants include the following key contributors:

- Governor's Office Infrastructure Advisor
- Governor's Office of Energy
- Governor's Office of Economic Development
- Office of the Governor Senior Climate Advisor
- Nevada Department of Agriculture (Weights & Measures)
- Nevada Department of Conservation and Natural Resources
- Nevada Department of Tourism and Cultural Affairs
- Nevada Department of Business and Industry
- Nevada Department of Environmental Protection
- Nevada Office of Science, Innovation and Technology
- Nevada Department of Motor Vehicles
- Nevada Department of Administration
- Nevada Division of State Parks
- Public Utilities Commission of Nevada
- NV Energy
- Nevada Rural Electric Association
- Washoe County Air Quality Management Division (Washoe County Health District)
- Clark County Department of Environment and Sustainability
- Federal Highway Administration – Nevada Division
- Regional Transportation Commission of Southern Nevada

- Regional Transportation Commission of Washoe County
- Tahoe Regional Planning Agency
- Carson Area Metropolitan Planning Organization

Within the last year, this working group reconvened to share the latest details on the NEVI Plan and funding, provide an overview of Year 1 goals, review NDOT's prioritization plan and results, and discuss the next steps. Members of the working group also shared the latest EV infrastructure developments and outreach activities for their respective agencies. This group also reviewed and commented on NDOT's Fiscal Year (FY) 2024 draft NEVI Plan before submission.

Public Engagement

Community Engagement Outcomes Report

Website

NDOT created a NEVI page on the Department's website at https://www.dot.nv.gov/mobility/alternative-fueling-infrastructure-plan. The page includes information on the NEVI Plan and funding, deployment of EV infrastructure, how to get involved (including links to surveys – refer to the following section for details), and a variety of resources that include frequently asked questions in English and Spanish.

Surveys

In a coordinated effort with NV Energy, NDOT's website provides links to NV Energy surveys to collect input on station locations and electrification in the state. NV Energy's EV charger location outreach results are available on its website at https://www.nvenergy.com/cleanenergy/electric-vehicles. There have been over 550 respondents to date, with a majority wanting to see chargers at grocery stores (~19 percent), followed by outdoor recreation locations (~14 percent). Other types of locations identified included government/public buildings (~11 percent); restaurants (~9 percent); entertainment (~7 percent); and residential, schools, and healthcare (5 percent each) (Figure 1). NV Energy also conducted a survey seeking residential and fleet customer insights. A summary of these results can be found in its June 2022 stakeholder meeting slides at https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/cleanenergy/ertep/TE-Plan-Stakeholder-Engagement%20.pdf.

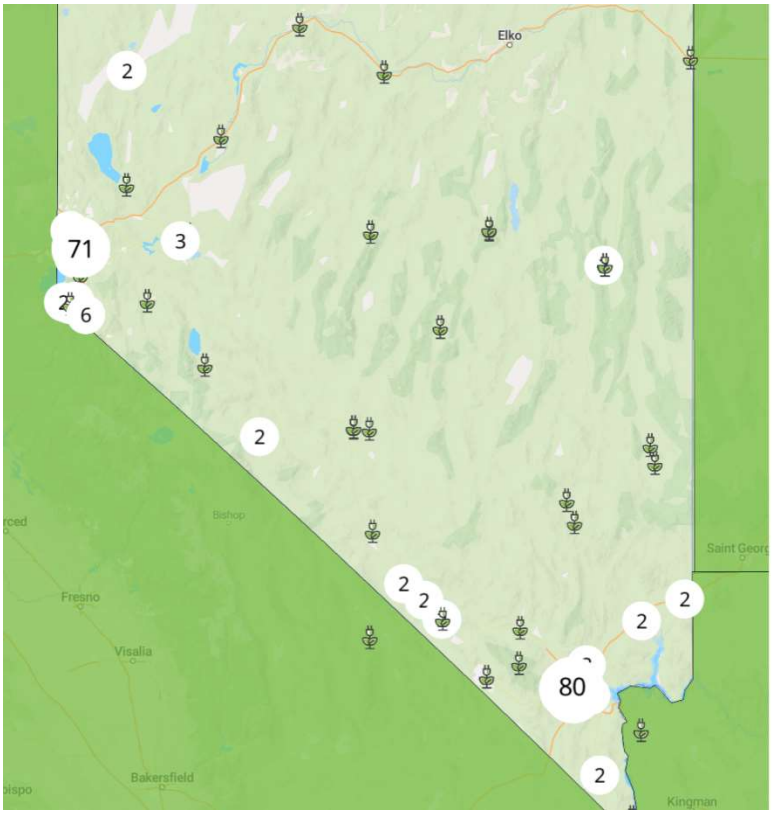

Figure 1. Public Feedback on Proposed Charging Stations in Nevada

Webinar

To engage the general public, NDOT hosted a webinar via Zoom. The webinar was announced through a press release and on NDOT's social media pages. During the webinar, NDOT provided an update on progress and a look ahead to future years while providing an opportunity for the public to ask questions, share their thoughts, and get involved in shaping EV charging in Nevada. A webinar recording was posted to the NDOT NEVI website for those unable to attend.

Forty-six people attended the live webinar, and the webinar recording had 32 views in the 10 days following the webinar. The attendees asked questions about eligibility and grant funding for non-profits, who pays for electricity to charge vehicles, identification of private property on which to locate chargers, Buy America requirements and challenges, and electricity load/capacity to avoid restrictions or brownouts in the future.

Disadvantaged Communities

In accordance with federal NEVI guidelines, NDOT is gathering input from residents of disadvantaged communities (DACs) to address their concerns relating to EV infrastructure deployment effectively. NDOT will continue to coordinate with regional agencies to gather readily available information. NDOT understands the importance of "going to the people" to truly reach members of a specific community. As such, outreach events specific to DACs will include tabling at community events, community centers, and/or local churches. Bilingual

outreach team members will engage the attendees to understand better their thoughts on EVs and how they might benefit and burden them.

Tribal Engagement

NDOT has coordinated with the Department's internal tribal liaison to share information on the NEVI program with the tribes during typical outreach cycles.

Additionally, NDOT invited tribes to apply for the Charging and Fueling Infrastructure Grant funds and made them aware of the available funds. At this time, NDOT not aware of any grant submissions.

Lastly, NDOT compiled data and developed a map illustrating proposed station locations on tribal lands to understand where future engagement may be warranted with planned deployments (Table 2 and Figure 2).

Table 2. Tribal Lands along Designated AFCs

Tribal Lands	AFCs	Number of Zones*
Reno-Sparks Indian Colony and Off-Reservation Trust Land	I-80, I-580	5
Pyramid Lake Paiute Reservation	I-80	2
Lovelock Indian Colony	I-80	1
Winnemucca Indian Colony	I-80	2
Battle Mountain Reservation and Off-Reservation Trust Land	I-80	1
Elko Colony	I-80	1
Wells Colony	I-80	1
Las Vegas Indian Colony	I-15	1
Moapa River Indian Reservation	I-15	1
Timbi-Sha Shoshone Reservation and Off-Reservation Trust Land	US 95	1
Walker River Reservation	US 95	1
Fallon Paiute-Shoshone Colony and Off-Reservation Trust Land	US 95	1
Ely Reservation	US 93	1
Stewart Community	I-580, US 395, US 50	5
Washoe Ranches Trust Land	US 395	1

**Zones depicted in Streetlight data. Approximately 1 mile each.*

I- = Interstate

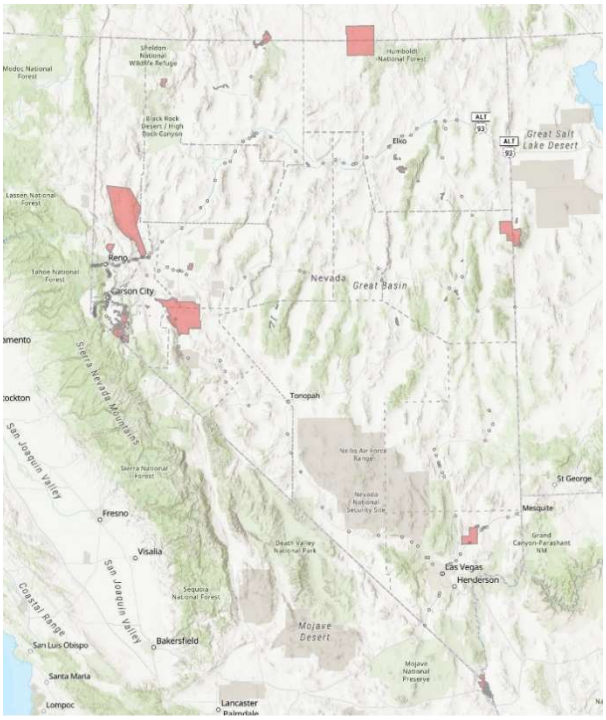

Figure 2. Tribal Lands in Nevada

Utility Engagement

NV Energy and NDOT are working through a utility agreement process by which NV Energy can deploy the NEVI-compliant stations on behalf of NDOT due to its robust existing EV charging program. As addressed in the 2022 plan, NDOT's implementation strategy aims to leverage existing work being completed by NV Energy under its Economic Recovery Transportation Electrification Plan (ERTEP), which was approved by the Public Utilities Commission of Nevada in 2022. Through ERTEP, NV Energy will invest approximately $100 million to rapidly expand EV charging station access across its service territories from 2022 through 2024. In 2023, the Nevada Public Utilities Commission also approved additional utility investments in interstate corridor charging as a part of NV Energy's Transportation Electrification Plan (TEP). Both ERTEP and TEP provide opportunities for NDOT and NV Energy to collaborate on EV charging infrastructure deployment.

NDOT has also remained engaged with the Nevada Rural Electric Association to keep them apprised of the program and potential future engagement.

Site-Specific Public Engagement

NDOT has engaged with Wells Rural Electric to discuss the planned stations in Wells and Carlin, as proposed in the 2022 Plan. The public utility asked several questions about leveraging the existing Level 2 charger funded through Volkswagen (VW) settlement funds. The utility mentioned maintenance issues at existing charging sites, and potential workforce challenges to meet reporting requirements. The latest NEVI guidance clarified some answers to the questions

about how to upgrade a VW funded site. The answers indicate that building a new station will better meet the requirements for the NEVI program although there is still a concern that a new site would compete with an existing station.

NDOT is reaching out to coordinate with the site host of the existing Moapa station, where an upgrade was proposed in the 2022 plan.

Through ERTEP, NV Energy has coordinated with potential site hosts in Carson City and Jean/Primm that align with NDOT's NEVI considerations. The anticipated site host in Carson City elected to withdraw its application due to conflicting planned construction. Subsequently, alternative site host applications are now being accepted and reviewed. NV Energy is continuing to identify other potential site hosts in Jean/Primm.

Plan Vision and Goals

Nevada's initial goals were focused on defining a methodology to ensure NEVI funds are being deployed strategically and applying a framework to bring existing AFCs on interstates to fully built out status.

The overarching goal of the Nevada NEVI Plan, to meet the needs of all Nevadans in an evolving EV landscape, remains the same as the base plan. The Nevada NEVI Plan uses a flexible framework to effectively accommodate the unprecedented nature of EVs and charging infrastructure implementation. The 2022 plan disseminates goals into an achievable timeline annually.

Given the changes in the Final Rule and the most recent NEVI guidance, the initial approach to achieve fully built out status may not be achievable with the current timing and funding. The initial goals relied on existing stations that were considered NEVI compliant in areas like Sparks, Winnemucca, and Las Vegas to achieve fully built out corridors, but requiring these site owners to meet uptime requirements may prove challenging. Based on feedback from Electrify America, NDOT understands that older-generation equipment will not meet that uptime requirement, whereas newer-generation equipment likely will. Knowing the status of equipment at each station and tracking the information will make it easier to determine whether each station is compliant at this phase in the process.

Nevada's goals for this 2023 plan have shifted from achieving fully built out status along the Interstate corridors to expand to address all AFCs across the state where the need is greatest and working with existing charging station owners to address and improve reliability. As EV infrastructure continues to be deployed throughout the 5-year program, the flexible data driven site selection framework detailed in this plan will evolve to guide decisions based on the best available information.

Other aspects of the 2022 plan vision and goals remain the same including the following:

- Job creation
- Equity
- Using NEVI funds accurately and efficiently
- Lower greenhouse gas (GHG) emissions
- Flexible framework

Contracting

Status of Contracting Process

NDOT has been coordinating with NV Energy to develop two sites along AFCs as outlined in the initial NEVI plan. NV Energy is coordinating the site contracts, including competitively soliciting site hosts and negotiating site host agreements, and will be responsible for ensuring the non-federal match. The agreement between NDOT and NV Energy is in progress and is anticipated to be finalized before funds are expended. With the agreement in place, NDOT and NV Energy will continue to collaborate on EV charging infrastructure deployment, leveraging the work being completed by NV Energy to rapidly expand EV charging station access across its service territories.

In early 2024, NDOT anticipates issuing a Notice of Funding Opportunity (NOFO) to provide turnkey services for electric vehicle supply equipment (EVSE) for locations outside NV Energy service territories. These services include site acquisition, design, permitting, purchase, construction, installation of hardware (and accompanying EVSE management software), operations, maintenance, and reporting. Applicants will be selected based on several criteria, including general technical requirements, site-specific elements, and pricing. The NOFO will follow the Federal Highway Administration (FHWA) Title 23 *Code of Federal Regulations* (CFR) guidance for Federal-Aid funding. All applicants shall comply with the terms, conditions, constraints, deadlines, and other requirements of the NOFO.

Prior to issuing the NOFO, NDOT will continue planning and engaging the public. A Request for Information (RFI) may be issued to seek industry and stakeholder feedback on NDOT's approach to procurement and draft NOFO. An RFI is anticipated to be released in spring 2024. NDOT will identify potential locations along the AFCs eligible for grant funding. The NOFO is anticipated to be released in spring 2024. The estimated schedule after the NOFO is released is shown in Figure 3.

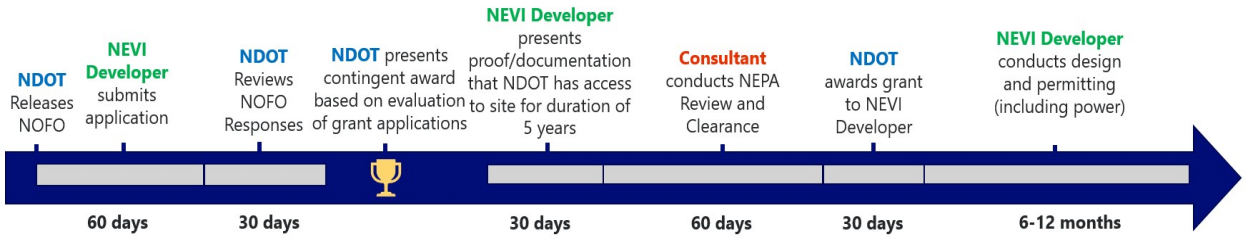

Figure 3. Project Timeline

Awarded Contracts

NDOT anticipates releasing a NOFO seeking grant applications; in spring 2024. NDOT will seek turnkey services that include site acquisition, design, permitting, purchase, construction, installation of hardware (and accompanying EVSE management software), operations, maintenance, and reporting. NDOT will develop an evaluation process that weighs the technical approach and project costs. NDOT will require applicants to coordinate with utility companies and provide written documentation that estimates power costs and schedule impacts.

Scoring Methodologies Utilized

NDOT will develop a methodology and criteria to evaluate grant applications. Items considered include technical elements, site-specific elements, and price. Examples of the information NDOT will be seeking to evaluate applications are as follows. These will be finalized as NDOT advances the procurement portion of this planning.

- Technical Elements
  - Program understanding and general approach
  - Team qualifications and experience
  - Processes and procedures related to data sharing, cybersecurity, and data management
  - Safety approach
  - Workforce training approach
- Site-specific Elements
  - How the site meets the intent of the FHWA and NDOT goals
  - Infrastructure needs and assessment
  - Sustainability approach
  - Future proofing the site
  - Equity and workforce development
  - Inclusion of site amenities
- Project Costs

- Amount required for all turnkey EVSE services, including development, design, construction, operations, and maintenance

Plan for Compliance with Federal Requirements

NDOT will continue coordinating with FHWA to confirm that NEVI requirements are included in future NOFOs and contracts. In addition, NDOT will coordinate with FHWA to ensure a practical approach (e.g., donation, easement, lease, permit, license, etc.) to provide access to sites for purposes of the NDOT inspection and audit throughout the grant term.

Civil Rights

Following the past NEVI Baseline Plan submittal, the U.S. Access Board has provided some clarification on standards that already apply to EV charging stations and (as of June 2023) is developing rulemaking specific to EV charging stations. In a May 2023 webinar,[1] the U.S. Access Board clarified that certain aspects of charging stations are already subject to Americans with Disabilities Act (ADA) and Architectural Barriers Act guidance, including the following:

- Cables, payment systems, connectors, and other aspects of charging stations are classified as "operable parts" to which certain reach requirements (e.g., height, curb access) and accessible floor space requirements already apply.
- Accessible EV charging spaces are not allowed to be used to count toward the required number of accessible parking spaces located in the same lot (even if an existing accessible parking space later has a charging station added).
- Signage for accessible spaces is already covered under the ADA and would similarly apply to an accessible charging station.

The U.S. Access Board affirms that it will consider submitted comments while finalizing rulemaking. Several advocacy groups have provided public comments on the Notice of Proposed Rulemaking for the NEVI Formula Program standards and requirements, including the National Disability Rights Network and Paralyzed Veterans of America. These groups highlighted a need for the rulemaking to include minimum standards to ensure that electric charging stations are built in compliance with ADA accessibility standards, and observe that disabilities may take many forms and it is common to experience more than one simultaneously, including mobility, hand dexterity, technological skill, English proficiency, colorblindness, hearing ability, strength, communication mode (e.g., sign language, verbal communication), and others. On-site and/or remote customer service could help address many of these challenges.

The U.S. Access Board further recommends several other design elements that may be included in the Final Rule:

[1] https://driveelectric.gov/webinars/accessibility

- "Use last" signage may be used to help direct drivers to use an accessible EV charging station for parking/charging only when all other parking/charging locations are in use.
- Certain accessibility standards may apply to all charging stations in a location (e.g., communication standards), while some standards may apply only to a certain percentage of total stations (e.g., mobility standards).
- Where a person with a disability needs to navigate along sidewalks or along curbs either to reach their destination or to access the charging infrastructure, care should be taken to limit the amount of additional necessary travel and avoid further obstructions. For example, if a charging station is located at on-street parking along a curb, the charging station should be located at the end of the street (to make curb ramps more accessible) and the charging station should not be placed in the middle of the adjacent sidewalk.

NDOT has considered these proposed requirements and will update the required design specifications following the Final Rule.

Existing and Future Conditions Analysis

Nevada's EV market is growing, as is the case across the country. In 2021, Nevada had roughly 17,000 registered EVs. In 2022, that number grew to 28,000, which is still a small percentage of the national total number of vehicles.

Table 3 is a breakdown of EV registrations by county as of June 2022. Over two-thirds of the registrations are in Clark County in Southern Nevada.

Table 3. EV Registrations by County in Nevada

County	EV Registrations
Carson City	241
Churchill	47
Clark	22,033
Douglas	388
Elko	32
Esmeralda	3
Eureka	3
Humboldt	18
Lander	3
Lincoln	9
Lyon	217
Mineral	10
Nye	177

Pershing	12
Storey	24
Washoe	4,789
White Pine	2
TOTAL	28,008

Alternative Fuel Corridor (AFC) Designations

Nevada has designated all interstates within the state as AFCs, including I-580, I-15, I-80, I-215, I-515, and I-11. Several state routes throughout Nevada, US 93, US 95, US 50, and US 395 were also categorized as AFCs, as shown in Figure 4. As part of the established flexible framework outlined in the Baseline Plan, the goals and visions of NDOT's NEVI Plan have shifted. The Baseline Plan set a long-term goal of having the State of Nevada achieve fully built out status. Since then, NDOT has refined its current goals to fill the gaps within the existing AFC network to achieve corridor ready status. Through achieving corridor ready status, NDOT will be able to continue progressing toward its end goal of having the state achieve fully built out status in the years to come.

The designated AFCs are intended to implement EV charging infrastructure effectively throughout Nevada. Through NDOT's prioritizing deployment along AFCs, Nevadans will be able to safely reach destinations in all parts of the state. The AFC network links Nevadans to major cities including Las Vegas and Reno while connecting to more rural counties and towns.

The AFCs proposed in previous rounds remain unchanged. Nevada still has a desire to retract the designated status of rural corridors, such as US 93, and potentially portions of US 50, that may not be ideal for meeting the proposed NEVI requirements for spacing. Figure 4 indicates the AFCs that are currently approved by FHWA.

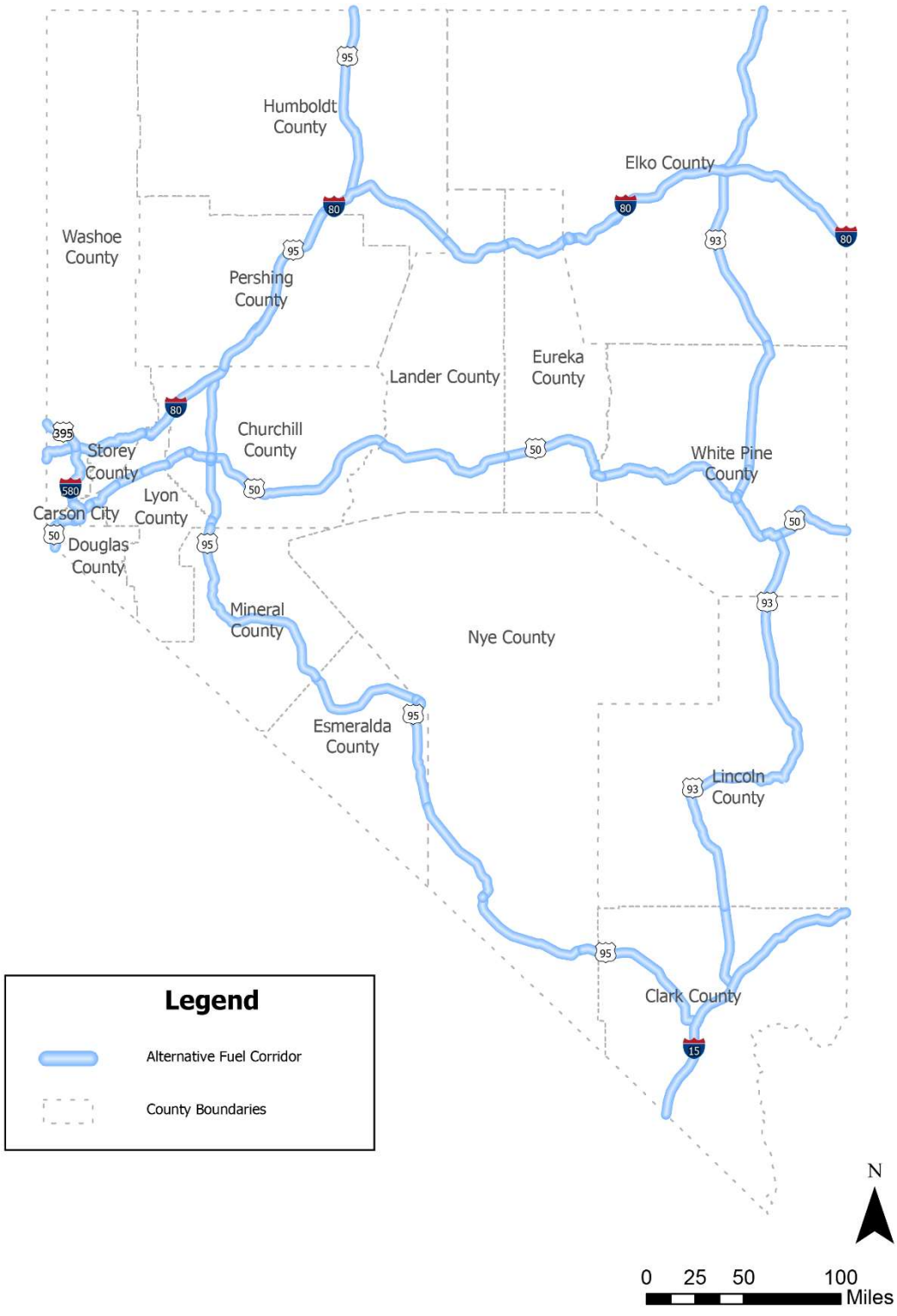

Figure 4. Alternative Fuel Corridors in Nevada

Existing Charging Stations

Table 4 and Figures Figure 5 and Figure 6 identify the existing charging stations within the state. Figure 5 identifies all existing stations, while Figure 6 identifies the "compliant" stations. Given the recent federal guidance requiring Title 23 compliance for existing stations, none of the stations meet all the requirements for compliance, but it is important to show the stations that serve the national network. NDOT intends to work with the existing station owners to develop a path toward compliance, while still prioritizing the investment of NEVI funds in alignment with the plan vision and goals.

Another caveat for the existing charging stations is the conversion of existing Tesla stations to public stations with an option for a Combined Charging System (CCS) cord conversion. This has been discussed with Tesla, and there may be sites opening up that could become NEVI compliant in the future, or could utilize NEVI funds to become compliant. For now, all Tesla sites are considered non-compliant. However, we intend to continue collaborating on future opportunities, especially in rural areas where the Tesla stations are utilizing a majority of the available power.

The only change in "compliant" stations since last year's plan is in Carson City, where a station was proposed in Year 1. A new station is potentially NEVI compliant and is being evaluated along with the latest existing infrastructure.

Table 4. Existing Electric Vehicle Charging Stations

State EV Charging Location Unique ID	Charger Level (DCFC, L2)	Route	Location (Street Address)	Number of Charging Ports	Meets All Relevant Requirements in 23 CFR 680?	Intent to Count toward Fully Built Out Determination?
US 93 Existing Stations						
204719	DCFC	US 93	Wells	3	No	Yes
155324	DCFC	US 93	Ely	3	No	Yes
152296	DCFC	US 93	Alamo	2	No	Yes
US 95 Existing Stations						
225893	DCFC	US 95	Las Vegas	1	No	Yes
171549	L2	US 95	Las Vegas	2	No	No
183815	L2	US 95	Las Vegas	1	No	No
183816	L2	US 95	Las Vegas	4	No	No
183817	L2	US 95	Las Vegas	5	No	No
207308	L2	US 95	Las Vegas	4	No	No
193823	L2	US 95	Las Vegas	2	No	No
207311	L2	US 95	Las Vegas	2	No	No
262909	L2	US 95	Las Vegas	2	No	No

State EV Charging Location Unique ID	Charger Level (DCFC, L2)	Route	Location (Street Address)	Number of Charging Ports	Meets All Relevant Requirements in 23 CFR 680?	Intent to Count toward Fully Built Out Determination?
262910	L2	US 95	Las Vegas	1	No	No
190876	L2	US 95	Las Vegas	2	No	No
172014	L2	US 95	Beatty	2	No	Yes
230839	DCFC	US 95	Luning	4	No	No
173141	L2	US 95	Hawthorne	2	No	Yes
170100	DCFC	US 95	Shurz	4	No	No
78952	L2	US 95	Fallon	2	No	Yes
152511	DCFC	US 95	Orovada	2	No	No
167499	DCFC	US 95	McDermitt	2	No	No
US 50 Existing Stations						
218165	L2	US 50	Stateline	2	No	Yes
200717	L2	US 50	Zephyr Cove	2	No	No
78952	L2	US 50	Fallon	2	No	Yes
222795	L2	US 50	Fallon	1	No	No
164016	DCFC	US 50	Fallon	4	No	No
164017	DCFC	US 50	Austin	4	No	No
231820	DCFC	US 50	Eureka	2	No	No
155324	DCFC	US 50	Ely	3	No	No
237874	L2	US 50	Baker	1	No	No
I-80 Existing Stations						
170370	DCFC	I-80	Sparks	4	No	Yes
136698	DCFC	I-80	Fernley	4	No	Yes
199184	DCFC	I-80	Lovelock	4	No	Yes
121745	DCFC	I-80	Winnemucca	4	No	Yes
170357	DCFC	I-80	Battle Mountain	4	No	Yes
191731	Level 2	I-80	Carlin	1	No	Yes
121746	DCFC	I-80	Elko	4	No	Yes
204719	Level 2	I-80	Wells	3	No	Yes
187647	DCFC	I-80	West Wendover	4	No	Yes
I-15 Existing Stations						
121805	DCFC	I-15	Las Vegas	6	No	Yes
192704	DCFC	I-15	Las Vegas	6	No	Yes
188080	DCFC	I-15	Las Vegas	4	No	Yes

State EV Charging Location Unique ID	Charger Level (DCFC, L2)	Route	Location (Street Address)	Number of Charging Ports	Meets All Relevant Requirements in 23 CFR 680?	Intent to Count toward Fully Built Out Determination?
149587	Level 2	I-15	Moapa	2	No	Yes
165281	DCFC	I-15	Mesquite	4	No	Yes
I-515 Existing Stations						
199442	DCFC	I-515	Henderson	4	No	Yes
201631	DCFC	I-515	Las Vegas	4	No	Yes
I-215 Existing Stations						
121805	DCFC	I-215	Las Vegas	6	No	Yes
I-11 Existing Stations						
199442	DCFC	I-11	Henderson	4	No	Yes
I-580 Existing Stations						
262365	DCFC	I-580	Carson City	4	No	Yes
US 395 Existing Stations						
262365	DCFC	I-580	Carson City	4	No	Yes

DCFC = direct current fast charger

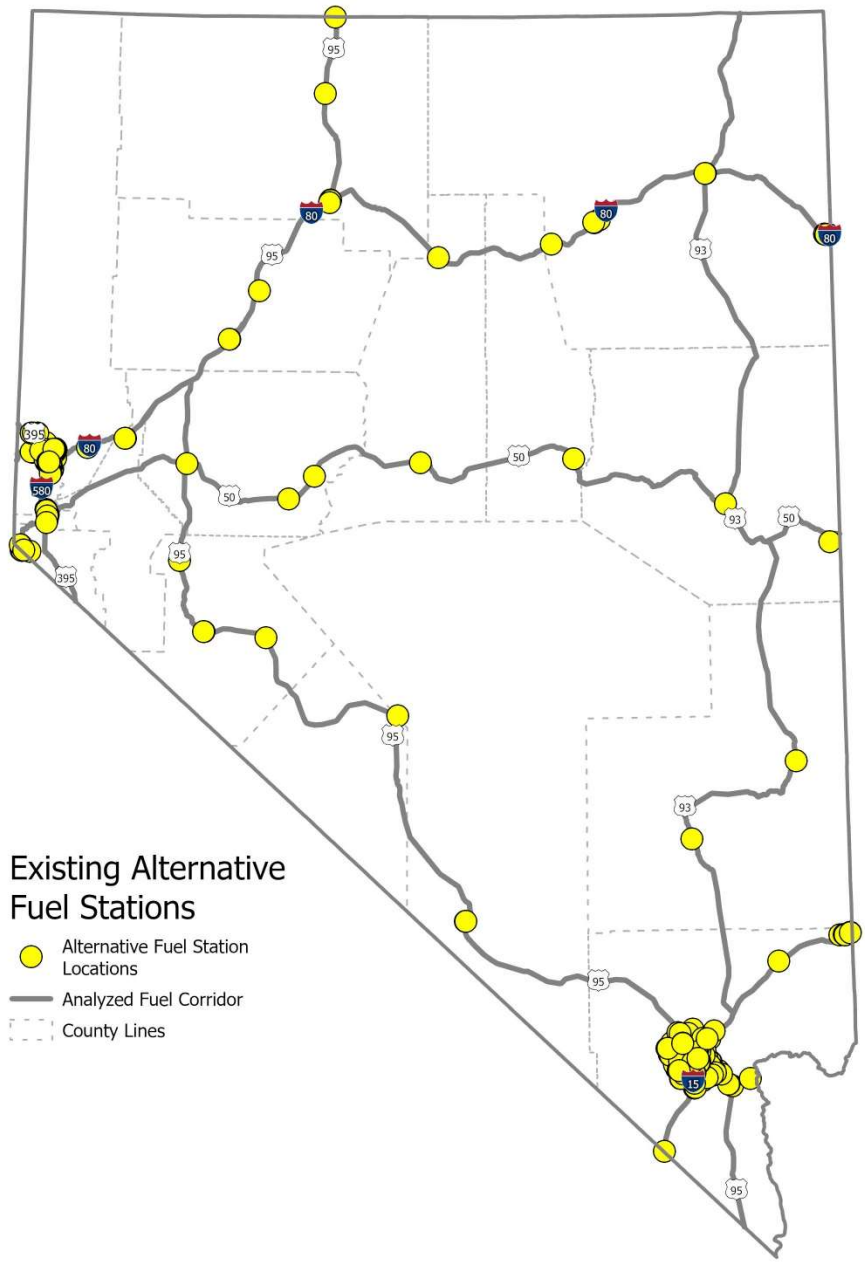

Figure 5. Existing Electric Vehicle Charging Stations

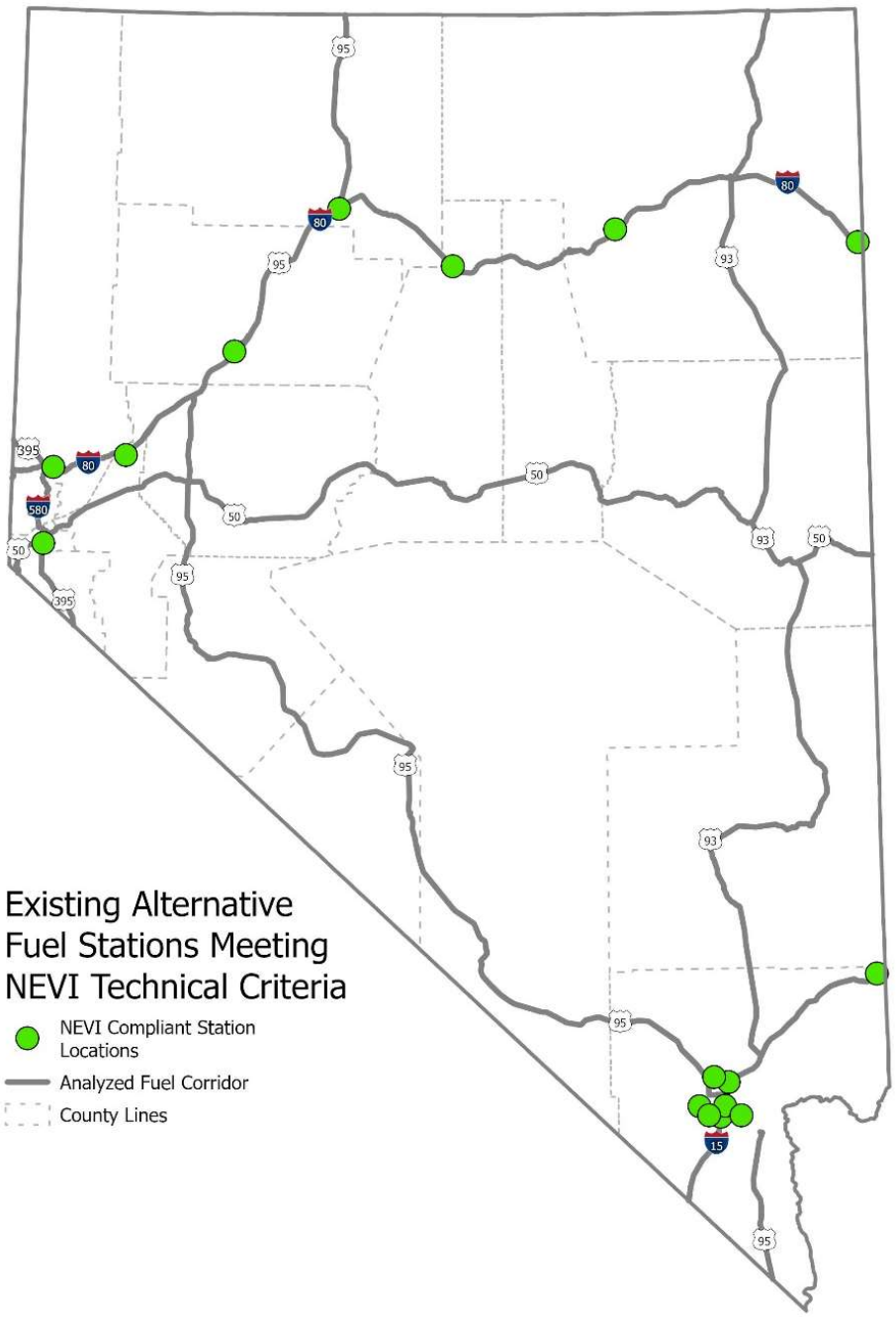

Figure 6. Existing NEVI-Compliant Stations

EV Charging Infrastructure Deployment

NDOT's implementation strategy aims to optimize available NEVI funding while leveraging existing work being completed by NV Energy, including under the Economic Recovery Transportation Electrification Plan (ERTEP) and Transportation Electrification (TEP) required by Nevada Senate Bill 448 (2021), to accelerate transportation electrification and designed to

provide economic recovery benefits and opportunities for the creation of new jobs across Nevada. In FY23 NDOT proposed to upgrade existing infrastructure along designated interstate corridors to achieve fully built out status and certification. Also, in FY23 NDOT leveraged its partnership with NV Energy to develop a plan for two new charging stations that meet both the NEVI and ERTEP goals. More information on the stations proposed in FY23 can be found in Table 5.

Table 5. FY23 Proposed Stations

State EV Charging Location Unique ID	Route	Location (Street Address)	Number of Charging Ports	Estimated Year Operational	Estimated Cost	NEVI Funding Sources	New Location or Upgrade?
TBD	I-15	Jean/Primm	8	2024	TBD	FY22/23	New
TBD	I-580	Carson City	8	2024	TBD	FY22/23	New
149587	I-15	Moapa	4	2025	TBD	FY22/23	Upgrade
204719	I-80	Wells	4	2025	TBD	FY22/23	Upgrade
191731	I-80	Carlin	4	2025	TBD	FY22/23	Upgrade

With all interstate corridors planned for fully built out certification pending the FY23 implementation now in FY24, NDOT has shifted to non-interstate AFCs. This included US 50, US 93, US 95, and US 395. Nevada's interstate AFCs had a high number of existing NEVI-compliant chargers, which necessitated a strategy of filling in gaps to achieve fully built out status. On Nevada's non-interstate AFCs, there are almost no existing NEVI-compliant chargers. This required a new strategy and process to prioritize between potential site locations where large stretches of corridors have no compliant chargers. The process NDOT has implemented in FY24 is multi-objective decision analysis (MODA).

MODA is shorthand for a simplified variation of what is known in decision analysis literature as multi-attribute utility theory (MAUT). MAUT relies upon the basic von Neumann–Morgenstern axioms of preference,[2] which allows the comparison of risky outcomes through the computation of expected utility. The theory and practice of MAUT has advanced through the years and has wide application in many fields. Figure 7 is a graphic that describes the MODA process steps used to prioritize potential sites.

[2] https://en.wikipedia.org/wiki/Von_Neumann%E2%80%93Morgenstern_utility_theorem

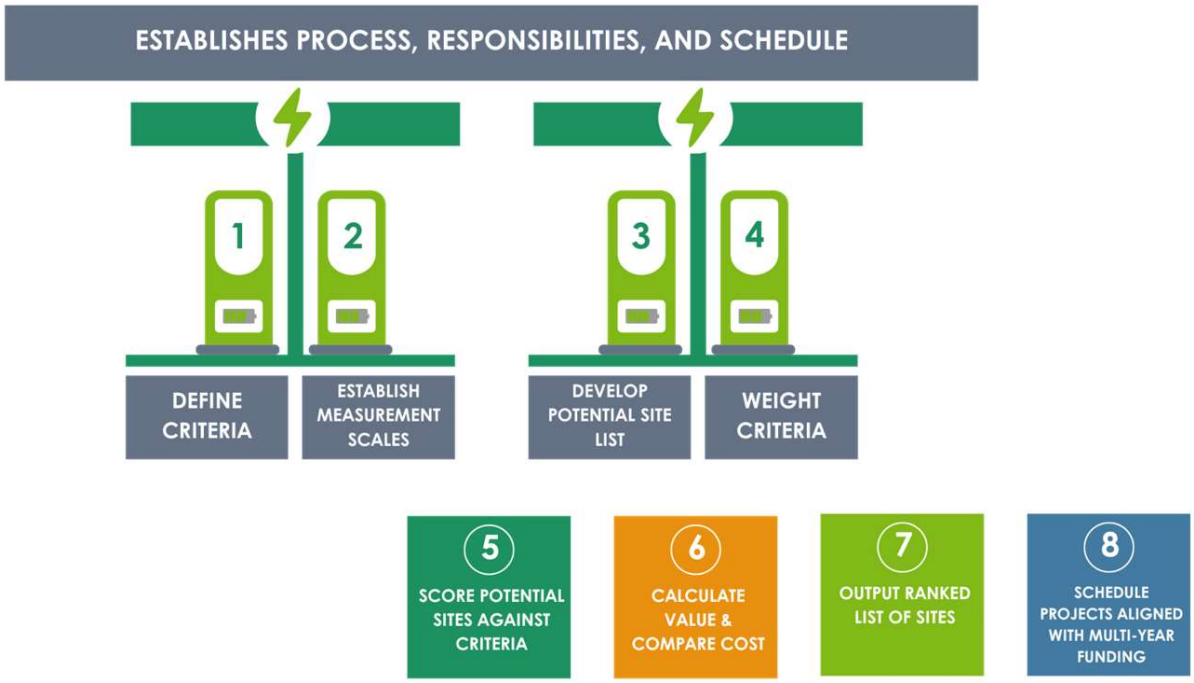

Figure 7. MODA Process

In the FY23 plan a list of considered criteria for MODA was provided in the FY23-26 Deployments section. Through later analysis and collaboration with stakeholders, a list of criteria that served as the best indicators of success in meeting NDOT's vision and goals was created. The accompanying data for these criteria were generated for all the identified potential site locations. The sites analyzed were identified by populated areas along AFCs, connectivity along AFCs (Figure 8), trip ends or where people stop their vehicles (Figure 9), and other criteria. A weighting workshop was held with NDOT leadership to discuss the order of precedence for the criteria. After the previously mentioned factors were input to the MODA process, a ranked list of potential site locations was created. A storymap has been created that visually displays all the criteria generated, the data sources and the relative weighting of the criteria can be found at the following link. Refer to Figures Figure 8 through Figure 10 for components of the storymap.

https://storymaps.arcgis.com/stories/23b13ed91b2d41b4b43a120a8b361775

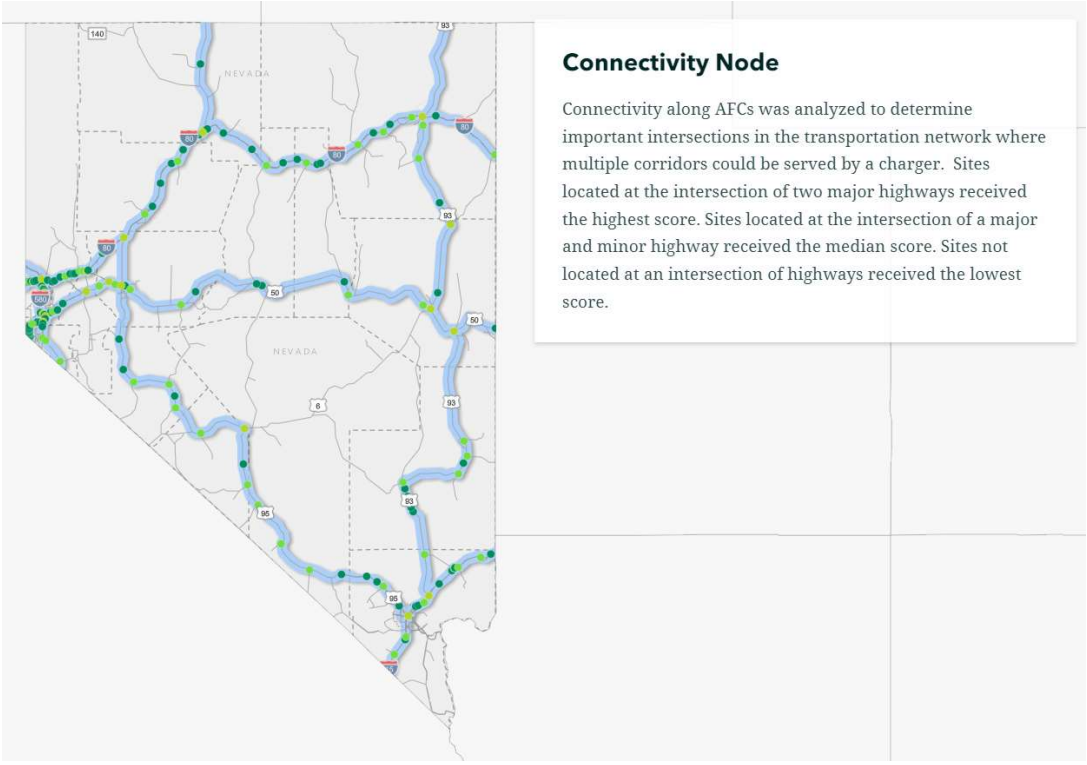

Figure 8. Storymap Component – Connectivity Nodes

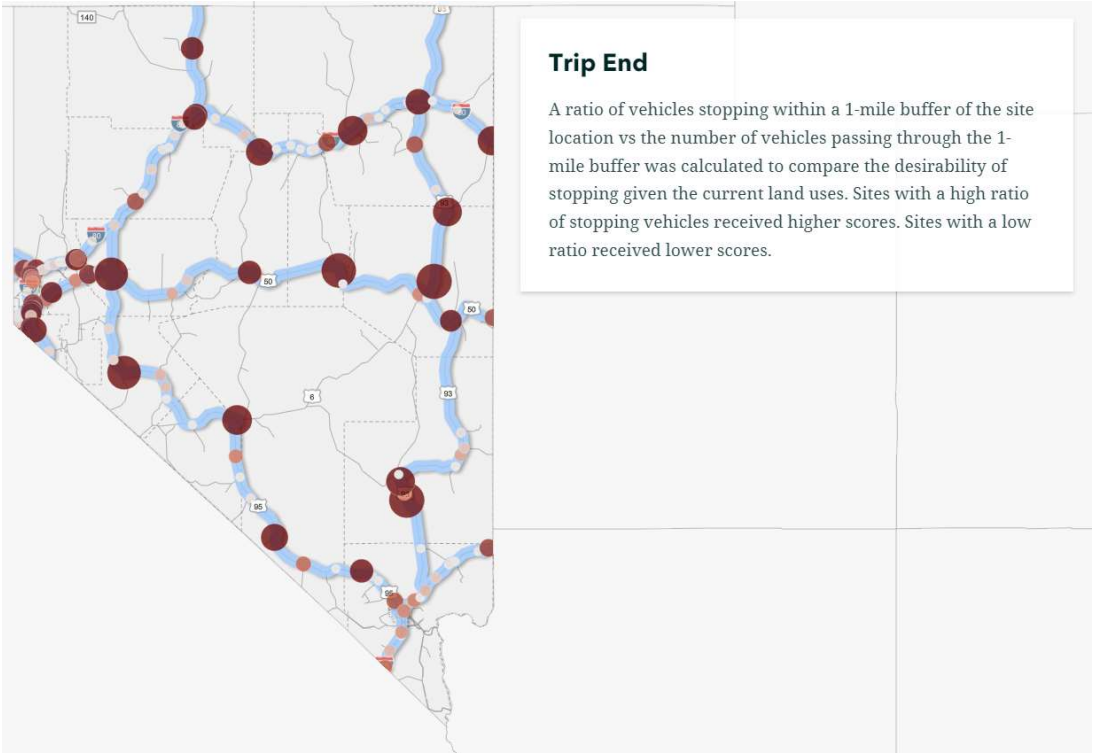

Figure 9. Storymap Component – Trip End Percentage

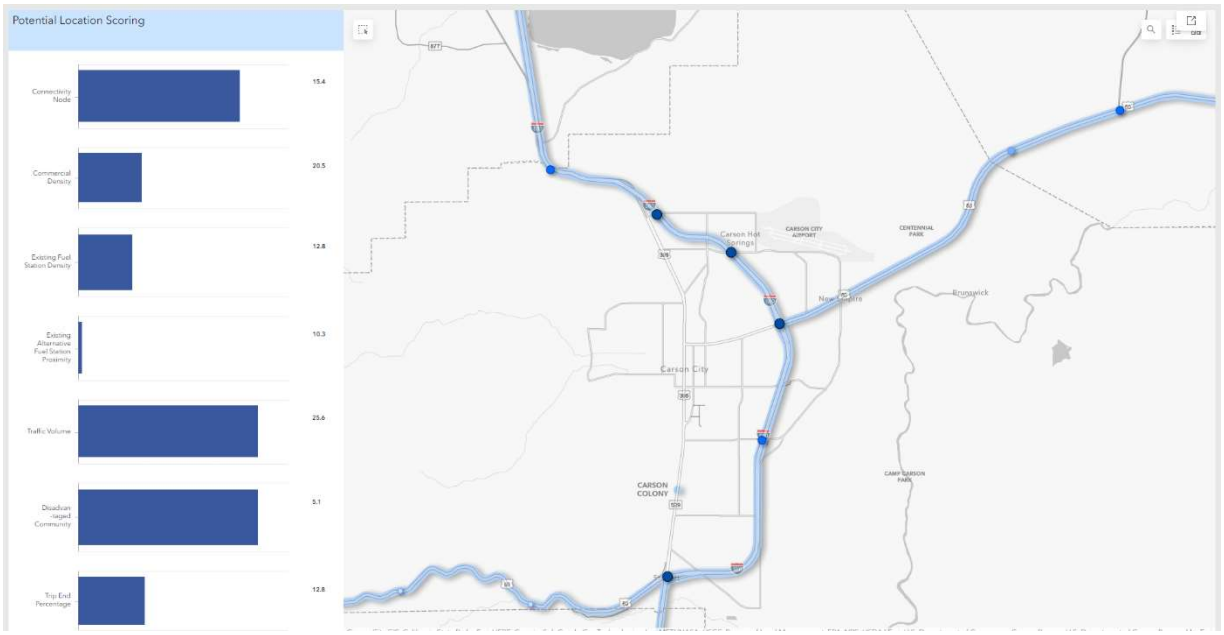

Figure 10. Storymap Component – Results Dashboard

Table 6. Analyzed MODA Criteria

Criteria	Scoring Description	Data Source	Weight
Connectivity Node	Sites located at the intersection of two major highways received the highest score. Sites located at the intersection of a major and minor highway received the median score. Sites not located at an intersection of highways received the lowest score.	NDOT GeoHub	15%
Commercial Density	Sites with a high amount of adjacent commercial locations (hotels, restaurants, public restrooms, etc.) within a 1-mile buffer received higher scores. Sites with a low amount received lower scores.	Open Street Map	21%
Existing Fuel Station Density	Sites with a high amount of adjacent gas stations within a 1-mile buffer received higher scores. Sites with a low amount received lower scores.	Open Street Map (modified and validated by Jacobs)	10%
Existing Alternative Fuel Station Proximity	Sites farther from existing EV charging infrastructure received higher scores. Sites closer to existing EV charging infrastructure received lower scores.	Alternative Fuels Data Center	10%
Traffic Volume	Sites with high adjacent traffic volumes received higher scores. Sites with low adjacent volumes received lower scores.	StreetLight InSight	26%
Disadvantaged Community	Sites located within a Justice40 identified disadvantaged community received a score. Sites not within a disadvantaged community received no score.	Justice40	5%

Criteria	Scoring Description	Data Source	Weight
Trip End Percentage	A ratio of vehicles stopping within a 1-mile buffer of the site location versus the number of vehicles passing through the 1-mile buffer was calculated. Sites with a high ratio of stopping vehicles received higher scores. Sites with a low ratio received lower scores.	StreetLight InSight	13%

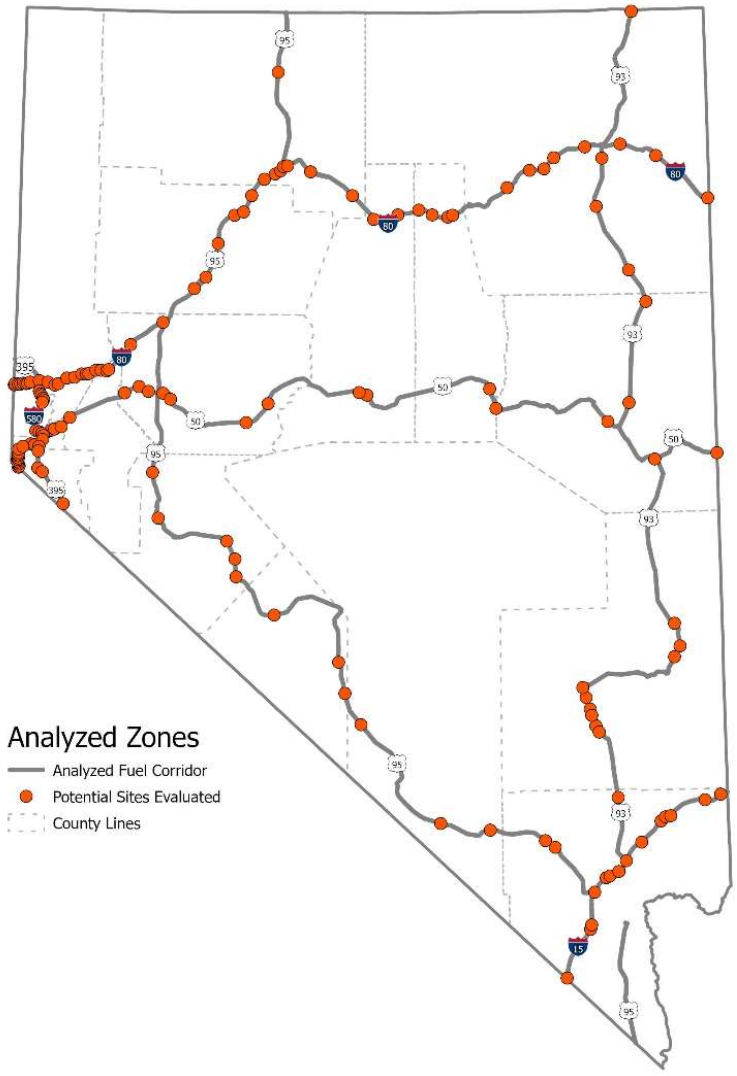

Figure 11. Potential Site Locations Analyzed

Funding under the NEVI program will provide up to 80 percent of the costs of charging infrastructure. Costs to be considered include grid-side electrical infrastructure that is needed to connect to the site meter, electrical panels, switchgear and transformers, the charging infrastructure, or the EVSE. NDOT is considering some sites that could use supplemental battery energy storage and solar to accommodate power and energy needs. Additional considerations

include land costs; operations and maintenance costs; and overall program design, execution, and operations.

As discussed, through its ERTEP and TEP programs NV Energy is investing over $100 million in EV charging infrastructure in Nevada, and NDOT intends to leverage ERTEP program funding as a private match for the new proposed federal NEVI stations within NV Energy's service territories. The details of this procurement strategy are still being coordinated. NV Energy will own and operate some stations, while other stations would have a customer ownership model or a private owner/operator model.

NDOT prefers that the private match come from the beneficiaries of these stations rather than other NDOT-led state funds. In future years, the private match is anticipated to be provided by the station owners who would generate the revenue at these new stations, where site selection influences the return rate and better justifies the initial investment. This funding match requirement would be part of future procurements. Discretionary grants are also of interest to expanding Nevada's EV charging infrastructure beyond the NEVI AFCs. This is particularly important in areas where different modes of transportation are electric, such as electric public fleets and other community considerations that influence electric charging demands. NDOT fully supports a variety of anticipated EV charging needs that look beyond this first year of NEVI funding and expects that future-year flexibility will be realized in the formula program after the initial build-out, including the discretionary grant program.

As this plan progresses, there will be a continued emphasis on zoning, permitting, and education. Zoning regulations near proposed stations will be carefully examined to ensure that they align with the desired development goals and community needs. There will be a focus on developing strategies to streamline the permitting process to be more efficient to facilitate responsible growth and development while maintaining environmental and social considerations. Additionally, educational initiatives will be integrated to foster awareness and understanding of the planning process, encouraging community engagement and collaboration. The planning document aims to create a well-balanced and sustainable future for the community by giving due attention to zoning, permitting, and education.

Planned Charging Stations

Within Table 7 current stations under development. Where NDOT is partnering with NV Energy, NV Energy is leading implementation efforts for these stations. Given the new guidance around 23 CFR 680, the other stations planned in FY23 listed in Table 5 are on hold until NDOT is ready to procure new sites.

Both stations in Jean/Primm and Carson City will follow the Interstate Corridor Site Profile detailed in NV Energy's ERTEP. This profile configuration will host eight charging ports (two Level 2, four DCFC 150 kilowatts [KW], and two DCFC 350 KW). Both sites are planned to be ADA compliant and have a shade canopy.

Table 7. Stations Under Development

State EV Charging Location Unique ID	Route	Location (Street Address)	Number of Charging Ports	Estimated Year Operational	Estimated Cost	NEVI Funding Sources	New Location or Upgrade?
TBD	I-15	Jean/Primm	8	2024	TBD	FY22/23	New
TBD	I-580	Carson City	8	2024	TBD	FY22/23	New

The top-ranked sites from the MODA process, discussed previously, were further vetted for other considerations such as land use/availability, power availability, and size of gap between existing charging infrastructure. This resulted in a list of proposed stations for FY24 and accompanying exceptions. The proposed stations for FY24 can be found in Table 8. These stations are planned to have four ports with 150 KW each and meet the new guidance in 23 CFR 680. A map that displays the locations of the FY24 proposed stations can be found in Figure 12.

Table 8. FY24 Proposed Stations

State EV Charging Location Unique ID	Route	Location (Street Address)	Number of Charging Ports	Estimated Year Operational	Estimated Cost	NEVI Funding Sources	New Location or Upgrade?
225893	US 95	Las Vegas - CC 215 and US 95	1	TBD	TBD	FY23/24	Upgrade
TBD	US 95	Indian Springs	4	TBD	TBD	FY23/24	New
172014	US 95	Beatty	2	TBD	TBD	FY23/24	Upgrade
TBD	US 95	Tonopah	4	TBD	TBD	FY23/24	New
173141	US 95	Hawthorne	2	TBD	TBD	FY23/24	Upgrade
78952	US 95	Fallon	2	TBD	TBD	FY23/24	Upgrade
TBD	US 93	Panaca	4	TBD	TBD	FY23/24	New
152296	US 93	Alamo	2	TBD	TBD	FY23/24	Upgrade
155324	US 93	Ely	3	TBD	TBD	FY23/24	Upgrade
TBD	US 50	Silver Springs	4	TBD	TBD	FY23/24	New
164017	US 50	Austin	4	N/A	N/A	N/A	Upgrade
231820	US 50	Eureka	2	N/A	N/A	N/A	Upgrade
TBD	US 395	Topaz Lake	4	N/A	N/A	N/A	New

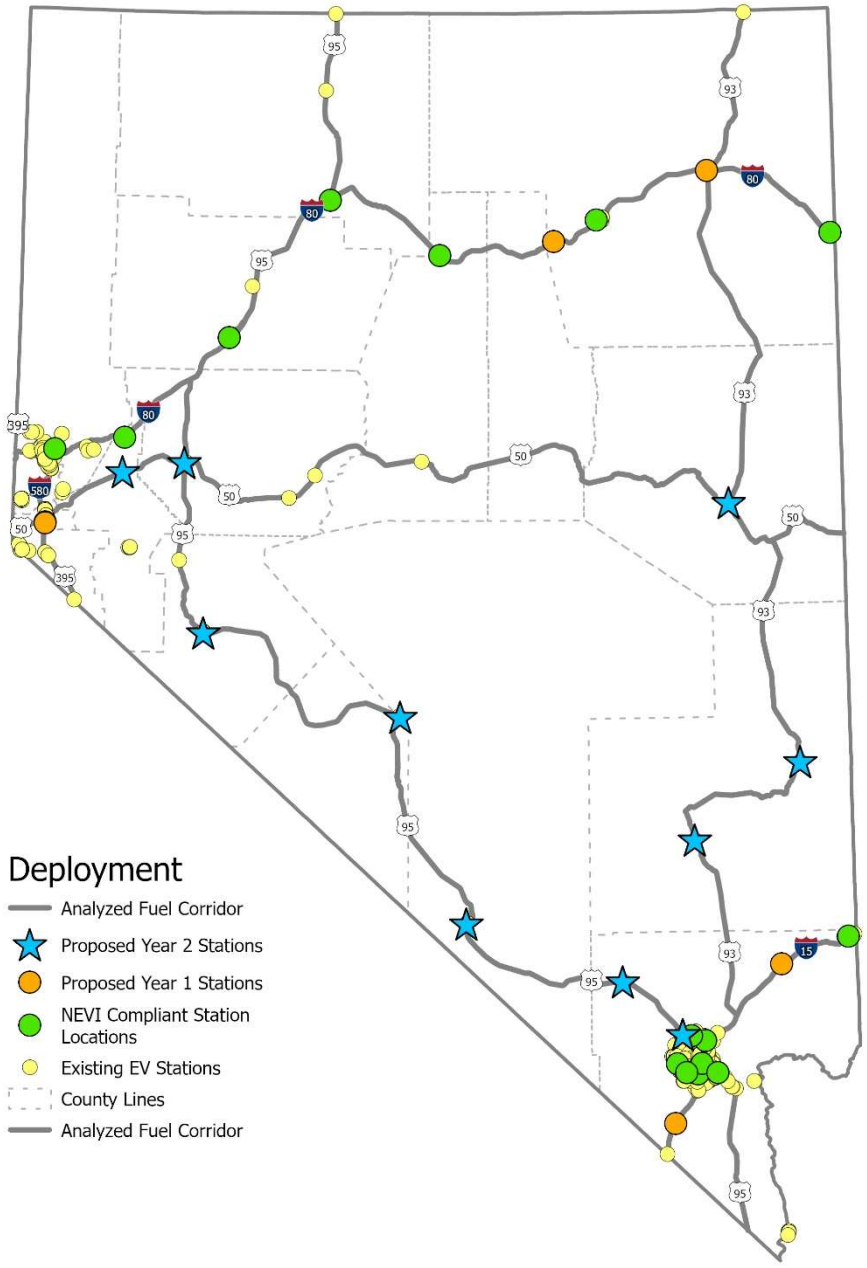

Figure 12. FY24 Proposed Stations

Planning toward a Fully Built Out Determination

The intent is to achieve fully built out status along all AFCs across the state.

A gap analysis was completed to identify focus areas for achieving fully built out status. Figure 12 and Table 8 identify the proposed stations based on the prioritization results. The remaining corridors are being evaluated and coordinated with the utility companies to determine an approach to fully built out determination.

The approach also assumes that all existing stations that meet the NEVI charging requirements (four ports, public CCS connectors, 150 KW, and within 1 mile of an AFC) are considered "compliant". Pending further guidance on the Title 23 requirements, which may change the approach, the investment focus will be on new and upgrading stations unless there is a known and documented reliability issue.

Implementation

The strategy for ensuring ongoing operations and maintenance of EV charging infrastructure will refer to the minimum requirements in the Final Rule. As stated in the baseline plan, constraints exist including limited Internet access in rural areas across Nevada and federally mandated reliability requirements. Taking these constraints into consideration, the Baseline Plan states that the requirements for operations and maintenance will be transferred to the utility owners and site owners. Currently, this language has been updated to state that the installation, maintenance, and ownership will be the responsibility of the selected site developer. Furthermore, NEVI developers and contractors will be required to submit emergency response plans and processes to follow in cases of extreme weather as part of their request for proposal submittals to NDOT.

Equity Considerations

As before, equity is considered throughout the Plan, touching a variety of sections that include contracting, public engagement, labor, and workforce, and more. The Plan continues to support objectives identified in the Memorandum on National Electric Vehicle Infrastructure (NEVI) Formula Program Guidance and Executive Order 14008: Tackling the Climate Crisis at Home and Abroad and considers more recent guidance including the Joint Office of Energy and Transportation's June 2023 webinar, "Workforce Development for the EV Charging Sector," and a May 2023 webinar, "Minority-Owned Business Outreach and Partnerships for EV Infrastructure."

Other factors, such as increasing parity in clean energy technology access and adoption, increasing equitable access to the electric grid, increasing access to low-cost capital (to support the adoption of clean energy technology), minimizing gentrification-induced displacement from new EV charging infrastructure, increasing equitable access to the electric grid, and others, will continue to be evaluated over time.

In this update to the plan, the project team has expanded upon, added, and clarified the strategies developed in the previous update of the plan. These are summarized in Table 9.

Table 9. Equity Strategies

Strategy	Objective	Measure	Target	Current Performance
Equity 1	Target direct spending in DACs.	Percentage of charging stations built in DACs.	40% of charging stations built in DACs for years 2 to 5	33% of stations in DACs (interim measure)
Equity 2	Prioritize workforce development opportunities within DACs and by DACs	Outreach activities completed by NDOT to the public and DACs more specifically	Consolidated source of information for members of the community and members	Workforce organizations gathered
Equity 3	Consider indirect benefits to DACs by prioritizing adjacent investments	Percentage of trips made by individuals whose income is below $50,000 into or through areas prioritized for stations	40% of trips made by lower-income individuals	39% of trips
Equity 4	Incorporate community input throughout the NDOT Alternative Fuels Readiness Plan	Outreach activities completed by NDOT to the public and DACs more specifically	Two events over Year 3	Not started

Comments on each of the strategies are summarized as follows:

Strategy 1: Target direct spending in DACs

In Year 2, the project team was able to prioritize locations outside those required to bring AFCs into compliance (refer to the EV Charging Infrastructure Deployment section for more information). The results of the Year 2 prioritization identified approximately 33 percent of locations in DACs based on a geospatial analysis comparing the location of prioritized charging stations by census tract and the location of DACs. It is anticipated that in Years 3 to 5, this percentage will increase. In Year 3, other direct benefits will continue to be identified through direct engagement with community members and DACs.

Strategy 2: Prioritize workforce development opportunities within DACs and by DACs

In Year 2, the project team sought to better understand the workforce development opportunities within the state and met with NV Energy to broadly discuss workforce development engagement that NV Energy is currently undertaking. NDOT will continue to coordinate with NV Energy in Year 3 of this plan. For Year 3, NDOT will provide a consolidated source of information on workforce opportunities on the website and continue work to raise awareness of this information within DACs (refer to the Labor and Workforce Considerations section for more on this cross-cutting strategy).

Strategy 3: Consider indirect benefits to DACs by prioritizing adjacent investments

In Year 2, the project team entered into an agreement with NV Energy to gain access to the utility's survey results. The utility is currently working to better understand community priorities with respect to prioritization. These survey results, which allow the project team to understand priorities for different self-identified market segments, will be part of the input used to identify which indirect benefits might be beneficial to DACs and individuals who may have experienced disadvantage or are historically underserved. For Year 2, approximately 39 percent of trips into, from, or through traffic zones in areas prioritized for stations are made by individuals whose household income is below $50,000 per year.

Strategy 4: Incorporate community input throughout the NDOT Alternative Fuels Readiness Plan

This strategy named certain areas of focus in Year 1 of this plan. For Year 2, the project team sought to better understand what outreach activities were currently ongoing in order to better target efforts. Based on this understanding, the project team's efforts for Year 3 will focus on developing engagement opportunities that can inform many elements of the plan including benefits, siting stations, displacement practices, and many others. This will include community-based organizations, credit unions, banks, community development financial institutions, developers, community groups, advocacy organizations, and others.

Labor and Workforce Considerations

NDOT has identified a strategy for supporting the workforce installing and maintaining EV charging infrastructure is to identify opportunities to promote existing workforce programs that provide appropriate licenses, certifications, and trainings in compliance with 23 CFR 680.106(j), including the following:

Table 10. Labor and Workforce Strategies

Strategy	Objective	Measure	Target	Current Performance
Labor and Workforce 1	Raise awareness of educational opportunities	Resources available and shared	Website posting live and shared	List of programs developed
Labor and Workforce 2	Raise awareness of requirements to work in transportation electrification industries	Resources available and shared	Website posting live and shared	List of certifications developed

The NEVI Formula Program provides funding to grow and diversify the local workforce that supports the installation, operation, and maintenance of EV charging infrastructure. Nevada strongly supports investments that expand good paying jobs, increase job access, improve job quality, provide strong labor standards, strengthen local/regional economies, and develop an equitable and diverse workforce in building EVSE infrastructure.

Strategy 1: Raise awareness of educational opportunities

The following skill sets for the operation and maintenance of EV charging infrastructure must be developed over the coming years to ensure a convenient and reliable charging network. Operating and maintaining EV chargers often requires non-electrician skill sets that may also share requirements and knowledge with other skills related to renewable energy generation and solar power. A summary of key workforce needs of EV charging infrastructure is shown as follows:

- Construction and installation:
  - General contractors
  - Electricians
  - Engineers – mechanical, electrical, and computer hardware engineers
- Operation and maintenance:
  - Technological skill sets in complex Internet of Things devices
  - Knowledge and capabilities related to networking, configuration, and communication issues
  - Knowledge of industry standards, which are currently being developed
  - Development of curricula specifically related to DCFC deployment

NDOT is aware that many organizations in the state actively train a workforce skilled in the installation, maintenance, and operation of EV chargers, including the following:

- California/Nevada Joint Apprenticeship Training Committee (CA-NV JATC)

- Northern Nevada Electrical Training Center (NNETC)
- Electrical Training ALLIANCE (previously called NJATC)
- National Electrical Contractors Association (NECA)
- Nevada's Apprenticeship Project
- Southern Nevada National Electrical Contractors Association (NECA)

Strategy 2: Raise awareness of requirements to work in transportation electrification industries

EV infrastructure projects primarily require work by electrical contractors and their employees who are electricians. FHWA's February 28, 2023, Final Rule, Section 680.106, requires that "all electricians installing, operating, or maintaining EVSE must meet one of the following requirements:

- Certification from the EVITP.
- Graduation or a continuing education certificate from a registered apprenticeship program for electricians that includes charger-specific training and is developed as a part of a national guideline standard approved by the Department of Labor in consultation with the Department of Transportation.
- For projects requiring more than one electrician, at least one electrician must meet the requirements above, and at least one electrician must be enrolled in an electrical registered apprenticeship program."

Physical Security and Cybersecurity

The NEVI Developer will be responsible for cybersecurity, including owning, operating, maintaining, and data sharing for the EVSE. NDOT will require all grant recipients to coordinate and participate in a privacy impact assessment. The grant recipients will be required to share information, including the following:

- How cybersecurity will be assessed throughout the term of the agreement
- Results in cybersecurity testing (not proprietary information that would make the overall system vulnerable)
- How system updates will affect end users
- Proposed protocols for notifying NDOT of any security breach

The grant recipient will develop a Data Management Plan for NDOT approval that incorporates the following:

- Guidance on risk assessments for personnel involved with the charging network, including contractors and service providers
- Planned cybersecurity strategies consistent with the NEVI requirements
- Approach to managing breaches of payment card industry (PCI), personally identifiable information (PII), or sensitive PII that may adversely affect users

Selected applicants will comply with local, state, or federal laws related to cybersecurity and privacy and supply data following EVSE acceptance as required by NEVI Formula Program Rules. The submitted data will be maintained in a secure manner and will not be used for any purposes other than those required to fulfill the requirements of the grant agreement. The selected applicant will disclose the location of the data and security processes and systems governing it while under the control of the selected applicant.

Program Evaluation

Nevada is proposing to follow the EV Chart data format and input template. These data will be used to track program evaluation metrics in accordance with the Final Rule in the following categories: uptime, outages and responses, capital and operations and maintenance costs, and energy usage.

One comment for FHWA to consider is to recommend reporting only outages rather than all uptimes to ensure reliability and simplify data reporting. The intent would be to evaluate the program based on the metrics included in the quarterly and annual data reports in alignment with the requirements in the Final Rule.

Year 1 strategic deployment evaluations to carry forward:

- Quantify local/private investment benefits leveraged with NEVI funds
- Pilot measures of direct and indirect benefits of NEVI-funded infrastructure to determine the percentage of benefits experienced by DACs
- Quantify investment benefits leveraged with other EV efforts across the state

Future year potential evaluations:

- Climate goals
  - Tracking EV adoption
  - Approximating GHG reduction attributed to EV use
  - Localized air quality monitoring
- Promoting equity
  - Demographics of EV registrations, EV sales, and charging station users
  - EV education
  - Air quality impacts in DACs
  - Small business participation
- Diversifying the economy
  - Metrics related to small businesses
  - Surveys of business owners within 1 mile of new stations

  - Contractor training programs and employment requirements/data tracking tied to new infrastructure construction contracts
  - Employment and training partnerships with energy providers
  - Original equipment manufacturer surveys
- Infrastructure implementation strategy
  - New/improved station usage
  - Maintenance surveys
  - Host location surveys
  - In-person surveys of new station users

Discretionary Exceptions

Several exceptions are being proposed as outlined in the following documentation. These exceptions carry forward the exceptions submitted in the previous plan and additionally extend exceptions across the rural areas of the state where power availability is a challenge, operations and maintenance would be at risk, or the investment return is not anticipated to be financially viable within the 5 years of this program.

Table 11. Discretionary Exceptions

Exception #	Type	Distance of Deviation	Included in Round 6 AFC Nomination	Reason for Exception Request
1	50 miles apart	5 miles	No	Geography
2	50 miles apart	21 miles	No	Geography Grid Capacity Extraordinary Cost
3	50 miles apart	5 miles	No	Geography
4	50 miles apart	7 miles	No	Geography
5	50 miles apart	88 miles	No	Geography
6	50 miles apart	68 miles	No	Geography
7	50 miles apart	16 miles	No	Geography

Justification for Exception(s)

As explained in the Climate and Land Use Patterns subsections within the Existing and Future Conditions Analysis, the state of Nevada is largely a rural semi-arid desert. Most of the

population (89%) is split between 2 metropolitan areas: Las Vegas and Reno. The remainder of the population is divided amongst small rural towns. This presents challenges when trying to meet the NEVI criteria as population centers can be spaced greater than 50 miles apart, and limited resources are recommended in areas of highest use and utility for Nevadans. Apart from that, achieving the power needed for DC fast charging may not be possible without expensive upgrades to the grid and power generation facilities. Balancing these factors, twelve new exceptions to the 50-mile criteria are requested in addition to the previous four from FY23. Exceptions are along both interstates, highways, and gaps to state borders.

Exception 1:

Approved in year 1, within the towns of Fernley and Lovelock are two existing DCFC stations (ID no. 136698 and 199184) that meet the NEVI criteria. The distance between stations is 55 miles and both are within 1 mile of Interstate 80. The Trinity Rest Area in Fallon was determined the only potential site location between the existing stations as there are no other commercial or population centers exist. As commercial activity at interstate rest stops is prohibited by federal law this would prohibit any revenue collection and require the station to be owned and operated by NDOT. This does not align with their strategy outlined within the Deployment section. In further years this site location will be reevaluated as the bill H.R.2 – Moving Forward Act advances through congress. Additionally, increasing power availability at this site to meet the NEVI standards would require a new transformer as well as trenching a new line toward the interstate, requiring significant utility investment anticipated to be over a million dollars. No changes are being requested regarding this previously approved exception.

Exception 2:

Approved in year 1, within the towns of Lovelock and Winnemucca are two existing DCFC stations (ID no. 199184 and 121745) that meet the NEVI criteria. The distance between stations is 71 miles and both are within 1 mile of Interstate 80. Potential upgrade or new site locations were reviewed and discussed with the energy provider for the area (NV Energy). An existing site exists adjacent to Nevada's Rye Patch State Park, which contains 3 existing charging ports that do not meet the NEVI criteria. It was determined that getting the power required for DCFC at this site or any other potential sites would require large upgrades to the power grid and would be cost prohibitive. Upgrading that site was estimated based on similar projects to cost $7-8 M due to the limited power supply and limited infrastructure in the area. In further years this site will be considered for any on site generation potential with the hopes of upgrading the existing ports to meet the criteria. No changes are being requested regarding this previously approved exception.

Exception 3:

Approved in year 1, within the towns of Winnemucca and Battle Mountain are two existing DCFC stations (ID no. 121745 and 170357) that meet the NEVI criteria. The distance between stations is 55 miles and both are within 1 mile of Interstate 80. A potential new site within the town of Valmy was identified, but when evaluating overall program funding it was determined that a 5-mile exception allows spending in other higher priority areas. In further years this site could be reconsidered. No changes are being requested regarding this previously approved exception.

Exception 4:

Approved in year 1, within the towns of Wells and West Wendover are two existing charging stations (ID no. 204719 and 187647). The station in the town of Wells does not meet NEVI criteria, but it is planned to be upgraded within year 1 to meet NEVI criteria. The existing station within West Wendover does meet NEVI criteria. The distance between stations is 57 miles and both are within 1 mile of Interstate 80. The only other potential site locations are at the Wells Conservation Camp Prison, or the town of Oasis with a population of 34 people, as no other commercial or population centers exist. These sites were not evaluated for feasibility as it was determined other potential stations were higher priority to ensure all interstate routes are corridor within year 1. In further years this site could be reconsidered. No changes are being requested regarding this previously approved exception.

Exception 5:

This exception addresses a 138-mile gap along US93 between the Year 2 recommendation EVCS in Ely and the planned year 1 EVCS in Wells. There is a ghost town on the route towards Wells, and a small town with over 1,000 residents that is less than 12 miles away from Ely. Figure 14 shows the minimal traffic along this route. Utilizing NEVI funds here would likely result in a low use station or stations.

Exception 6:

This exception addresses a 118-mile gap along US93 between two Year 2 recommended stations in Ely and Panaca. Within this gap, there are three towns, Pioche, and Bennet Springs with a total of just over 1000 residents. Aside from this, there aren't any urban centers or high traffic areas, as seen in Figure 14. Due to this, a charging station along this route will likely be under-utilized.

Exception 7:

This exception addresses a 16-mile gap on US395 between Reno/Sparks and the California border. This segment of US395 begins at the California border and ends at the intersection with Interstate 80 where the route becomes Interstate 580. Within the city of Sparks there is a compliant charger (along I80) located 4 miles from the intersection with US395. We believe due to the adjacent compliant charger and a high number of level 2 chargers in the Sparks area this segment of US395 should be exempted in the initial stages of EV adoption to allow for funding to be allocated to other areas with larger gaps.

Note on Future Exceptions:

We are still coordinating three proposed upgrade stations with the Nevada rural electric providers that currently operate the stations at Carlin and Wells along I-80, and at Moapa along I-15, which would bring the interstates to fully built out. Pending the power availability and feedback we receive; we may have additional exceptions in the future.

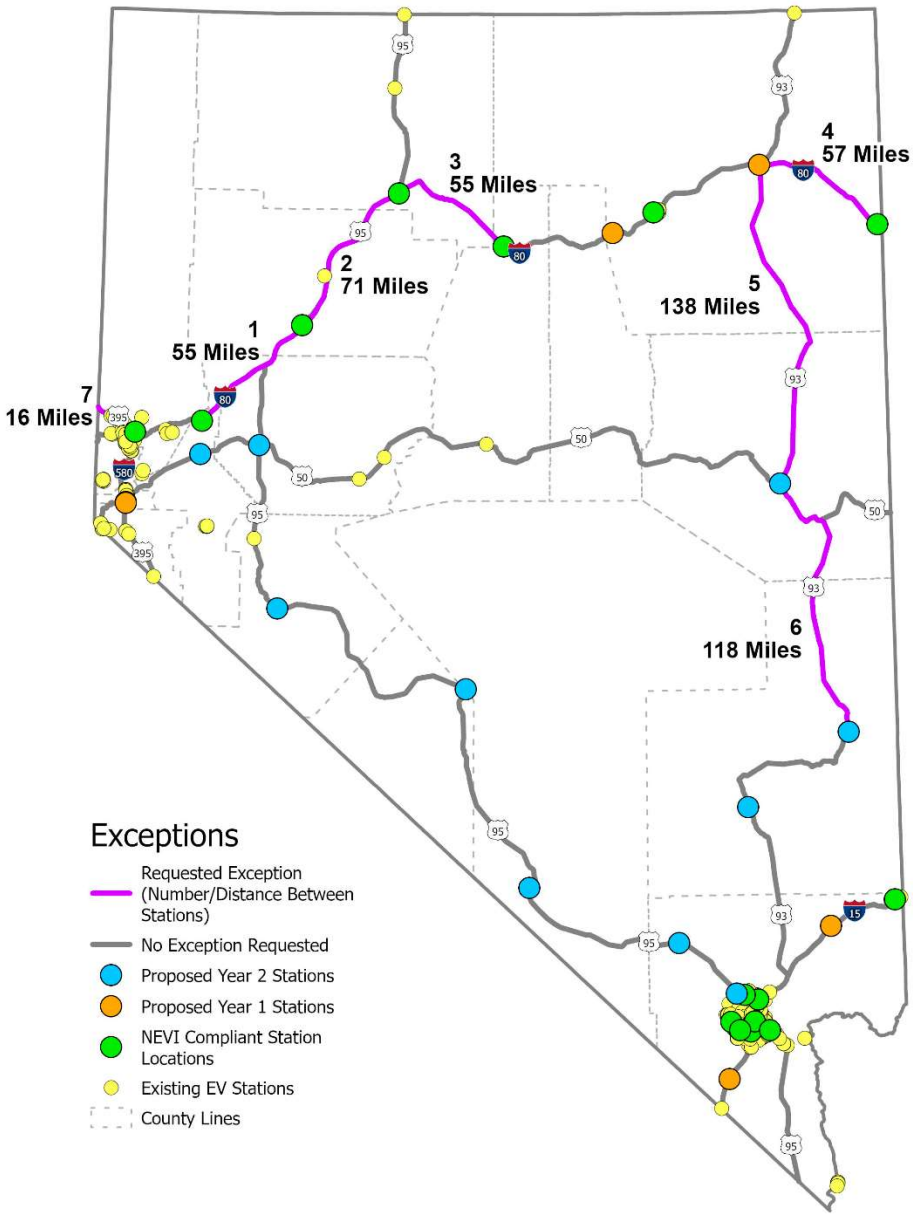

Figure 13. Map of Requested Exceptions

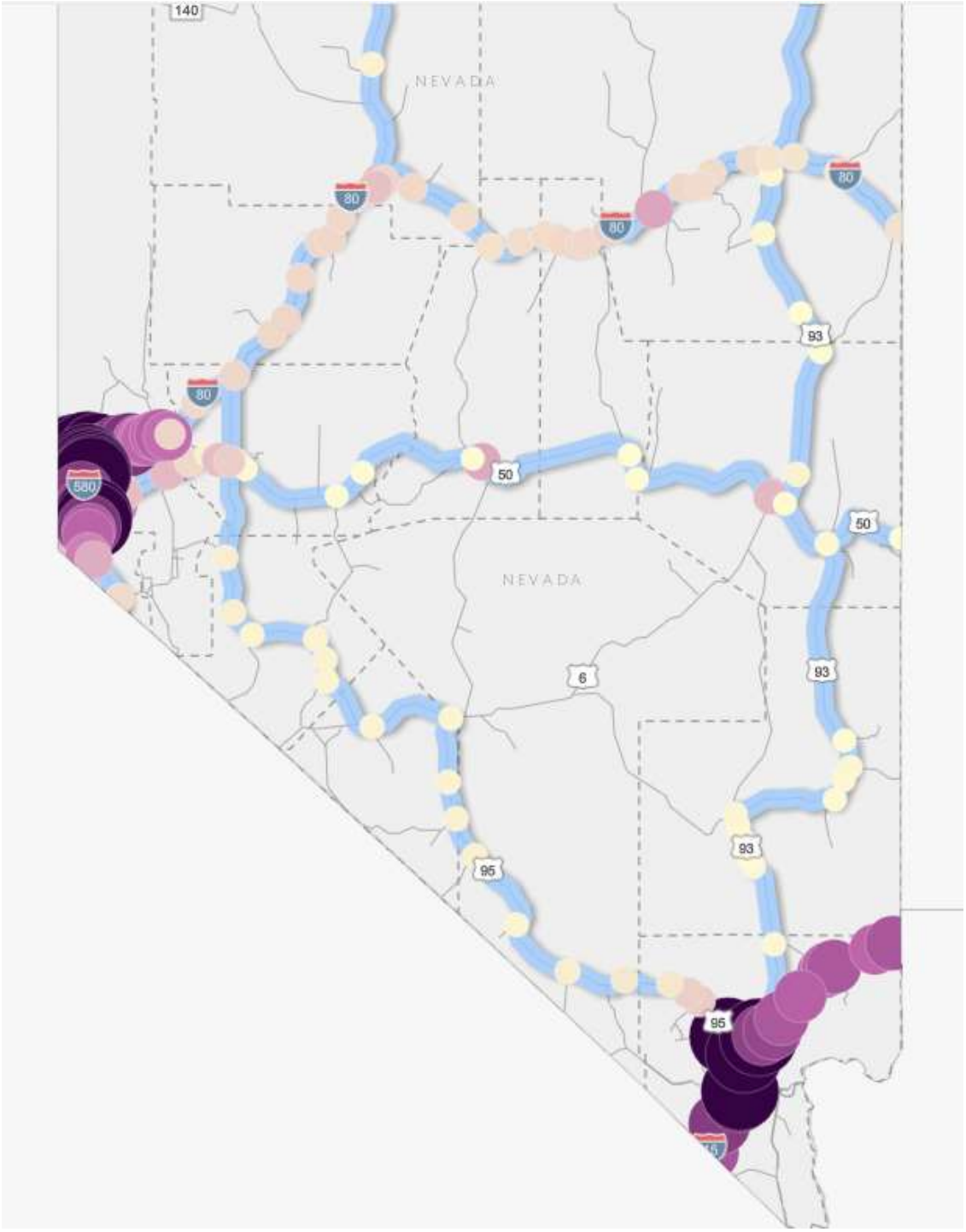

Figure 14. Average Annual Daily Traffic Volumes Map