

**U.S. Department of Transportation Federal Highway Administration**

**Docket No. FHWA–2021–0022**

**Development of Guidance for Electric Vehicle (EV) Charging Infrastructure Deployment**

**Comments in Response to RFI**

**by the Southeast Electric Transportation Regional Initiative**

**January 28, 2022**

The Southeast Electric Transportation Regional Initiative (SETRI) was formed in the fall of 2021, following two years of planning and coordination among a large number of public, private, academic and non-governmental and environmental organizations in the Southeast region. Over 70 organizations have signed a Memorandum of Understanding (MOU) pledging to support the development of electric vehicle markets in the region and provide a means for collaboration to help ensure that regional needs and considerations are considered in State (and Federal) policy development. The initial participants of the group and the MOU are available on the organization's Web Site <https://southeastev.org/>. The group is currently facilitated by the Georgia Tech Energy, Policy, and Innovation Center and the Duke University Nicholas Institute for Environmental Policy Solutions.

These comments are in response to the Request for Information posted by the Federal Highway Administration on November 29, 2021 (Federal Register, Vol. 86, No. 226, Page 67783) opening Docket No. FHWA-2021-0022. This proceeding results from passage by Congress of the Infrastructure Investment and Jobs Act (IIJA), or Public Law 117-58 on November 15, 2021, and in particular, the National Electric Vehicle Formula Program (EV Charging Program), providing funding to States to strategically deploy EV charging infrastructure and to establish an interconnected network to facilitate data collection, access, and reliability. The law also establishes a discretionary grant program for Charging and Fueling Infrastructure (Charging and Fueling Infrastructure Program) to strategically deploy publicly accessible EV charging infrastructure and hydrogen, propane, and natural gas fueling infrastructure along designated alternative fuel corridors or in certain other locations that are accessible to all drivers of such vehicles.

Many of SETRI's participating organizations are submitting their own comments and we commend those to your attention. As a new coalition, SETRI has not yet developed positions on many of the technical issues for which the DOT seeks input, nor are we principally organized as a technical organization. As such, this response may not necessarily reflect the position of all signatories to the SETRI MOU, or organizations participating in the work of SETRI. That said, many of the entities involved in the SETRI steering group do wish to comment as an informal collective on one particular area on which little attention seems to be paid in the questions asked in the RFI. As such, our comments likely belong as a response to statutory consideration nine, which asks for input on any other issues which should be of interest to the Secretary.

Our specific concern is that while the EV Charging Program will consist of grants made by state Departments of Transportation based on plans submitted to and approved by the federal DOT as specified in the IJJA, we believe there is still a need for coordination among states. In the Southeast, as is probably true in other regions, the interstate highway system is highly interconnected, and states are interdependent for their transportation needs. Tourism is certainly one industry that is important for the region and would benefit from regional coordination for EV infrastructure. Another major need in this region is storm evacuation which has been the subject of considerable discussion and planning but still needs additional analysis to ensure that EVs are able to use the highways to escape storms or other disasters. And most industry in our region relies on these interconnected highways for both incoming supplies – from east coast ports in particular – and for shipping their products. As electrification moves from light-duty to medium- and heavy-duty vehicles, the need for states to coordinate also increases in order to ensure that charging infrastructure will meet the needs of all states in the region in an equitable manner.

SETRI, and other regional initiatives, can help convene relevant stakeholders and facilitate actions toward meeting these needs. SETRI is supportive of helping states ensure that individual state plans are coordinated, consistent and will all contribute to broader regional needs. SETRI is already coordinating with regional stakeholders on issues of interest to DOT and the states. States may wish to form their own (or expand existing) collaboratives through state departments of transportation, energy offices, and/or governors' offices to work with SETRI as well. But our advice to DOT is that it include regional coordination and collaboration as a needed objective in funding plans submitted by state governments.

In addition to working with states to explore appropriate regional actions and priorities, SETRI is also interested in coordinating with other regional electric transportation initiatives for the purposes of sharing best practices and exchanging information.

We thank the Department of Transportation for the opportunity to provide these limited comments and look forward to the opportunity to work with you in the future.

Respectfully submitted on behalf of SETRI\*;

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\*Note The views and comments expressed in this response may not necessarily reflect those of all signatories to the SETRI MOU or organizations participating in the work of SETRI.