



# Kentucky's Electric Vehicle Infrastructure Deployment Plan

## FY 2025 Update

August 30, 2024



# Executive Summary

Kentucky's 2024 Electric Vehicle Infrastructure Deployment Plan Update (2024 Plan Update) was developed in accordance with the National Electric Vehicle Infrastructure (NEVI) Formula Program guidance issued by the Federal Highway Administration (FHWA) on June 11, 2024. The process included robust engagement efforts and a thorough technical and policy analysis. These combined efforts resulted in a plan that provides a thoughtful and flexible framework for implementing an effective charging network across the Commonwealth.

## Introduction

Kentucky's original 2022 Electric Vehicle Infrastructure Deployment Plan was developed by the Kentucky Transportation Cabinet (KYTC) in close coordination with Kentucky's Energy and Environment Cabinet (EEC). The initial plan was updated in the summer of 2023, and approved by FHWA on September 29, 2023.

The 2024 Plan Update considers the most recent guidance that was released by FHWA, in collaboration with the Joint Office, on June 11, 2024. The purpose of this update is to comply with the guidance and provide a summary of the program implementation, outreach activities, and planning initiatives. As requested by FHWA, the 2024 Plan Update addresses key items such as the Commonwealth's progress towards a fully built-out Alternative Fuel Corridor (AFC) network (all interstates and parkways in the state), coordination with disadvantaged communities, and strategies for charging deployment beyond AFC build-out.

The update also summarizes the results of KYTC's two requests for proposals (RFPs) for developers to design, build, own, operate, and maintain EV charging stations in the state. Since the last plan update, KYTC has procured 42 charging stations along its AFC network and has seen the opening of the Commonwealth's, and the Southeast's, first NEVI-awarded station in Richmond, Kentucky.

## State Agency Coordination

KYTC continues to coordinate with the EEC, Cabinet for Economic Development (CED), Education and Labor Cabinet (ELC), Kentucky Public Service Commission (PSC), and FHWA's Kentucky Division. KYTC and EEC worked together on this update, two NEVI Program RFPs, and the Electric Vehicle Charger Grant Program managed by EEC and funded by the Volkswagen Environmental Mitigation Settlement. In 2024, ELC and KYTC met several times to discuss workforce topics including the number of Electric Vehicle Infrastructure Training Program (EVITP) certified electricians, registered apprenticeship programs, partnerships, funding, and potential workforce development strategies.

## Public Engagement

Since September 2023, KYTC has conducted three virtual large group stakeholder meetings, distributed surveys, e-newsletters, and press releases, and made key updates to the Kentucky EV Charging website. KYTC expanded upon its continued public engagement efforts through the establishment of the Disadvantaged Communities (DAC) Working Group. The DAC group will meet quarterly to discuss engagement opportunities, charging needs, and transportation electrification challenges. KYTC held its first virtual DAC Working Group meeting in July 2024.

## Plan Vision and Goals

KYTC remains committed to the 2022 Electric Vehicle Infrastructure Deployment Plan Vision and Goals and will continue to align program efforts with the 2022-2045 Long-Range Statewide Transportation Plan and recently published Carbon Reduction Strategy, approved in February 2024. Key metrics have been updated to analyze yearly progress for NEVI-funded stations that are operational and in development (awarded but not operational).

## Contracting

Since the prior plan update, KYTC has completed two RFP processes and awarded 42 NEVI-funded charging stations to be built and operated by 11 different developers. The joint KYTC, EEC, and CED proposal technical evaluation committee reviewed and scored responses based on scoring metrics that assigned value to qualities such as proposer experience and qualifications, site access and amenities, location within a Justice40 area, cost, and future-proofing. KYTC is currently developing an RFP 3 to procure the remaining stations needed to achieve AFC buildout. KYTC is also considering contracting approaches for post-AFC-buildout.

## Existing and Future Conditions Analysis

In August 2024, Kentucky opened its first NEVI-funded charging station in Richmond. This is the first charging station that counts toward the fully built-out determination. Beyond its NEVI-awarded station, KYTC is aware of over 30 rapid charging stations within a one-mile driving distance of AFCs. Previously, KYTC considered several existing stations as potentially NEVI-credible sites and counted these stations toward the AFC build-out status. FHWA recently clarified that these stations cannot be counted as NEVI-credible unless they fulfill the NEVI requirements. As a result, KYTC is now developing the RFP 3 to address the resulting gaps.

## EV Charging Infrastructure Deployment

With the opening of Kentucky's first NEVI-funded station in August 2024, 41 NEVI-funded stations remain in development. These 41 stations are expected to be fully operational in 2026.

KYTC has developed an implementation plan to move quickly toward fully built-out status for its AFC network. Per FHWA guidance, a state is fully built out when all AFCs have an operational NEVI station every 50 miles and 25 miles from AFC endpoints. The first two RFPs were major steps toward that goal, awarding most of the necessary stations. To fill the remaining gaps, KYTC expects to procure approximately 10 more stations through RFP 3. It is anticipated that KYTC will achieve fully built-out status (with all stations operational) no later than December 2026.

Once FHWA grants approval to move off the AFC network, KYTC intends to implement EV Program Phase 2 (Other Priority Corridors) and Phase 3 (Community Charging) concurrently. These phases are essential to meet the needs of Kentucky's residents and visitors in portions of the state that will be difficult to travel to or from in an EV, even after the AFC network is fully built out. Phase 2 will focus on providing charging along other priority corridors (non-AFC roadways) that support long-distance travel and improve charging access. Phase 3 will focus on providing publicly accessible charging facilities in communities and at major destinations. Special consideration will be given to rural and disadvantaged communities.

Figure ES 1: Kentucky EV Program Phases



## Implementation

Key updates to KYTC’s program implementation include:

- KYTC now allows developers to use battery systems to supplement the required 600kW minimum grid connection in locations where EV charging demand is expected to be low.
- KYTC is coordinating with the Joint Office and developers on implementing the Electric Vehicle Charging Analytics and Reporting Tool (EV-ChART).
- KYTC is working with developers to implement site design considerations that will benefit customers. This includes larger grid connections and accessible signage.
- KYTC issued two RFPs and will release RFP 3 in the Fall of 2024. These three RFPs are expected to support the full buildout of the AFC network.

## Equity Considerations

The Interim Implementation Guidance for the Justice40 Initiative and the NEVI Program Guidance identifies NEVI as a Justice40-covered program. KYTC’s planning, procurement, and engagement are guided by equity considerations to ensure that Kentucky’s disadvantaged communities (DACs) benefit from the Commonwealth’s NEVI program. RFP responses were awarded additional points if the proposed charging station was in a Justice40 community.

KYTC used the Climate and Economic Justice Screening Tool (CEJST) to identify DACs within the state. According to CEJST, nearly 48% of Kentucky’s NEVI-awarded stations are located within DACs and 90% are within three miles of a DAC.

Since the prior update, KYTC has expanded its public engagement to include focused outreach to DACs. In July 2024, KYTC established a DAC Working Group to identify existing charging challenges and what charging solutions would best serve DACs. Following the first meeting, KYTC shared a questionnaire requesting feedback on barriers to charging and potential future charging station locations. To initiate this group, KYTC reached out to 120 individuals from across the state representing statewide, regional, and local groups that serve underrepresented and disadvantaged communities. This group will continue to hold quarterly virtual meetings.

## Labor and Workforce Considerations

KYTC is coordinating with ELC to identify workforce development strategies that can expand the workforce for installing, operating, and maintaining NEVI-funded charging stations in Kentucky. Any potential program developed through this coordination will be dedicated to training and increasing EVITP certifications, a requirement for electricians installing NEVI-funded stations.

KYTC has also met with the International Brotherhood of Electrical Workers (IBEW) to discuss the EVITP certification process. Through this conversation, KYTC learned that there are several hundred EVITP-certified electricians in the main IBEW region, 31 contractors that employ EVITP-certified electricians, and many registered apprentices working through the certification process. The IBEW has also made EVITP certifications part of its standard training process.

## Program Evaluation

In the prior update, KYTC identified a list of program evaluation metrics to track progress. The 2024 Plan Update provides five-year targets for specific metrics and the progress towards those goals. Metrics are reported for all 42 awarded stations as well as for the one operational station.

Table ES 1: Kentucky EV Program Evaluation Metrics

Metric	All Awarded Stations (42)	Operational Stations (1)	Total (for reference)
AFC Network miles covered by EV charging stations	1,345 (91.4%)	50 (3.4%)	1,471
Residents within 15 miles of EV charging stations installed using NEVI funds	3,324,615 (73.8%)	113,039 (2.5%)	4,507,312
Rural residents within 15 miles of EV charging stations installed using NEVI funds	1,001,995 (53.8%)	47,405 (2.5%)	1,860,980
Justice40 residents within 15 miles of EV charging stations installed using NEVI funds	1,184,399 (59.6%)	12,740 (0.6%)	1,986,077

## Discretionary Exceptions

KYTC is requesting one exception from the requirement that charging stations be installed every 50 miles along Kentucky’s AFC network and within 25 miles of the end of an AFC. Exception 1 for Interstate 69 (I-69) is a temporary request that will be resolved once the Ohio River Crossing project completes construction. When the I-69 AFC in Kentucky is connected to the I-69 AFC in Indiana, the distance between stations will be 47.1 miles, meeting the requirement.

Table ES 2: Discretionary Exception Request

Exception	Type	Distance of Deviation	Corresponding AFC	Reason for Exception Request
1	50 miles apart	8.9 miles	Interstate 69 (I-69)	Geography

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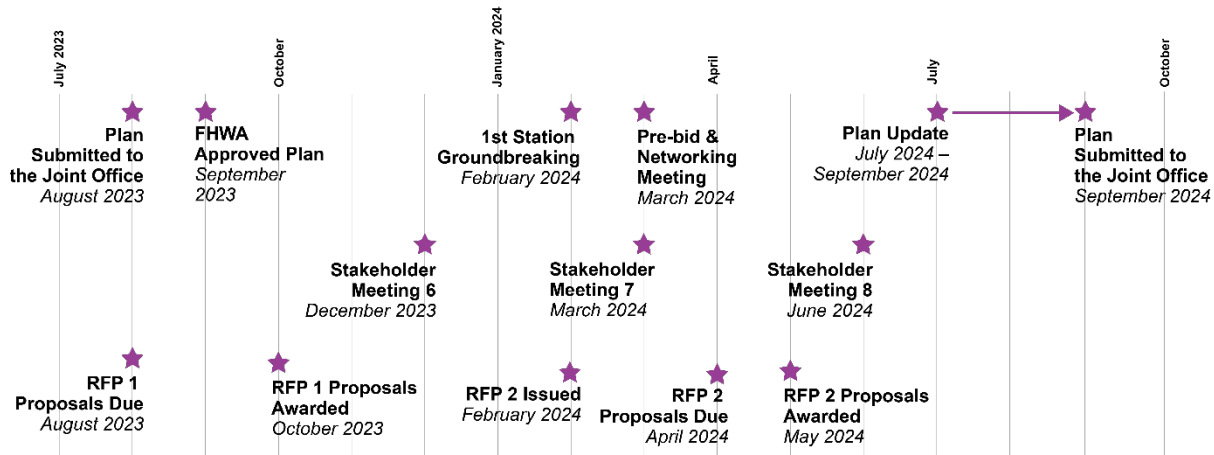
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# Introduction

The Kentucky Transportation Cabinet (KYTC) worked closely with the Kentucky Energy and Environment Cabinet (EEC) to update Kentucky’s Electric Vehicle Infrastructure Deployment Plan (Plan). The 2023 Plan was approved by the Federal Highway Administration (FHWA) on September 29, 2023. The Kentucky 2024 Plan Update covers all changes made since August 1, 2023, when Kentucky’s 2023 Plan was submitted to the Joint Office. The updates also account for the most recent National Electric Vehicle Infrastructure (NEVI) Program guidance released by FHWA, in collaboration with the Joint Office, on June 11, 2024.

The 2024 Plan Update takes into consideration the program’s significant progress towards build-out and KYTC’s continuous engagement efforts with stakeholders and the public (Figure 1). Since June 2023, KYTC has released two Requests for Proposals (RFPs), awarded 11 developers through three rounds of awards, and selected 42 charging stations along Kentucky’s Alternative Fuel Corridors (AFCs). In August 2024, the Commonwealth celebrated the opening of Kentucky’s first NEVI-funded charging station, which was also the first NEVI-funded station to open in the Southeast.

Figure 1: NEVI Program Activities Since July 2023



## Updates from the Prior Plan

In accordance with FHWA guidance, the 2024 updates are summarized below.

**Chapter 1: Introduction** – Documents the 2023 Plan Update approval, summarizes major Fiscal Year (FY) 2024 activities, and presents the status of plan implementation.

**Chapter 2: State Agency Coordination** – This section was updated to include state agency coordination activities that occurred in FY24.

**Chapter 3: Public Engagement** – KYTC's updated Community Engagement Outcomes Report summarizes the public engagement activities that occurred throughout FY 2024 as well as future planned engagement.

**Chapter 4: Plan Vision and Goals** – The descriptions of goals and their metrics were adjusted to provide more specific measurements that will be used to evaluate program progress. Relevant metrics were updated to reflect program progress towards goals.

**Chapter 5: Contracting** – This entire chapter was revised to provide updates on the additional rounds of awards under RFP 1 and 2. Updates include a synopsis of the contracting process, RFP scoring methodologies, and the awarded sites.

**Chapter 7: Existing and Future Conditions Analysis** – Updates were made to document existing charging stations along the AFCs.

**Chapter 8: EV Charging Infrastructure Deployment** – Updates were made to identify the planned NEVI-compliant charging stations resulting from RFPs 1 and 2. This section also provides an update on KYTC's efforts to reach full build-out and an overview of plans for further charging infrastructure deployment after build-out.

**Chapter 9: Implementation** – Presents the changes made related to station implementation.

**Chapter 10: Equity** – This update includes the identification of KYTC's disadvantaged communities (DACs) and presents past and planned DAC outreach.

**Chapter 11: Labor and Workforce Considerations** – Summarizes KYTC's engagement with the Kentucky Education and Labor Cabinet (ELC) to discuss workforce development strategies. This discussion also covered the number of Electric Vehicle Infrastructure Training Program (EVITP) certified electricians, registered apprenticeship programs, partnerships, and funding.

**Chapter 13: Program Evaluation** – Metrics were updated to demonstrate program progress. Updates were also made to the metrics to provide more specific measurements for targets.

**Chapter 14: Discretionary Exceptions** – One discretionary exception request is presented.

## State Agency Coordination

In the delivery of the 2024 Plan Update, KYTC continues to coordinate with the EEC, ELC, Cabinet for Economic Development (CED), Kentucky Public Service Commission (PSC), and FHWA's Kentucky Division.

KYTC's coordination with EEC falls into three major categories: plan updates, NEVI procurements, and EV station funding from Kentucky's Volkswagen Mitigation Trust. EEC was an important part of the 2024 Plan Update review process. For the two RFPs, EEC staff played a critical role in the evaluation and selection of developers. This included extensive staff review time and several days of intensive technical review committee meetings. Finally, KYTC helped to promote EEC's Electric Vehicle Charger Grant Program, which offered 50% rebates using Kentucky's Volkswagen Mitigation Trust funds. The initial round funded Level 2 chargers only. Future rounds may fund additional Level 2 chargers and Direct Current Fast Charging (DCFC) stations.

In 2024, ELC and KYTC met several times to discuss workforce topics including the number of Electric Vehicle Infrastructure Training Program (EVITP) certified electricians, registered apprenticeship programs, partnerships, funding, and potential workforce development strategies. Workforce strategies will continue to be coordinated with ELC with the goals of expanding sources of training, experience levels, and the diversity of the workforce for installing and maintaining charging infrastructure.

KYTC and CED partnered on the two RFPs. CED staff were involved in the evaluation and selection of developers. They contributed considerable staff time to review proposals as well as several days of intensive technical review committee meetings. CED also provided KYTC with information on EV-related economic development activities across the state.

KYTC continues to communicate with PSC, sharing updates on the KY EV Charging Program's progress and how utilities may support the program. Both agencies continue to discuss how PSC may support Kentucky's NEVI efforts and enable transportation electrification within the state.

Per federal guidance, this plan update reaffirms that KYTC is committed to the "Buy America" requirements of the NEVI program. KYTC is working closely with the developers of the 42 selected stations in the state to demonstrate compliance with this important requirement. KYTC and EEC will also continue to monitor the development of "Buy America" compliant charging infrastructure.

# Public Engagement

Outreach to the public remains central to the update of this plan and continues to be an important aspect of plan implementation. Since September 2023, KYTC has conducted a series of large group stakeholder meetings, distributed surveys, e-newsletters and press releases, and continued engagement with utilities. KYTC expanded upon public engagement efforts through the establishment of a Disadvantaged Communities (DAC) Working Group, a group that will regularly meet to discuss DAC engagement opportunities, charging needs, and transportation electrification challenges.

## Large Group Stakeholder Meetings

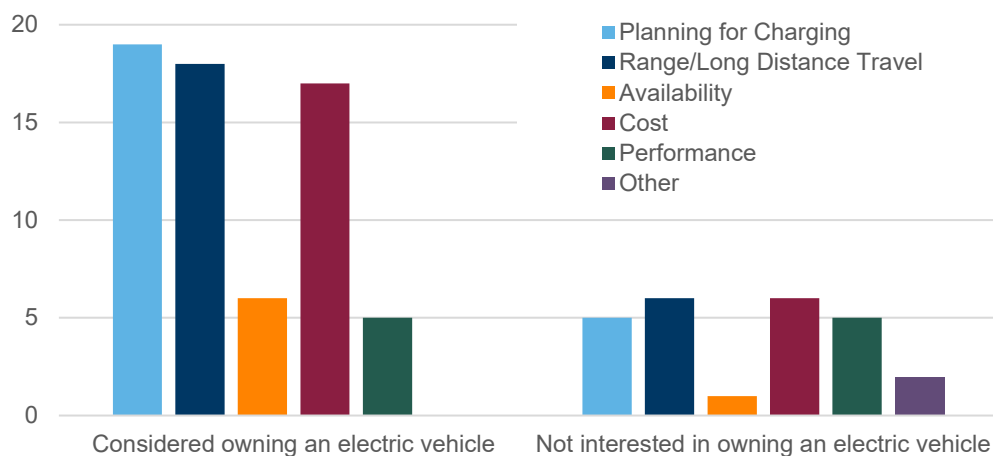
Since the approval of the 2023 Electric Vehicle Infrastructure Deployment Plan update, KYTC held three large group stakeholder meetings in December 2023, March 2024, and June 2024. These quarterly meetings provided updates to interested groups on the status of implementing the plan, funding opportunities, and other news related to the NEVI program. Meeting participants were encouraged to ask questions using the chat function in Microsoft Teams and to provide feedback through interactive polling using the Slido application. The program’s stakeholder list includes approximately 1,100 members representing a variety of groups.

### Stakeholder Survey – June/July 2024

KYTC released a survey to the EV stakeholder group from June 26 – July 8, 2024, to gather updated feedback on the progress of Kentucky’s EV Charging Program, receiving 78 responses. The short, six-question survey was created to gather feedback on the next phases of the program after the build-out of the AFC network and to determine any change in sentiment towards the NEVI Formula Program. The specific questions and answer choices shared in this survey are provided in Appendix A: Survey Questions for the Stakeholder Group.

The team reaffirmed the common barriers to ownership for those who are considering owning an EV, compared to those who do not have an interest in owning an EV (Figure 2). Planning for Charging – the logistics of determining when and where to charge – is the main concern for those who are considering owning an EV, followed closely by range/long-distance travel and cost. For those who are not interested in owning an EV, range/long-distance travel and cost are both equal barriers.

Figure 2: Survey Responses - Barriers to Ownership



Stakeholders were asked to rank the criteria that KYTC should consider for determining where to invest in new charging stations post-AFC build-out, with the following results:

Rank	Charging Station Location Criteria
1	Near areas of anticipated higher demand for charging
2	In charging gaps (areas without existing access to public charging stations)
3	Within rural and/or disadvantaged areas
4 (tie)	Near higher population centers
4 (tie)	Near tourist destinations (state parks, historical sites, etc.)
6	Near amenities (restrooms, convenience stores, etc.)
7	Near areas of higher concentrations of employers/jobs

Respondents of the survey were also asked to rank the *types* of areas the team should consider when deciding to locate new, post-AFC buildout charging stations:

Rank	Types of Areas for Locating New Charging Stations
1	Workplace/employment centers
2	Retail/commercial centers
3	Public facilities (e.g., libraries, parks, schools, government buildings)
4	Multifamily housing communities
5	Existing fueling stations
6	Hotels and lodging
7	Within rural and disadvantaged communities
8	Tourism destinations
9	Downtown centers

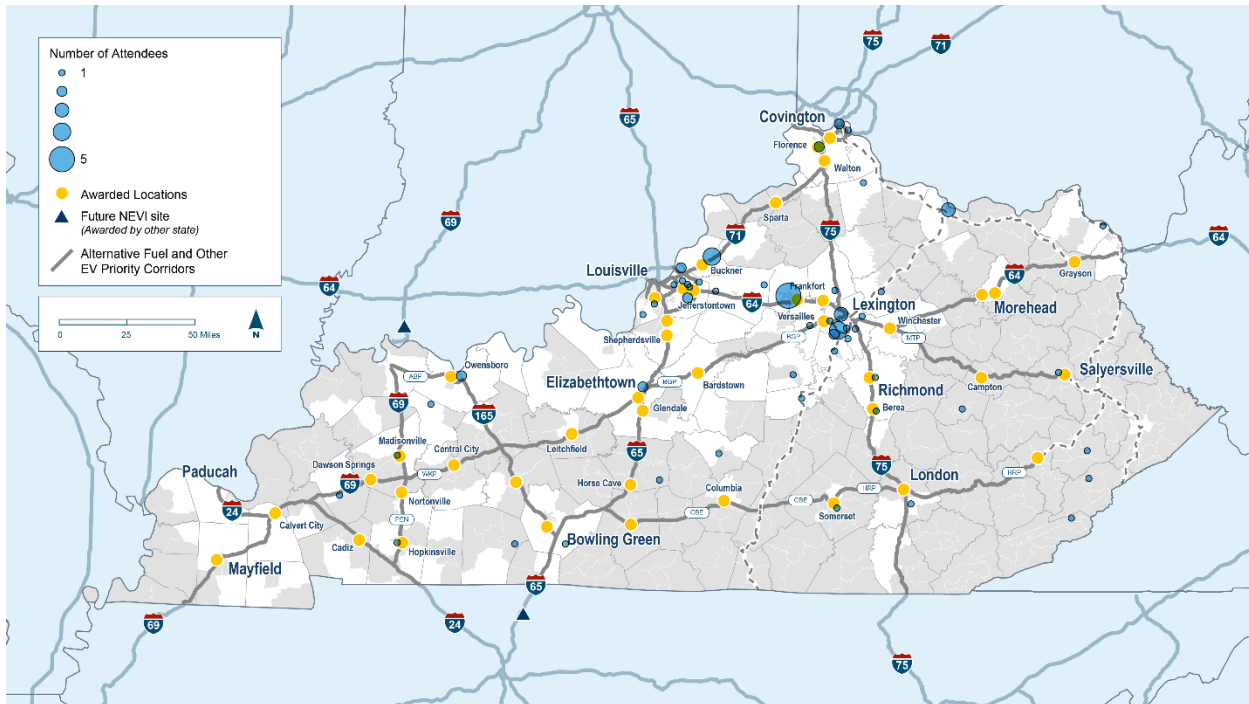
Lastly, respondents were asked to identify specific locations or areas that should be considered for deploying charging stations. It is important to note that while charging at rest areas was a common response, federal regulation ([23 CFR § 752.5](#)) does not permit commercial establishments to be constructed on the rights-of-way of the Interstate System. Due to this restriction, the commercial entities that own and operate stations cannot charge drivers a fee to use chargers at rest areas. The following bullets represent additional key themes from respondents' location suggestions:

- Areas with limited access to interstates and parkways where charging gaps currently exist, particularly in Eastern Kentucky
- State Parks, national parks, and forests, as well as other tourism destinations
- Local and city parks
- Multifamily housing complexes in urban areas without existing private, overnight charging access
- Redundancy in more urban, populous areas and highly trafficked roads to increase capacity along high-demand routes
- Airports
- Commercial hubs (e.g. shopping destinations and grocery stores) with high dwell times due to a variety of amenities

# Disadvantaged Communities Working Group

In June 2024, KYTC established a Disadvantaged Communities Working Group to discuss DAC's charging needs and EV priorities. Nearly 120 individuals from across the state were invited to be a part of this group to begin and continue this important dialogue, especially as KYTC works toward the next phases of implementation. These individuals represent statewide, regional, and local groups that serve underrepresented and disadvantaged communities. The first meeting was attended by 36 individuals, representing communities from many parts of the state (Figure 3).

Figure 3: Locations of DAC Working Group Representatives (First Meeting)

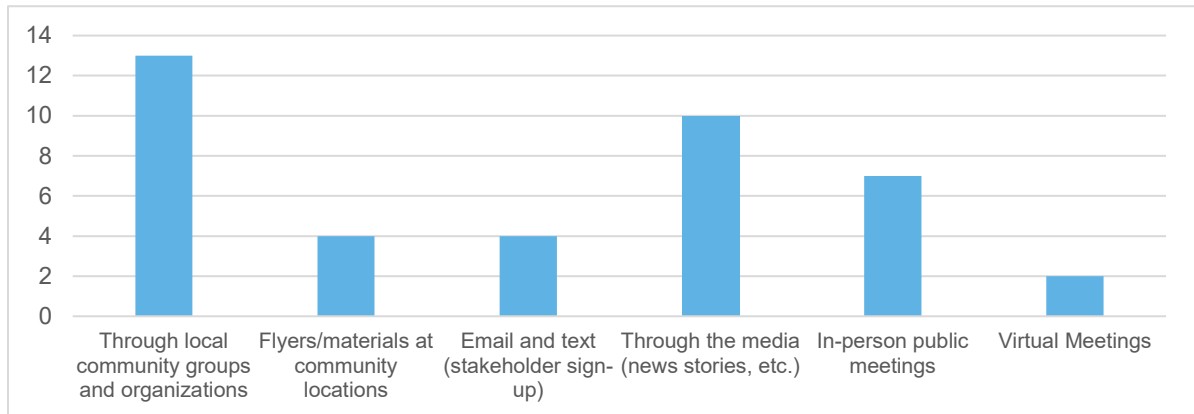


## DAC Questionnaire

Following the kickoff meeting, the working group was asked to participate in a short survey to gather feedback on 1) the best way to share information with DACs; 2) top community charging locations respondents would like to see in the future; and 3) how KYTC and its partners can ensure DACs are getting value from the NEVI Program.

This questionnaire was shared with the Working Group on July 25, 2024. KYTC received 15 responses from participants. Respondents indicated the best way to share information with DACs is through local community groups and organizations, followed by media – such as news stories or social media posts. Appendix B: Survey Questions for the Disadvantaged Communities Working Group identifies the specific questions and answer choices shared in the DAC questionnaire.

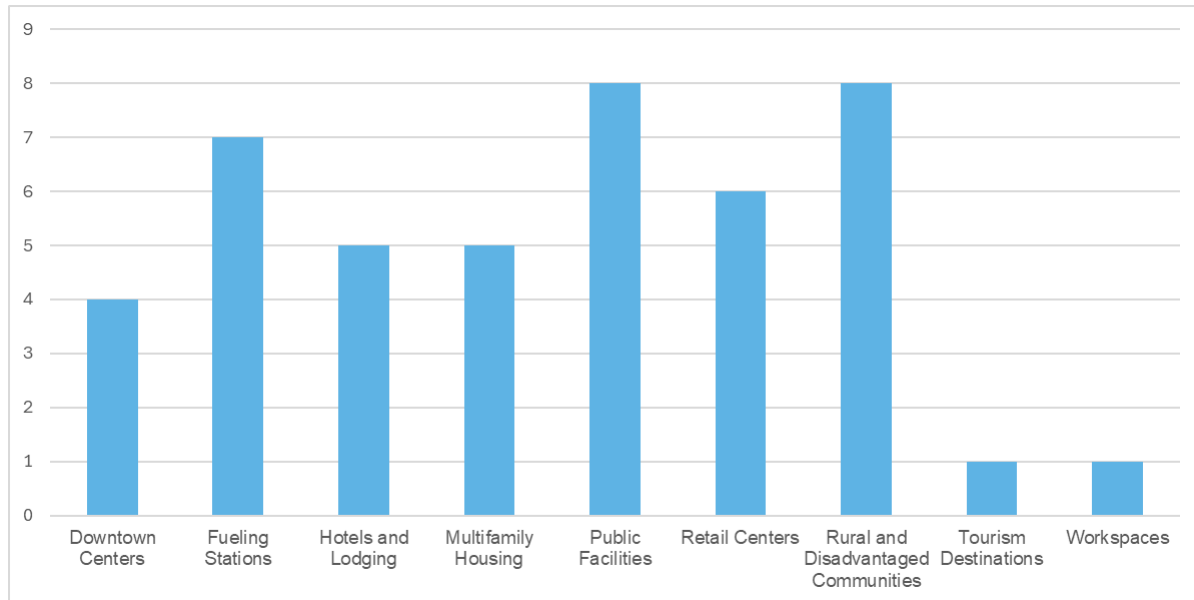
Figure 4: Responses to The Question, "What is The Best Way to Engage and Share Information With Disadvantaged Communities?"



Next, questionnaire respondents were asked to choose the top three community charging locations they would like to be considered in the next phases of the program. Figure 5 summarizes this question's responses.

The bar graph shows a range of 0 to nine. The categories of rural and disadvantaged communities and public facilities tied for the most wanted areas for EV charging. Next from highest to lowest: fueling stations, retail centers. Hotels and multi-family housing are tied in the next position, followed by downtown centers. The least preferred locations are tourism destinations and workspaces.

Figure 5: Responses to the Question, "What Are the Top Three Community Charging Locations You Would Like to See Considered for Future EV Charging Sites?"



The group was also asked to provide specific locations for consideration in future charging station deployment. The following bullets represent key themes found across the 15 responses to this question.

- Agencies with multiple locations in rural areas, such as West Kentucky Allied Services, community action agencies, extension offices, and Area Development Districts
- High-density, urban areas
- Public parking near state highways



- Local community centers
- Workplaces as an alternative to at-home charging that may not be available to residents of multifamily housing or urban areas.

Finally, the group was asked to identify strategies that may ensure DACs are gaining value from future phases of charging station deployment in Kentucky. Respondents emphasized thoughtful and continuous public engagement, including public meetings and staying connected with community representatives who are trusted by DACs. Concerning valuable charging station types, DAC Working Group members stressed the importance of providing charging within residential areas that do not have access to off-street parking and private charging options. DAC Working Group members also noted the value of advancing green jobs within DACs by connecting DAC residents with training and apprenticeship programs related to the installation, operation, and maintenance of NEVI stations. Responses also revealed the obstacle of EV affordability that may stand in the way of DACs benefiting from charging developed under the NEVI program.

## Stakeholder Correspondence – GovDelivery

In November 2023, the team transitioned from communicating with stakeholders through emails to using GovDelivery. This transition improved the team’s ability to communicate effectively with approximately 1,100 people who requested to receive updates on the EV Charging Program. During this reporting period, the team sent 14 messages to the stakeholder list with an average unique open rate of 42.5%.

Newsletters were used to inform the audience about stakeholder meetings, funding opportunities, RFPs, contract awards, groundbreakings, and other news relevant to the program. The number of unique opens for each is provided in Table 1.

Table 1: Stakeholder Newsletter Tracking

Subject Line	Date	Total Sent	Messages Delivered	Total Opens	Unique Opens
"Join us for our next Stakeholder Meeting December 12!"	12/1/2023	1,003	963 (96%)	1163	370 (39%)
"Recap of the December 12 Stakeholder Meeting"	12/20/2023	974	960 (99%)	900	439 (46%)
"Updates on Kentucky's EV Charging Program: Groundbreakings and a Second RFP"	2/23/2024	1,045	1,020 (98%)	1,030	413 (41%)
"KY EV Charging Program Pre-Bid and Networking Event Tomorrow!"	3/4/2024	1,135	1,100 (97%)	1,324	459 (42%)
"Stakeholder Meeting Today, 2:00 p.m. Eastern"	3/13/2024	1,023	1,002 (98%)	973	403 (41%)
"Missed the last stakeholder meeting? Check out this summary!"	3/25/2024	1,060	1,027 (97%)	953	488 (48%)
"New EV Charging Station Funding Opportunity"	4/22/2024	1,089	1,059 (97%)	1,571	420 (40%)
"New EV Charging Station Funding Opportunity Available Now"	5/1/2024	1,093	1,064 (97%)	1,507	425 (40%)
"Kentucky's EV Charging Program: More Awards Announced"	5/24/2024	1,103	1,069 (97%)	1,255	509 (48%)
"Join us June 26 for our Quarterly Stakeholder Meeting"	6/4/2024	1,111	1,079 (97%)	1,103	428 (40%)
"REMINDER! Next EV Charging Program Stakeholder Meeting June 26!"	6/18/2024	1,113	1,080 (97%)	854	377 (35%)

"Kentucky EV Program Stakeholder Meeting on Wednesday"	6/25/2024	1,113	1,079 (97%)	771	390 (37%)
"Help inform the next phase of Kentucky's Electric Vehicle Charging Program"	6/26/2024	1,110	1,082 (97%)	744	388 (36%)
"KY EV Stakeholder Meeting Materials"	7/3/2024	1,110	1,077 (97%)	840	495 (47%)

## Stakeholder Correspondence – Governor’s Office

### Press Releases

Four press releases were distributed to announce contract awards for charging stations during this reporting period. Each press release was posted on the Commonwealth’s [website](#) as well as the project website, [evcharging.ky.gov](http://evcharging.ky.gov) (Table 2).

Table 2: Press Releases

Title	Date
<a href="#">Governor Beshear Announces Initial round of Awards to Build Statewide Network of Electric Vehicle Charging Stations</a>	10/5/2023
<a href="#">Gov. Beshear Announces Second Round of Awards to Build Statewide Network of Electric Vehicle Charging Stations</a>	10/23/2023
<a href="#">Gov. Beshear, Officials Break Ground on First EV Charging Station in Southeastern US Supported by Federal Program</a>	2/19/2024
<a href="#">Gov. Beshear Announces More Awards as State Builds Out Electric Vehicle Charging Network</a>	5/23/2024

### Team Kentucky Updates

Since October 2023, Kentucky’s EV Charging Program has been included in four of Governor Beshear’s live Team Kentucky Updates. These events are streamed on the Governor’s Facebook and YouTube pages (Table 3).

Table 3: Governor Beshear Team Kentucky Updates

Title	Date	EV Topic	Link
<a href="#">Gov. Beshear: \$27.5 Billion in Investments Announced to Support Job Growth, Economic Development Across Kentucky</a>	10/5/2023	RFP 1 Awards	<a href="#">Video</a>
<a href="#">Gov. Beshear Provides First Team Kentucky Update of Second Term</a>	12/14/2023	CFI Grants	<a href="#">Video</a>
<a href="#">Gov. Beshear Provides Team Kentucky Update</a>	3/14/2024	Kentucky’s eligibility for \$70 million through the NEVI Program	<a href="#">Video</a>
<a href="#">Gov. Beshear Announces More Awards as State Builds Out Electric Vehicle Charging Network</a>	5/23/2024	RFP 2 Awards	<a href="#">Video</a>

# Community Engagement Outcomes Report

This section summarizes the meetings and other engagements that occurred from September 2023, when the previous plan update was submitted, through August 2024, when this plan update was submitted for approval. Table 4 provides a synopsis of the 18 community engagement activities that occurred since the previous plan update. Table 5 notes the meetings related to the NEVI program that KYTC staff participated in since the previous plan update.

Table 4: Community Engagement Summary Statistics

Meeting Type	Number of Meetings	Number of Participants
Conference	5	425
Federal Webinar	1	75
Meeting	2	115
RFP	2	81
Stakeholder	4	393
State	3	170
Utility	1	35
<b>Total</b>	<b>18</b>	<b>1294</b>

Table 5: Meeting Participation

Meeting Name	Category	In-person or Virtual	Month/Year	Attendees
National Association of State Energy Officials (NASEO)/American Association of State Highway and Transportation Officials (AASHTO) NEVI Conference	Conference	In-Person	July 2023	125
WTS - Advancing Women Advancing Transportation	Meeting	In-Person	July 2023	40
Mid-America Association of State Transportation Officials (MAASTO)	Conference	In-Person	Aug. 2023	100
KYTC Statewide Transportation Planning Meeting	State	Hybrid	Oct. 2023	60
AASHTO TransComm Conference	Conference	In-Person	Oct. 2023	100
Stakeholder Meeting 6	Stakeholder	Virtual	Dec. 2023	179
KYTC Statewide Equipment Meeting	State	In-Person	Dec. 2023	75
Utilities Meeting	Utility	Virtual	Jan. 2024	35
Stakeholder Meeting 7	Stakeholder	Virtual	March 2024	68
RFP Networking and Pre-Bid Meeting	RFP	Virtual	March 2024	63
Networking Event Participants	RFP	Virtual	March 2024	18
Early Lessons Learned on NEVI Site Construction	Federal Webinar	Virtual	March 2024	75
Lexington Forum	Meeting	In-Person	May 2024	75
MAASTO Connected and Automated Vehicles (CAV)/EV Conference	Conference	In-Person	June 2024	50
Mid-Atlantic Conference on Regulatory Utilities 29th Annual Education Conference	Conference	In-Person	June 2024	50
Stakeholder Meeting 8	Stakeholder	Virtual	June 2024	110
Interim Joint Committee (IJC) on Transportation, Kentucky	State	In-Person	July 2024	35
DAC Working Group	Stakeholder	Virtual	July 2024	36
				<b>1294</b>

## Engagement – Lessons Learned

The EV program engagement activities have informed KYTC and others on critical EV infrastructure planning and implementation topics. Some lessons learned include:

1. **Range Anxiety Still a Top Issue** - Range anxiety continues to be a barrier to EV adoption in Kentucky. This was supported by the stakeholder and DAC Working Group feedback.
2. **Interstate and Parkway Service / High Demand Area Service** – Continued feedback that service to the key high demand corridors and areas should be a priority.
3. **Statewide Coverage** - Service to areas both rural and away from interstates and parkways has also been a theme. A particular interest in charging stations to serve Eastern Kentucky and other areas without nearby charging infrastructure.
4. **Cost of Purchasing an EV** - Although the average price for an EV has decreased, the purchase price is still a concern. DAC Working Group members noted that this is a major barrier to EV adoption among DACs and will impact utilization of chargers in these communities.
5. **Charging in Disadvantaged Communities** - Access to charging in disadvantaged communities was a clearly stated barrier to EV adoption.
6. **Community Charging Needs** – Other key needs identified through the engagement include the need for charging to serve public facilities, employment centers, retail centers, and multi-family housing, especially those that do not have access to private, off-street, overnight charging.
7. **Ongoing Engagement** – Based on the feedback over the past year, there is a need to continue and expand on the engagement that has been conducted to date. Communication is key to ensuring people are informed and able to engage on the topic of EV infrastructure.
8. **Communication with EV Charging Implementation Partners, Utilities, and Other Key Stakeholders** – The feedback from industry and other stakeholders about Kentucky’s EV infrastructure program has been very positive and the need to continue this active dialogue.

## Engagement – Impact on Plan Development

The ongoing engagement has had a direct impact on the plan development and implementation.

1. **Phase 1: Interstates and Parkways** - KYTC is implementing the plan to serve interstates and parkways, addressing range anxiety and providing service to high demand corridors and areas.
2. **Phase 2: Other Priority Highways** – KYTC has listened to the feedback and is preparing for a future phase to extend service to more rural areas of the state and to areas without direct interstate or parkway access. This currently includes highways in eastern Kentucky but will also include highways in other parts of the state where additional coverage is needed. KYTC is developing an approach to identify which highways should be added. This approach will consider input from stakeholders, the DAC Working Group, and other members of the public.
3. **Phase 3: Community Charging** – KYTC is also listening to input regarding how to set up and implement the future community and destination charging program. This could include service to many types of locations and land uses. Input from the DAC Workgroup will be very important as this post-AFC part of the plan is developed further. KYTC continues to gather feedback directly from stakeholders regarding ideal community charging locations and amenities.

Other ways the engagement has impacted the plan development and implementation include how requests for proposals have been developed and implemented. For example, the general approach has been designed to facilitate small and disadvantaged business involvement in the process. It also considered DACs in the site scoring.

KYTC has also considered input from stakeholders that bring a utility or truck charging perspective to the plan. This input is also considered in the way the plan was developed and is being implemented.

In the next year, community engagement findings will further shape Kentucky's EV infrastructure planning and implementation efforts.

### Engagement – Plan for Ongoing Engagement

KYTC has an aggressive plan for ongoing engagement in fiscal year 2025. This will include:

1. Continued Quarterly Stakeholder Meetings
2. Quarterly DAC Workgroup Meetings
3. Regional In-person Meetings (Expect to hold several in 2025)
4. Regular Email Updates
5. Website Updates
6. New Program Video

These methods are designed to promote two-way communication as KYTC needs input for the program to be successful. The public continues to search for information and resources related to EVs and the EV infrastructure program in Kentucky. These specific engagement methods will effectively serve both needs.

### Tribal Engagement

No changes. Kentucky does not have federally recognized tribes.

### Utility Engagement

On January 12, 2024, as part of the continuous utility engagement efforts of Kentucky's NEVI program, KYTC held a virtual meeting with utility providers throughout the Commonwealth. The meeting provided program updates and served as an opportunity to update utility contact information for future coordination.

KYTC engaged utilities in the RFP 2 procurement process and will continue to work closely with utilities as awarded stations move through development. KYTC worked with utility providers to identify updated contacts that could be shared with developers submitting proposals for RFP 2. Similar to RFP 1, each developer was required to contact the utility responsible for providing power to the proposed charging station site. KYTC has continued to work with utilities to provide an informative utility form for developers that gathers input from utilities regarding what potential developers should have ready when contacting them.

Awarded developers are also required to coordinate directly with utilities throughout the program's delivery, to ensure charging infrastructure will be supplied with the appropriate power and projects can be safely and efficiently delivered.

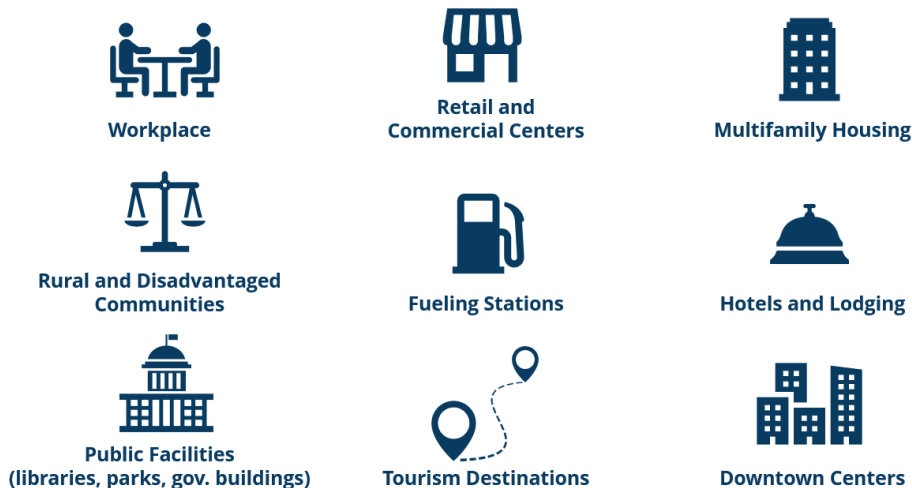
KYTC participated in the Mid-Atlantic Conference of Regulatory Utilities Commissioners (MACRUC) 29th Annual Education Conference. KYTC was part of a panel discussion, *Charge Up: Increasing Public Electric Vehicle Charging*.

## Site-Specific Public Engagement

Through the RFP process and carefully crafted scoring criteria, KYTC encouraged developers to propose charging station sites at locations that would be appropriate for EV charging and compatible with the communities in which they are built. Proposals were awarded more points for proposing a site in an area that supports an EV charging station. For example, a station in a commercial area with many user amenities would score higher than a similar one in an industrial, agricultural, or residential area. Proposers were also encouraged to interact with and partner with communities, including local businesses and stakeholders, both before and after station development. Points were given during the evaluation process to firms that demonstrated past or planned positive engagement with the local community. For example, a company with an existing business in the community, and with local employees, scored well in this area.

Charging station site selection during Phase 2 (Other Priority Corridors) and Phase 3 (Community and Destination Charging) will be guided by feedback from previous and future community engagement activities, DAC outreach, and a series of in-person meetings. Engagement will focus on specific corridors and types of charging locations (Figure 6) that the public would like to see in future phases of charging station deployment. KYTC has begun this coordination with stakeholders and DAC representatives, gathering feedback on locations and corridors of interest to local communities.

Figure 6: Types of Community and Destination Charging Locations (Program Phase 3)



# Plan Vision and Goals

KYTC remains committed to the vision and goals outlined in the 2022 Plan. As a result, this Plan Update restates the 2022 vision and goals that continue to guide the plan implementation and notes any updates to the goal language. The Plan Vision and Goals (Table 6) are largely tied to Kentucky’s Long-Range Transportation Plan and other Commonwealth plans, including the recently published Carbon Reduction Strategy.

## Plan Vision and Goals

KYTC considered the NEVI Formula Program goals and guidance, in tandem with Kentucky’s Long-Range Statewide Transportation Plan goals, to develop the following vision:

*“A reliable, accessible, convenient, and affordable EV charging network that supports transportation choices, energy diversification, economic development, and environmental sustainability for all Kentuckians.”*

To provide greater detail on the program’s progress, the metrics for goals One through Three have been updated. These updates are indicated in bold orange text below:

Table 6: Vision and Goals Updates

Kentucky’s EV Goals	How the Plan Will Meet the Goal	Metric
<b>GOAL ONE</b> A corridor-based EV charging system that supports interstate and regional travel	Kentucky has defined a system of Interstates and Parkways that serve long-distance travelers within and through the state. The system connects major urban and rural areas across the state. Most EV drivers will be able to access the system by driving 50 miles or less.	System miles are covered by <b>operational</b> and <b>awarded</b> EV charging stations that meet the standards outlined in this plan.
<b>GOAL TWO</b> A local EV ecosystem that serves Kentucky’s communities and travelers.	Although intended for long-distance travel, the fast-charge infrastructure can also serve as a vital part of the local EV ecosystem near these corridors. They can serve as a backup for local Level 2 charging or be used for emergency fast charging.	Number of residents and employees <b>within five miles, 15 miles, and 50 miles</b> of EV charging stations installed using NEVI funds <b>and planned stations awarded that will use NEVI funds.</b>
<b>GOAL THREE</b> A comprehensive system that supports transportation choices for all of Kentucky’s residents	Justice40 and rural communities were key considerations in the selection of corridors and prioritization of interchanges for future charging infrastructure. It is essential that Kentucky’s EV infrastructure works for all of Kentucky’s communities.	Number of rural and Justice40 residents within <b>five, 15, and 50 miles</b> and 50 miles of EV charging stations installed using NEVI funds <b>and in development stations awarded that will use NEVI funds.</b>
<b>GOAL FOUR</b> An interconnected, reliable, and resilient vehicle fueling system that can adapt to changes in market conditions and transportation technologies	The switch to electrified mobility opens Kentucky’s transportation sector to new energy sources, providing an opportunity for energy diversification and redundancy that is not possible with petroleum-burning internal combustion engines. Reliability will be critical to the success of the system.	Percent operational time for EV charging stations installed using NEVI funds.

Kentucky's EV Goals	How the Plan Will Meet the Goal	Metric
GOAL Five A transportation system that reduces emissions and promotes clean air in Kentucky	Increasing the number of zero-emission vehicles on Kentucky's highways will reduce pollution. Reducing emissions will also benefit communities adjacent to major corridors by decreasing pollution that may affect these areas.	Number of registered EVs in the state of Kentucky

*\*Metric updates are indicated in bold orange text.*

## Alignment with State Plans

It is important to KYTC that Kentucky's NEVI Program furthers existing Commonwealth goals, particularly within Kentucky's transportation efforts. The Plan will continue to be aligned with other relevant statewide plans' goals and strategies, including [KYTC's 2022-2045 Long-Range State Transportation Plan \(LRSTP\)](#), and KYTC's recently released [Carbon Reduction Strategy \(CRS\)](#), published in November 2023, and approved by FHWA in February 2024.

The CRS is a plan developed in response to FHWA's Federal Carbon Reduction Program (CRP). The CRP provides \$6.4 billion in formula funding over five years for states to develop carbon reduction strategies and for projects that will reduce carbon dioxide emissions. States are required to develop their CRS in consultation with metropolitan planning organizations (MPOs) in the state and update their strategies every four years. KYTC was responsible for developing Kentucky's CRS and identified the following goals:

- **Goal One:** Reduce On-Road Carbon Emissions
- **Goal Two:** Enhance Safety
- **Goal Three:** Improve System Reliability and Efficiency
- **Goal Four:** Provide Connectivity and Travel Options
- **Goal Five:** Promote Flexibility, Effectiveness and Practicality
- **Goal Six:** Benefit all Kentuckians

Kentucky's CRS set the goal of reducing on-road carbon emissions, noting the Commonwealth's EV charging program as an ongoing strategy that supports transportation-based carbon reduction.

## Post-Build-out Planning

Phase 1 of Kentucky's EV Program is to build out the AFC network in accordance with federal requirements (Figure 7). KYTC's post-build-out policy is designed to provide capacity where needed and coverage to every corner of the state. Once the AFC network is certified as fully built out, Phases 2 and 3 will begin concurrently. Phase 2 will provide charging stations along other non-AFC high-priority highways. Phase 3 will provide funding for community and destination charging throughout the Commonwealth.



Together, Phases 2 and 3 will strategically fill charging gaps and provide greater access in rural and disadvantaged communities. Phases 2 and 3 will likely use new procurement methods and contractual approaches. This will be necessary given that many of these stations will be smaller and involve lower cost Level 2 charging. It will likely be necessary to bundle projects and/or work with a set of competitively selected developers to implement the program.

Figure 7: Kentucky EV Program Phases



## Contracting

On June 15, 2023, KYTC issued the first request for proposals (RFP 1 – ID: 605--2300000290-4). On February 19, 2024, KYTC issued a second request for proposals (RFP 2 – ID: 605-2400000175). The purpose of both RFPs was to solicit proposals from qualified entities to design, build, operate, and maintain DCFC EV charging stations along the Commonwealth’s AFCs. RFP 2 was issued to solicit proposals to fill in leftover EV charging gaps from RFP 1 to achieve build-out. This was a best-value procurement pursuant to 23 CFR 636.

KYTC evaluated proposals based on established evaluation criteria and awarded contracts to proposers for select sites. Awardees are executing contracts in the form of a project agreement (PA) with KYTC and agree to PA terms and conditions related to a particular project. A copy of the PA and Scope of Work is included as Attachment four in RFP 2. As per the PA terms and conditions, developers will be expected to carry out site acquisition, design, purchase, construction, installation of hardware and software, operation and maintenance, and reporting services for a given project. KYTC will not develop, own, operate, or maintain projects. The contract duration is to be for the five years following construction completion.

## Status of Contracting Process

The details of the two RFPs that have been issued to date are provided in Table 7. RFP 1 resulted in two rounds of awards, while RFP 2 awarded proposals in one round. KYTC is currently guiding awardees to groundbreaking and construction. No additional procurement processes under the NEVI Formula Program have been issued; however, RFP 3 is currently in development.

RFP 3 is expected to solicit proposals for an estimated 10 additional designated zones. This RFP is intended to secure all remaining stations necessary to reach the buildout of Kentucky’s AFC network. RFP 1 and 2 procurement decisions were made to procure all stations necessary for buildout, initially developing the network of sites around existing Electrify America stations. Along with other state DOTs, KYTC initially counted Electrify America’s existing public fast-charging stations towards the buildout status of Kentucky’s AFCs. In the summer of 2024, it was confirmed that an agreement had not been reached between the FHWA and Electrify America to credit existing stations as NEVI-compliant. As a result, KYTC must fill the gaps where Electrify America stations had previously been included in the network.

Table 7: Status of Contracting Process

Round of Contracting	# of Received	Contract Type	Solicitation Released	Solicitation Closed	Date of Award (Official Announcement)
RFP 1	150	design-build-operate-maintain	June 15, 2023	Aug. 24, 2023	Round 1 – Oct 5, 2023 Round 2 – Oct 23, 2023
RFP 2	55	design-build-operate-maintain	Feb. 19, 2024	April 19, 2024	May 23, 2024
RFP 3	NA	design-build-operate-maintain	Tentative Sept. 19, 2024	Tentative Oct. 21, 2024	Tentative Dec. 13, 2024

# Awarded Contracts

## First RFP

### Round 1 of Awards

On October 5, 2023, KYTC announced the first round of awards for 16 public charging stations along 11 AFCs (Figure 8 and Table 8). Six developers were awarded and, after executing project agreements, are now in the process of developing the awarded sites.

### Round 2 of Awards

The first RFP also included a second round of awards announced on October 23, 2023. In the second round of awards, five developers were approved to build eight public charging stations along three AFCs. The selected sites are currently under development after the execution of project agreements.

## Second RFP

### Round 3 of Awards

On May 23, 2024, KYTC announced awards for 18 public charging stations that will be implemented by eight developers. Several developers are in the process of executing project agreements, while others have signed agreements and are now in the process of developing the awarded sites.

Figure 8: Awarded Sites by RFP

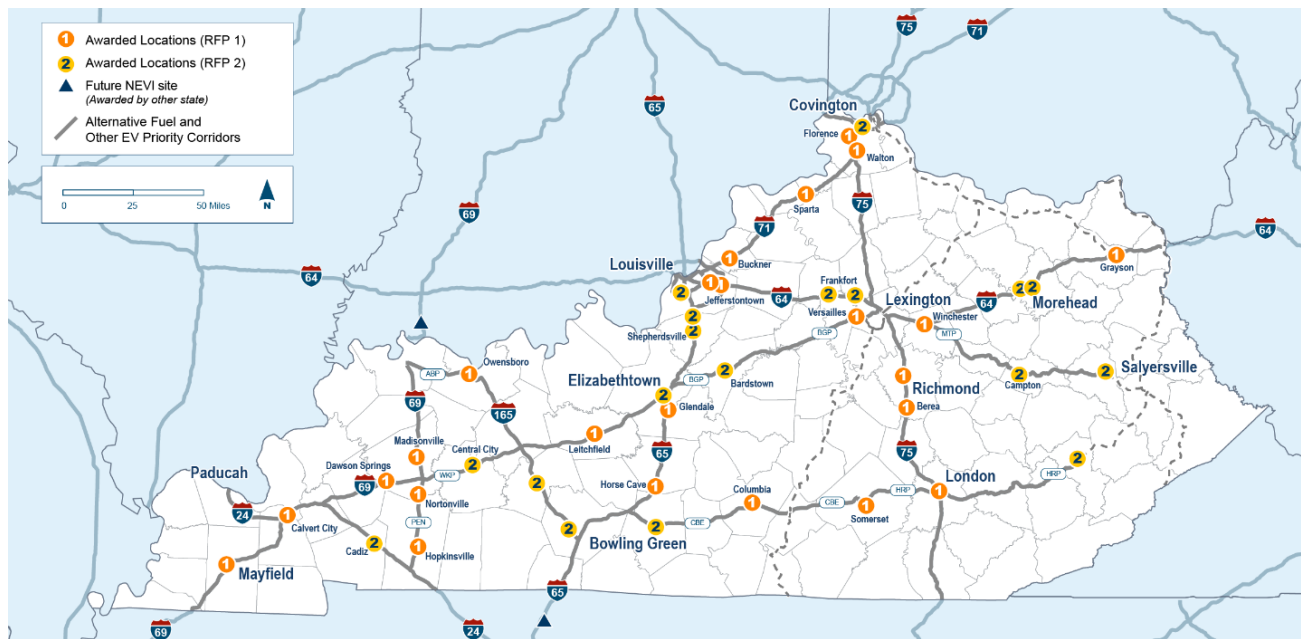


Table 8: Awarded Sites

Round of Contracting (example: 1st Round of Three)	Award Recipient	Contract Type (design-build-operate-maintain, design-build, or others)	Location of Charging Station	Award Amount	Estimated Date to Begin Operation
RFP 1	BP Products North America, Inc.	design-build-operate-maintain	1335 S Hurstbourne Pkwy, Louisville, KY 40222	\$431,592	10/14/24 to 7/21/25
RFP 1	BP Products North America, Inc.	design-build-operate-maintain	1804 Blankenbaker Pkwy, Louisville, KY 40299	\$508,896	10/14/24 to 7/21/25
RFP 1	BP Products North America, Inc.	design-build-operate-maintain	554 Glendale Hodgenville Rd W, Glendale, KY 42740	\$489,351	10/14/24 to 7/21/25
RFP 1	BP Products North America, Inc.	design-build-operate-maintain	4731 KY 146, Buckner, KY 40010	\$418,586	10/14/24 to 7/21/25
RFP 1	BP Products North America, Inc.	design-build-operate-maintain	145 Richwood Rd, Walton, KY 41094	\$444,992	10/14/24 to 7/21/25
RFP 1	BP Products North America, Inc.	design-build-operate-maintain	777 Burlington Pike, Florence, KY 41042	\$494,589	10/14/24 to 7/21/25
RFP 1	Circle K	design-build-operate-maintain	707 Chestnut St, Berea, KY 40403	\$537,492	1/1/25 to 3/1/25
RFP 1	Circle K	design-build-operate-maintain	1000 Amberley Way, Richmond, KY 40475	\$536,600	1/1/25 to 3/1/25
RFP 1	Francis Energy Charging	design-build-operate-maintain	110 Clinic Dr, Hopkinsville, KY 42240	\$855,276	6/30/24
RFP 1	Francis Energy Charging	design-build-operate-maintain	162 Hopkinsville Rd, Nortonville, KY 42442	\$897,498	6/30/24
RFP 1	Francis Energy Charging	design-build-operate-maintain	370 US 27, Somerset, KY 42501	\$852,793	6/30/24
RFP 1	Francis Energy Charging	design-build-operate-maintain	1505 W Broadway, Mayfield, KY 42066	\$875,282	6/30/24
RFP 1	Francis Energy Charging	design-build-operate-maintain	5715 Charleston Rd, Dawson Springs, KY 42408	\$858,799	7/14/24
RFP 1	Francis Energy Charging	design-build-operate-maintain	800 E Center St, Madisonville, KY 42431	\$863,471	6/30/24
RFP 1	eCAMION USA, Inc	design-build-operate-maintain	705 Jamestown St, Columbia, KY 42728	\$605,009	6/1/24
RFP 1	eCAMION USA, Inc	design-build-operate-maintain	105 Melcon Ln, London, KY 40741	\$605,009	6/1/24
RFP 1	eCAMION USA, Inc	design-build-operate-maintain	769 White St, Leitchfield, KY 42754	\$605,009	6/1/24
RFP 1	Love's Travel Stops	design-build-operate-maintain	2966 US 62, Calvert City, KY 42029	\$650,000	6/1/24
RFP 1	Love's Travel Stops	design-build-operate-maintain	750 Carol Malone Blvd, Grayson, KY 41143	\$650,000	6/1/24
RFP 1	Love's Travel Stops	design-build-operate-maintain	4000 L & N Turnpike Rd, Horse Cave, KY 42749	\$725,000	6/1/24
RFP 1	Love's Travel Stops	design-build-operate-maintain	499 Loves Dr, Sparta, KY 41086	\$625,000	6/1/24

Round of Contracting (example: 1st Round of Three)	Award Recipient	Contract Type (design-build-operate-maintain, design-build, or others)	Location of Charging Station	Award Amount	Estimated Date to Begin Operation
RFP 1	Red E Charging LLC	design-build-operate-maintain	3590 Lexington Rd, Versailles, KY 40383	\$633,534	3/25/25
RFP 1	Red E Charging LLC	design-build-operate-maintain	201 N Main St, Winchester, KY 40391	\$629,784	3/25/25
RFP 1	Universal EV Chargers	design-build-operate-maintain	3220 W Parrish Ave, Owensboro, KY 42301	\$630,989	11/1/24
RFP 2	Francis Energy Charging	design-build-operate-maintain	645 S 2nd St, Central City, KY 42330	\$830,184	6/19/25
RFP 2	Francis Energy Charging	design-build-operate-maintain	4455 Russellville Rd, Bowling Green, KY 42101	\$582,180	6/19/25
RFP 2	Francis Energy Charging	design-build-operate-maintain	557 SL Rogers Blvd, Glasgow, KY 42141	\$706,435	6/19/25
RFP 2	Francis Energy Charging	design-build-operate-maintain	3333 KY 801, Morehead, KY 40351	\$728,371	6/19/25
RFP 2	Francis Energy Charging	design-build-operate-maintain	205 Quillen Chapen Service Rd, Campton, KY 41301	\$877,249	6/19/25
RFP 2	Francis Energy Charging	design-build-operate-maintain	342 Mountain Pkwy, Salyersville, KY 44165	\$908,766	6/19/25
RFP 2	GPM Investments	design-build-operate-maintain	1079 Morton Blvd, Hazard, KY 41701	\$583,782	2/15/26
RFP 2	Love's Travel Stops	design-build-operate-maintain	1090 Cedar Grove Rd, Shepherdsville, KY 40165	\$650,000	2/12/26
RFP 2	Love's Travel Stops	design-build-operate-maintain	601 Ring Rd, Elizabethtown, KY 42701	\$650,000	2/12/26
RFP 2	Pilot Travel Centers	design-build-operate-maintain	2050 E Blue Lick Rd, Shepherdsville, KY 40165	\$400,000	11/9/24
RFP 2	Red E Charging LLC	design-build-operate-maintain	300 Lacefield St, Midway, KY 40327	\$613,859	2/1/25
RFP 2	Red E Charging LLC	design-build-operate-maintain	1690 Flemingsburg Rd, Morehead, KY 40351	\$615,626	2/1/25
RFP 2	Shubham	design-build-operate-maintain	2329 S Main St, Morgantown, KY 42261	\$815,412	5/14/25
RFP 2	Tesla	design-build-operate-maintain	2791 Town Center Blvd, Crestview Hills, KY 41017	\$384,782	11/1/25
RFP 2	Tesla	design-build-operate-maintain	1302 US 127, Frankfort, KY 40601	\$384,782	11/1/24
RFP 2	Universal EV Chargers	design-build-operate-maintain	1714 New Haven Rd, Bardstown, KY 40004	\$676,800	5/1/26
RFP 2	Universal EV Chargers	design-build-operate-maintain	3901 Taylor Blvd, Louisville, KY 40215	\$681,940	5/1/26
RFP 2	Universal EV Chargers	design-build-operate-maintain	153 Broadbent Blvd, Cadiz, KY 42211	\$702,040	5/1/26

# Scoring Methodologies Utilized

KYTC established a proposal evaluation committee to review, evaluate, and verify information submitted by proposers, and an awards committee to rank proposals and make award recommendations to KYTC. Responses were submitted in three parts – an administrative proposal, a technical proposal, and a cost proposal. Upon receipt, each proposal was first reviewed for responsiveness on a pass/fail basis. After proposals were reviewed for responsiveness, and to the extent a proposal was deemed “responsive”, each technical proposal and each cost proposal was reviewed, evaluated, and scored according to the scoring criteria of the RFP. Figure 9 shows the corridor groups within which proposals would be considered for RFP 1. Figure 10 shows the designated zones within which developers could propose stations in RFP 2.

Figure 9: Map of RFP 1 Corridor-Groups

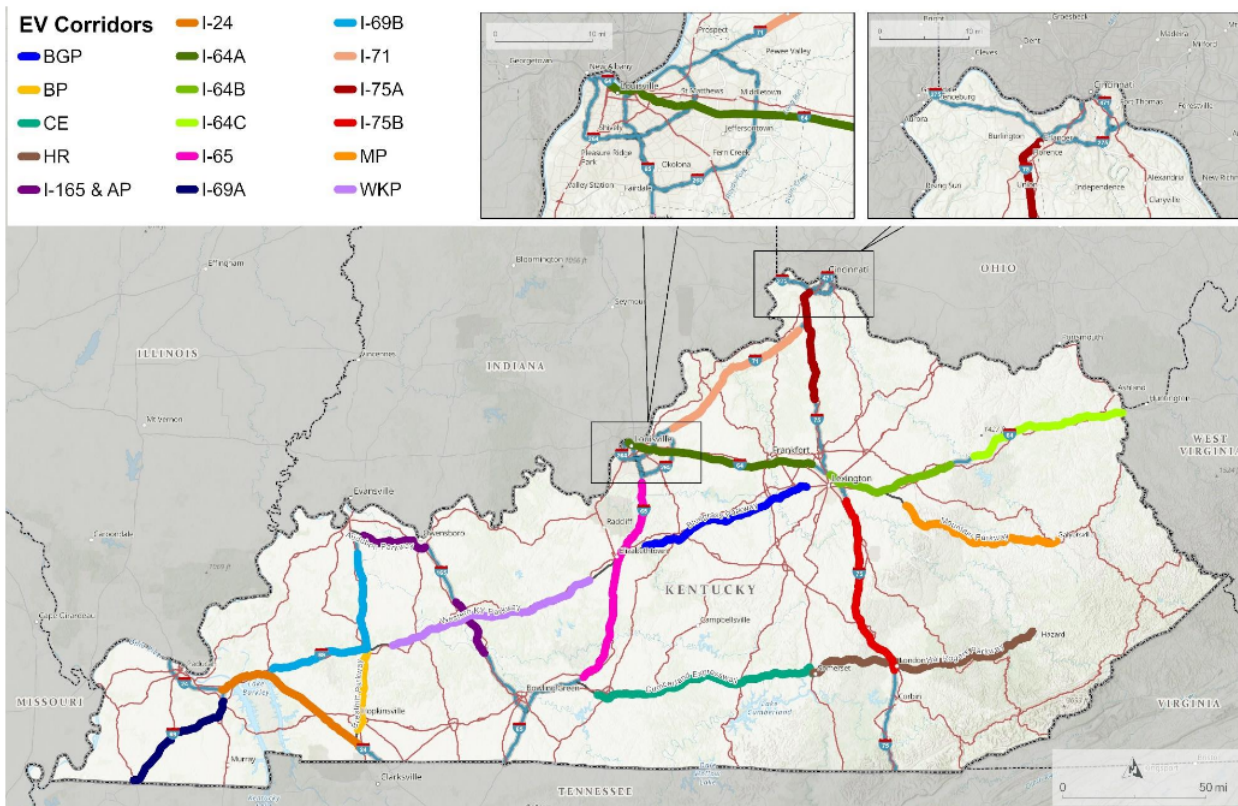
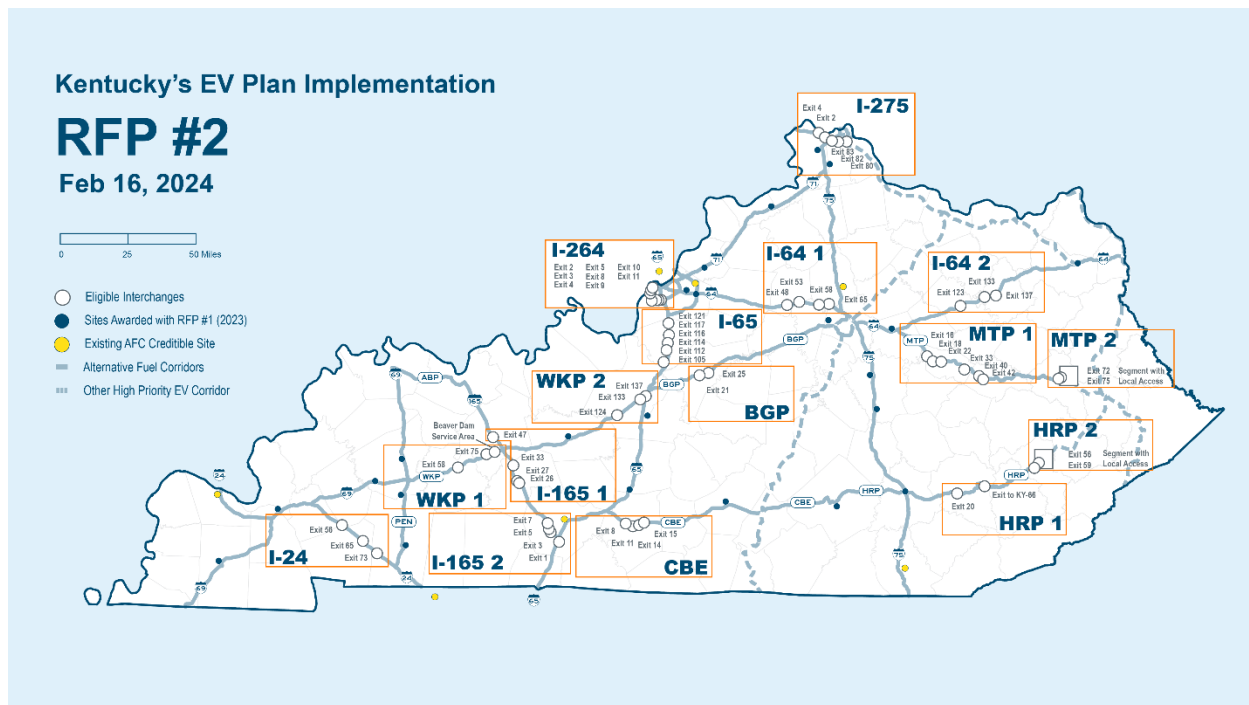


Figure 10: Map of RFP 2 Designated Zones



## Scoring Metrics

For each corridor group in RFP 1 and each designated zone in RFP 2, KYTC evaluated technical proposals, providing up to 1,600 points in RFP 1, or 1,800 points in RFP 2, and ranked cost proposals based on the lowest proposed subsidy amount, providing up to 600 points.

Each technical proposal was also awarded additional points according to the criteria listed in Table 9.

Table 9: Criteria for Additional Points for Technical Proposals

Criteria	Points Awarded
A site is located within a Justice40 area	60
Includes futureproofing concepts	60
Allows for a vehicle with a trailer to pull through	20
EVSE stations with an available charging rate of 300Kw or greater	60

In RFP 2, additional points were given if the site was located at an exit in a designated zone that optimized the build-out of the network (200 points). For RFP 1, this zone was referred to as a “corridor group” while RFP 2 updated the term to “designated zone”, a label that may also be used for future procurements. The use of traditionally disadvantaged business enterprises (DBE) is being encouraged through networking events and outreach efforts. Due to restrictions in federal law related to NEVI, points were not allowed to be awarded to DBE firms as part of the technical proposals.

The proposal with the lowest total subsidy requested in the cost proposal for each of the corridor groups or designated zones received the maximum points for that corridor group or designated zone. For each of the corridor groups or designated zones, the remaining proposals received points in proportion to the lowest subsidy requested.

For each proposal, the proposer's total score was calculated as the sum of the technical proposal and the cost proposal. The preferred proposer(s) was determined for each corridor group or designated zone. The proposer with the highest candidate site score within the specific corridor group or designated zone was selected as the preferred proposer for that corridor group or designated zone.

## **Plan for Compliance with Federal Requirements**

KYTC complies with Federal requirements, including 23 U.S.C., 23 CFR 680, and all applicable requirements under 2 CFR 200 by ensuring that federal requirements are integrated into procurement and inspection processes.

KYTC's NEVI RFP documents are specific in their technical requirements to ensure compliance with 23 U.S.C., 23 CFR 680, and all applicable requirements under 2 CFR 200. The RFP includes technical requirements, scope of work, and draft contractual terms for awardees so that they clearly understand KYTC's program expectations and requirements. Each application is reviewed by a team of technical experts for compliance with federal requirements. During the contracting process, submitted materials are monitored for compliance with federal regulations.

To ensure compliance with federal requirements throughout the development of each site, KYTC provides developers with a series of worksheets that lay out federal requirements and contractual obligations developers must meet. Once completed by the developers, the worksheets are reviewed by technical experts for compliance. KYTC offers office hours each week for developers to meet with the technical expert team and discuss any questions regarding the worksheets.

KYTC utilizes the following monetary compliance mechanisms to ensure developers satisfy all requirements from the initial project agreement to station operation:

- 20% withholding of capital expense reimbursements and periodic reimbursements to ensure compliance.
- Monetary penalties (liquidated damages) for uptime and reporting non-compliance against payments during the operational period

KYTC has also established an invoicing submission and review process to ensure developers meet cost eligibility, Davis-Bacon Act, labor payroll, and Build America, Buy America requirements, along with applicable federal requirements. While it is KYTC's approach to engage with developers to achieve positive outcomes and keep projects moving forward; KYTC also has the right to terminate its contracts with developers when there is non-compliance with developer obligations under the contracts, including failure to meet federal requirements.

KYTC prepared a project management plan (PMP) to describe and document the approach for the completion of EVSE stations awarded under the NEVI Formula Program. Created in collaboration with FHWA, the PMP identifies KYTC's management procedures and organizational structure to comply with Federal and State requirements and provides a guide for the interactions between contractors, agencies, and staff within Kentucky's EV Charging Program.

The PMP describes KYTC's approach to the following topics:

- Management organization and responsibilities
- Contract administration
- Financial/commercial management
- Document management
- Cost and schedule control
- Design change management
- Construction oversight



- Risk management
- Quality assurance and control
- Safety and security management
- Testing, acceptance, and start of operations
- Reporting during operations

## Phase 2 and Phase 3 Contracting Approach

The contracting approach for Phases 2 and 3 will significantly differ from Phase 1's AFC station procurement. KYTC is exploring alternative procurement methods for off-AFC stations such as:

- **Station Bundling** – Awarding a single contract for several charging stations. This may award a single developer with several charging stations based on a specific bundling criterion such as:
  - *Contract Zones*: A single contract may be awarded for multiple stations within a given geographic area referred to as a contract zone. This would require KYTC to divide the Commonwealth into zones.
  - *Location Types*: A developer may be awarded numerous charging stations that fall under a specific location type. For example, a developer may be awarded a contract for all stations at public parks or municipal buildings.
  - *Station Types*: A developer may be awarded a contract to develop all Level 2 stations of a certain size or all DCFC stations on other high-priority corridors.
- **Indefinite Delivery Indefinite Quantity (IDIQ) Contracts** – Awarding a contract to one or more qualified developers for an indefinite quantity of charging station development services for a fixed time. Once it is determined what, where, and when future charging stations are needed, KYTC may release task orders to the selected developers. This contracting method may be used in conjunction with the strategies listed above.

KYTC is currently evaluating these contracting methods to determine which would be the best for efficiency and effectiveness in implementing Phases 2 and 3.

# Civil Rights

No Changes.

# Existing and Future Conditions Analysis

The following section provides an update to charging stations developed along Kentucky’s AFCs, within one mile of an AFC exit.

## Alternative Fuel Corridor (AFC) Designations

No Changes.

## Existing Charging Stations

Table 10 identifies and provides details for existing locations of DCFC infrastructure along designated AFCs. Currently, the one station to count towards fully built-out determination is Kentucky’s first NEVI-funded station, which opened in August 2024. Updates to this table from the last plan update are indicated in orange text.

Table 10: Existing Charging Stations as of August 30, 2024

EV Charging Location Unique ID*	Route	Location (street address)	# of Charging Ports	EV Network (if known)	Meets all relevant requirements in 23 CFR 680?	Intent to count towards Fully Built Out determination ?
121785	I-75	112 Osborne Way, Georgetown	4	Electrify America	No	No**
121794	I-24	5130 Hinkleville Rd, Paducah	4	Electrify America	No	No**
121795	I-65	350 Corvette Dr., Bowling Green	4	Electrify America	No	No**
121797	I-75	589 KY-92, Williamsburg	4	Electrify America	No	No**
279347	I-265	4100 Towne Center Dr, Louisville	6	Electrify America	No	No**
215075 216580	Western KY Pkwy	675 Western Kentucky Pkwy, Beaver Dam	2	ChargePoint Network	No	No
205127	I-24	3300 Park Ave, Paducah	1	ChargePoint Network	No	No
260574	I-71	949 Burlington Pike, Florence	1	ChargePoint Network	No	No
4703257	I-75	1000 Amberley Way, Richmond	4	Circle K	Yes	Yes
312645	I-69	2007 US-45, Mayfield	1	ChargePoint	No	No
349544	I-69	921 Cs-1355-30, Madisonville	2	Matrix	No	No
314459	I-69	162 Hopkinsville Rd, Nortonville	8	Tesla	No	No
351269	I-65	625 Garvin Ln, Franklin	4	Red-E	No	No

EV Charging Location Unique ID*	Route	Location (street address)	# of Charging Ports	EV Network (if known)	Meets all relevant requirements in 23 CFR 680?	Intent to count towards Fully Built Out determination ?
578161	Cumberland Parkway	650 US-127 Russell Springs	4	Enel	No	No
311257	I-75	481 KY-92, Williamsburg	4	EVgo	No	No
329728 329730	I-75	1013 Buc-ee's Blvd, Richmond (North)	10	ChargePoint	No	No
259982	I-75	1013 Buc-ee's Blvd, Richmond (South)	12	Tesla	No	No
320208	I-75	110 Triport Rd, Georgetown	4	EVgo	No	No
47178 47179	I-71	Florence Discount Center Shopping Center, 8053 Burlington Pike, Florence	2	InCharge Vattenfall	No	No
308085	I-71	6149 Hopeful Church Rd, Florence	2	ChargePoint	No	No
189353	I-71	4990 Houston Rd, Florence	12	Tesla	No	No
194188	I-71	2100 Dixie Hwy, Fort Mitchell	2	ChargePoint	No	No
331357	I-275	3485 Valley Plaza Pkwy, Fort Wright	8	Tesla	No	No
335717	I-64	3060 Owingsville Rd, Mt Sterling	4	EVgo	No	No
102188	264	2120 Gardiner Ln, Louisville	8	Tesla	No	No
197420	265	9500 Preston Hwy, Louisville	12	Tesla	No	No
219757	I-64	5 Autocenter Dr, Louisville	2	ABB	No	No
279347	265	4100 Towne Center Dr, Louisville (1)	8	Tesla	No	No
331493	I-64	1670 Waddy Rd, Waddy	4	EVgo	No	No
49791	I-64	1220 Versailles Rd, Frankfort	2	Non-networked	No	No
164000	265	4100 Towne Center Dr, Louisville (2)	12	ChargePoint	No	No

\*Updates to this table from the last plan update are indicated in orange text.

\*\*These stations had been counted towards fully built-out determination in the previous plan update, before the FHWA's latest communications regarding the existing Electrify America sites.

# EV Charging Infrastructure Deployment

The following section provides an update on planned charging stations within one mile of Kentucky’s AFC exits, KYTC’s progress towards fully built-out certification, and KYTC plans once build-out certification is achieved.

## Planned Charging Stations

Since September 2023, KYTC has awarded 42 stations through two RFPs and three rounds of awards. With the opening of Kentucky’s first NEVI-funded station in August 2024, 41 NEVI-funded stations are in the planning phase. These stations have moved past the project agreement phase and are now in development. The following section provides further details for the remaining stations in development (Table 11 and Table 12).

Table 11: Stations Under Construction

State EV Charging Location Unique ID	Route	Location (Address)	# of Ports	Estimated Quarter/Year Operational	Estimated Cost	Funding Sources	New Location or Upgrade?
NA	NA	NA	NA	NA	NA	NA	NA
KYTC is not currently aware of any DCFC stations that are under construction along AFCs.							

Table 12: Planned Stations

State EV Charging Location Unique ID (KYTC ID)	Route	Location (Address)	# of Ports	Estimated Quarter/Year Operational	Estimated Cost	Funding Sources	New Location or Upgrade?
I64-015	I-64	1335 S Hurstbourne Pkwy Louisville, KY 40222	4	Q4 2025	\$431,592	NEVI FY22/FY23	New
I64-017	I-64	1804 Blankenbaker Pkwy Louisville, KY 40299	4	Q4 2025	\$508,896	NEVI FY22/FY23	New
I65-086	I-65	554 Glendale Hodgenville Rd W Glendale, KY 42740	6	Q4 2025	\$489,351	NEVI FY22/FY23	New
I71-017	I-71	4731 KY 146 Buckner, KY 40010	4	Q4 2025	\$418,586	NEVI FY22/FY23	New
I75-175	I-75/I-71	145 Richwood Rd Walton, KY 41094	6	Q4 2025	\$444,992	NEVI FY22/FY23	New
I75-181	I-75/I-71	7777 Burlington Pk Florence, KY 41042	6	Q4 2025	\$494,589	NEVI FY22/FY23	New
I75-076	I-75	707 Chestnut St Berea, KY 40403	4	Q1 2025	\$537,492	NEVI FY22/FY23	New
HRP-00A	Hal Rogers Parkway	370 US 27 Somerset, KY 42501	4	Q4 2024	\$852,793	NEVI FY22/FY23	New
I69-022	I-69	1505 W Broadway Mayfield, KY 42066	4	Q4 2024	\$875,282	NEVI FY22/FY23	New

State EV Charging Location Unique ID (KYTC ID)	Route	Location (Address)	# of Ports	Estimated Quarter/Year Operational	Estimated Cost	Funding Sources	New Location or Upgrade?
I69-092	I-69	5715 Charleston Rd Dawson Springs, KY 42408	4	Q4 2024	\$858,799	NEVI FY22/FY23	New
I69-114	I-69	800 E Center St Madisonville, KY 42431	4	Q4 2024	\$863,471	NEVI FY22/FY23	New
PEN-007	Edward T. Breathitt Pennyrile Parkway	110 Clinic Dr Hopkinsville, KY 42240	4	Q4 2024	\$855,276	NEVI FY22/FY23	New
PEN-033	Edward T. Breathitt Pennyrile Parkway	162 Hopkinsville Rd Nortonville, KY 42442	4	Q4 2024	\$897,498	NEVI FY22/FY23	New
CBE-049	Louie B. Nunn Cumberland Expressway	705 Jamestown St Columbia, KY 42728	4	Q1 2025	\$605,009	NEVI FY22/FY23	New
I75-041	I-75	105 Melcon Ln London, KY 40741	4	Q4 2024	\$605,009	NEVI FY22/FY23	New
WKP-107	Wendell H. Ford Western Kentucky Parkway	769 White St Leitchfield, KY 42754	4	Q4 2024	\$605,009	NEVI FY22/FY23	New
I24-027	I-24	2966 US 62 Calvert City, KY 42029	4	Q1 2025	\$650,000	NEVI FY22/FY23	New
I64-172	I-64	750 Carol Malone Blvd Grayson, KY 41143	4	Q1 2025	\$650,000	NEVI FY22/FY23	New
I65-058	I-65	4000 L and N Turnpike Rd Horse Cave, KY 42749	4	Q1 2025	\$725,000	NEVI FY22/FY23	New
I71-055	I-71	499 Loves Dr Sparta, KY 41086	4	Q1 2025	\$625,000	NEVI FY22/FY23	New
BGP-072	Martha Layne Collins Bluegrass Parkway	3590 Lexington Rd Versailles, KY 40383	4	Q4 2024	\$633,534	NEVI FY22/FY23	New
I64-096	I-64	201 N Main St Winchester, KY 40391	4	Q4 2024	\$629,784	NEVI FY22/FY23	New
I65-011	US 60 (Audubon Pkwy/I-165 AFC)	3220 W Parrish Ave Owensboro, KY 42301	4	Q1 2025	\$630,989	NEVI FY22/FY23	New
I65-005	I-165	4455 Russellville Rd Bowling Green, KY 42101	4	Q4 2025	\$582,180	NEVI FY22/FY23	New
CBE-011	Louie B. Nunn Cumberland Expressway	557 SL Rogers Blvd Glasgow, KY 42141	4	Q4 2025	\$706,435	NEVI FY22/FY23	New
I64-133	I-64	3333 KY 801 Morehead, KY 40351	4	Q4 2025	\$728,371	NEVI FY22/FY23	New

State EV Charging Location Unique ID (KYTC ID)	Route	Location (Address)	# of Ports	Estimated Quarter/Year Operational	Estimated Cost	Funding Sources	New Location or Upgrade?
<b>MTP-042</b>	Bert T. Combs Mountain Parkway	182 Quillen Chapel Service Rd Campton, KY 41301	4	Q4 2025	\$877,249	NEVI FY22/FY23	New
<b>MTP-0LA</b>	Bert T. Combs Mountain Parkway	342 Mountain Parkway Salyersville, KY 44165	4	Q4 2025	\$908,766	NEVI FY22/FY23	New
<b>WKP-058</b>	Wendell H. Ford Western Kentucky Parkway	645 S 2nd St Central City, KY 42330	4	Q4 2025	\$830,184	NEVI FY22/FY23	New
<b>HRP-059</b>	Hal Rogers Parkway	1079 Morton Blvd Hazard, KY 41701	4	Q2 2025	\$583,781	NEVI FY22/FY23/ FY24	New
<b>I65-116</b>	I-65	1090 Cedar Grove Rd Shepherdsville, KY 40165	4	Q1 2026	\$650,000	NEVI FY24	New
<b>WKP-133</b>	Wendell H. Ford Western Kentucky Parkway	601 Ring Rd Elizabethtown, KY 42701	4	Q1 2026	\$650,000	NEVI FY24	New
<b>I65-121</b>	I-65	2050 E Blue Lick Rd Shepherdsville, KY 40165	4	Q1 2025	\$400,000	NEVI FY24	New
<b>I64-065</b>	I-64	300 Lacefield St Midway, KY 40327	4	Q1 2025	\$613,859	NEVI FY24	New
<b>I64-137</b>	I-64	1690 Flemingsburg Rd Morehead, KY 40351	4	Q1 2025	\$615,626	NEVI FY24	New
<b>165-026</b>	I-165	2329 S Main St Morgantown, KY 42261	4	Q4 2024	\$815,412	NEVI FY24	New
<b>275-083</b>	I-275	2791 Town Center Blvd Crestview Hills, KY 41017	8*	Q1 2026	\$384,782	NEVI FY24	New
<b>I64-053</b>	I-64	1302 US 127 Frankfort, KY 40601	12*	Q4 2024	\$384,782	NEVI FY24	New
<b>264-009</b>	I-264	3901 Taylor Blvd Louisville, KY 40215	4	Q4 2025	\$681,940	NEVI FY24	New
<b>BGP-021</b>	Martha Layne Collins Bluegrass Parkway	1714 New Haven Rd Bardstown, KY 40004	4	Q4 2025	\$676,800	NEVI FY24	New
<b>I24-065</b>	I-24	153 Broadbent Blvd Cadiz, KY 42211	4	Q4 2025	\$702,040	NEVI FY24	New

\* This site will have 4 NEVI-compliant ports. This number represents the total number of both NEVI and non-NEVI-compliant ports.

## Planning Towards a Fully Built Out Determination

KYTC has developed an implementation plan to move quickly toward fully built-out status for its AFC network. The first two RFPs were major steps toward that goal, awarding the majority of stations necessary to develop a fully built-out charging network. Since the 2023 Plan Update, 42 stations have been selected, providing coverage along all of Kentucky's AFCs. KYTC and private developers are working together to efficiently move projects to construction and into operations. Kentucky's first operational station opened in August 2024, marking the first of many station openings. All RFP 1 and RFP 2 awarded charging stations are anticipated to be fully operational in 2026 unless supply chain issues delay construction completion.

### Corridor Status

KYTC is steadily moving towards build-out certification across its AFC network which includes 11 interstates and eight parkways in Kentucky. The following section provides a build-out update for each AFC. The status of each AFC is further illustrated in a series of maps in Appendix C: Build-out Maps.

#### Interstate 24 (I-24)

Interstate 24 (I-24) is located on the western edge of the state and connects Illinois and Tennessee (Figure C 2). Key destinations served by this corridor include Paducah, Eddyville, Fort Campbell, and the Land Between the Lakes Recreation Area. I-24 also connects with the I-69 AFC.

A station was awarded in RFP 1 on the segment shared with I-69 at Exit 27 (I24-027) in Calvert City. A second station was awarded in RFP 2 at Exit 65 in Cadiz. Two additional stations are needed to achieve build-out. The distance between the awarded stations is 38 miles. The gap on the west end of the AFC is 26 miles and the gap on the east end is 28 miles.

- Corridor Length: 92 miles (including alignment shared with I-69)
- Stations in Development: two (including one on alignment shared with I-69)
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: two
- Buildout Strategy: RFP 3 will solicit proposals for the stations needed to achieve build-out. The station in the west will be located within 25 miles of the Illinois border, while the station in the east will be located within 25 miles of the Tennessee border.

#### Interstate 64

Interstate 64 (I-64) runs through the central part of Kentucky, connecting Indiana and West Virginia (Figure C 3). I-64 serves two of Kentucky's largest cities, Lexington and Louisville, as well as the state capital, Frankfort. This AFC also runs through Eastern Kentucky, passing through Winchester and Mt. Sterling on the way to the Kentucky-West Virginia border near Ashland. The I-64 AFC will provide key connections to numerous AFCs as shown on the I-64 map.

- Corridor Length: 190 miles (including alignment shared with I-75)
- Stations in Development: eight
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0, with the completion of the stations in development, I-64 will be built out with redundancy in Louisville, Frankfort, and Morehead.



### Interstate 65

Interstate 65 (I-65) is located in the central part of the state, connecting Indiana and Tennessee (Figure C 4). I-65 is a highly trafficked north-south corridor, serving Louisville, Bowling Green, and Elizabethtown as well as numerous vehicle manufacturers located along this busy corridor. The I-65 AFC will provide key connections to numerous other AFCs as shown on the I-65 map.

- Corridor Length: 137 miles
- Stations in Development: four
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: one
- **Buildout Strategy:** RFP 3 will solicit proposals for the gap of 71 miles between the stations awarded in Horse Cave, Kentucky and White House, Tennessee.

### Interstate 69

Interstate 69 (I-69) is being constructed along new alignments and portions of Kentucky's parkway system between Indiana and Tennessee in the western part of Kentucky (Figure C 5). I-69 is a new corridor that will connect Texas with Michigan. Destinations along I-69 include Dawson Springs, Henderson, and the Land Between the Lakes National Recreation Area. The I-69 AFC connects to several other AFCs as shown on the I-69 map. Once a new alignment, new exit ramps, and bridge over the Ohio River are complete in 2031 with the completion of the I-69 Ohio River Crossing project, the Kentucky I-69 AFC will be extended across the Kentucky-Indiana state border and will connect to Indiana's I-69 AFC. At present, the AFC ends south of the Ohio River, near Henderson, KY. Due to this ongoing construction, KYTC is requesting a discretionary exception (see Exception Request: Interstate 69) for the NEVI 50-mile spacing requirement because the end of the AFC is currently over 25 miles from the NEVI-awarded station in Madisonville, KY.

- Corridor Length: 148 miles (including alignment shared with I-24)
- Stations in Development: four (including one on alignment shared with I-24)
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0 (if exception is granted)
- **Buildout Strategy:** If KYTC's requested exception is granted, the AFC will be built out upon completion of the 4 NEVI stations in development.

### Interstate 71

Interstate 71 (I-71) is located in the northern part of the state between two of Kentucky's most populous areas, Louisville, Kentucky, and Cincinnati, Ohio (Figure C 6). The I-71 AFC will provide key connections for EV travelers to other AFCs as shown on the I-71 map.

- Corridor Length: 96 miles (including alignment shared with I-75)
- Stations in Development: four
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0

## Interstate 75

Interstate 75 (I-75) is located in the central part of Kentucky and serves as a north-south corridor running between Ohio and Tennessee (Figure C 7). This corridor connects two populous areas (Cincinnati and Lexington) and as a result, is a highly trafficked corridor in Kentucky. The I-75 AFC spans numerous regions including the Cumberland Plateau, Bluegrass Region, and urban areas of Lexington and Northern Kentucky adjacent to Cincinnati. This corridor will provide key connections to other AFCs as shown on the I-75 map.

- Corridor Length: 192 miles (including alignment shared with I-71)
- Stations in Development: four (including 2 on alignment shared with I-71)
- Stations Operational: one
- Additional Stations Needed to Achieve Build-out: two (minimum)
- **Buildout Strategy:** KYTC will procure two stations, at a minimum, in RFP 3 to address the existing gaps along I-75. At least one station will be located north of Lexington while another will be located near I-75's southern terminus.

## The Audubon Parkway and I-165

The Audubon Parkway and I-165 (ABP+I-165) are two freeways in western Kentucky that are connected in Owensboro, where one of Kentucky's NEVI stations is in development (Figure C 8). The ABP+I-165 AFC will support EV travel from Evansville to Bowling Green and will connect to other AFCs including I-69, WKP+BGE, and I-65. Key destinations along ABP+I-165 include Bowling Green, Owensboro, and Henderson.

- Corridor Length: 101 miles
- Stations in Development: three
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0

## Louie B. Nunn Cumberland Expressway and Hal Rogers Parkway

Louie B. Nunn Cumberland Expressway and Hal Rogers Parkway (CBE+HRP) are two parkways that run east-west in southern Kentucky (Figure C 9). The two parkways connect in Somerset, where one of the five NEVI stations along this AFC is being developed. This AFC will provide charging options, supporting EV travel between Bowling Green and Hazard. The CBE+HRP AFC connects with other AFCs including I-65 and I-75 and with future Other High Priority EV Corridors. Key destinations served by CBE+HRP include London, the Mammoth Cave National Park, and the Daniel Boone National Forest.

- Corridor Length: 181 miles
- Stations in Development: five (including one station on I-75)
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: one
- **Buildout Strategy:** With RFP 3, KYTC will attempt to procure one additional station east of London to fill the one remaining gap and achieve buildout.

## Wendell H. Ford Western Kentucky Parkway and Martha Layne Collins Blue Grass Parkway

Wendell H. Ford Western Kentucky Parkway and Martha Layne Collins Blue Grass Parkway (WKP+BGE) are two parkways running east-west through central Kentucky (Figure C 10). The parkways are linked by a two-mile segment of I-65, but they function together as a common corridor. Key destinations along the WKP+BGE AFC include the Lexington metropolitan area, Leitchfield, and Elizabethtown.

- Corridor Length: 182 miles (including two miles along I-65)
- Stations in Development: five
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0

### Bert T. Combs Mountain Parkway

Bert T. Combs Mountain Parkway (MTP), commonly known as the Mountain Parkway, is a parkway in eastern Kentucky that connects Winchester and Salyersville (Figure C 11). The MTP supports travel to popular Kentucky recreation destinations in the Red River Gorge area. The MTP AFC will serve as a key corridor, providing greater charging access in Eastern Kentucky and a future connection to other high priority EV corridors on US-23. The MTP Expansion project is currently underway, extending MTP to US 23 to improve transportation connectivity in Eastern Kentucky. Upon completion of the expansion project, KYTC will extend the MTP AFC to its new terminus.

- Corridor Length: 76 miles (including one mile of I-64)
- Stations in Development: three (including one on alignment shared with I-64)
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0

### Pennyrile Parkway

Pennyrile Parkway (PEN) runs through Western Kentucky, connecting I-24 north of Tennessee with I-69 to Indiana at the Western Kentucky Parkway (Figure C 12). This AFC connects to the I-24, I-69, and WKP+BGP AFCs and serves as a north-south connection between I-24 and I-69.

- Corridor Length: 33 miles
- Stations in Development: two
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0

### Interstate 264

Interstate 264 (I-264) is the interior beltway serving Louisville (Figure C 13). This AFC provides key connections to the I-65, I-64, and I-71 AFCs and serves a high-traffic corridor around Kentucky's largest metropolitan area.

- Corridor Length: 23 miles
- Stations in Development: one
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0

### Interstate 265

Interstate 265 (I-265) is an exterior beltway serving the Louisville metropolitan area (Figure C 14). I-265 connects Indiana to Kentucky via the Lewis and Clark Bridge and provides key connections to the I-71, I-64, and I-65 AFCs in Kentucky.

- Corridor Length: 28 miles
- Stations in Development: 0
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: one
- **Buildout Strategy:** KYTC will procure a single station between Indiana and I-65 in RFP 3 to reach build-out on I-265.

### Interstate 275

Interstate 275 (I-275) is a beltway around the Cincinnati metropolitan area that serves Kentucky, Ohio, and Indiana (Figure C 15). Destinations along I-275 include the Cincinnati/Northern Kentucky International Airport, City of Covington, and the Ohio River crossing in Fort Thomas, KY.

- Corridor Length: 24 miles
- Stations in Development: one
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0

### Interstate 471

Interstate 471 (I-471) connects I-71 in Cincinnati, Ohio with I-275 in Highland Heights, Kentucky, crossing the Ohio River (Figure C 16).

- Corridor Length: 4.9 miles
- Stations in Development: 0
- Stations Operational: 0
- Additional Stations Needed to Achieve Build-out: 0. This AFC meets the requirements for build-out following the logical direction of travel requirement. This requirement states that any point along the corridor is connected via an AFC to a station in each logical direction so that the gap is no more than 50 miles. There is an awarded, in development NEVI station less than 25 miles from I-471’s terminus, at Exit 83 in Crestview Hills on the connected I-275 AFC. As a result, I-471 is covered by its connection to I-275 and proximity to the Exit 83 station.

### Remaining Stations Needed for Full Buildout

KYTC anticipates that an estimated 10 additional stations will be needed to achieve full build-out. With the approval of this plan, Kentucky will have approximately \$27.5 million of Federal NEVI funding available. For the first 42 station awards, the average Federal funding was about \$650,000 per station. Assuming a conservative 20% increase in the cost per station, KYTC expects that each remaining station could amount to \$780,000 for an estimated total of \$7.8 million to construct the estimated 10 stations. Based on future guidance received from the FHWA and Joint Office, KYTC may use these funds for post-build-out charging station deployments.

However, KYTC has planned to set aside an additional \$2.2 million, for about \$10 million total to address any contingencies and support the build-out of the AFC network. According to the above estimates, KYTC may have a potential \$17.5 million in unallocated funds in FY 2025. When FY 2026 funds are added, this amount could increase to approximately \$32.3 million. Depending on future FHWA guidance, KYTC could make these funds available to support the implementation of Phases 2 and 3 and meet any additional charging needs that will be determined in the future (Table 13).

Table 13: Kentucky NEVI Funding Sources and Uses

NEVI Funding Year	Funding (millions)	Program Phases	Expenditures (millions)	FY Funding Used
FY 2022 – 2024	\$39.9	Phase 1 - RFP 1 & 2	\$27.2	FY 22-24
FY 2025	\$14.8	Phase 1 - RFP 3	\$10.0*	FY 24 only
FY 2026	\$14.8	Phases 2 and 3 and other to be determined charging needs	\$32.3*	FY 24 - 26
<b>Total Federal Funding</b>	<b>\$69.5</b>	<b>Total Expenditures</b>	<b>\$69.5</b>	

\*Potential estimated expenditures based on current average costs and contingency allowances

KYTC is in the process of planning an additional RFP (RFP 3) for the Fall of 2024 to procure the remaining estimated 10 charging stations. The exact location of these stations will be dependent on the proposals received and how the proposed sites relate to each other. The Contracting chapter provides further details of the plans for the additional RFP. Once proposals are selected and awarded sites are confirmed, KYTC will have awarded all charging stations required to reach full build-out status across Kentucky’s AFCs, assuming the proposed [discretionary exception](#) provided in this update is approved. KYTC’s RFP 3 awards will occur before the end of 2024.

Based on current project schedules, and considering supply chain challenges that may cause delays, KYTC anticipates that the remaining estimated 10 stations needed for full build-out may not be operational before the end of 2026 (Table 14). According to current FHWA build-out guidance, states can only reach their fully built-out status determination once all necessary charging stations along all AFCs are operational. Based on this policy, KYTC is expected to reach its fully built-out status by the end of 2026.

Table 14: Stations Needed and Completion Date for Build-Out

How many stations are still needed to achieve Fully Built Out status?	About 51 (41 in planning and an estimated 10 procured through RFP 3)
Provide the estimated month/year to achieve Fully Built Out status:	Dec. 2026

## Future Planning

As outlined above, unless the federal guidance is modified, KYTC may be required to wait until the end of 2026 to begin procurement for non-AFC charging stations (Phases 2 and 3 as well as additional charging needs to be determined). This requirement would prevent the deployment of charging stations on other high-priority corridors and within communities, for two years after KYTC has awarded all the required stations on the AFC network. Future post-buildout charging station deployment spending is expected to be \$32.3 million, nearly half of Kentucky’s dedicated NEVI funding. Delaying Phases 2 and 3 and the deployment of nearly 50% of NEVI funds until the beginning of 2027 would lead to:

- **Equity Issues** - Prevent KYTC from addressing important equity issues related to the need for Level 2 and DCFC charging in DACs across the state. Phases 2 and 3 would focus on DACs and more remote rural communities, including charging for low-income multi-family housing, employment sites, and public agencies.
- **Public Support Issues** - Create the potential for negative program feedback. Stakeholders in communities located off the AFCs continue to ask for Phases 2 and 3 to move forward. The funding is secured, but KYTC would have to tell communities that are not located along Interstates and Parkways that they need to wait even though KYTC has the funding available.
- **Statewide Access Issues** - Leave remote portions of the state off the AFCs with no EV charging stations at all. It will be nearly impossible for residents in these areas to use EVs or for visitors driving EVs to access these areas.
- **Economic Development and Visitor Impacts** - There are currently very few charging stations at workplaces and shopping areas across Kentucky, many of which are located off AFCs. Furthermore, there are few charging stations at major tourism and community destinations. This lack of charging will hold Kentucky’s economic growth back.
- **Public Facility Access** - Few public institutions in disadvantaged and rural communities have public charging infrastructure. This includes city and county buildings, libraries, parks, and

recreational facilities. This presents an equitable access issue for residents and visitors to those areas.

- **Cost Increases and Lost Program Momentum** - Waiting two years will increase costs due to inflation and reduce what Kentucky can accomplish with its available funding. It will also negatively impact program momentum. For example, KYTC might need to suspend the quarterly stakeholder and quarterly DAC stakeholder meetings until new program elements begin advancing again.

If KYTC were permitted to proceed with Phases 2 and 3 once all stations necessary to achieve fully built-out status were under contract rather than operational, KYTC could select and award additional charging stations in the first half of 2025. This alternative policy would bring charging station access to communities and other priority corridors that serve rural and underserved areas sooner. KYTC has initiated planning for Phases 2 and 3 and is prepared to move toward procurement once it receives approval from the FHWA. The benefits of this approach include:

- **Advancing Equity** – KYTC would be able to deploy Level 2 and DCFC charging in DACs in 2025. Phases 2 and 3 will focus on DACs and charging for multi-family housing, employment, and in more remote rural communities.
- **Generating Positive Public Opinion** – Near-term implementation of Level 2 charging in communities across the state provides a quick-win opportunity for the program. Communities would see and experience the benefits of the program.
- **Statewide Access for All** – To provide access for everyone, residents and visitors traveling in all parts of the state, Kentucky must install chargers off of the AFC network. Phases 2 and 3 will provide charging stations for underserved individuals and will extend the network to remote communities.
- **Promoting Economic Development** – Phases 2 and 3 will provide charging stations at workplaces and shopping areas across Kentucky. They will also serve major tourism and community destinations promoting growth and good paying jobs.
- **Charging at Public Facilities** – To make EVs work for Kentuckians, it is necessary to have stations at public locations in disadvantaged and rural communities. This would include public housing, city and county buildings, libraries, and parks.
- **Strategic Opportunity** – By moving forward with Phases 2 and 3 in the first quarter of 2025 (after all AFC stations have been awarded), Kentucky will be able to begin soliciting and deploying up to hundreds of Level 2 and DCFC stations across the state. These Level 2 stations could be procured and installed in 2025 using the funding available. This could be followed up with several hundred more stations in 2026 and beyond. Considering contingencies for completing the AFCs, \$32.3 million in funding would remain for Phases 2 and 3. \$22.3 million is estimated to be able to fund approximately 446 Level 2 stations and \$10 million could fund approximately 40 small DCFC stations.

## EV Charging Infrastructure Deployment After Build-Out

Once FHWA grants the necessary approval to move to post build-out planning, KYTC intends to implement EV Program Phase 2 (Other Priority Corridors) and Phase 3 (Community Charging) concurrently and address any future charging needs that have yet to be determined. This is essential to meet the charging needs of Kentucky's residents and visitors as portions of the state will still be difficult to travel to/from in an EV even after the AFC network is fully built out.

### Phase 2: Other Priority Corridors

Phase 2 will focus on providing more extensive charging access along non-AFC, priority corridors, especially those without nearby access to an interstate or parkway. These corridors are referred to as

other priority corridors and represent roadways that KYTC will site charging stations along after AFC build-out is achieved. Phase 2 will be guided by two key priorities:

1. **Service Demand:** Other priority corridors will provide charging along roadways that are expected to have a high demand. These corridors include Kentucky's highly trafficked, non-AFC roadways and roadways that experience high volumes of long-distance travel.
2. **Service Coverage:** Other priority corridors will provide 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.

KYTC is expanding upon its existing other priority corridors to further meet charging demand and expand charging coverage across the Commonwealth. As part of the ongoing planning for Phase 2, KYTC will take the next steps to add further corridors into Kentucky's existing other priority corridors through a network-wide analysis.

### Phase 3: Community Charging

Phase 3 will run in parallel to Phase 2 and focus on providing community and destination charging. Phase 3 charging stations may be in various locations including public roads, schools, parks, and in publicly accessible parking facilities. Community charging stations will fill charging gaps within Kentucky and meet Justice40 requirements, with special consideration on improving charging access within rural and disadvantaged communities.

The planning approach for Phase 3 stations will be two-pronged, guided by further public engagement and a location prioritization analysis. Since Phase 3 is focused on providing access to community charging, KYTC's community outreach will continue to gather feedback on charging station priorities. Since the last plan update submission, KYTC has gathered feedback from stakeholders on community charging priorities through virtual meetings and a questionnaire. As referenced in the [Public Engagement](#) and [Equity Considerations](#) chapters, KYTC will continue community outreach both in-person and virtually to gather feedback on community and destination charging.

In July 2024, as discussed in the Equity Considerations chapter, KYTC established the EV Disadvantaged Communities Working Group to discuss the charging needs of Kentucky's DACs. These meetings will continue, with DAC charging priorities as a key topic for discussion. KYTC will then translate community feedback into site considerations that will be used in a location prioritization analysis for Phase 3 site selection.

### Implementation of Phases 2 and 3

KYTC has developed a comprehensive low-risk approach that could achieve build-out of the AFC network and initiate the post-build-out Phases 2 and 3. The currently available funding presented in Table 13 shows that Kentucky has already secured sufficient funds to build out the AFC network, using only NEVI funds available through FY 2024. This includes a conservative contingency amount in the RFP 3 allocation. There will still be \$2.7 million in FY 2024 funds and the newly assigned \$14.8 million for FY 2025 that could be used for future charging needs.

It is estimated that the FY 2024 to FY 2026 funds that would not be needed for the AFC network would be approximately \$32.3 million and this funding could support hundreds of Level 2 and/or DCFC stations for other corridors and communities across Kentucky.

This Phase 2 and 3 implementation could begin as soon as the first half of 2025 if FHWA would allow the state to proceed based on signed contracts for stations to build out the AFCs instead of waiting until the end of 2026 when all stations are projected to be operational. This would require a change to the current guidance.

Moving forward would also depend on Kentucky securing the remaining stations that are needed with RFP 3 and FHWA granting the one exception request in this plan. Advancing the program expeditiously could lead to Level 2 charging stations across the Commonwealth before the end of 2025.

As discussed previously, the contracting approach for these other phases would be procured differently from the AFC stations. KYTC is exploring options such as station bundling, contracts covering specific areas or types of facilities, or indefinite delivery indefinite quantity (IDIQ) type contracts. KYTC is working through the best approach for efficiency and effectiveness.

## Electric Vehicles in Kentucky

### Registered Battery Electric Vehicles

There were approximately 12,490 BEVs registered in Kentucky as of August 5, 2024. From 2017 to 2024, BEV registrations have increased by nearly 12,000. BEVs currently represent 0.33% of the approximately 3.7 million registered passenger cars and trucks in the state. As observed in the 2022 Plan, the majority of BEVs registered in Kentucky are from major urban areas or neighboring counties, with few vehicles present in the more rural areas. While BEVs represent a fraction of vehicle registrations in Kentucky, BEV adoption is gradually increasing.

The registration counts (Table 15) for 2017-2023 represent the full calendar year and were sourced from KYTC’s former vehicle information system (AVIS).

Table 15: End-of-Year Registered Battery Electric Vehicles and Passenger Cars and Trucks in KY

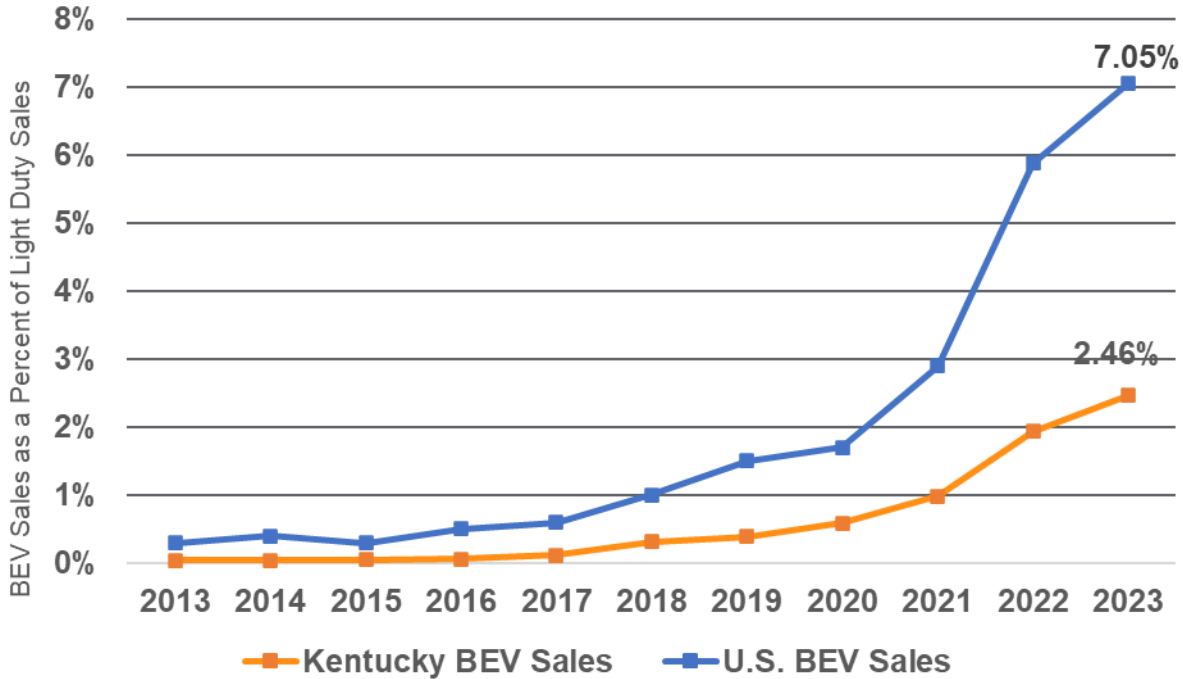
Year	Registered BEVs	Percent Growth	Registered Passenger Cars and Trucks
2017	563	-	3,555,751
2018	898	60%	3,430,765
2019	1,497	67%	3,438,399
2020	2,273	52%	3,499,733
2021	3,621	59%	3,580,111
2022	5,876	62%	3,625,953
2023	9,340	59%	3,608,463



## Battery Electric Vehicle Sales

By the end of 2023, 2.46% of all light-duty vehicle sales in Kentucky were BEVs. In comparison, U.S. sales showed approximately 7% of vehicle sales as BEVs. As shown in Figure 11, BEV sales percentages have increased significantly in Kentucky and nationally since 2020.

Figure 11: BEV Sales in the U.S. and Kentucky



# Implementation

KYTC is implementing the state’s EV Program in accordance with the latest guidance from FHWA and the Joint Office. This includes the guidance published on June 11, 2024, and the National Electric Vehicle Infrastructure Standards and Requirements published on February 28, 2023. It also includes other supporting documentation such as the NEVI Formula Program Questions and Answers Page on the FHWA website.

## Strategies for EVSE Operations and Maintenance

In accordance with the latest Federal guidance, Kentucky allows private developers to use battery systems to supplement the 600kW minimum grid connection. This approach is only allowed to be used in locations where the EV charging demand is projected to be low enough that the battery storage capacity and design would “provide a high probability that the EV charging station will not fail to meet the required power level for any customer.”

## Strategies For EVSE Data Collection and Sharing

KYTC is working closely with the Joint Office on implementing the Electric Vehicle Charging Analytics and Reporting Tool (EV-ChART) system. The state’s RFP requires developers to provide the EV-ChART data as well as several supplemental data fields that will allow Kentucky to properly check the data before approved. KYTC has also worked with one of our developers to implement a successful application programming interface (API) with public-facing data.

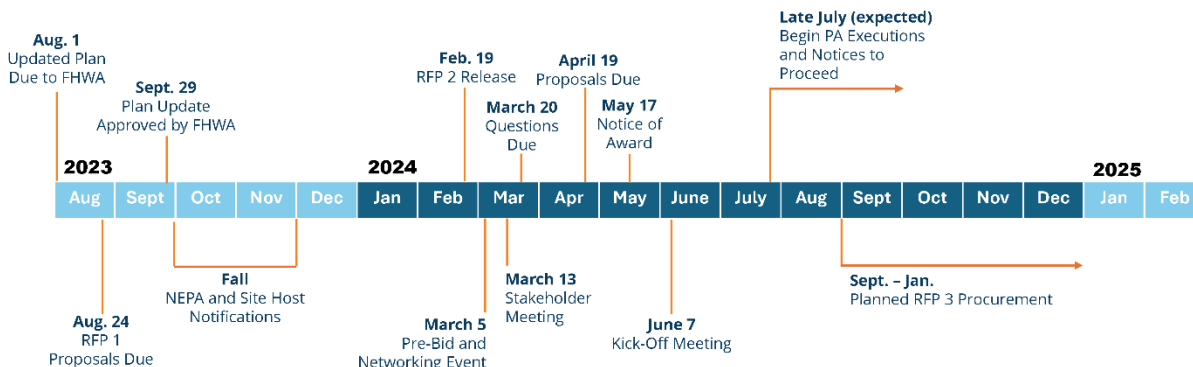
## Potential Site and Layout Considerations

KYTC is working closely with developers to implement future proofing and proposed site elements that will benefit customers, such as canopies. Each developer is responsible for their site layouts, and KYTC is coordinating with each. KYTC has developed signage guidelines based on the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD) 11th Edition as well as the U.S. Access Board’s Design Recommendations for Accessible Electric Vehicle Charging Stations.

## Plan for Implementation and Deployment

KYTC has developed a comprehensive implementation plan. Two RFPs have been issued, and an RFP 3 will be issued in the fall of 2024. These three RFPs are expected to result in build-out of the AFC system. Figure 12 shows program implementation from August 2023 to February 2025.

Figure 12: Program Implementation



## Equity Considerations

The Interim Implementation Guidance for the Justice40 Initiative (released July 2021) and the NEVI Formula Program Guidance (released in February 2022 and June 2023) identify clean transportation as a Justice40-covered program. As specified by the updated FHWA guidance, KYTC used the Climate and Economic Justice Screening Tool (CEJST) to identify disadvantaged communities within the state that meet the eight categories of burden:

- Climate change
- Energy
- Health
- Housing
- Legacy pollution
- Transportation
- Water and wastewater
- Workforce development

A community is considered disadvantaged in the CEJST if it is in a census tract that is:

1. At or above the threshold for one or more environmental, climate, or other burdens, and
2. At or above the threshold for an associated economic burden.

Additionally, if a census tract is completely surrounded by disadvantaged communities and is at or above the 50th percentile for low-income, it is also considered disadvantaged.<sup>1</sup>

Figure 13 provides a heat map showing the population in disadvantaged communities by county Figure 14 shows the station locations and the CEJST disadvantaged census tracts. Based on the CEJST criteria, nearly half of the sites for Kentucky's 42 charging stations approved in Kentucky (48%) are in disadvantaged communities. Most sites (90%) are within three miles of a disadvantaged community.

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<sup>1</sup> [Methodology & data - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#)

Figure 13: Kentucky's Disadvantaged Populations by County

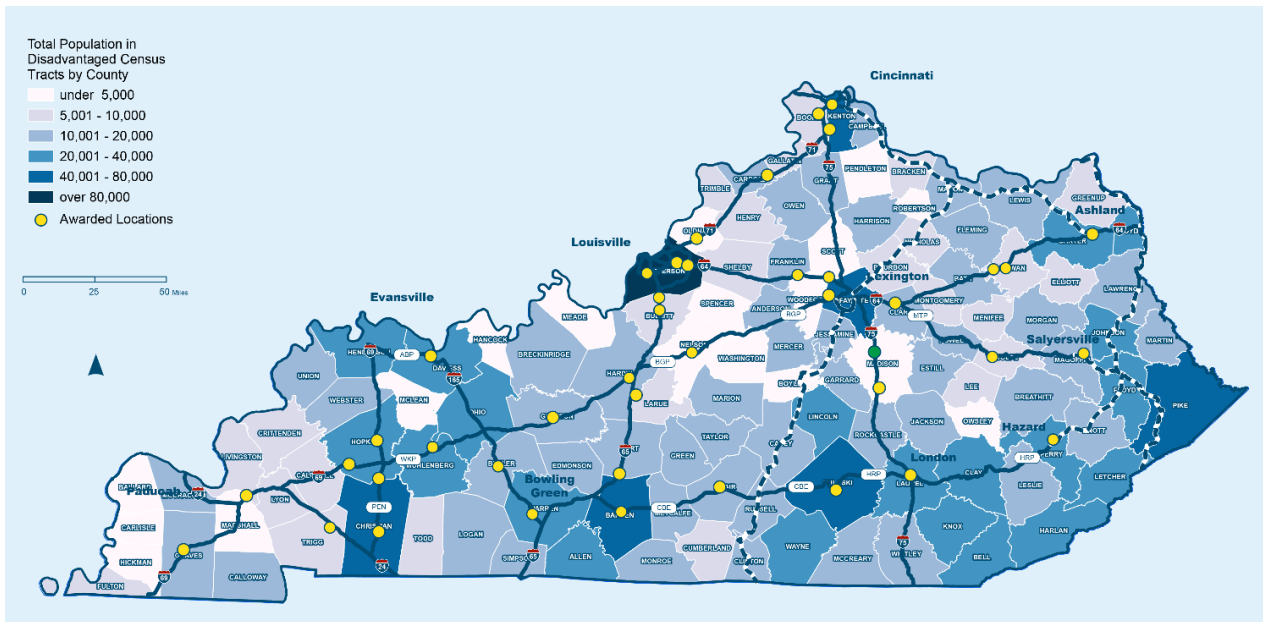
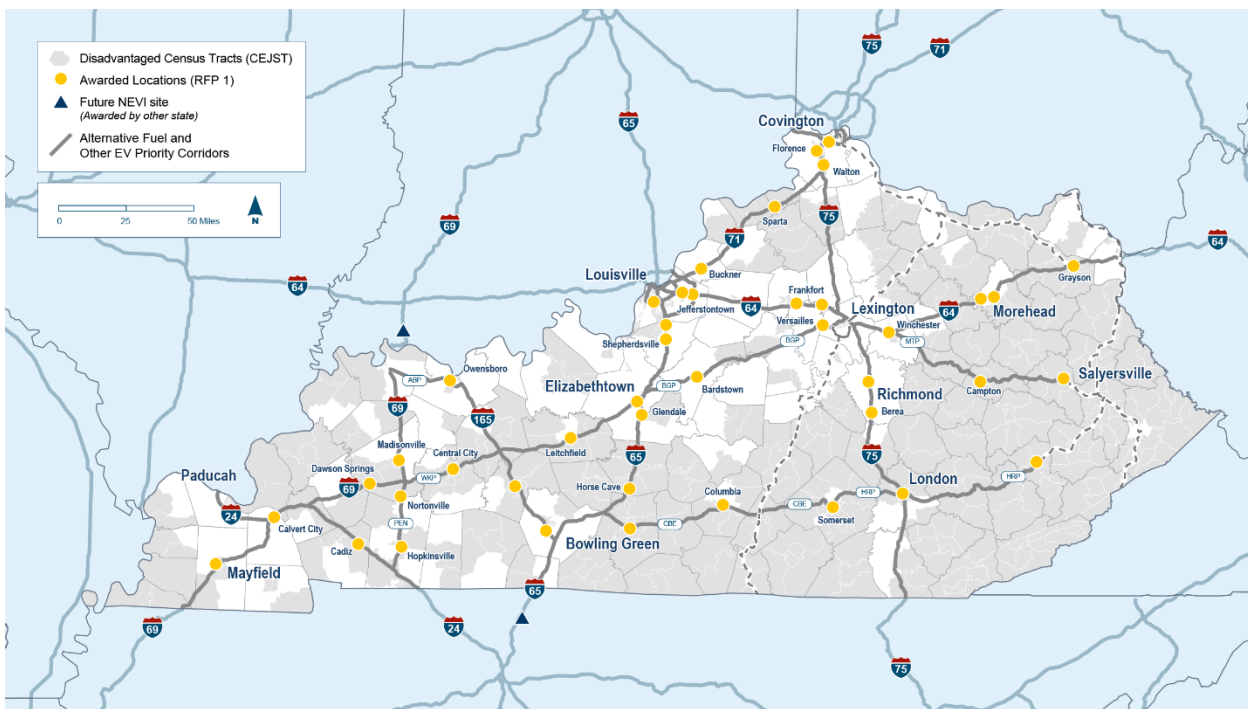


Figure 14: Kentucky's Disadvantaged Communities (CEJST)



## Identification and Outreach to Disadvantaged Communities (DACs)

KYTC is committed to building an EV charging network that will serve all Kentuckians and visitors to the state. To that end, KYTC is planning its future engagement efforts to ensure that KYTC is sharing and gathering information in an impactful way that engages and benefits Kentucky's DACs.

In July 2024, KYTC established a Disadvantaged Communities Working Group to gain valuable insight into DACs' charging needs and to strengthen KYTC's approach to equity in its future phases of deployment. Nearly 120 individuals from across the state were invited to be a part of this group to begin and maintain this important dialogue, especially as KYTC works toward Phases 2 and 3. They represented statewide, regional, and local groups that serve underrepresented and disadvantaged communities. A map of the coverage of the organizations invited to participate in the DAC Working Group can be found in the [Public Engagement](#) section of this document.

### Agencies Contacted for DAC Working Group

#### Statewide

Center of Excellence in Rural Health  
Evolve KY  
Hispanic Ministry Services  
Kentuckiana Regional Planning & Development Agency  
Kentucky Clean Cities and Communities Partnership  
Kentucky Council of Area Development Districts  
Kentucky League of Cities  
Kentucky Office of Rural Health  
Kentucky Small Business Development Center  
National Black MBA Association - KY Chapter  
Rural Reimagined  
Volunteers of America Mid-States

#### Central Kentucky

Bluegrass Community Action Partnership  
Central Kentucky Community Action Council  
Centro Latino  
Federated Transportation Services of the Bluegrass  
Frankfort Transit System  
Japan/America Society of Kentucky  
Kentucky Center for Agriculture and Rural Development  
Kentucky Chinese American Association  
Multi-Purpose Community Action Agency  
NAACP Hardin Co. Branch  
Transit Authority of Central Kentucky  
Tri-County Community Action Agency

#### Eastern Kentucky

Appalachia Service Project  
Appalachian Regional Commission  
Appalachian Research and Defense Fund of Kentucky (AppalReD Legal Aid)  
Bell-Whitley Community Action Agency  
Big Sandy Area Community Action Program  
Big Sandy Regional Interagency Council  
Daniel Boone Community Action Agency  
Gateway Community Action Agency  
Harlan County Community Action Agency

Hispanic Ministry Services – Big Sandy/Licking Region  
Hispanic Ministry Services – Bluegrass East Region  
Hispanic Ministry Services – Bluegrass East Region  
Hispanic Ministry Services – Bluegrass West Region  
Hispanic Ministry Services – Mountain West and East Region  
KCEOC Community Action Partnership  
Kentucky River Foothills Development Council  
Laurel County Diversity and Inclusion Council  
Licking Valley Community Action Program  
LKLP Community Action Council  
Middle Kentucky Community Action Partnership  
Northeast Kentucky Community Action Agency  
OneEast Kentucky  
Rural Transit Enterprises Coordinated, Inc.  
Sandy Valley Transportation Services  
United Way of Northeast Kentucky

#### Northern Kentucky

African American Chamber of Commerce  
City of Maysville Transit  
NAACP Northern KY Branch  
Northern Kentucky Community Action Commission  
Transit Authority of Northern Kentucky  
United Way of Greater Cincinnati

#### Southern Kentucky

Community Action of Southern Kentucky  
Lake Cumberland Community Action  
United Way of Southern Kentucky

#### Western Kentucky

Audubon Area Community Services  
Fulton County Transit Authority  
Hispanic Alliance of Greater Owensboro  
Murray-Calloway County Transit Authority  
NAACP Paducah-McCracken Branch  
Opportunity Center of Owensboro  
Pennyrile Allied Community Services  
West Kentucky Allied Services

## Bowling Green

Black Leaders Advocating for the Community  
(BLAC)  
City of Bowling Green  
GoBG Transit  
NAACP Warren Co. Branch  
Western Kentucky University – Association for the  
Study of African American Life & History

## Lexington

Bluegrass Community Foundation  
City of Lexington  
Community Action Council  
Hispanic Ministry Services – Fayette Region  
Kentucky Refugee Ministries  
Lexington Urban League  
NAACP Lexington Branch

Transit Authority Board – Lextran

## Louisville

Greater Louisville Inc.  
Kentuckiana Works  
Kentucky Refugee Ministries  
La Casita Center  
Louisville Hispanic Chamber of Commerce  
Louisville Metro Community Action Partnership  
Louisville Metro Government  
Louisville Urban League  
NAACP Louisville Branch  
Noir Black Chamber of Commerce Inc.  
OneWest  
Transit Authority of River City (TARC)  
West End Business Association

The Disadvantaged Communities Working Group will serve as important liaisons between the organizations they represent and KYTC's EV Charging Program Team. The two-way communications between the project team and this group will help to identify local concerns, needs, and preferences as they relate to Kentucky's NEVI program. Quarterly meetings are being held virtually, information is being shared with members and feedback will continue to be solicited at key project milestones.

At its first meeting on July 24, 2024, KYTC relied on the DAC Working Group to help identify the biggest barriers to EV ownership for DACs and to describe what community charging locations members believe work best to serve these groups. This discussion will continue in future meetings and through future phases of implementation. Following the first meeting, KYTC shared a questionnaire with members to gather insight into key topics that will shape future phases of deployment, particularly efforts to improve equitable access to charging.

The following provides a synopsis of the responses received for key questions included in the questionnaire. The DAC Questionnaire section in the Public Engagement chapter provides further details on the questionnaire results.

### **"What is the best way to engage and share information with disadvantaged communities?"**

Questionnaire respondents indicated that connecting with DACs through local community groups and organizations would be most effective for engagement efforts and sharing information. Reaching out to communities through media (e.g. news, stories, etc.) was the second most common answer amongst respondents.

### **"What are the top three community charging locations you would like to see considered for future EV charging sites?"**

DAC Working Group members ranked public facilities and locations within rural and disadvantaged communities as the top community charging locations they would like to see in future phases of deployment. Fueling stations and retail centers were the next most common responses.

## “How can we ensure disadvantaged communities are getting value from the National Electric Vehicle Infrastructure (NEVI) Formula Program?”

In response to this open-ended question, respondents shared various strategies for consideration in ensuring DACs experience benefits from the NEVI program. Common themes amongst these responses included:

- Public engagement
- Continued communication with trusted representatives and advocates for DACs
- Addressing the challenge of EV affordability and the limited used EV market
- Connecting DAC residents with trainings and certifications to build “green” job skills within DACs
- Improve charging opportunities within residential areas that do not commonly have access to private, off-street, overnight parking

## Process to Identify, Quantify, and Measure Benefits to DACs

While KYTC has identified several preliminary metrics for evaluating benefits to DACs, the state is committed to working with the DAC Working Group to update and expand on that list. This would include working with the group to define new performance metrics and the data sources and methods for assessing those metrics. This topic is expected to be an important agenda item at the upcoming DAC Workgroup meeting in October 2024. Updates to how benefits to DACs will be assessed and tracked will be included in KYTC’s Program Evaluation that will be updated with the next plan update.

### Initial DAC Benefit Assessment Metrics

In the Program Evaluation chapter, KYTC presented an initial goal intended to provide one measure of equitable access to charging, particularly for Kentucky’s DACs. As shown, KYTC is currently tracking Goal Three’s progress through the metrics shown in Table 16. **KYTC intends to expand on what is presented and include additional metrics related to Justice40 benefits after further engagement with the DAC Working Group. Possible options are discussed below.** The current metrics are tracked using a geographic information system (GIS) analysis of the CEJST tool data and population data from the U.S. Census Bureau.

Table 16: Goal Three Program Evaluation Summary

Metric	Miles	Source	Five-year Target	2024 Progress
Rural residents within # miles of EV charging stations installed using NEVI funds (count and % of state total)	5	KYTC	12%	Awd: 181,996 (9.8%) Op.: 6,569 (0.4%)
	15	KYTC	60%	Awd: 1,001,995 (53.8%) Op: 113,039 (2.5%)
	50	KYTC	99%	Awd: 1,856,278 (99.7%) Op: 399,535 (21.5%)
Justice40 residents within # miles of EV charging stations installed using NEVI funds (count and % of state total)	5	KYTC	25%	Awd: 478,805 (24.1%) Op: 2,076 (0.1%)
	15	KYTC	65%	Awd: 1,184,399 (59.6%) Op: 12,740 (0.6%)
	50	KYTC	99%	Awd.: 1,980,757 (99.7%) Op: 401,300 (20.2%)
Justice40 benefits (Will be determined during program development. Will be informed by community outreach to DACs)	-	KYTC	TBD	N/A

## Future DAC Benefit Metrics and DAC Working Group Engagement

KYTC will work with the DAC Working Group to identify meaningful, potential DAC benefits associated with the NEVI program implementation in Kentucky. Methods for assessing these benefits will be determined along with the data sources needed to conduct the assessments. Possible benefit categories, metrics, and data sources are provided in Table 17. It is expected that several new performance metrics and goals will be added to Goal Three. Metrics could also be added to other goals as well. KYTC will discuss the current metrics listed in Table 17 with the DAC Working Group to determine if these are useful to include as part of the DAC benefit assessment process. Once the DAC performance metrics and goals are set, KYTC will begin tracking the program’s progress through the Program Evaluation process and periodically share progress with the group. Updates will also be provided with the annual plan updates.

Table 17: Potential Benefits to Disadvantaged Communities

Potential Benefit Category	Metrics	Data Source
Improve clean transportation access	Distance to DCFC Charging Stations	KYTC
Decrease the transportation energy cost burden	Avg. Cost per kWh for Charging	EEC/KYTC
Reduce environmental exposure to transportation emissions	ICE VMT Per County	KYTC
Increase clean energy technology access and adoption	TBD	TBD
Increase access to low-cost capital to increase adoption of clean energy technologies	State and Federal Funding Amounts	CED, KYTC, EEC
Increase clean energy job pipeline, job training, and enterprise creation	TBD	ELC, KYTC
Provide charging infrastructure for transit and shared-ride vehicles	DCFC Stations for Transit	KYTC, Transit Agencies
Increase access to the electric grid	TBD	EEC



## Labor and Workforce Considerations

The Kentucky Education and Labor Cabinet is coordinating with KYTC to develop a proposal for a workforce development program to use NEVI funding to connect a diverse labor pool with training for the installation, operation, and maintenance of Kentucky's NEVI-funded charging stations. These coordination activities began in the spring of 2024 when KYTC and ELC began discussing workforce development strategies that could expand the workforce for installing, operating, and maintaining NEVI-funded charging stations. Strategies will be supported through the ELC's Department of Workforce Development which connects Kentuckians to employment, workforce information, education, and training. Since the 2023 plan update submission, KYTC and ELC have met multiple times to discuss opportunities for utilizing NEVI funds to increase the number of EVITP-certified electricians and to develop skill-building and training opportunities for Kentucky's workforce. Any program developed through this coordination will be dedicated to training and increasing EVITP certifications within the state to strengthen the workforce supporting the buildout of NEVI-funded charging stations.

In May 2024, KYTC and ELC held a virtual meeting to discuss NEVI workforce development opportunities with the following agencies:

- Kentucky Community and Technical College System (KCTCS)
- Kentucky Center for Statistics (KYSTATS)
- Cabinet for Economic Development (CED)
- Department of Public Advocacy
- EEC

In this meeting, KYSTATS provided background on Kentucky's existing workforce in EV charging infrastructure related fields via workforce statistics. KYTC outlined the NEVI program requirements for using NEVI funds for workforce development programs, presented on what other states are doing in this area, and shared other federal funding opportunities. Through continued coordination with the agencies represented in this meeting, ELC is exploring opportunities to develop a workforce development program that connects Kentucky residents with training resources that will support the further deployment of charging.

KYTC also met with the International Brotherhood of Electrical Workers (IBEW). The IBEW has been included in prior outreach and networking related to program procurements. During the most recent meeting KYTC learned that there are hundreds of EVITP certified electricians in the main IBEW region in the state and 31 contractors who employ EVITP certified electricians. In fact, the IBEW has made EVITP certification part of their standard training process. There are also many registered apprentices that are working through the certification process. Coordination with ELC and IBEW will continue as needed to continue to build the EV charging workforce needed in the state.

In compliance with [23 CFR 680.106\(j\)](#) to ensure that the installation and maintenance of chargers is performed safely by a qualified and increasingly diverse workforce of licensed technicians and other laborers, all electricians installing, operating, or maintaining EVSE must receive certification from the EVITP or a registered apprenticeship program for electricians that includes charger-specific training developed as part of a national guideline standard approved by the Department of Labor in consultation with the Department of Transportation, if and when such programs are approved.

# Physical Security & Cybersecurity

No changes.

# Program Evaluation

Kentucky’s NEVI program has experienced significant program progress since the last Plan Update. KYTC continues to evaluate the performance of Kentucky’s NEVI Program through a variety of metrics developed to track progress towards the Plan goals. The following section provides updates to the program progress based on metrics defined in the previous plan submission.

Where relevant, KYTC measures current progress towards targets based on the following categories:

- Awarded (Awd.): KYTC awarded NEVI stations that include both operational and in development stations that have already moved past signing contracts.
- Operational (Op.): NEVI stations open and operating.

## Goal One: A corridor-based EV charging system that supports interstate and regional travel

### Indicator: Network Coverage

Metric	Source	Five-year Target	2024 Progress
AFC Network miles covered by EV charging stations that meet the NEVI standards (1,471 total AFC miles in KY)	KYTC	>800 miles	Awd: 1,345 mi (91.4%) Op: 50 mi (3.4%)
EV charging infrastructure, meeting NEVI minimum standards and requirements, is installed every 50 miles along the State’s portion of the Interstate Highway System, where no exceptions have been granted. (yes/no)	KYTC	Yes	No
Total chargers per federal NEVI dollar invested (charger/ \$ for Level 2 and DCFC chargers)	KYTC	DCFC: 1/\$200,000 Level 2: TBD	DCFC: 1/\$134,000 Level 2: N/A
Charging stations meeting NEVI guidance along AFCs (number)	KYTC	DCFC: ~51	Awd: 42 Op: 1
Charging stations on other priority corridors and community charging stations (number)	KYTC	DCFC: TBD Level 2: TBD	DCFC: TBD Level 2: TBD

*Data source: The AFC Network was calculated from the shapefiles managed by the U.S. Department of Energy, Energy Efficiency and Renewable Energy Alternative Fuels Data center and the US Department of Transportation Federal Highway Administration HEPGIS data center less the total of the gaps identified in the Build-out maps in Appendix C.*

[https://hepgis-usdot.hub.arcgis.com/datasets/15593a84e7924814826faad39bd9ad12\\_0/explore?location=28.090220%2C-102.538558%2C4.97](https://hepgis-usdot.hub.arcgis.com/datasets/15593a84e7924814826faad39bd9ad12_0/explore?location=28.090220%2C-102.538558%2C4.97)

<https://afdc.energy.gov/corridors>

## Goal Two: A local EV ecosystem that serves Kentucky's communities and its travelers

### Indicator: Network Access

Metric	Source	Five-year Target	2024 Progress
Residents within five miles of EV charging stations installed using NEVI funds (count and % of state population)	KYTC	40%	Awd: 1,692,655 (37.6%) Op: 45,571 (1.0%)
Residents within 15 miles of EV charging stations installed using NEVI funds (count and % of state total)	KYTC	80%	Awd: 3,324,615 (73.8%) Op: 113,039 (2.5%)
Residents within 50 miles of EV charging stations installed using NEVI funds (count and % of state total)	KYTC	99%	Awd: 4,502,598 (99.9%) Op: 1,046,944 (23.3%)
Employees within five miles of EV charging stations installed using NEVI funds (count and % of state total)	KYTC	50%	Awd: 867,675 (47.9%) Op: 21,901 (1.2%)
Employees within 15 miles of EV charging stations installed using NEVI funds (count and % of state total)	KYTC	85%	Awd: 1,463,306 (80.8%) Op: 33,301 (1.8%)
Employees within 50 miles of EV charging stations installed using NEVI funds (count and % of state total)	KYTC	100%	Awd: 1,811,137 (100.0%) Op: 445,995 (24.6%)
Average waiting time for an available charger (minutes)	Owner Operator	TBD	N/A

Data source: Buffers of actual station locations dissolved to represent the areas within five, 15, or 50 miles of each station. Population data as reported at the 2020 census tract level for the year 2020 by the US Census. The total population of tracts proportionate to the size of the tract within five-, 15-, or 50 miles from the station was summed into the metric categories above. Employment data from the 2021 US Census Longitudinal Employer-Household Dynamics (LEHD), Origin-Destination Employment Statistics (LODES) of total employment of Workplace Area Characteristics (WAC) at the census block geographic level. The total employment attributed to the census block centroid within the distance buffer was summed into the metric categories above.

Data - Longitudinal Employer-Household Dynamics (census.gov)

### Indicator: Job Creation and Workforce

Metric	Source	Five-year Target	2024 Progress
KYTC will work with the Education and Labor Cabinet (ELC) to define a relevant metric for future measurement	ELC	TBD	N/A

### Indicator: Customer Satisfaction

Metric	Source	Five-year Target	2024 Progress
Percent of EV owners willing to recommend EVs to others	KY Nonprofit	TBD	N/A

### Goal Three: A comprehensive system that supports transportation choices for all of Kentucky’s residents

**Indicator: Equity**

Metric	Miles	Source	Five-year Target	2024 Progress
Rural residents within # miles of EV charging stations installed using NEVI funds (count and % of state total)	5	KYTC	12%	Awd: 181,996 (9.8%) Op.: 6,569 (0.4%)
	15	KYTC	60%	Awd: 1,001,995 (53.8%) Op: 113,039 (2.5%)
	50	KYTC	99%	Awd: 1,856,278 (99.7%) Op: 399,535 (21.5%)
Justice40 residents within # miles of EV charging stations installed using NEVI funds (count and % of state total)	5	KYTC	25%	Awd: 478,805 (24.1%) Op: 2,076 (0.1%)
	15	KYTC	65%	Awd: 1,184,399 (59.6%) Op: 12,740 (0.6%)
	50	KYTC	99%	Awd.: 1,980,757 (99.7%) Op: 401,300 (20.2%)
Justice40 benefits <i>(Will be determined during program development. Will be informed by community outreach to DACs)</i>	-	KYTC	TBD	N/A

*Data source: Buffers of actual station locations dissolved to represent the areas within five, 15, or 50 miles of each station. Population data as reported at the 2020 census tract level for the year 2020 by the US Census. The total population of tracts proportionate to the size of the tract within five-, 15-, or 50 miles from the station was summed into the metric categories above. Justice40 is determined by the Climate and Economic Justice Screening Tool (CEJST) resource uploaded to a GIS platform. The metrics of the CEJST resource are coded within the shapefile at the 2010 Census Tract level. The data include total population estimates per tract from the 2019 American Community Survey. The total population of tracts that are disadvantaged proportionate to the size of the tract within five-, 15-, or 50 miles from the station were summed into the metric categories above.*

<https://screeningtool.geoplatform.gov/en/downloads#3/33.47/-97.5>

### Goal Four: A resilient vehicle fueling system that can adapt to changes in market conditions and transportation technologies

**Indicator: Reliability**

Metric	Source	Five-year Target	2024 Progress
Percent time in service (percent time available) for EV charging ports installed using NEVI funds (percent)	Owner Operator	97% Uptime	N/A*
Stations achieving high reliability (97%) as defined by the NEVI program (number of stations by owner-operator)	Owner Operator	TBD	N/A
Number of complaints per location (count per charging station)	Owner Operator	TBD	N/A

\*Kentucky’s one operational station has not been open long enough to record and share this data with KYTC

**Indicator: Utilization**

Metric	Source	Five-year Target	2024 Progress
Number of charging events (sum by day, week, month, and year)	Owner Operator	TBD	N/A*
Charging energy consumed (sum DC MWh by day, week, month, and year)	Owner Operator	TBD	N/A*
Unique users per charging station (number by month and year)	Owner Operator	TBD	N/A*
Time with a vehicle connected, by location, land use, and time of day (percent vehicle connection time per charger by month and year)	Owner Operator	TBD	N/A*

\*Kentucky's one operational station has not been open long enough to record and share this data with KYTC

**Indicator: Payments**

Metric	Source	Five-year Target	2024 Progress
State tax and fee revenue collected (sum by month and year)	KYTC, Owner Operator	TBD	N/A*
Average charging cost per kWh (dollar value)	Owner Operator	TBD	N/A*
Payments (number by subscription, app, and/or debit/credit card)	Owner Operator	TBD	N/A*

\*Kentucky's one operational station has not been open long enough to record and share this data with KYTC

**Goal Five: A transportation system that reduces emissions and promotes clean air in Kentucky**

**Indicator: EV Adoption**

Metric	Source	Five-year Target	2024 Progress
Registered Light Duty BEVs in the state of Kentucky (count and share of registered passenger car and truck fleet)	KAVIS	18,700 BEVs ~0.5%	12,491 BEVs 0.3%
Consumers who are considering or plan to purchase an EV in the next 5 years (percent)	KY Non-Profit	TBD	N/A
Consumers who identify a lack of charging stations as a barrier to EV purchase (percent)	KYTC	<50%	84%

**Indicator: Air Quality**

Metric	Source	Five-year Target	2024 Progress
Fuel Consumption (gallons of gasoline consumed per registered vehicle)	KYTC	TBD	TBD

# Discretionary Exceptions

KYTC is requesting two discretionary exceptions from the requirement that charging infrastructure is installed every 50 miles along Kentucky’s designated AFCs (Table 18 and Figure 15). In accordance with the Joint Office exception template guidance, KYTC’s defined reasons for the requested exceptions are expected to persist through the FY22-FY26 NEVI funding timeframe. The following section provides the reasoning behind the two discretionary exception requests.

Table 18: Requested Discretionary Exceptions

Exception	Type	Distance of Deviation	Corresponding AFC	Reason for Exception Request
1	50 miles apart	8.9 miles*	Interstate 69 (I-69)	Geography

\* The station under development is 33.9 miles from the current AFC terminus; however, construction of the I-69 Ohio River Crossing will connect I-69 in Kentucky to I-69 in Indiana, resolving the need for an exception by 2031.

Figure 15: Location of Discretionary Exception



## Exception Request: Interstate 69

KYTC is requesting a temporary exception for an 8.9-mile deviation from the 50-mile spacing requirement on the I-69 AFC due to the ongoing design and construction of I-69 between Henderson, Kentucky, and Evansville, Indiana (Figure 16). Currently, the northern terminus of the I-69 AFC at Exit 10B is over 25 miles from Kentucky's nearest NEVI station in development on I-69 in Madisonville (Exit 114). As shown in Figure 17, this gap currently exceeds the 25-mile NEVI spacing requirement for build-out certification on I-69 by 8.9 miles. NEVI guidance states that there must be a station within 25 miles of the end of an AFC. While the I-69 AFC terminus is over 25 miles from Exit 114, this end point is only a temporary condition. Once construction is complete by 2031 and Kentucky's I-69 AFC is connected to I-69 in Indiana, this deviation will no longer exist, and I-69 will meet the 50-mile spacing requirement.

I-69 currently ends in Henderson just south of the Audubon Parkway as illustrated in Figure 16. I-69 begins again in Evansville, IN at the US 41 interchange. Kentucky and Indiana are working expeditiously to complete this final connection across the Ohio River. The [Interstate 69 Ohio River Crossing project](#) (I-69 ORX) has three elements:

- Section one is the Kentucky approach work which will extend I-69 north to US 60. It is currently under construction and will be completed in 2025.
- Section two is the Ohio River Crossing, which includes a new four-lane bridge. This project will go into construction in 2027 and will be complete in 2031.
- Section three is the Indiana approach work which will connect the new bridge to I-69 in Indiana. This project will be completed in 2026.

Figure 16: I-69 Ohio River Crossing Project Sections



Kentucky is currently developing a NEVI-funded station in Madisonville, KY at Exit 114 as in Figure 17. Indiana has awarded a NEVI-funded station in Evansville, IN at Exit 3. When the I-69 ORX project is complete both states will nominate the new Interstate sections as AFCs and the distance between the two stations will be 47.1 miles (Figure 18). Therefore, this portion of the AFC network will meet the NEVI 50-mile spacing requirements.

Until the construction is complete, drivers will continue to use US-41 to connect from I-69 in Kentucky to I-69 in Indiana. Using this route, the distance between the NEVI-funded station in Madisonville, KY, and the NEVI-funded station in Evansville, IN is 47.9 miles. Consequently, the travel distance is below 50 miles currently and will remain below 50 miles when the I-69 construction is complete.



Figure 17: Exception Request - Interstate 69

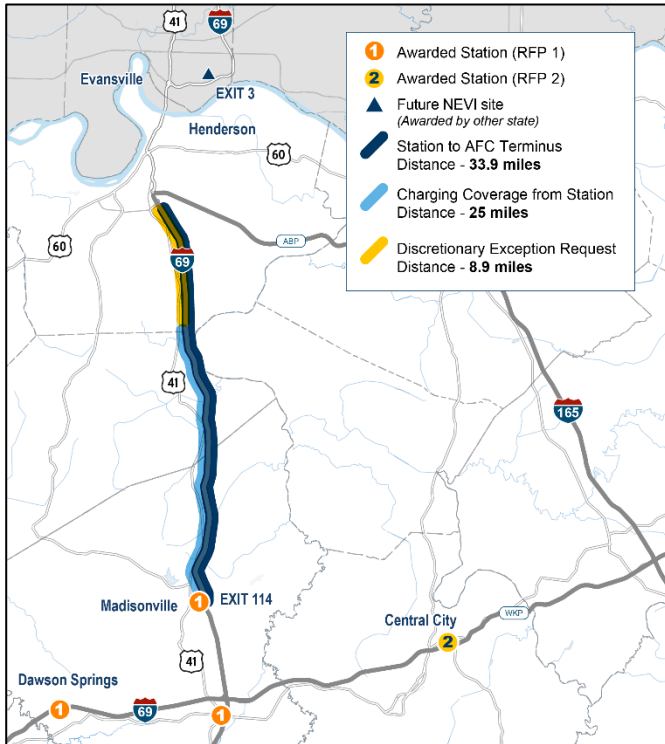
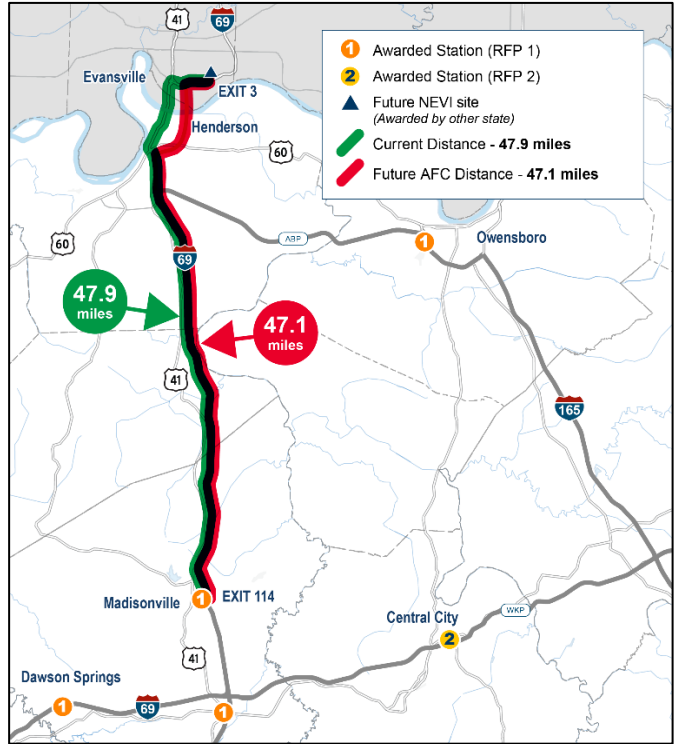


Figure 18: Future Resolution of Exception Request



In summary, this requested exception will not impact the convenience, affordability, reliability, and equitable access components of both the national network and Kentucky’s AFC network. The completion of the I-69 ORX project by 2031 will resolve the need for this exception, as the distance between I-69 Exit 114 in Kentucky and I-69 Exit 3 in Indiana will be 47.1 miles.

## Appendices: Supporting Materials

- A. **Survey Questions for the Stakeholder Group**
- B. **Survey Questions for the Disadvantaged Communities Working Group**
- C. **Build-Out Maps**

## Appendix A: Survey Questions for the Stakeholder Group

In June 2024, KYTC asked the EV stakeholder group the following questions in an online survey created in JotForm.

1. What is your home zip code?
2. What is your household's EV ownership status?
  - I own an electric vehicle
  - I own a plug-in hybrid vehicle.
  - I have considered owning an electric vehicle.
  - I am not interested in owning an electric vehicle.
3. What do you consider to be the top barrier(s) to owning an EV?
  - Planning for charging
  - Availability
  - Performance
  - Range/Long Distance Travel
  - Cost
  - Other
4. What criteria should Kentucky use to decide where to invest in new charging stations along high-priority corridors?
  - Within rural and/or disadvantaged communities
  - Near areas of anticipated higher demand for charging
  - In charging gaps (areas without existing access to public charging stations)
  - Within rural and/or disadvantaged areas
  - Near higher population centers, Near tourism destinations (state parks historical sites, etc.)
- Near amenities (restrooms, convenience stores, etc.)
- Near areas of higher concentrations of employers/jobs
5. What types of areas should Kentucky consider when deciding to locate these charging stations?
  - Workplace/employment centers
  - Retail/commercial centers
  - Public facilities (e.g., libraries, parks, schools, government buildings)
  - Multifamily housing communities
  - Existing fueling stations
  - Hotels and lodging
  - Within rural and disadvantaged communities
  - Tourism destinations
  - Downtown centers
6. What specific locations or areas (e.g. communities, highways, or regions) should Kentucky consider for deploying charging stations?
7. What is your preferred form of engagement to provide feedback on the state's EV charging plans? Check all that apply.
  - Online surveys
  - Virtual meetings
  - EV website form
  - In-person

## Appendix B: Survey Questions for the Disadvantaged Communities Working Group

The following questions were shared via an online questionnaire to the Disadvantaged Communities Working Group members following their first meeting.

1. What is your home zip code?
2. What is the best way to engage with and share information with disadvantaged communities? (Check all that apply.)
  - Through local community groups and organizations
  - Flyers/materials at community locations
  - Email and text (stakeholder sign-up)
  - Through the media (news stories, etc.)
  - In-person public meetings
  - Virtual meetings
  - Other
3. What do you think is the biggest barrier to electric vehicle use for disadvantaged communities?
  - High cost of electric vehicles and EV batteries
  - Access to public charging stations
  - Access to at-home charging
  - Long recharging times
  - Anxiety about range/long trips
4. What are the top three community charging locations you would like to see considered for future EV charging sites?
  - Downtown centers
  - Fueling stations
  - Hotels and lodging
  - Multifamily housing
  - Public facilities (libraries, parks, government buildings)
  - Retail centers
  - Rural and disadvantaged communities
  - Tourism destinations
  - Workplaces
5. What specific locations or areas (e.g. communities, highways, or regions) should Kentucky consider for future phases of deployment of charging stations?
6. How can we ensure disadvantaged communities are getting value from the National Electric Vehicle Infrastructure (NEVI) Formula Program?

## Appendix C: Build-out Maps

The following maps provide a visual status update for each Kentucky AFC's progress toward buildout according to NEVI requirements. Figure C 1 is a guide for the symbology used in the build-out maps.

Figure C 1: Build-Out Map Symbology Explanation

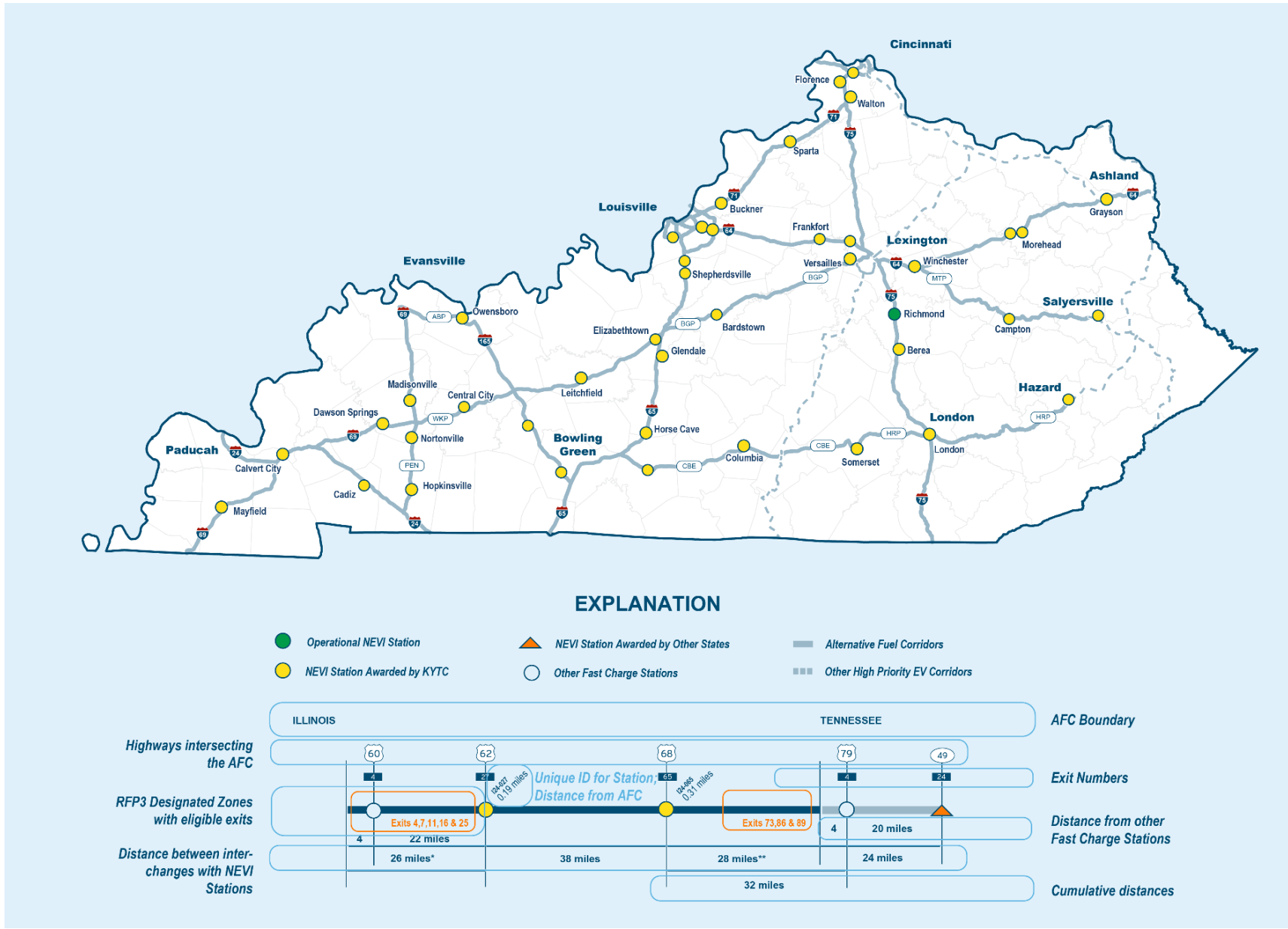


Figure C 2: I-24 AFC Build-Out Status

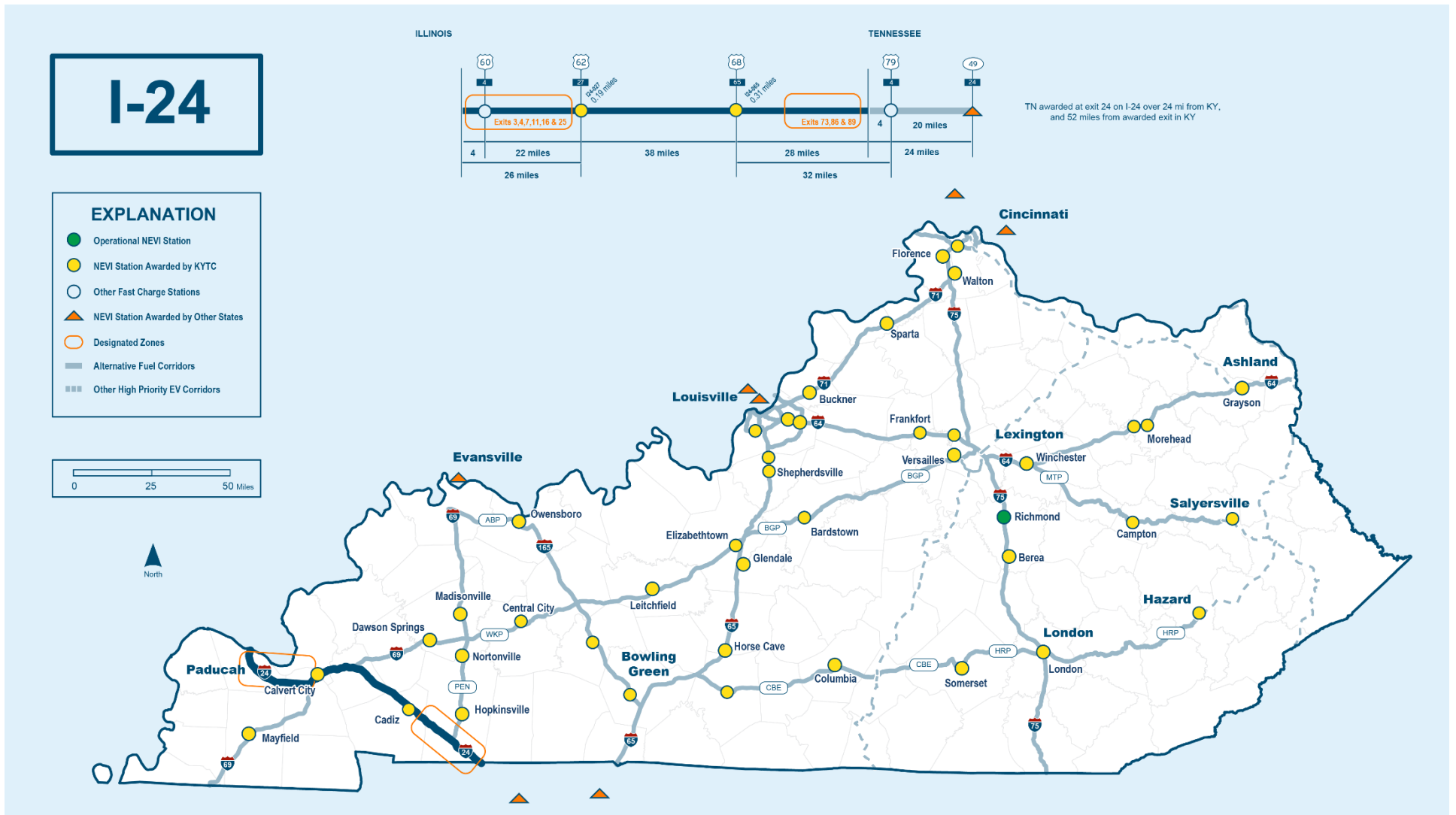


Figure C 3: I-64 AFC Build-Out Status

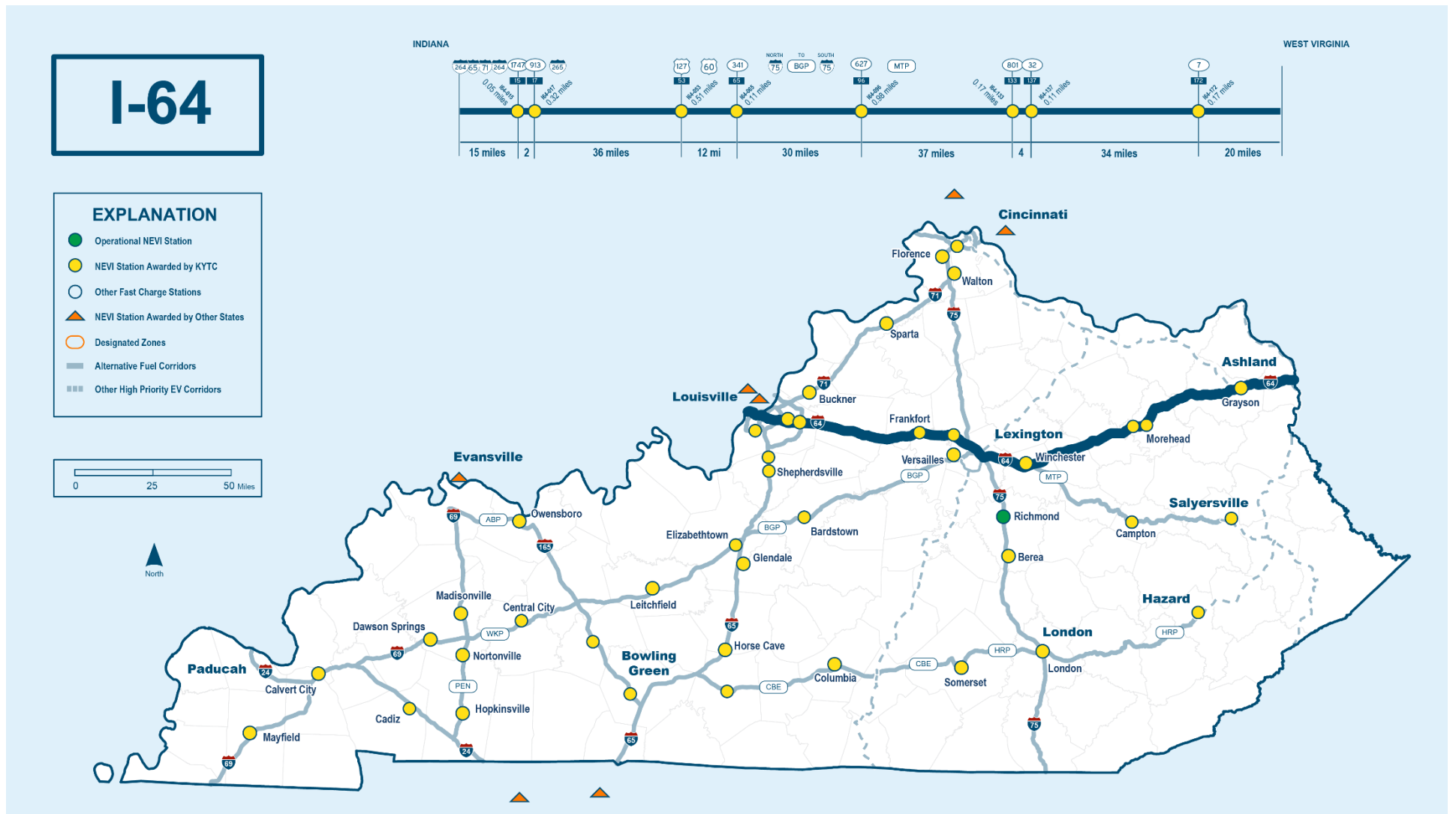




Figure C 4: I-65 AFC Build-Out Status

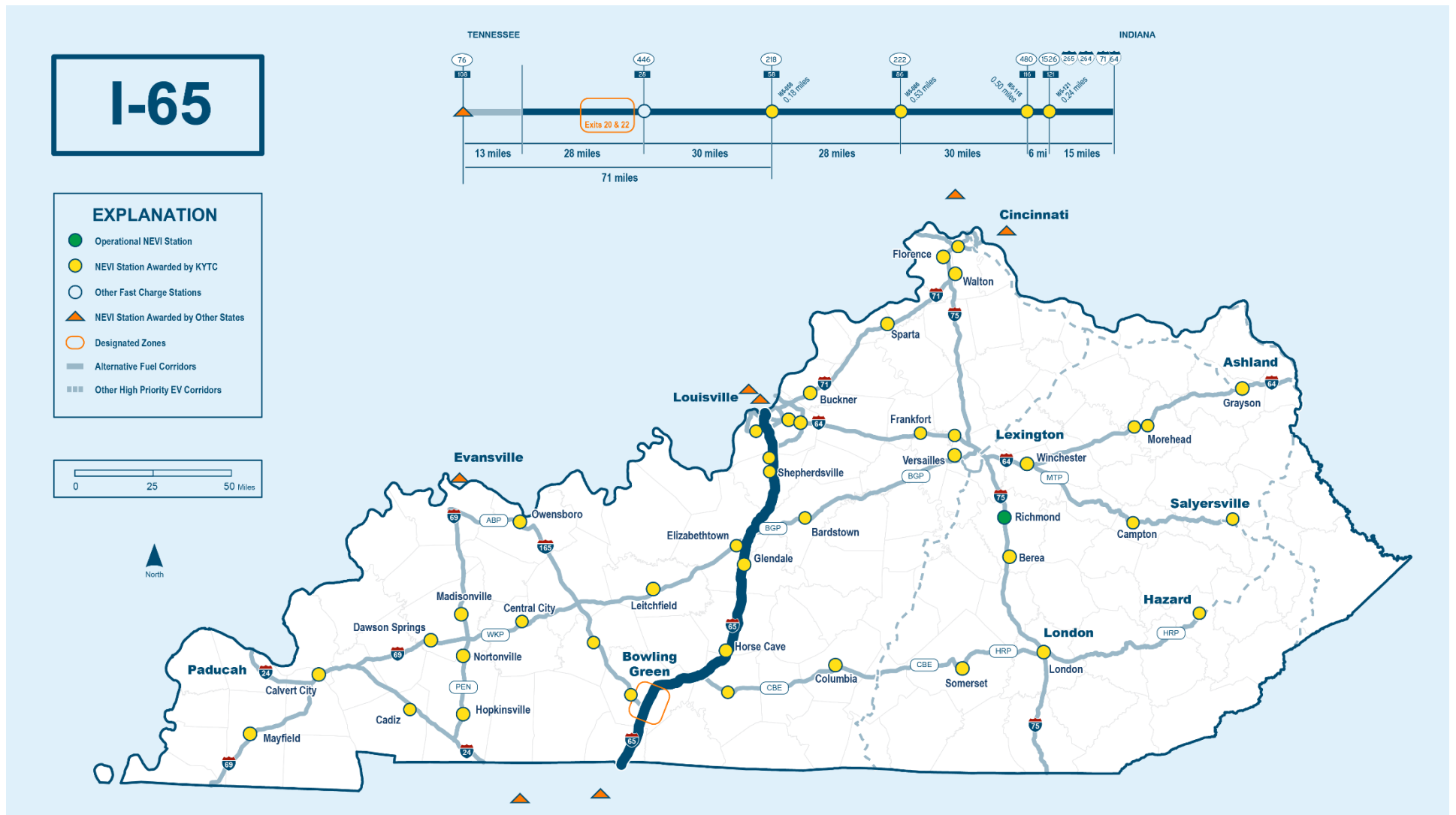


Figure C 5: I-69 AFC Build-Out Status

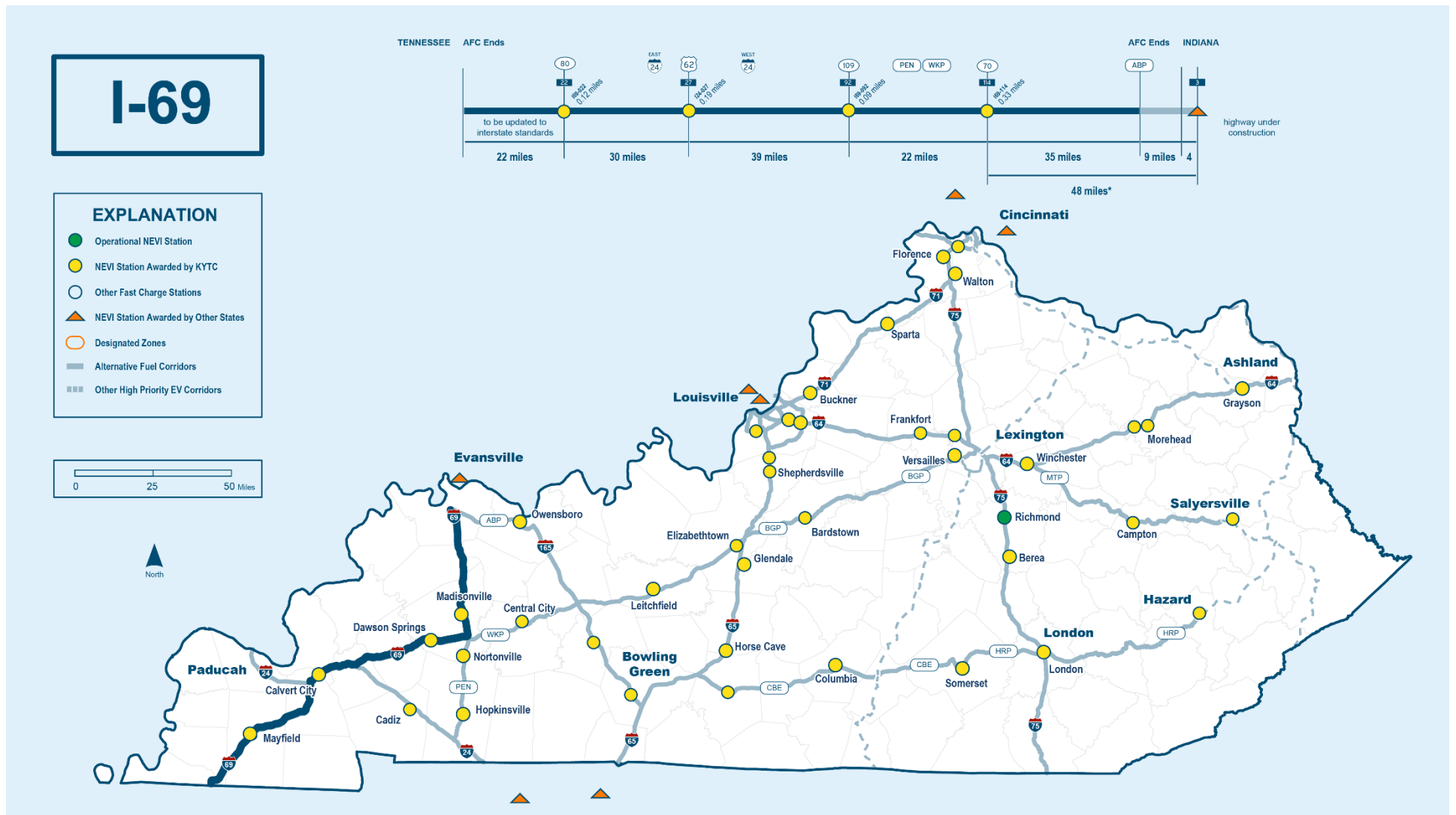


Figure C 6: I-71 AFC Build-Out Status

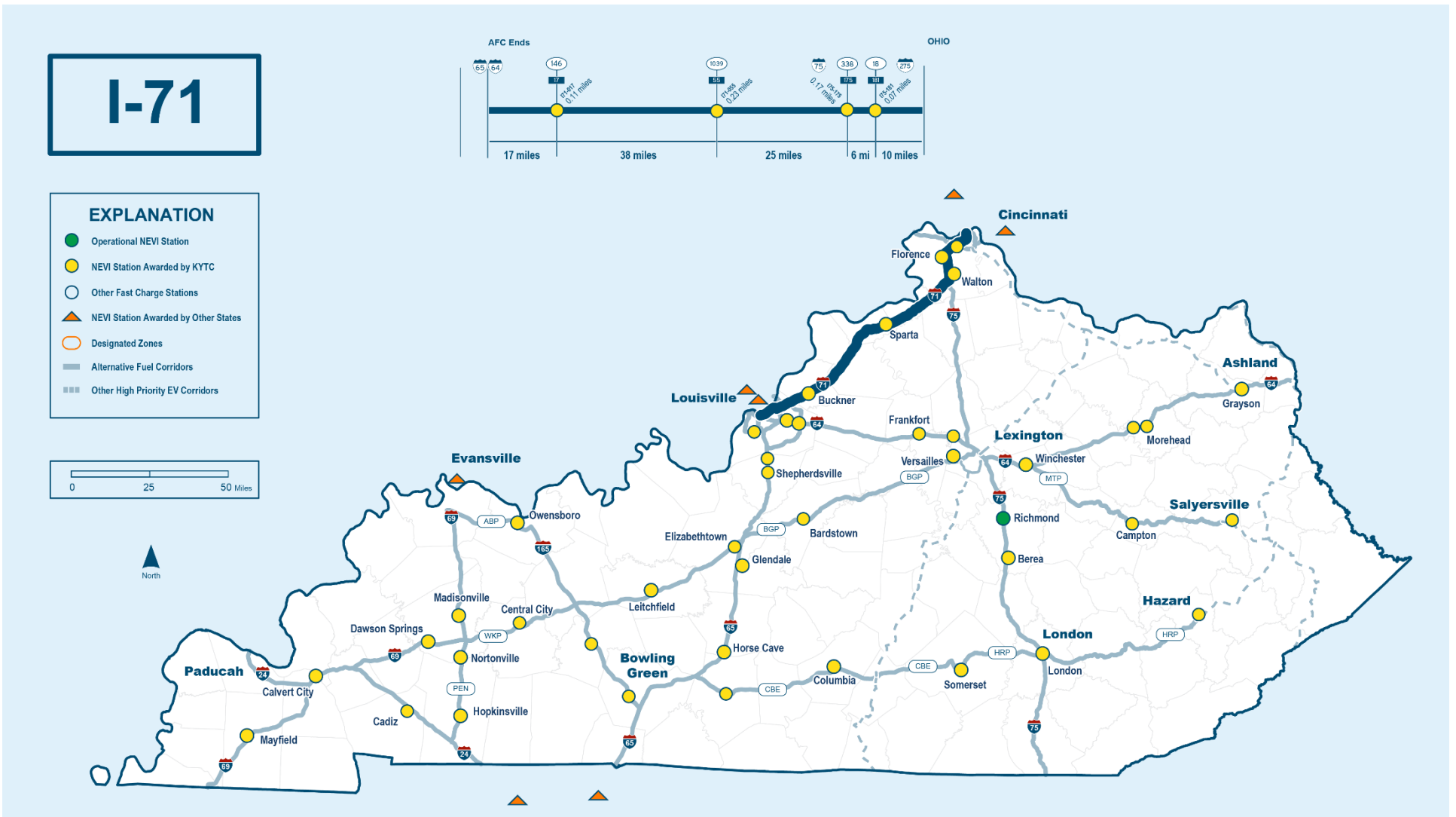


Figure C 7: I-75 AFC Build-Out Status

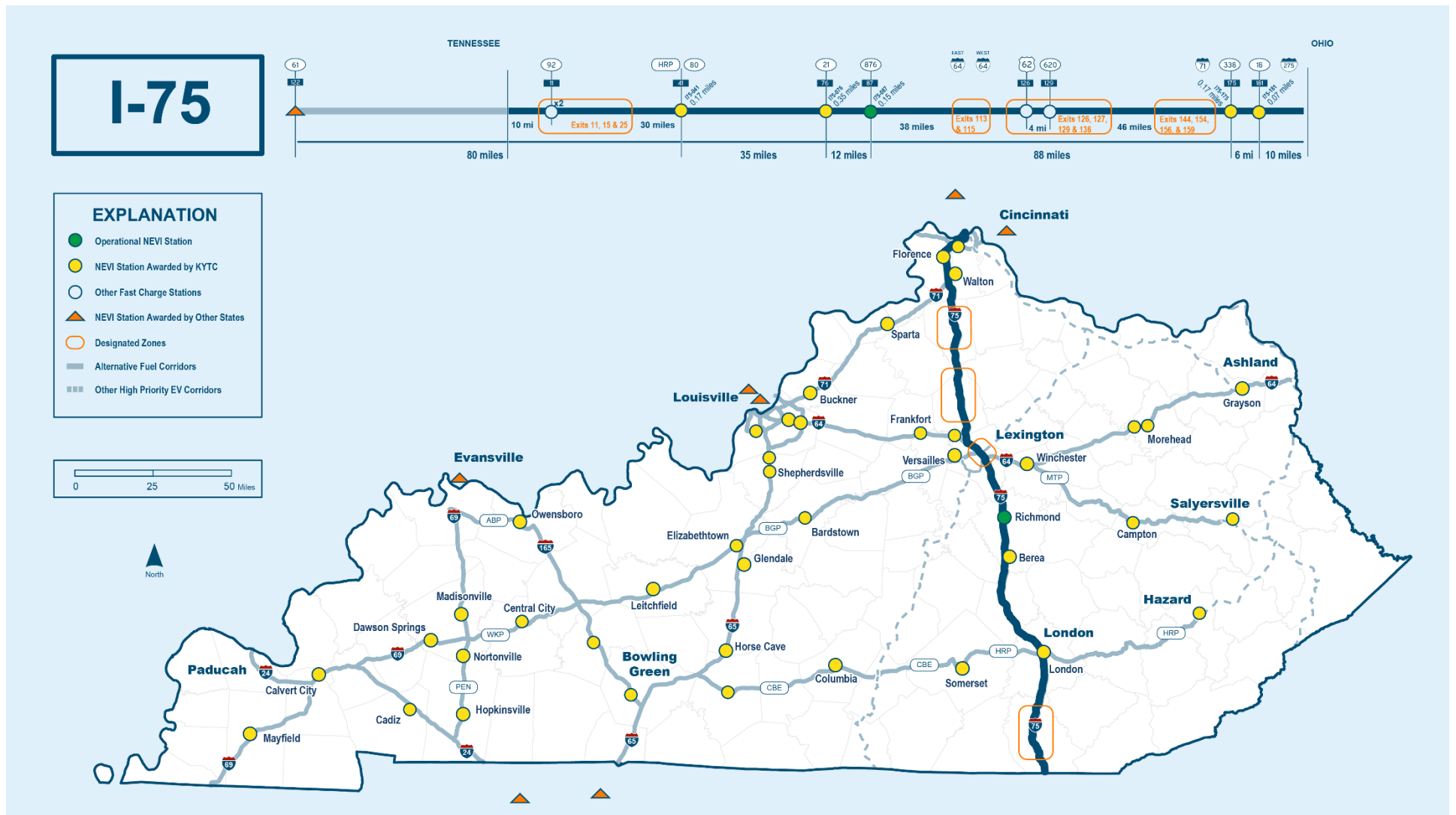


Figure C 8: ABP+I-165 AFC Build-Out Status

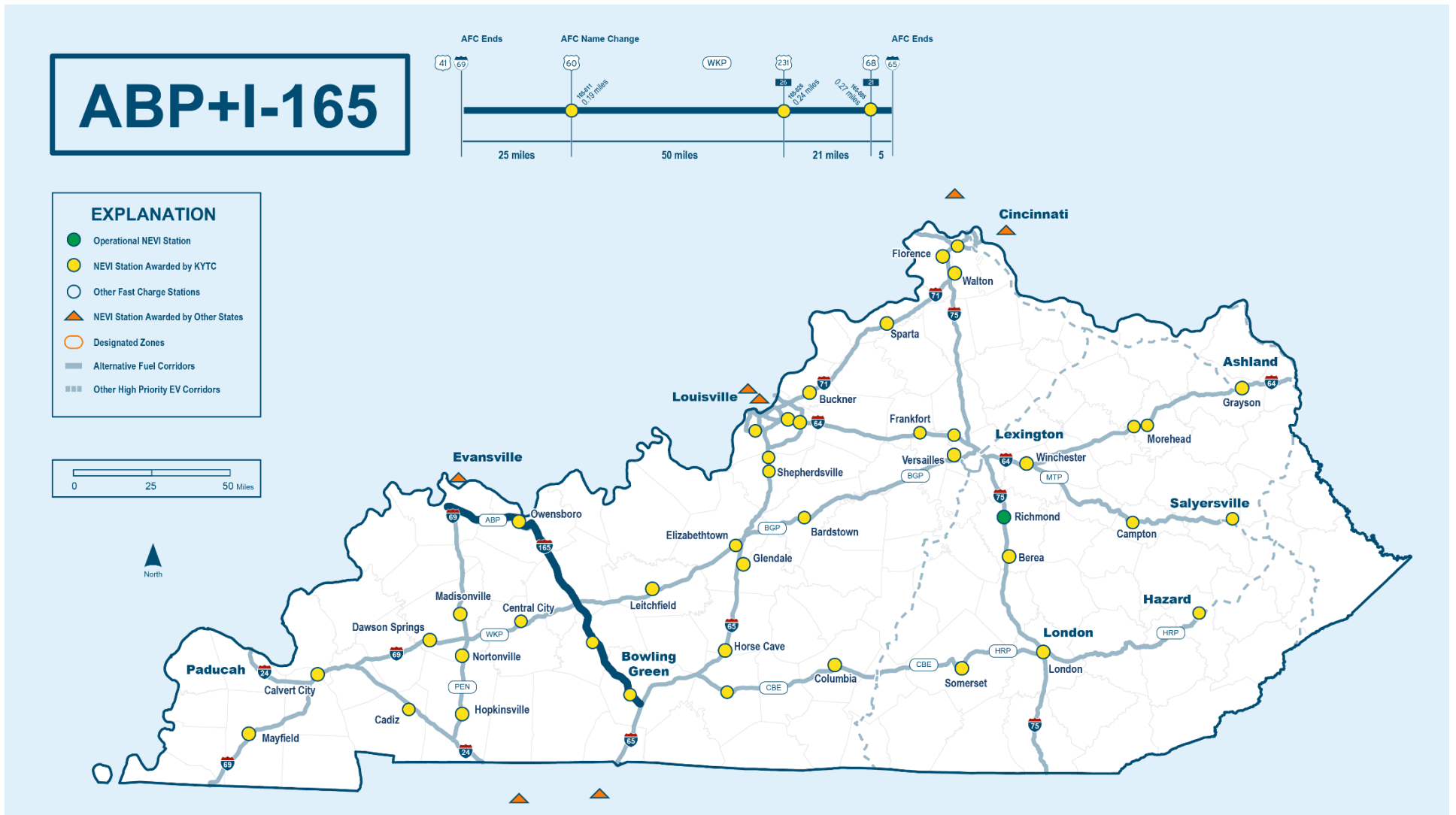


Figure C 9: CBE+HRP AFC Build-Out Status

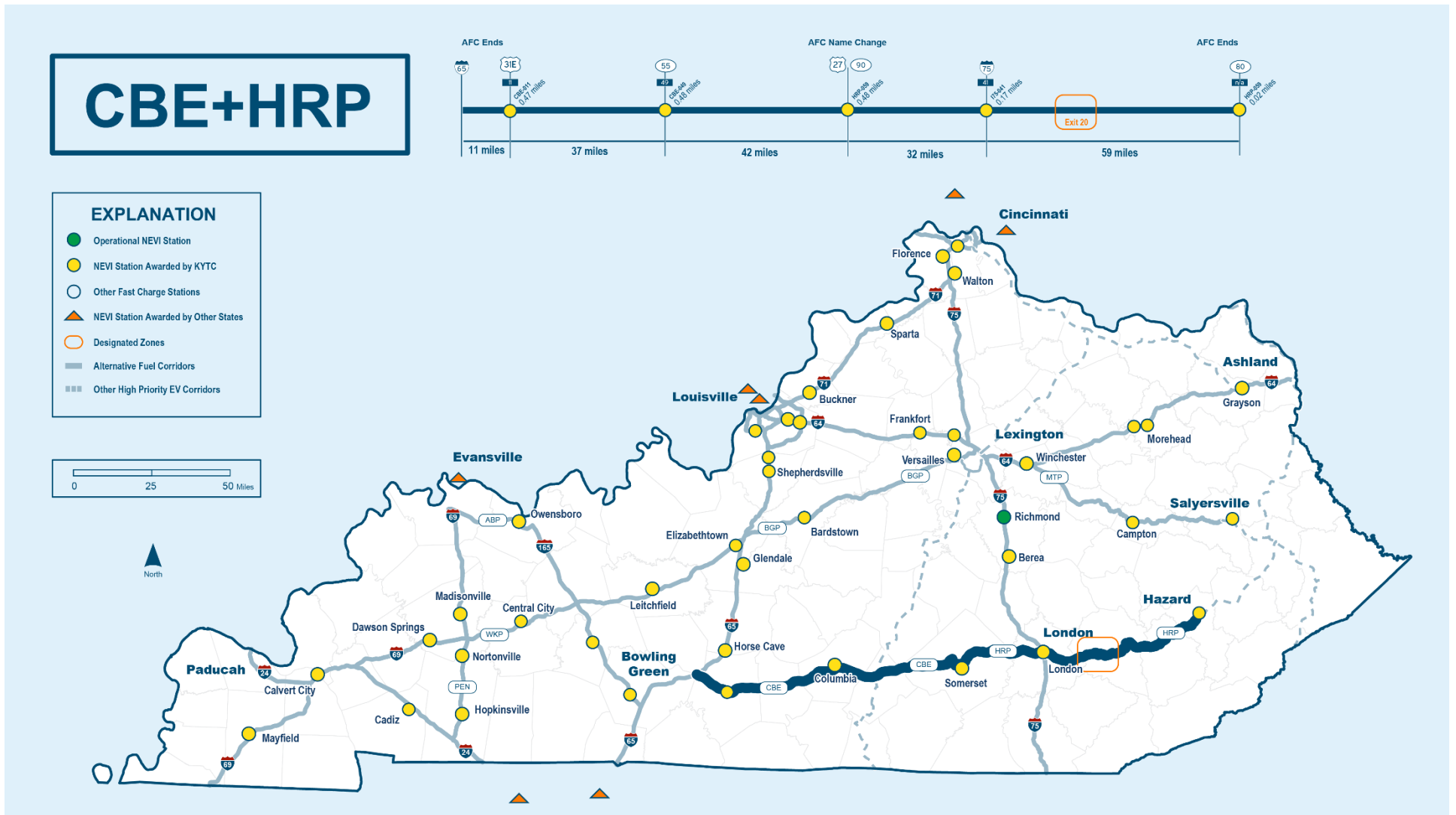


Figure C 10: WKP+BGP AFC Build-Out Status

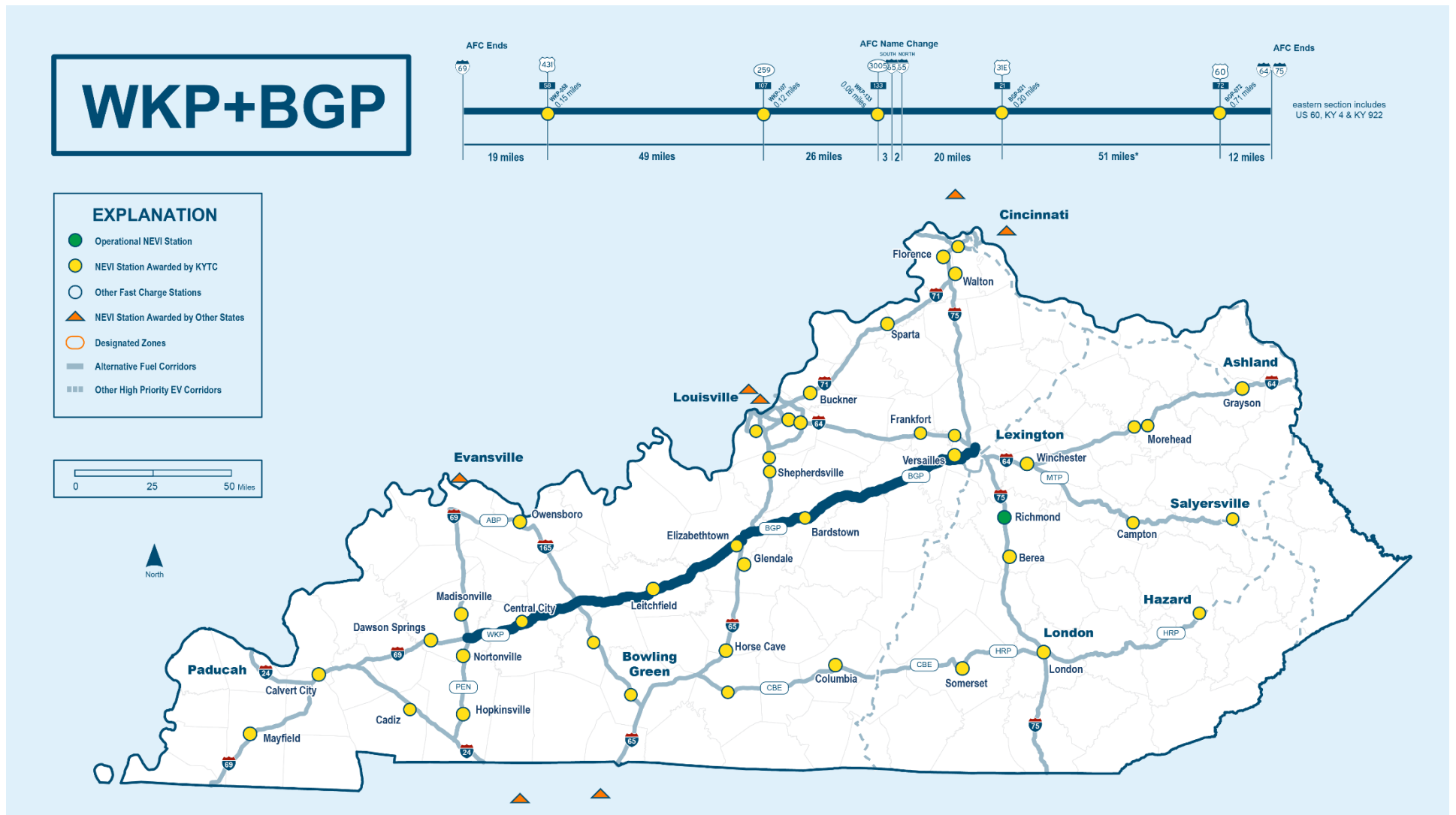


Figure C 11: MTP AFC Build-Out Status

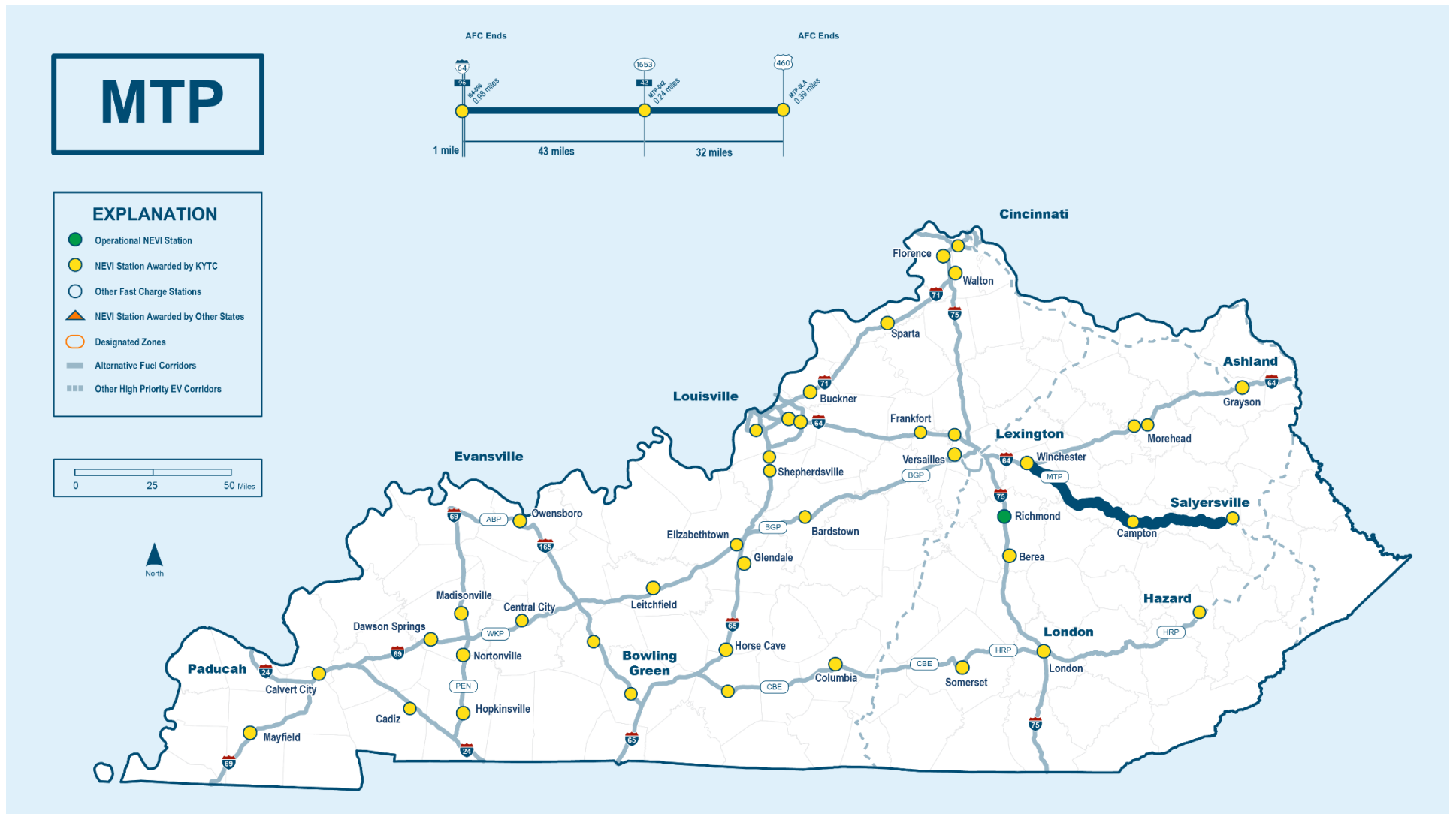




Figure C 12: PEN AFC Build-Out Status

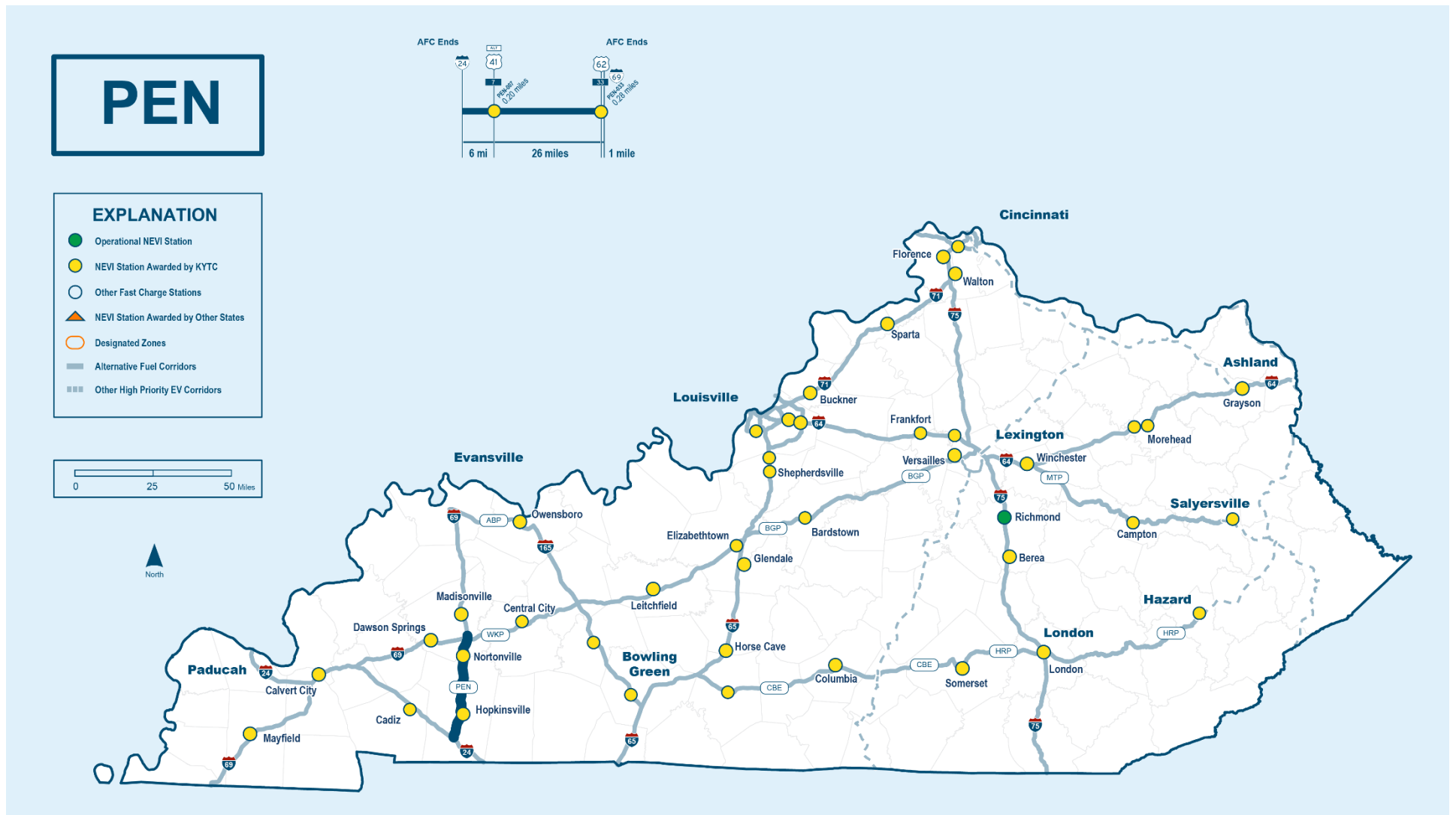


Figure C 13: I-264 AFC Build-Out Status

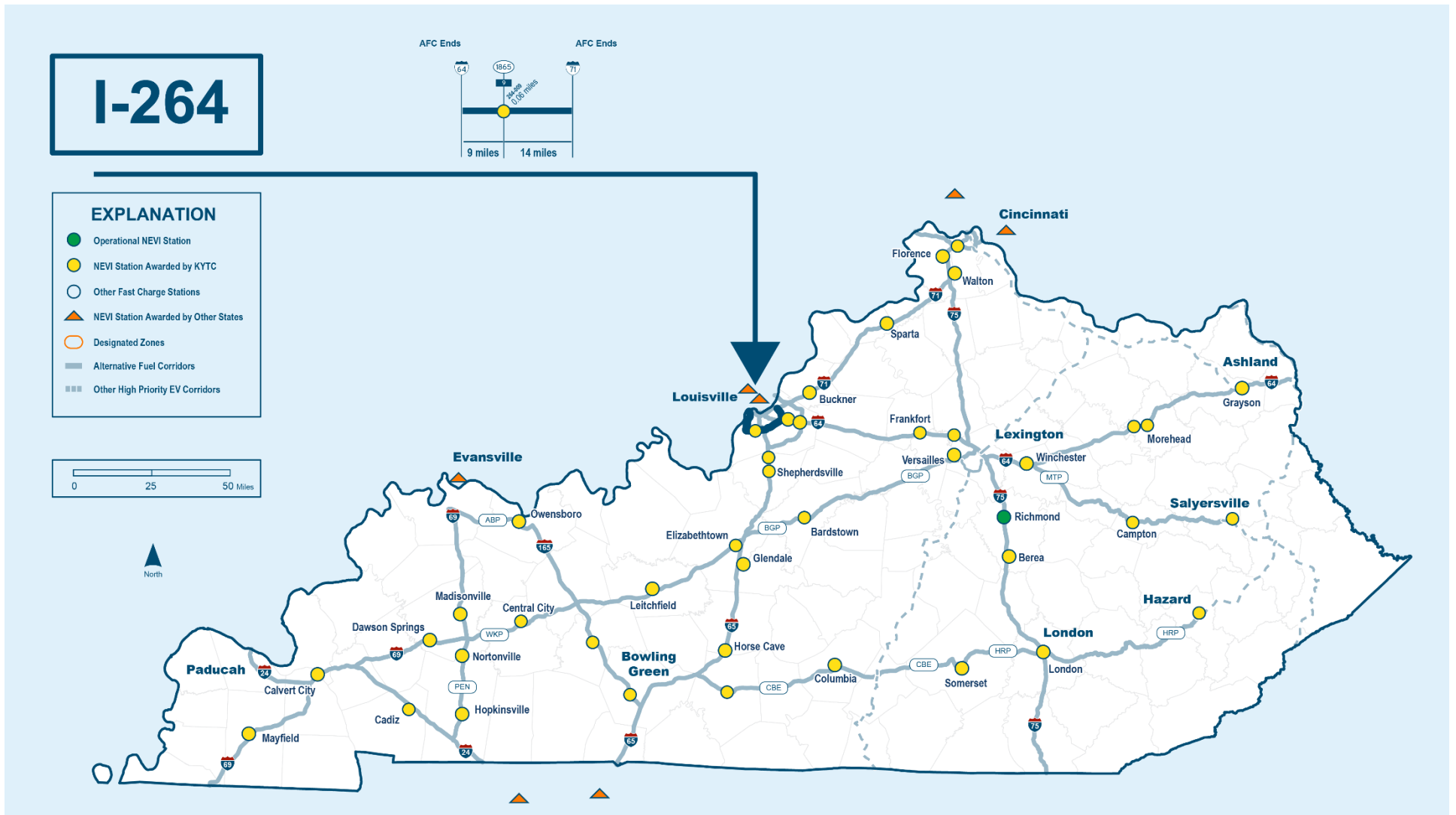


Figure C 14: I-265 AFC Build-Out Status

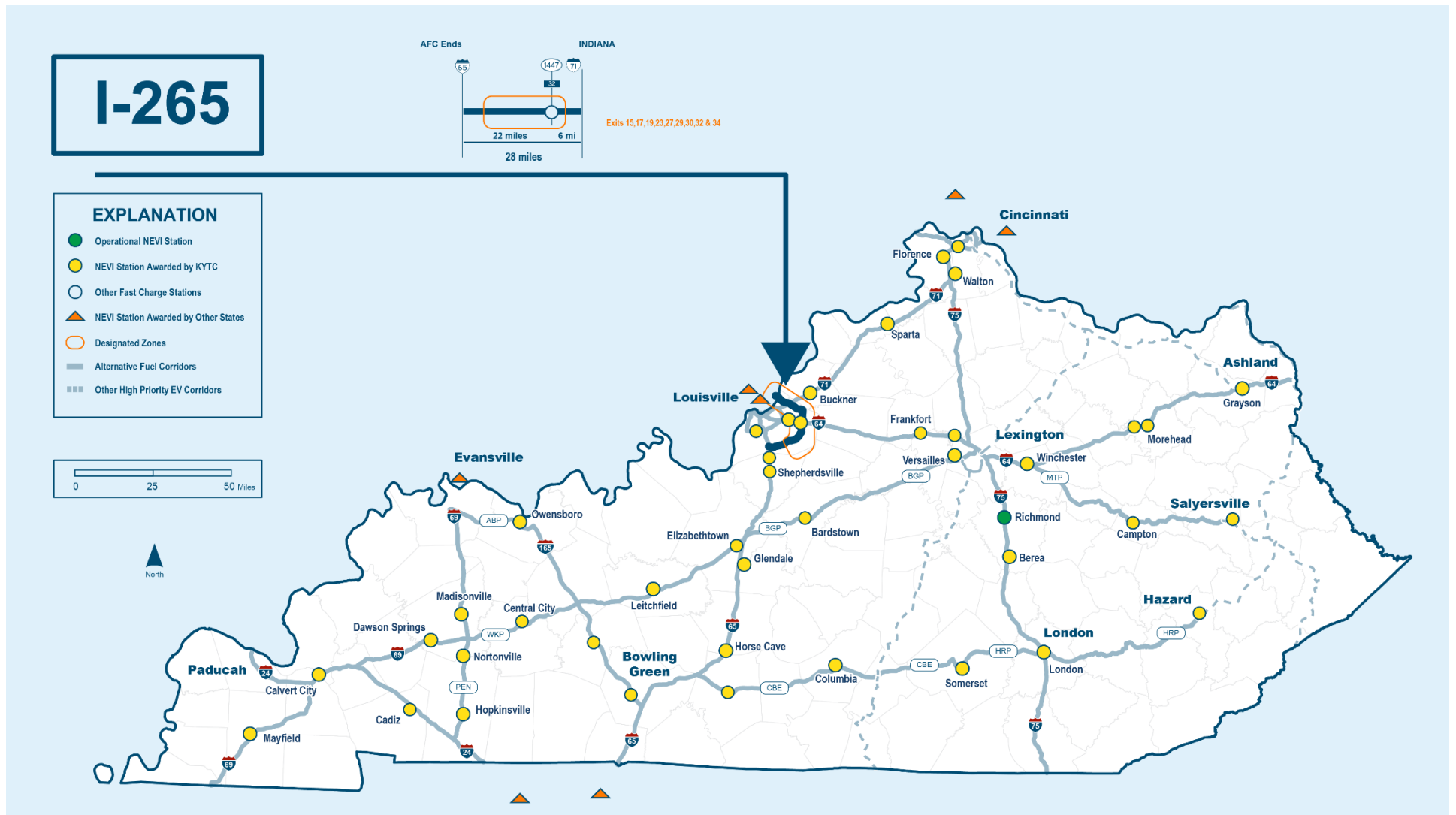


Figure C 15: I-275 AFC Build-Out Status

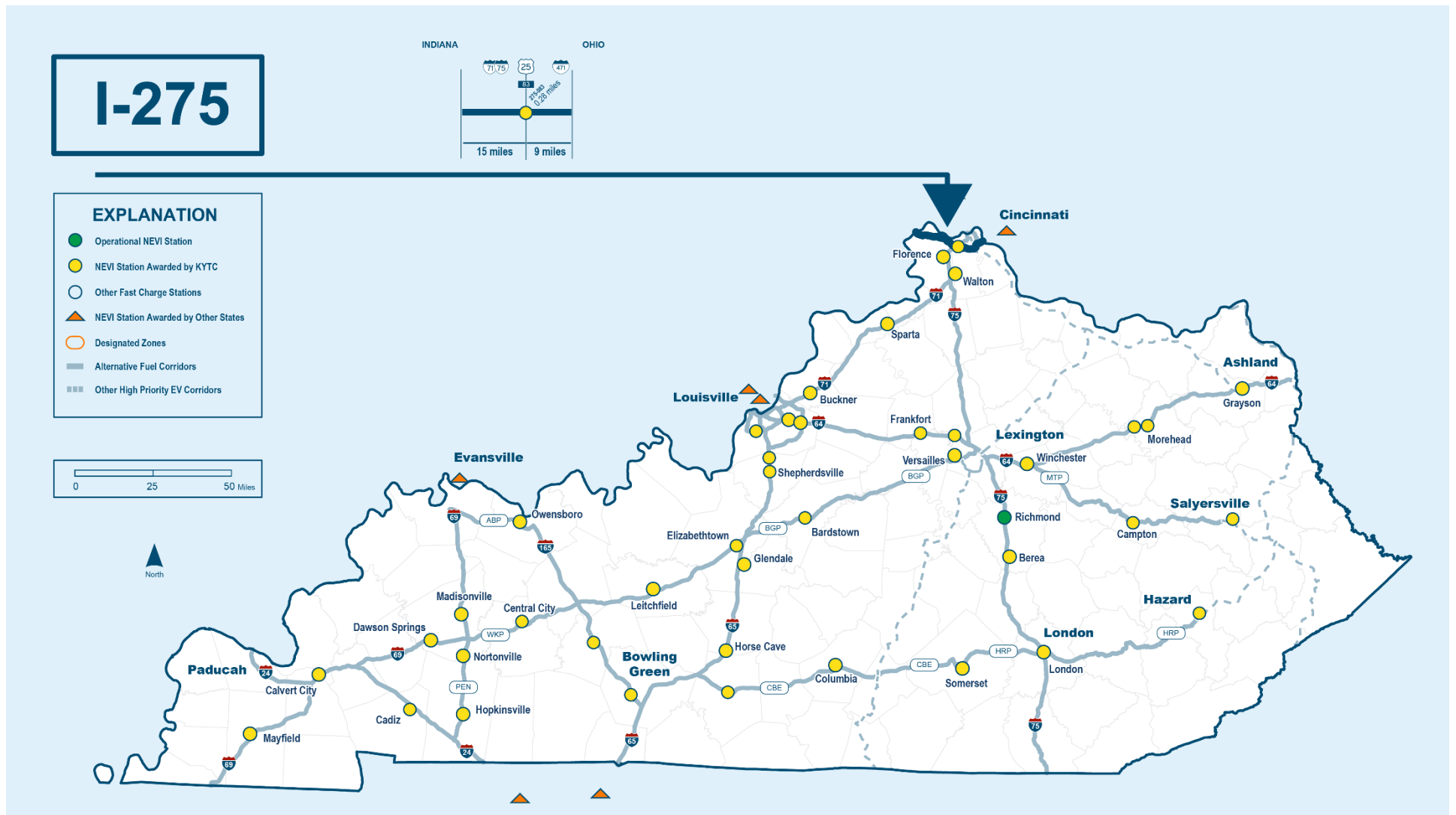


Figure C 16: I-471 AFC Build-Out Status

