

**2025 Update of the National Electric Vehicle Infrastructure (NEVI)  
Program Deployment Plan for Colorado**

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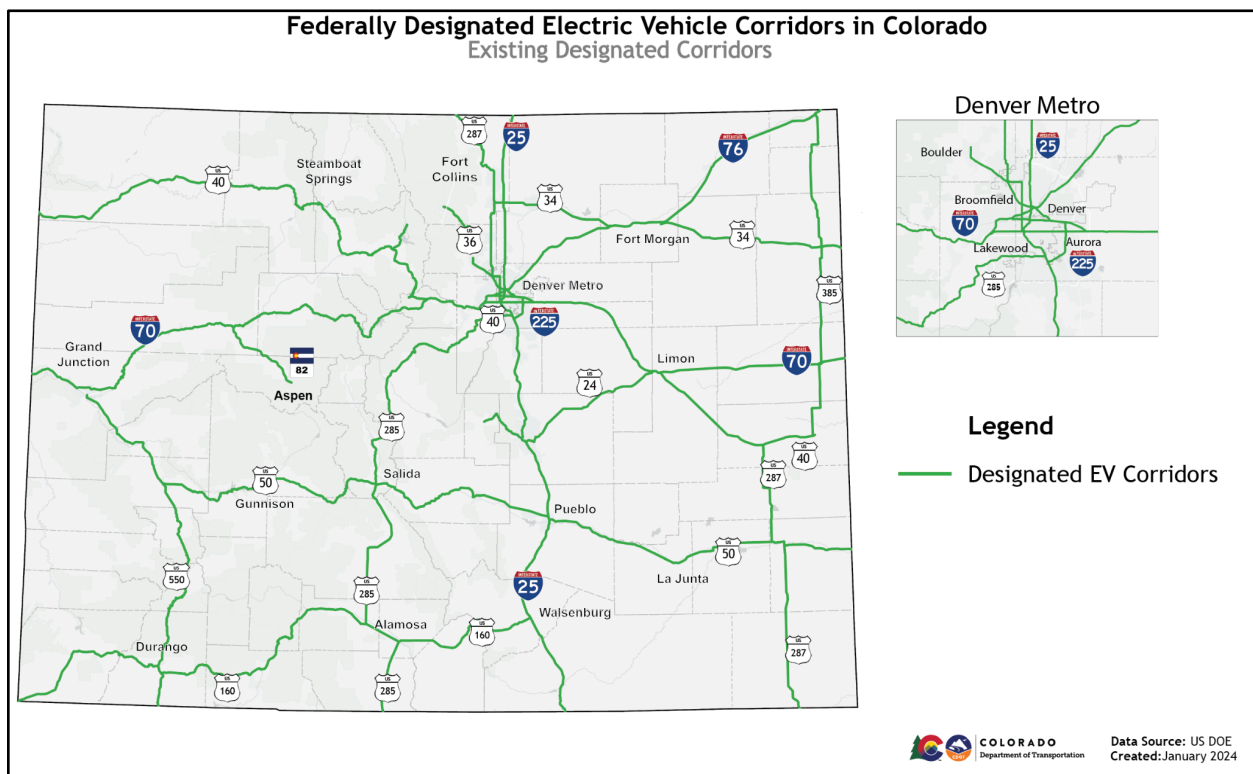
## Description of Plan to Use NEVI Program Funds by Fiscal Year

### Background

Colorado has been successfully implementing the NEVI Program over the past 3 years through a close partnership between the Colorado Department of Transportation (CDOT) and the Colorado Energy Office (CEO). In alignment with the state's prior history and structure of collaboration between these two entities, Colorado has analyzed existing charging infrastructure gaps and investment priorities along its 16 designated Alternative Fuel Corridors (AFCs) and implemented a competitive grant program designed to identify and award the strongest proposals by private sector companies and local governments to construct and operate NEVI Program compliant stations within those gaps.

Colorado's designated AFCs are listed below:

Corridor	Termini
I-25	Wyoming Border to New Mexico Border
I-70	Utah Border to Kansas Border
I-76	Denver to Nebraska Border
I-225	I-25 to I-70
I-270	I-25 to I-70
US 24	Divide to Limon
US 34	Granby to Grand Lake; Loveland to Nebraska Border
US 36	Estes Park to Lyons; Boulder to Denver
US 40	Utah Border to I-70; Golden to Aurora (Colfax Ave.); Limon to Cheyenne Wells
US 50	Grand Junction to Kansas Border
US 160	New Mexico Border to Walsenburg
US 285	New Mexico Border to Denver
US 287	Wyoming Border to Denver
US 385	Julesburg to Cheyenne Wells
US 550	Montrose to New Mexico Border
CO 82	Glenwood Springs to Aspen



A common element of EV grant programs in Colorado has been the leading role that CEO has played in program design, administration, and evaluation. Regardless of the original source of federal, state, or other funds, Colorado has used interagency agreements (IAAs) to sub-allocate charging- or fueling-related portions of larger programs to CEO to manage on the state's behalf. All programs operate on a reimbursement basis, with CEO staff processing requests for completed projects for the review, approval, and reimbursement by the funding agency.

In the implementation of the NEVI Program, CDOT remains responsible for compliance with regulatory requirements and maintains close and constant involvement in all steps of program design and implementation. The advantage of this approach is that grant applicants, local communities, and industry stakeholders are able to establish a consistent, ongoing relationship with CEO, its staff, procedures, webpages, and program "brands" over multiple years while CEO develops expertise in the electric vehicle market and in developing and refining grant programs. Based on this experience and the positive feedback that it has generated from project partners over the years, CDOT decided to continue this approach in managing Colorado's allocation of NEVI funds by developing an IAA with CEO to incorporate NEVI funds into CEO's Direct Current Fast-Charging (DCFC) Plazas Program and updated the program guidelines to align with federal guidance as well as stakeholder needs.

CDOT, CEO, and other partner agencies continue to collaborate on program development and design as well as refine the scoring and selection of proposed projects to ensure that they align with federal, state, and stakeholder goals and priorities. Upon project selection, CEO establishes individual project agreements with each grantee and is responsible for monitoring the scope, schedule, and budget of the project through its completion. Project agreements incorporate all NEVI standards and requirements, and CDOT provides oversight, guidance, and support for CEO in applying these agreement terms.

Additionally, CDOT plays the leading role in requirements related to highway signage, environmental clearances, and other topic areas where CDOT has greater expertise.

CDOT established an IAA with CEO in 2023 under which CEO administers the DCFC Plazas grant program using the state's apportionment of NEVI funds while CDOT ensures that the program adheres to all federal requirements and guidelines. Using this structure, CDOT and CEO have completed three rounds of grant solicitations released in March 2023, October 2023, and July 2024 and issued awards for 53 sites totalling \$29,117,000 statewide.

## Plan for Investment of FFY26 Funding

Over the course of Colorado's existing NEVI Program implementation, CDOT has completed the obligation of the entirety of federal funds for FFY22 - FFY25 totalling \$44,494,590. Therefore the remainder of this document refers only to the remaining FFY26 funding, which totals \$12,042,149.

Colorado plans to remain consistent in the application of its FFY26 NEVI Program funding by maintaining the four existing investment priorities that have been applied to previous funding years. They are:

1. Construction of new charging locations within identified charging gaps along Colorado's federally designated Alternative Fuel Corridors.

Despite significant investments by the state and private operators, there are areas along the federally-designated Alternative Fuel Corridors that still lack DCFC. CDOT and CEO will work with partner agencies and other stakeholders to identify charging gaps. These locations will be designated in Request for Applications (RFAs) as preferred locations and will be prioritized over proposals for other sites.

2. Expansion of existing charging stations along Colorado's federally designated Alternative Fuel Corridors by adding additional chargers and increasing power as required by NEVI standards.

There are a number of existing EV charging stations along Colorado's federally designated Alternative Fuel Corridors that do not currently meet NEVI requirements but may be cost-effectively upgraded by adding chargers and power modules. Some of these sites were future-proofed as part of the previous DCFC Corridors Program by upsizing transformers, including additional conduit and wiring, and installing mounting pads at the time of original construction. CDOT and CEO will prioritize the funding of sites along designated AFCs where cost-effective upgrades can be made to bring them into compliance with NEVI requirements.

3. Construction of additional charging locations in areas where charging infrastructure already exists but is insufficient to meet the growing EV market demand.

Colorado's EV market is rapidly expanding, with the EV share of new vehicle sales surpassing 20 percent over the last several quarters. The expansion of charging infrastructure in the Front Range metro areas, in other population centers, and near recreational destinations will be needed to accommodate growth of the market and maintain a positive user experience for travelers looking for available chargers away from home.

4. Construction of charging infrastructure to support the electrification of the medium and heavy duty vehicle market.

While research and engagement with commercial freight and delivery fleets indicates that there is a general industry preference for “behind-the-fence” depot charging, there is still likely to be a significant need for medium- and heavy-duty vehicles to charge at publicly-available stations as vehicle capabilities and fleet adoption rates advance. CDOT and CEO will work with stakeholders to identify strategies for project prioritization, site design, and operational support for locations intended to serve multiple MHD fleets or a combination of MHD and light-duty users.

Based on the existing locations of station awards and the most recent analysis of infrastructure gaps along AFCs, there are approximately 20 more locations that need to be awarded NEVI projects to approach a Fully Built Out status across Colorado’s entire network.

At such time as projects have been awarded in these remaining areas and substantial progress is being made towards their construction, Colorado will review the overall landscape of projects to assess any remaining gaps larger than the 50-mile target established by CDOT and CEO for this program. There are several corridors in Colorado in which a gap of greater than 50 miles would be reasonably considered Fully Built Out, due to a lack of major communities suitable for hosting a NEVI funded station, the existence of other charging options within the gap, or other mitigating factors. When a determination has been made at the state level that the entirety of Colorado’s AFC network should be considered Fully Built Out, staff will prepare and submit a letter to FHWA determining the status as Fully Built Out and provide a reasonable explanation of the State’s determination, including maps, tables, data, and other information as appropriate.

## EV Charging Infrastructure Deployment After Fully Built Out Status

Following FHWA’s review and certification of Colorado’s determination of Fully Built Out status on the designated AFCs, CDOT and CEO will continue to distribute all unawarded funds via the DCFC Plazas Program to support additional charging deployments at both the corridor and community level, based on the quality of the proposed project, local demand for additional charging, value to the state, and other factors. Colorado may also choose to invest a portion of remaining funds to support medium- and heavy-duty charging needs across the state, as appropriate.

## Public Engagement

### Community Engagement Outcomes Report

CDOT and its partners engaged in numerous outreach events during the period between the previous plan approval on November 15, 2024 and the submission of this plan on September 10, 2025. The outreach goals were to share what the NEVI Program has accomplished to date, provide updates on what is to come in the future, and collect feedback on the implementation of the NEVI Program and EV charging infrastructure in Colorado more generally. Also, as part of the outreach CDOT continued to use an online tool for members of the general public to suggest charging locations via a pin-drop map.

The list below highlights a number of outreach events that CDOT and its partners participated in to promote the NEVI Program and other EV initiatives:

- Women Who Charge EVSE Technician Training (2/3/25)
  - CDOT staff provided an in-person overview of state EV policy and programs, including NEVI implementation, to a cohort of students completing an EVSE technician training course, and also accepted feedback on ways to improve current grant program offerings.
- SAE International Online EV Infrastructure Event (2/4/25)
  - CDOT staff presented virtually on Colorado's charging network buildout, including the incorporation and use of NEVI Program funds to accelerate its growth.
- Colorado Scenic & Historic Byways Commission (2/5/25)
  - Provided an update on the latest round of awards for the DCFC Plazas Program, including NEVI Program funding, and solicited feedback for incorporation into future rounds.
- Drive Clean Colorado Summit & Expo (2/26/25 - 2/27/25)
  - CDOT staff attended in person and participated in a panel updating the audience on NEVI Program implementation and seeking feedback on future improvements.
- Colorado EV Coalition ZEV Workforce Development Subgroup (3/5/25)
  - CDOT staff presented virtually to this workforce and training opportunities group about the progress made in Colorado over the course of 2024 and the ongoing implementation of infrastructure grant programs, including NEVI.
- Large Public Power Council (LPPC) E-Mobility Task Force (3/19/25)
  - CDOT staff presented in-person to a meeting of the LPPC E-Mobility Task Force, discussing Colorado's overall EV policy landscape and particularly the ways in which electric utilities and public agencies can collaborate to smooth the build-out of NEVI-funded infrastructure.
- National Alternative Fuel Corridor Coalition Meeting (3/20/25)
  - CDOT staff presented virtually to the members of the National Alternative Fuel Corridor Council on the state's NEVI implementation progress.
- DRCOG Advanced Mobility Partnership (AMP) Meeting (4/1/25)
  - CDOT staff presented an update on NEVI Program implementation progress to date and solicited feedback on the program from local government participants.
- American Council of Engineering Companies (ACEC) Colorado Conference (4/23/25)
  - CDOT staff participated in a panel on the topic of federal and state EV charger funding programs, with a particular focus on the NEVI Program and its ongoing implementation. The presentation included engagement with the private sector

engineering firm participants to improve future collaboration with the public sector panelists.

- State of Colorado and National Renewable Energy Laboratory (NREL) Meeting (6/25/25)
  - Colorado staff met with NREL researchers and discussed current NEVI efforts and opportunities for future collaboration on the program.
- Colorado Scenic & Historic Byways Commission (8/6/25)
  - Provided a status update on the implementation of the NEVI Program and how it helps to support Colorado's efforts to electrify its 26 scenic and historic byways.
- Colorado EV Coalition (8/21/25)
  - CEO and CDOT presented on programmatic updates and successes as well as an update on the new NEVI Program Guidance and timeline for 2025 NEVI Plan submission.

#### Future Planned Events

- Drive Clean Colorado Summit & Expo (10/22/25-10/23/25)
  - Plan to provide an update on the overall status of the NEVI Program and the next scheduled round of DCFC Plazas Program grants in the fall of 2025.

### Utility Engagement

CDOT and CEO have a long history of utility engagement in support of transportation electrification, and the existing relationships and processes established through this prior work were leveraged to support this 2025 NEVI Plan Update. When engaging with electric utilities through standing meetings such as the Rocky Mountain Utility Exchange, CEVC Beneficial Electrification Subgroup, or at meetings of the Colorado Rural Electrification Association or Colorado Association of Municipal Utilities, the main goal is to gain understanding of their challenges and limitations in supporting transportation electrification, provide updates and context on current and upcoming EV charging grant programs, and identify ways in which the two groups can better collaborate in the future. The main takeaway from these events is generally that utility stakeholders are satisfied with Colorado's handling of the NEVI Program and would appreciate additional support and financial resources to address the grid upgrades necessary to support broader transportation sector electrification.

### Lessons Learned

CDOT has the following takeaways from the outreach process:

- Due to the specific nature of the NEVI Plan, outreach was more successful when tied to other, more general information about EV programs in Colorado.
- Several years into the implementation of the NEVI Program, stakeholders are generally familiar with its elements and are not seeking major adjustments.
- The general public was largely unaware of the amount of public charging already available in the state. Also, engagement revealed that the main concerns about charging were costs, reliability, and speed.
- There is uncertainty around the future direction of the national EV market and concern about the speed of charger deployment, but EV sales in Colorado remain strong and charging investment by both public and private entities is continuing to grow.

Overall, the main lessons learned from the outreach process were that applicants, electric utilities, and the public stakeholders are supportive of Colorado's method of implementing the NEVI Program, but more can be done to promote its benefits to the general public. Industry professionals found the number of grant offerings sufficient, and the streamlined application process of combining the NEVI Program with DCFC Plazas Program helpful. The general public had concerns around the cost and reliability of public charging and also seemed less aware of the amount of statewide charging infrastructure and capabilities of EVs more broadly. As a result, both targeted and general public engagement over the remaining implementation of the NEVI Program will be necessary and an opportunity to continue improving the program in the coming years.

## Physical Security & Cybersecurity

### Physical Security

In order to ensure the physical security and comfort of users, Colorado requires that project sites receiving NEVI funding include existing dusk-to-dawn area lighting, or if this is not already in place, that it be installed as a part of the project. Project awards are also prioritized for locations that will have a reasonable level of public activity so that EV drivers feel safe, rather than secluded. For example, it is preferred that the placement of chargers at a given site be located near the entrance of the host facility, as opposed to around the side or back of the building. Projects that site charging at the far end of a large parking lot, behind or on the side of a building far from a building's entrance, or in locations where there is likely to be little activity, especially at night, will not be considered.

NEVI funded projects are also required to include comprehensive directional signage to guide users to the charging station from all entrances to the locations in parking lots. Although many EV users tend to rely on mobile applications to locate chargers away from home, these often help drivers navigate to an address rather than the specific location of the charging station within the parking lot. Wayfinding signage helps users to find the charging site with confidence and raise general public awareness of public charging availability.

Lastly, applicants for NEVI Program funding are encouraged to clearly describe additional safety precautions implemented on-site for EV drivers charging their vehicles as part of their applications to the DCFC Plazas Program. CDOT and CEO thoroughly review these applications and prioritize the award of locations that support the safety and comfort level of customers.

### Cybersecurity

In order to maintain a reliable EV charging ecosystem that protects consumers and the national electricity grid, grant awardees must secure connected EV charging infrastructure against possible cyberattacks. This includes, but is not limited to, protecting physical charging infrastructure, the EV Charging Station Management System and web applications from unauthorized physical or remote access. Grant awardees are required to comply with NIST 800 (<https://csrc.nist.gov/publications/sp800>) series standards before, during, and after completion of NEVI station construction or a comparable cybersecurity standard to ensure protection of the charging stations and users.

NEVI grant recipients will be required to protect against and actively monitor for:

- Firmware manipulation
- Billing manipulation
- Bot recruitment and network proxy
- Denial of Service (DoS) attacks
- Charging data/record theft
- Personally identifiable information leakage
- Payment fraud
- Demand-supply manipulation attacks (synchronized charging demand/discharge supply disruption)

Applicants for NEVI funding managed by the State of Colorado will be required to submit a cybersecurity plan detailing their approach to this threat as well as how they will respond to potential incidents,

including reporting to the State of Colorado if and when such events occur. Grantees will be expected to maintain and update their cybersecurity plans over the life of the program and, upon request, demonstrate that it remains effective and is being followed to ensure that the NEVI investment and interests of the traveling public are being protected.