



Kentucky's Electric Vehicle Infrastructure Deployment Plan

Fiscal Year 2026 Submission

September 9, 2025



Executive Summary

The Kentucky Electric Vehicle Infrastructure Deployment Plan (EVIDP) was developed in accordance with the National Electric Vehicle Infrastructure (NEVI) Formula Program's [interim final guidance](#) issued by the Federal Highway Administration (FHWA) on August 11, 2025. This new guidance made several changes to the previously released and now rescinded NEVI guidance from June 11, 2024, including:

- Minimizing the content required in State plans to statutory and regulatory requirements
- Simplifying the plan approval process
- Providing States with the flexibility to determine the appropriate distance between stations along alternative fuel corridors to allow for reasonable travel.
- Minimizing requirements for States to consider electric grid integration, renewable energy, and alignment with electric distribution interconnection processes, except where required by regulation.
- Encouraging selection of charging locations where the charging station owners are also the site host to accelerate project delivery.
- Eliminating requirements for States to address consumer protections, emergency evacuation plans, environmental siting, resilience and terrain considerations.
- Providing States with more flexibility in determining when their system is built out, allowing NEVI funds to be used on public roads statewide.

The Kentucky EVIDP includes the following plan content as requested by the interim final guidance:

1. **NEVI Program Funding Allocation Plan:** A description of how Kentucky intends to use NEVI Program funds for each fiscal year (FY). The Plan covers all unobligated funding for FYs 2022-2026. Updates from the FY 2025 Plan Update include:
 - Of the approximately \$69.5 million in total federal NEVI funding, KYTC has obligated \$36.9 million for the construction and operation of 46 stations across its Alternative Fuel Corridors (AFC) network, as well as the administration of the KY EV Charging Program. This leaves \$32.6 million remaining for other uses including the development of future EV charging stations statewide after Build Out Certification and further program administration.
 - KYTC is currently evaluating the publicly available charging stations along Kentucky's AFC network to determine whether the AFC network is built out and ready for Build Out Certification.
2. **Community Engagement Outcomes Report:** As per 23 CFR 680.112(d), a description of the community engagement activities conducted as part of the development and approval of Kentucky's most recently submitted State EV Infrastructure Deployment Plan, including engagement with disadvantaged communities (DACs). Updates from the FY 2025 Plan Update include:
 - Since September 2024, KYTC has led or presented at 14 events on behalf of the KY EV Charging Program.
3. **Physical and Cybersecurity Plans:** A description of physical and cybersecurity strategies, per 23 CFR 680.106(h). Since the previous plan updates, no changes have been made to these plans.

KYTC submits the Kentucky EVIDP consistent with FHWA's interim final NEVI guidance released August 11, 2025. KYTC disagrees with the legality of FHWA's revocation of previously approved state EVIDPs, including Kentucky's EVIDP, and the need to resubmit state plans for fiscal years 2022-25. The Commonwealth of Kentucky is party to litigation challenging that revocation in *Washington v. Dept. of Transportation*, No. 25-cv-00848-TL (W.D. Wash.), in which the district court enjoined the revocation of certain state plans for fiscal years 2022-25. By submitting this state plan, KYTC does not waive, and instead expressly reserves, any rights, claims, or defenses it may have regarding FHWA's actions regarding the NEVI Formula Program in that case or otherwise. All of KYTC's current and future submissions related to the NEVI Formula Program are made subject to this reservation of rights.

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Introduction

The Kentucky EV Charging Infrastructure Program has procured 46 electric vehicle charging stations along its Alternative Fuel Corridor (AFC) network comprised of all interstates and parkways within the Commonwealth. Kentucky is continuing to move forward with its EV Charging Program to provide an accessible, convenient, and affordable EV charging network that serves the driving choices of Kentuckians and supports EV-related economic development.

The following Kentucky EVIDP considers the most recent guidance released by FHWA on August 11, 2025. The purpose of the plan is to comply with the updated guidance and meet the statutory and regulatory requirements of the National Electric Vehicle Infrastructure Program. As requested by FHWA, the KY EVIDP addresses the following key items:

- A description of how the State intends to use NEVI Program funds for each fiscal year. The Plan should cover all unobligated funding for fiscal years 2022-2026.
- A Community Engagement Outcomes Report, per 23 CFR 680.112(d).
- A description of physical and cybersecurity strategies, per 23 CFR 680.106(h).

NEVI Program Funding Allocation Plan

Through the National Electric Vehicle Infrastructure Program, Kentucky is expected to receive approximately \$69.5 million in formula funding over five years to support the expansion of electric vehicle charging in the state. KYTC's Division of Planning has completed and received approval for Electric Vehicle Infrastructure Deployment Plans submitted in the summers of 2022, 2023, and 2024. To date, Kentucky has been allocated approximately \$54.7 million (FY22-FY25) to build a network of EV charging stations across the state.

KYTC has issued three Requests for Proposals (RFP) to solicit qualified entities to design, build, operate, and maintain Direct Current Fast Charging (DCFC) EV Supply Equipment Stations. The latest, RFP 3, was issued on September 17, 2024, and closed October 21, 2024, awarding 11 additional charging stations. As of the submission of this plan, 46 DCFC sites are under contract on designated AFCs, all interstates and parkways. Funding has been obligated for the construction of these sites that fall under Phase 1 of Kentucky's EV Charging Program. KYTC is currently evaluating the publicly available charging stations along Kentucky's AFC network to determine whether the AFC network is ready for Build Out Certification and if the program can proceed to the next phases of implementation.

Future Plans

As shown in **Table 1**, KYTC has obligated approximately \$36.9 million in NEVI funding to date. These funds were allocated to Phase 1 of Kentucky's EV Charging Program for building out Kentucky's AFC network and program administration. With the estimated remaining NEVI funds, KYTC will continue program administration and progress to its post-build-out plans in Phases 2 and 3 for the development of additional DCFC and Level 2 chargers both on and off AFCs. **Table 2** shows the expected uses for all NEVI funding available to Kentucky.

Table 1. KY EV Charging Program Funding

	FY 22	FY 23	FY 24	FY 25	FY 26	Total
Estimated NEVI Funding Available	\$10,280,470	\$14,793,712	\$14,793,815	\$14,793,827	\$14,793,858	\$69,455,682
Estimated NEVI Funding Obligated	\$10,280,470	\$14,793,712	\$11,796,769	\$0	\$0	\$36,870,951
Estimated NEVI Funding Remaining to be Obligated	\$0	\$0	\$2,997,046	\$14,793,827	\$14,793,858	\$32,584,731

Table 2. KY EV Charging Program Funding Uses

	Total by Uses of Funds (Includes Procurement, Construction, Operations, and Inspection)
EV Charging Stations on AFCs (Includes funding to support Phase 1 Build Out, as well as required program administration)	\$42,201,429
Statewide Post-Build Out EV Charging Stations (Includes Phases 2 and 3)	\$27,254,253
Total NEVI Funding Uses	\$69,455,682

Phased Implementation Plan

KYTC has a three-phase plan for implementation of the KY EV Charging Program. The program has been designed to provide both capacity where needed and coverage across Kentucky.

- **Phase 1: AFC Network** is dedicated to procuring DCFC stations along Kentucky's designated Alternative Fuel Corridors (all interstates and parkways) for accessible and reliable charging options that reduce range anxiety in the Commonwealth. KYTC has secured 46 stations and is in the process of determining whether the AFC network is built out. KYTC will continue to work with private developers to reach operational status. With the completion and approval of AFC build-out, Phases 2 and 3 will begin.
- **Phase 2: Other Priority Corridors (Figure 1)** will focus on procuring more extensive charging access along non-AFCs, especially those without nearby access to an interstate or parkway. These are referred to as other priority corridors and represent roadways that KYTC will site charging stations along post-AFC build-out. Phase 2 will prioritize:
 - **Service Demand:** charging along roadways that are expected to have a high demand. These corridors include Kentucky's highly trafficked, non-AFCs and roadways that experience high volumes of long-distance travel
 - **Service Coverage:** charging coverage throughout Kentucky to address existing charging station gaps. KYTC identified key roadways in the Commonwealth's more rural areas to plan for expanded charging access across Kentucky.
- **Phase 3: Community and Destination Sites** will run in parallel to Phase 2 and focus on providing community and destination charging while filling existing charging gaps. Charging stations may be sited in various locations including public roads, schools, parks, and in publicly accessible parking facilities.

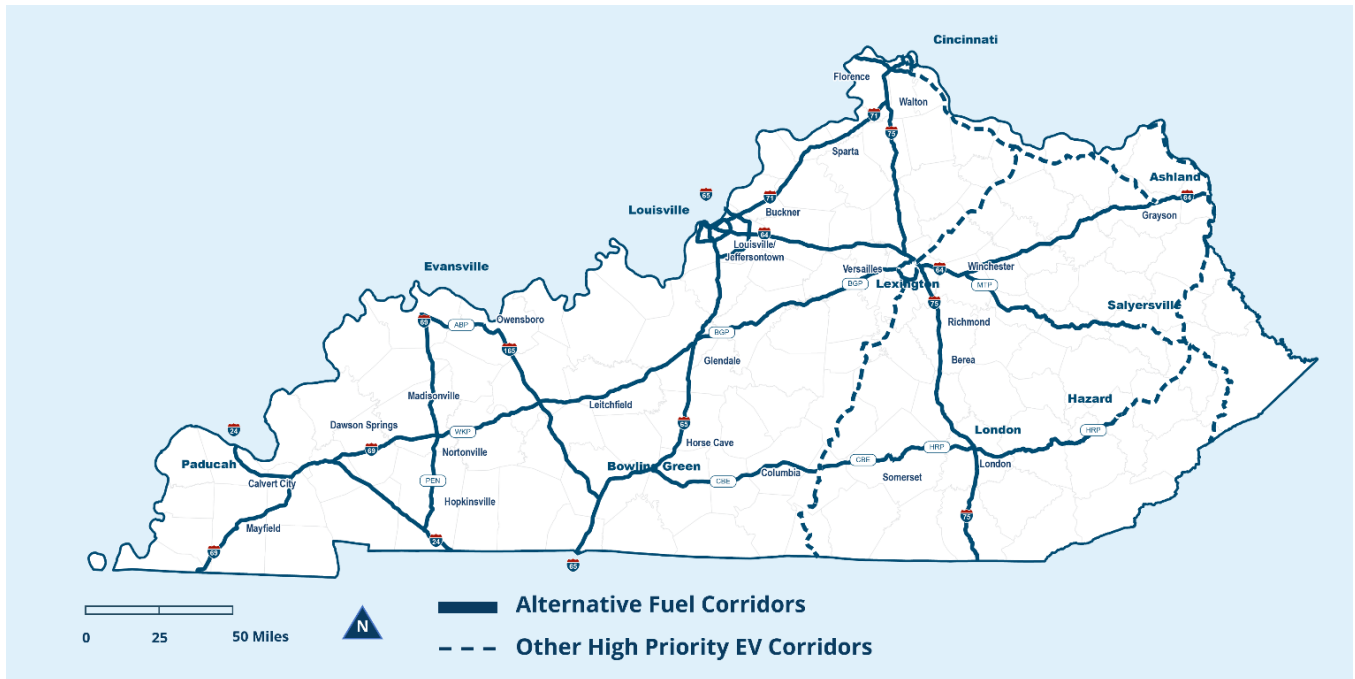


Figure 1. Alternative Fuel Corridors and Other Priority Corridors*

*The other priority corridors are not yet final and may be updated as the program proceeds.

Community Engagement Outcomes Report

This section summarizes the meetings and other engagements that occurred between September 2024, when the previous plan update was submitted, and when this plan was submitted for approval. **Table 3** provides a summary by type of meeting for the community engagement activities that occurred during that timeframe. **Table 4** provides additional details for these NEVI program-related meetings that KYTC staff participated in since the previous plan update.

Since September 2024, KYTC has conducted two virtual large group stakeholder meetings, distributed surveys, e-newsletters, and press releases, and made key updates to the Kentucky EV Charging website. KYTC has also given numerous program updates to keep the public informed on next steps and opportunities of the program. KYTC has also communicated with utilities directly and through a large utility representatives meeting. In 2024 and 2025, KYTC continued to engage key project stakeholders including a Working Group established in 2024 to reach out to key portions of the state that have been areas of underinvestment for EV charging stations.

Table 3: Community Engagement Summary

Meeting Type	Number of Meetings
Conference	4
Federal Webinar	1
Meeting	3
RFP	1
Stakeholder	2
State	2
Utility	1
Total	14

Table 4: Community Engagement Event Attendance

Event Name	Category	In-person or Virtual	Month/Year
KY League of Cities, Cracker Barrel Session	Conference	In-Person	September 2024
RFP 3 Pre-Bid and Networking Session	RFP	Virtual	October 2024
Stakeholder Meeting 9	Stakeholder	Virtual	October 2024
Disadvantaged Communities Working Group	Stakeholder	Virtual	October 2024
NASEO-AASHTO, Helping Developers Navigate NEVI	Webinar	Virtual	November 2024
Kentucky Petroleum Marketers Association	Conference	In-Person	November 2024
RFP 3 Developer Kick Off Meeting	Meeting	Virtual	January 2025
Kentuckians for Better Transportation (KBT)	Conference	In-Person	January 2025
Kentucky Elected Officials Briefing	State	Virtual	February 2025
Build America, Buy America Webinar	Meeting	Virtual	June 2025
Budget Review Subcommittee on Transportation	State	In-Person	July 2025
ADA Webinar – Contractual and Technical Requirements	Meeting	Virtual	July 2025
KY EV Charging Program Update for Utilities	Utility	Virtual	August 2025
KYTC Partnering Conference, EV Charging Program Update	Conference	In-Person	September 2025

Physical and Cybersecurity Plans

KYTC is committed to public security, including physical security, cybersecurity, cyber resiliency, and privacy protections for all services and systems that KYTC helps develop in the communities they serve.

As the Infrastructure Investment and Jobs Act has allocated funds for deployment of EVSE, and as KYTC intends to deploy these systems to support EV travel, this section addresses both physical security and cybersecurity. The cybersecurity sections provide guidelines and best practices for KYTC and EVSE deployers and meets the National Electric Vehicle Infrastructure Standards and Requirements, Final Rule, Code of Federal Regulations Section 23, Part 680 (23 CFR 680) issued on February 15, 2023, (collectively, NEVI Requirements).

Physical Security and Safety

The physical security and safety of people using the DCFC stations is of the highest importance. To provide that security and safety it is important that sites be well designed. For example, the site should be designed in accordance with local, state, and federal requirements with regard to layout, signage, and traffic flow. This will promote traffic safety. Considerations that promote site security include clear lines of sight to and from the charging station, lighting, cameras, and possibly the presence of on-site staff. Having active adjoining or shared-site uses can also be beneficial. These types of safety considerations are taken into account during the proposal evaluation process.

Cybersecurity

Cybersecurity is an important and quickly changing area of concern for electric vehicle charging station operations. KYTC's approach to cybersecurity for the NEVI program is to ensure that it is addressed at each station, but to leave most of the specific implementation details up to the site operators and charging network providers.

The approach to cybersecurity for individual charging stations is scored during the proposal evaluation process. Factors that are considered during evaluation include the approach to protecting the charging infrastructure, managing cyber risks, and effectively responding to cyber threats or attacks.

While cybersecurity is ultimately the responsibility of the charging station operator, KYTC does require station operators to have a plan that addresses the following items, at a minimum:

- Safeguarding Against Cyberattacks
- Data Privacy During Transportation and Storage
- Data Protection from Unauthorized Access, Modification, and Destruction
- Threat Surfaces and NIST 800-53 Controls

In addition to the required cybersecurity plan, KYTC also requires charging station operators to provide Payment Card Industry (PCI) attestations of compliance to ensure that the personal information is adequately protected. Many charging station operators also provide third-party cybersecurity certifications along with their plans, including ISO 27001 and SOC2 reports.

Additionally, charging station operators are required to notify KYTC in the event of a cybersecurity incident within 24 hours of their discovery.