National Association of State Energy Officials

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April 5, 2024

The Honorable Shailen P. Bhatt
Administrator, Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Docket No. FHWA–2023–0054 Request for Information on the J3400 Connector and Potential Options for Performance-Based Charging Standards

Dear Administrator Bhatt,

The National Association of State Energy Officials (NASEO) offers our comments in response to the Federal Highway Administration's (FHWA) Request for Information on the J3400 Connector and Potential Options for Performance-Based Charging Standards (Docket No. FHWA-2023-0054). NASEO represents the governor-designated State Energy Directors and their offices from each of the 56 states, territories, and the District of Columbia. Most State Energy Offices play a significant role in electric vehicle (EV) policy and program development and rollout, including charging infrastructure planning and deployment, grid planning, and building private-sector partnerships with both vehicle and charging manufacturers. State Energy Offices are also typically a key supporting agency or state lead for the National Electric Vehicle Infrastructure (NEVI) program. NASEO encourages FHWA to consider the following:

1. **Not requiring that existing charging stations be retrofitted with J3400 connectors**

While it is critical that federal funds facilitate access and interoperability of EV charging, NASEO is supportive of existing direct current fast chargers (DCFCs), including those supported by federal funding through NEVI or other programs, not being required to be retrofitted with a J3400 or other connector. Requiring retrofits of stations that are under contract, under construction, or already built would add unnecessary administrative and financial burdens for states and awarded charging providers. Such burdens would likely impede states' progress toward achieving "fully built out" certification, delaying their ability to utilize formula funds for community and other charging needs beyond designated alternative fuel corridors. In addition, Combined Charging System (CCS) to J3400 adapters are increasingly common in the market and therefore do not warrant requiring permanent J3400 connectors on existing chargers. Some states also already offer the ability for charging providers and/or site hosts to seek funding for retrofits (e.g., for power level upgrades), and

these states will decide whether connector retrofits will be eligible for this funding. States have seen willingness on behalf of some site hosts to cover costs associated with needed retrofits to keep up with the market (e.g., swapping CHAdeMO connectors for CCS) and increase utilization. As such, NASEO supports states not being required to retrofit existing charging stations with J3400 connectors.

NASEO appreciates the opportunity to provide input before FHWA revises the minimum standards and requirements for EV chargers. We urge a forward-looking approach that enables states to move ahead with charger deployment to ensure a convenient, affordable, reliable, and equitable network of chargers nationwide.

Best regards,

David Terry, President
NASEO

CC: State and Territory Energy Offices, U.S. Department of Energy, U.S. Department of Transportation