ARIZONA DEPARTMENT OF TRANSPORTATION

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Streamlined 2025 Arizona Department of Transportation Electric Vehicle Charging Infrastructure Deployment Plan

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NEVI Plan Overview with Alternative Fuel Corridors and EV Station Locations

Introduction

As per the National Electric Vehicle Infrastructure (NEVI) Formula Program Interim Final Guidance document, dated August 11, 2025, this Arizona Department of Transportation (ADOT) Electric Vehicle (EV) Infrastructure Deployment Plan includes the following statutory and regulatory requirements:

1. A description of how the state intends to use NEVI Formula Program funds for each fiscal year. The plan covers all unobligated funding for the fiscal years 2022 to 2026.
2. A Community Engagement Outcomes Report, per 23 Code of Federal Regulations (CFR) 680.112(d).
3. A description of physical and cybersecurity strategies, per 23 CFR 680.106(h).

This Streamlined 2025 ADOT EV Charging Infrastructure Deployment Plan contains nine (9) additional corridors and includes additional stations along the Interstates. This plan will be posted on the ADOT EV webpage upon approval at www.azdot.gov/EVPlan. In addition, in Appendix B is a 2025 ADOT Alternative Fuel Corridor (AFC) Nomination document for the new Arizona corridors in the 2025 plan. Following the AFC nomination and plan approval, ADOT intends to deploy newly proposed stations on the designated AFCs. Links to previously approved ADOT EV Infrastructure Deployment Plans from 2022 to 2024 are also referenced in Appendix A.

Nomenclature

ADOT designated the names of the plans based upon the calendar year published (i.e., 2022 to 2025). The federal fiscal years associated with the calendar years are as follows. Furthermore, the EV plans were implemented in phases as designated in **Table 1**.

Table 1: ADOT EV Plans 2022 to 2025 with respect to Fiscal Years and Phases

Calendar Year	Federal Fiscal Year	ADOT Phase
2022	2022 – 2023	1
2023	2024	2
2024	2025	
2025	2026	3

Plan Vision and Goals

The following goals are anticipated for 2025 and 2026:

- Nominate new 2025 AFCs for approval
- Solicit and award the Phase 2 sites (from the approved 2023 and 2024 plans)
- Solicit and award Phase 3, EV Stations identified in the 2025 plan

ADOT EV Plan Phased Approach

ADOT is deploying its EV infrastructure in four phases. Below is a summary and status:

- Phase 1: 2022 EV plan corridors (shown in blue):
  - Phase 1 is focused on network and station locations on the Interstate highways. Design has begun with the stations planned to open in 2026.

- Phase 2: 2023 EV plan corridors (shown in red) and 2024 EV plan corridors (in purple):
  - The Phase 2 solicitation is planned in fall 2025.

- Phase 3: 2025 EV plan corridors (shown in light blue):
  - New AFC nominations are included in this plan.

- Phase 4: Future EV plan corridors (not shown on map)
  - If ADOT receives full build-out certification, ADOT intends to utilize the remaining funds in a fourth implementation phase for a build-out of EV chargers on non-National Highway System (NHS) routes (for example, routes east of Globe).

Figure 1. 2022 to 2025 EV Plans AFC Corridor Overview

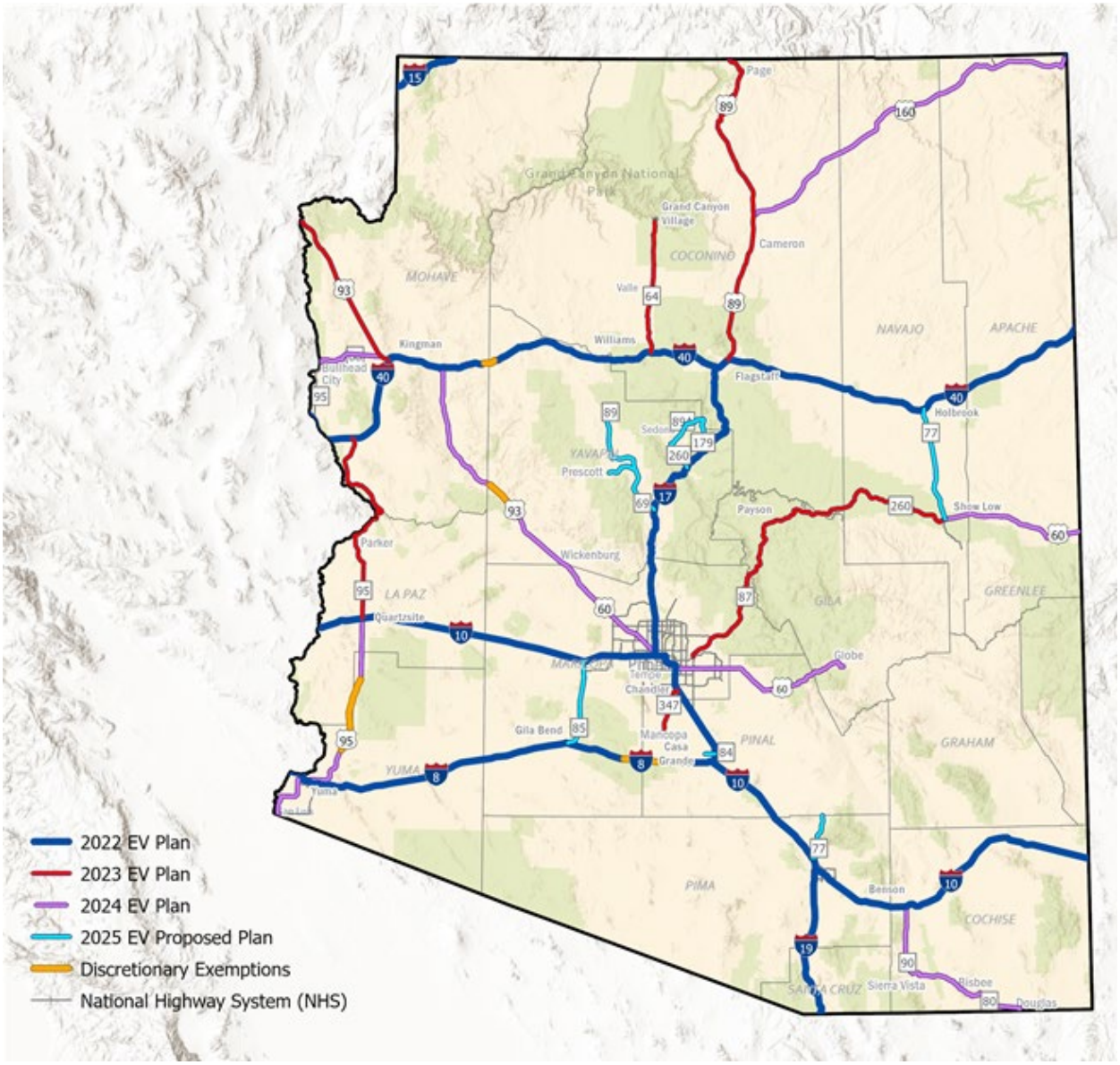
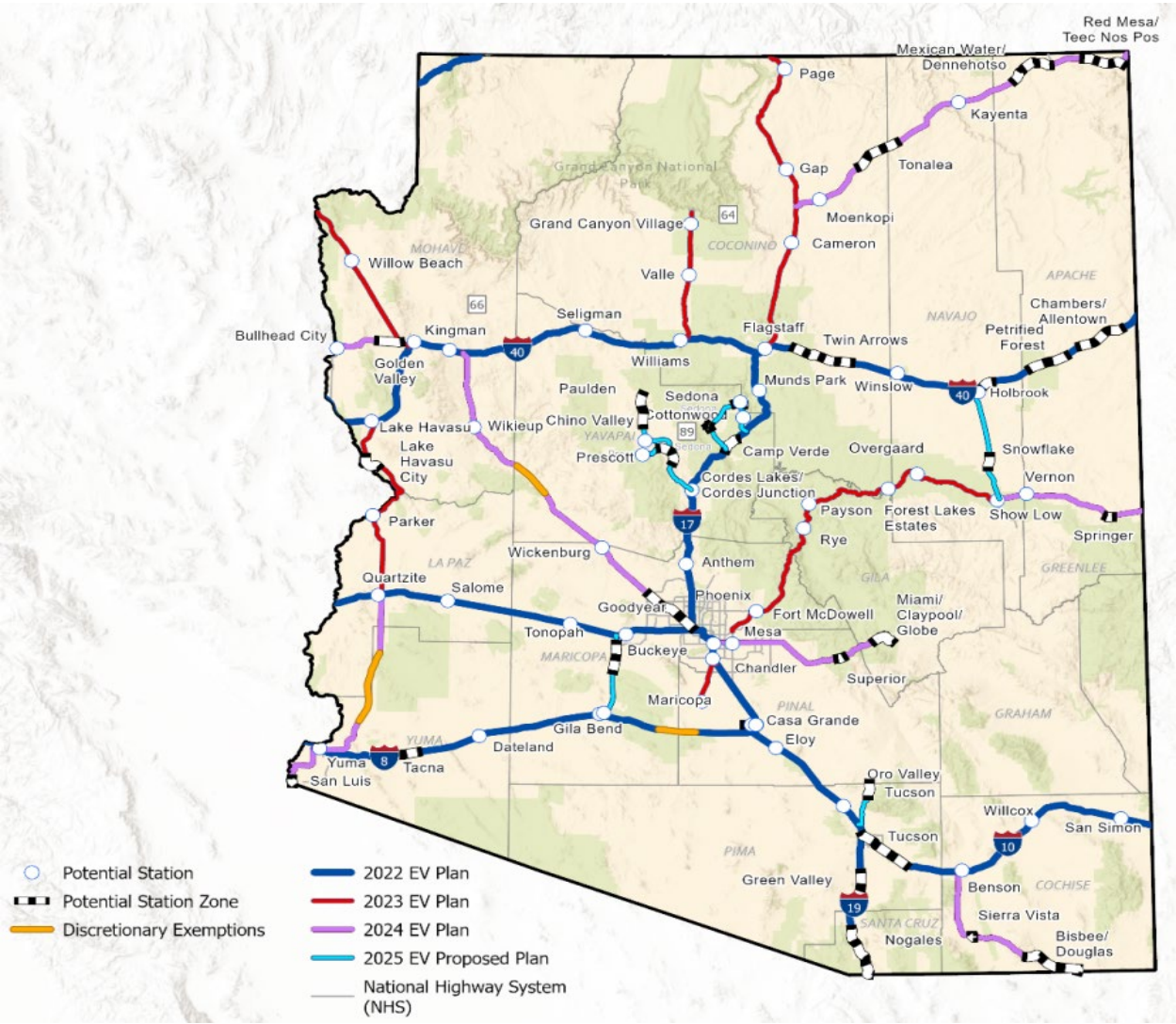


Figure 2. 2022 to 2025 ADOT EV Plan Overview: Station Locations



Funding for Federal Fiscal Years 2022 to 2026

Below is a description of how Arizona intends to use NEVI Formula Program funds for each federal fiscal year. The funds that are obligated are marked in **Table 2**. The unobligated funding for the fiscal years 2022 to 2026 are listed below. ADOT intends to use all remaining unobligated funding as per **Table 2**.

Table 2: ADOT Budget for EV Plans in Phases

Activity per ADOT EV Plan Phases	Phase 1	Phase 2**	Phase 3	Phase 4
Fiscal Year	2022-2023	2023-2024	2025-2026	2026
Sites	18	35	21	15
EV Plan Update (Planning Funds)	Obligated	Obligated	Obligated	$150,574
Developer Reimbursement (Construction)	Obligated	$28,800,000	$16,800,000	$12,000,000
Preliminary Engineering (Phase 2)	Obligated	$1,060,000	$777,000	$855,000
Project Oversight (Construction and O&M)	*$738,000	$1,435,000	$861,000	$933,000
Total Remaining	**$738,000**	**$31,295,000**	**$18,438,000**	**$13,938,574**

*An authorization request has been submitted for $525,000 for construction oversight for Phase 1. An authorization request for Phase 1 operations and maintenance (O&M) will be submitted at a later date and utilize the remaining funding.

**Some NEVI authorization requests have been sent over to FHWA during the preparation of this plan and will change the unobligated values shown in this Table for Phase 1 and 2.

Total Unobligated Funding	**$64,409,574**
Previously Obligated	**$12,090,426**
Arizona Allocation	**$76,500,000**
Potentially Unused	**$0**

Phase 2: 2023 and 2024 EV Plans

ADOT is including the previously approved 2023 and 2024 (Phase 2) EV plans consistent with the Federal Highway Administration's (FHWA) interim final NEVI guidance released August 11, 2025, as these stations have not yet been obligated. ADOT disagrees with the legality of FHWA's revocation of previously approved state plans and the need to resubmit state EV plans for approval. Arizona is party to litigation challenging that revocation in *Washington v. Dept. of Transportation*, No. 25-cv-00848-TL (W.D. Wash.), in which the district court enjoined the revocation of certain state plans for fiscal years 2022 to 2025. By including the 2023 and 2024 plans in the 2025 plan, ADOT does not waive, and instead expressly reserves, any rights, claims, or defenses it may have regarding FHWA's actions for the NEVI Formula Program in that case or otherwise. All ADOT current and future submissions related to the NEVI Formula Program are made subject to this reservation of rights.

ADOT plans to advertise the locations in Phase 2, without revision to the approved EV plans, in fall 2025. See Appendix A for a link to the approved 2023 and 2024 ADOT EV plans, including a list of stations to be advertised. ADOT is including these plans to meet the FHWA's interim final NEVI guidance that requires a description of how Arizona intends to use all unobligated NEVI Formula Program funds for each fiscal year (2022 to 2026) (see **Table 2**).

Phase 3: 2025 EV Plan

2025 EV Plan Standards Update

ADOT will follow the minimum standards in the NEVI Requirements. The 2025 update to the FHWA guidelines has removed the requirement to have EV charging stations 50 miles apart, within 1 mile from the interchange, and within 25 miles from the state border. For the 2025 EV Stations, ADOT will adopt the following guidelines:

- Install the EV charging stations approximately 50 miles apart and within 2 miles from the interchange.
- EV charging stations will be within approximately 25 miles of the Arizona State borders.
- Reasonable exceptions to distances can be made.

Solicitations will comply with all applicable federal and state requirements. They will be advertised and made available to potential proposers through appropriate distribution channels. ADOT will hold a pre-proposal meeting or other meetings, as appropriate, with potential proposers to discuss program goals, selection criteria, and other topics.

Solicitation documents will provide detailed information on submittal requirements, eligibility, program goals, and standards for station upgrade, installation, operation, and maintenance, as applicable. Administrative and other applicable requirements including NEVI Formula Program requirements, applicable state requirements, applicant responsibilities relating thereto, and other relevant information will also be included.

ADOT will verify that solicitation documents and contracts executed with all parties awarded NEVI Formula Program funding comply with Title 23 U.S.C., 23 CFR Part 680, and all applicable requirements under 2 CFR Part 200. Contract provisions will require that all applicable federal requirements are met by the awardee, and appropriate monitoring will be conducted to verify compliance.

ADOT will use NEVI Formula Program funds for new EV charging station O&M costs.

ADOT will require, via contract terms, that infrastructure be maintained and operated at the same location for a period of no less than 5 years from the service commencement date. Contract terms may require that awardees for new stations post a performance bond to guarantee that the EV station remains operational for the 5-year operations and maintenance period.

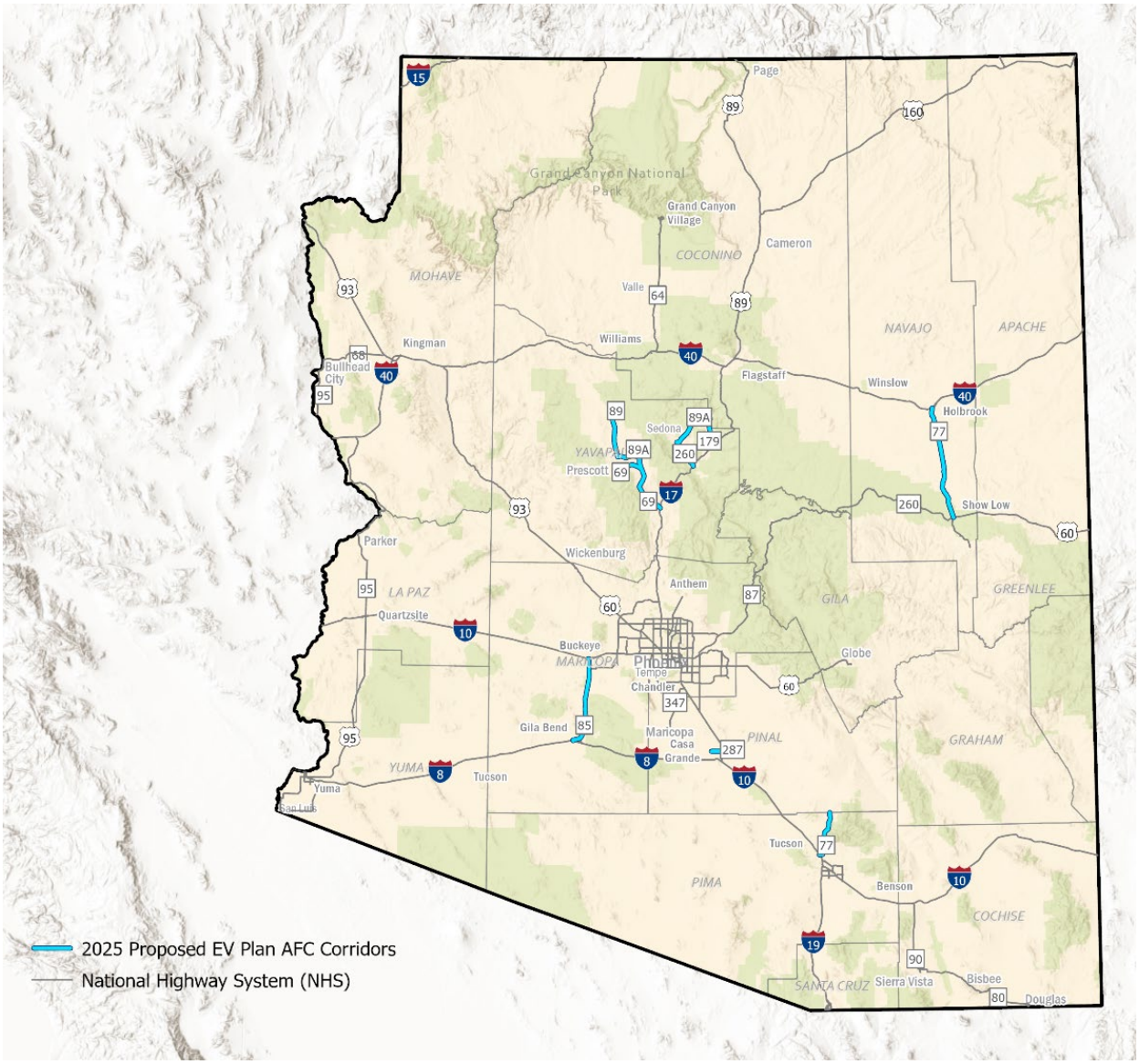
ADOT will meet all federal requirements for the use of federal aid and the requirements of the NEVI Standards and guidance. ADOT described how it intends to comply with the federal and state requirements in the 2024 EV plan, which can be downloaded using the link in Appendix A.

2025 Alternative Fuel Corridor Nominations

The 2025 plan seeks to close the remaining gaps for NEVI-compliant stations along the Interstates. Additionally, in 2025, ADOT nominated additional highways for AFC status. Reference Appendix B regarding the 2025 ADOT AFC nominations document. They are as follows:

- State Route (SR) 77, Show Low to Holbrook
- SR 77, Tucson to Pima County Border
- SR 69, Interstate 17 (I-17) to Prescott
- SR 89A/89, from SR 69 to just north of Paulden (Milepost 339)
- SR 179, I-17 to Sedona
- SR 89/89A, Cottonwood to Sedona
- SR 260, I-17 to Cottonwood/SR 89A
- SR 85, I-8 (Gila Bend) to I-10 (Buckeye)
- SR 287, Casa Grande to I-10

Figure 3. 2025 EV Plan AFC Nominations



The FHWA did not have a Round 9 to solicit AFC nominations by the date of submission of this document in 2025. ADOT has included the request for the AFC nominations for the nine corridors in Appendix B. ADOT requests that the FHWA approve these nominations as part of this plan submission.

2025 EV Infrastructure Deployment Strategy

ADOT proposes an EV deployment strategy designed to meet the objectives set forth in the *Plan Vision and Goals* section of this plan. The strategy supports increasing long-range mobility for EV drivers and the development of a national charging network by closing gaps in charging infrastructure along the state's highway system.

2025 EV Station Strategy Summary

The deployment strategy identifies potential stations to fill in gaps in charging infrastructure by providing funding for the design, installation, operation, and maintenance of proposed EV station locations along the AFCs as identified above. Potential station locations along the 2025 AFC are listed in **Table 3**.

NEVI Potential Stations along the 2025 Alternative Fuel Corridors

Locations identified in this plan to fill in gaps in the AFC are presented as general locations, rather than specific addresses and sites. At certain locations more than one interchange may be eligible as a site for station construction. Where possible, numerous exit locations are listed as potential station zones to allow proposers flexibility in selecting their site. The selected contractor will work with property owners and ADOT to determine precise location for installation.

Proposed station locations were identified using NEVI Standards, Requirements and following criteria:

- Traffic volume
- Availability of amenities
- Presence of infrastructure
- Cost
- Proximity to other NEVI-compliant EV stations
- Utility capacity
- Public and stakeholder input

Table 3: Potential NEVI Station Zones Along 2025 AFCs

Route	Locations	Exit Number	Utility Territories
SR 77	Snowflake, Taylor	Brimhall Street to Pinedale Road	APS
SR 77	Catalina, Tucson	Edwin Road to East Rancho Vistoso Blvd.	Tucson Electric Cooperative
SR 69	Prescott Valley, Dewey-Humbolt	North Lake Valley Road to Main Street	APS
SR 89A/89	Paulden, Chino Valley	Bramble Drive to Road 2 South	APS
SR 179	Cottonwood, Sedona	Main St to Hart Road	APS
SR 89/89A	Cottonwood	Camino Real to Rio Mesa Trail	APS
SR 260	Sedona	Arroyo Pinon Drive to Sombart Lane	APS
SR 85	Buckeye	Buckeye Canal to Arizona Cycle Park	APS

EV Plan New/Upgrade Stations Along the Interstates

The previous 2022 EV plan identified charging stations on the Interstates that we believed met NEVI Standards and Requirements. However, ADOT learned that these stations did not meet NEVI data reporting requirements and cannot be counted towards fully built-out status. These station locations are listed in **Table 4. Figure 4** shows the 2025 locations along the Interstates. ADOT intends to make a solicitation to deploy new/upgraded stations at these locations.

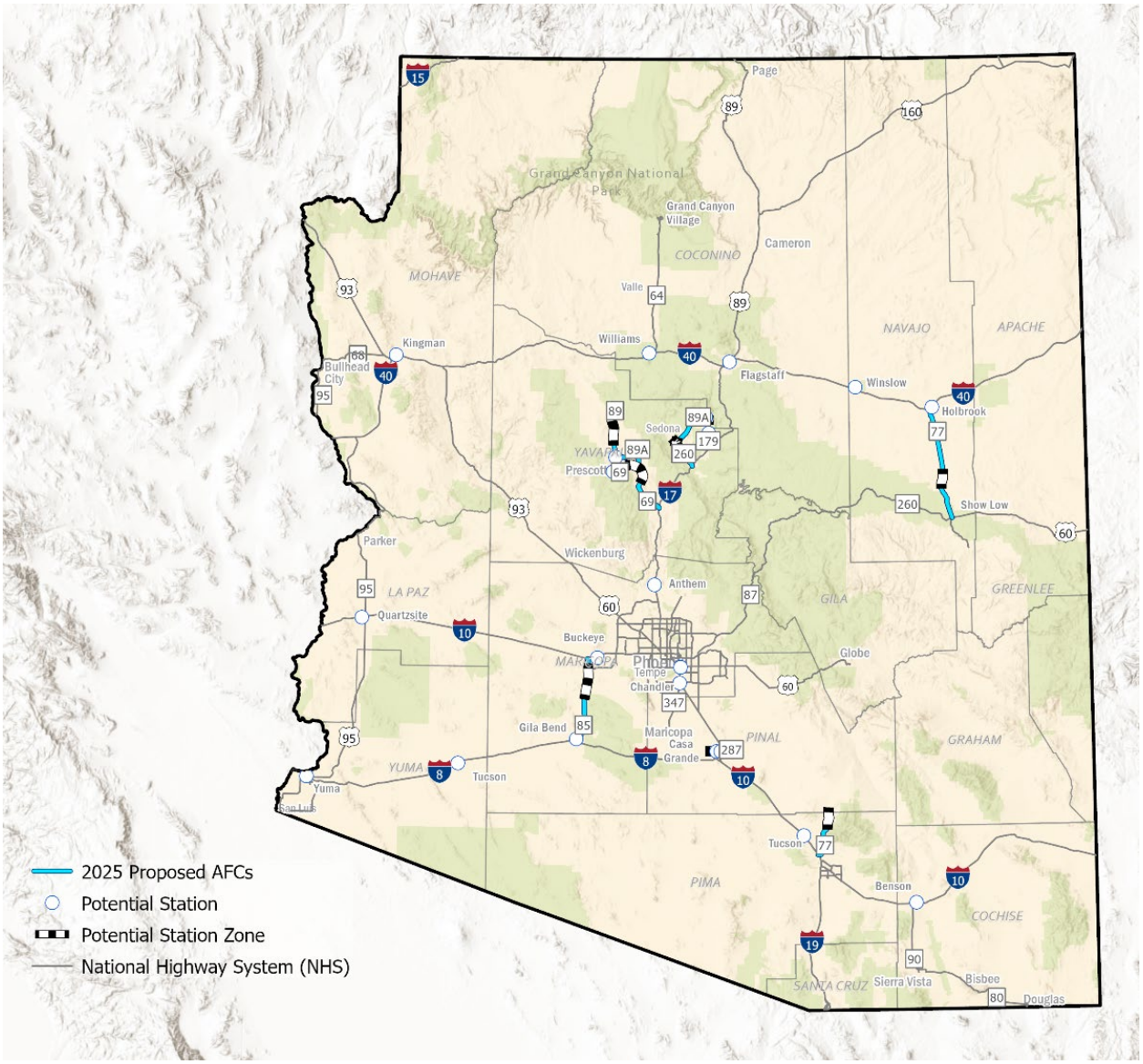
Table 4: NEVI Potential Station along Interstates, 2025

Route	Locations	Exit Number	Utility Territories
I-8	Yuma	2	Arizona Public Service (APS)
I-10	Tempe	154	APS/Salt River Project (SRP)
I-40	Kingman	51	TBD
I-40	Williams	163	APS
I-40	Flagstaff	198	APS
I-40	Winslow	253	APS
I-10	Quartzsite	17	APS
I-10	Buckeye	117	APS
I-10	Chandler	162	APS/SRP
I-8	Dateland	67	APS
I-10/I-19	Tucson	244	Tucson Electric Power
I-10	Benson	303	Sulphur Springs Valley Electric Co-op
I-17	Anthem	229	APS

Figure 4. NEVI Potential Stations Along Interstates, Arizona, 2025

A map displaying the potential stations for the 2025 EV plan is shown in **Figure 5**.

Figure 5. Potential Station Locations along Interstates and AFCs, 2025



Community Engagement Outcomes Report

Engagement Approach

ADOT continues to be committed to effective and inclusive public engagement throughout the development of the various EV Charging Infrastructure Deployment phases. A Public Involvement Plan (PIP) was developed for the 2025 EV plan to identify public involvement goals and methods to inform, engage, and solicit input from key stakeholders and the public.

A Four-Factor Analysis of the census tracts near the nine AFCs proposed for the 2025 EV plan was conducted. The analysis of the corridor area determined Spanish was the only language that met the "safe harbor" threshold, and as such, the meeting presentation was interpreted in Spanish. All other material was provided digitally with the ability to be translated through the Google translate option.

ADOT conducted public engagement efforts from August to September 2025 to seek input on the 2025 EV Plan Update. The 2025 EV plan outreach focused on the following key updates:

- New Arizona nominated AFCs
- Approximate locations for deployment of EV charging stations, upgraded and/or new, along the AFCs and Interstates
- Updates on community engagement

2025 EV Plan Public Engagement

The following public engagement efforts were conducted for the 2025 plan. Further resources can be found in Appendix C:

- ADOT conducted a formal public comment period for the 2025 EV Plan Update from August 25 through September 8, 2025. Comments could be provided through the following methods:
  - An online comment form at: azdot.gov/EVcomments
  - By email at: AZEVPlan@azdot.gov. The project email account was also used to respond to public inquiries about the plan.
  - Phone: 623.695.7411
  - Mail: ADOT EV Plan, 1611 West Jackson Street, Phoenix, AZ 85007
- A 2025 ADOT EV Statewide Self-Guided Virtual Public Meeting presentation was made available on the ADOT EV website azdot.gov/EVPlan2025 on August 25, 2025, in English and Spanish, followed by a 15-day public comment period. The 2025 recording was also directly distributed through an email link to the 4,300+ website subscribers.
- The ADOT EV plan website (azdot.gov/azevplan) was updated to include information about the plan, public meeting notices, public meeting materials, and project documents.
- In June 2025, the 2025 EV corridors were presented at a meeting between ADOT and Maricopa County.
- In June 2025, the 2025 EV corridors were presented at a meeting between ADOT and Sonora, Mexico.

Public Outreach and Notification

ADOT utilized various methods for promoting awareness of the plan, its development process, draft recommendations, and planned engagement activities for the public at each phase of outreach. The methods used to promote and seek public input on the 2025 EV plan are summarized below:

- The ADOT EV website www.azdot.gov/azevplan was updated with information about the plan and how to participate and provide comments during each outreach phase.
- On August 25, 2025, ADOT distributed a news release to secure media coverage on the 2025 EV plan.
- Multiple posts were made on various ADOT social media platforms (Facebook, Instagram, X [previously called Twitter], and Nextdoor).
- ADOT distributed several GovDelivery alerts to the EV program subscriber email list, which includes the 4,300+ website subscribers representing diverse stakeholders including the general public, EV owners, EV industry (e.g., charging station operators, automobile manufacturers, suppliers, and advocacy organizations), communities along the AFCs, representatives from Metropolitan Planning Organizations/Council of Governments in Arizona, various state agencies, the six tribal communities touching the AFCs, utility companies, chambers of commerce, and other business organizations.

Links to additional notification materials can be found in Appendix C.

Outreach and Participation Summary

Table 5 summarizes the public outreach results for the 2025 EV plan.

Table 5: Outreach and Participation Summary

Item	Results
GovDelivery emails	Sent August 25 and September 3, 2025, to 4,300+ subscribers.
Social media engagement	Nine posts made across Nextdoor, Facebook, Instagram, and X with an average reach of 23,900 per post.
Webpage visits	2,090 webpage visits during the comment period.
Media coverage	ADOT's EV plan garnered 11 instances of earned media with an estimated total audience of 93,600.
Comments and questions received	More than 400 comments received during the comment period from August 25 to September 8, 2025.

Comment Summary

ADOT received a total of **404** comments on the 2025 EV Plan Update via the following methods:

- # online comment form: 361
- # email comments: 35
- # phone comments: 8
- # mailed comments: 0

Comment themes are provided below. A link to a spreadsheet log of public comments received can be found in Appendix C.

Public comments offered different opinions on the 2025 EV plan and NEVI Formula Program. Approximately 65 percent of commenters expressed support of additional EV corridors and stations to ease travel anxiety and approximately 30 percent opposed the use of taxpayer money to fund EV charging stations that will be privately owned. Other comment themes expressed were:

- Stations should be in areas that are safe and well lit.
- Locations should be near food establishments and restrooms.
- Stations should be "future proof" with additional charging units per location and higher power capabilities to reduce charging time.
- Positive feedback over the inclusion of the North American Charging Standard (abbreviated as NACS) connector type.
- There should be station locations added east of Globe, Arizona.

Continuing Public Engagement Activities

ADOT will continue to conduct public outreach as part of the EV plan implementation in Arizona to keep the public and key stakeholders informed about the status of charging station procurement, design, and construction. The materials for this outreach period will be maintained on the project website, along with previously shared study materials. Interested parties can, at any time, sign up to receive project updates through the project website, and ADOT consistently maintains a project phone line, email address, and mailing address to receive and respond to comments and questions about the EV plan.

Tribal Engagement

Over the course of the NEVI Formula Program, ADOT has invited the following tribes, tribal departments, and tribal related organizations to coordination meetings and has met with several tribes individually:

- Colorado River Indian Tribe
- Hopi Tribe
- Ak-Chin Indian Community
- Fort Mojave Indian Tribe
- Fort McDowell Yavapai Nation
- Gila River Indian Community

- Hualapai Tribe
- Tonto Apache Tribe
- Navajo Nation Division of Transportation
- Navajo Nation
- Salt River Pima-Maricopa Indian Community
- Mazatzal Hotel and Casino
- Bureau of Indian Affairs
- FHWA Tribal Coordinator
- Inter-Tribal Council of Arizona

ADOT also presented an overview of the 2025 plan update at the ADOT-Navajo Nation Transportation Partnership meeting in Window Rock in January 2025. The Hopi Tribe was also in attendance.

Community Engagement during Charging Station Implementation

Contractors must ensure the EV charging station locations are in line with the community's needs, barriers to implementation are identified up-front, and the station will ultimately be used by the community. Community engagement requirements will be included in all contracts. Community engagement activities shall comply with civil rights laws and the NEVI Standards and Requirements.

State Agency Coordination

The last Arizona state agency coordination meeting was held on July 25, 2024. The 2025 corridors were presented at that meeting.

Public Disclosure Requirements

ADOT intends to comply with the NEVI Standards and Requirements relating to contracting with private entities. The following strategies are based on the Standards and Requirements:

- ADOT will comply with the FHWA's public disclosure requirements, as published in the NEVI Standards and Requirements, for the documents concerning the operations of EV, including the procurement process used, price of award, number of bids received, identification of the awardee, and proposed contract with the awardee, in accordance with state law and the financial summary of contract payments. ADOT will ensure these items are made publicly available whether through an announcement, public comment period, or other means.
- Any agreements for the operation and maintenance of an EV charging station will be subject to Arizona Revised Statute Title 28 (Transportation), Chapter 22 (Public-Private Partnerships in Transportation), 2 CFR Part 200 and 2 CFR Part 1200.

Additional Public Disclosure Considerations

ADOT will encourage station owners to consider electricity rates in the surrounding community when setting a pricing structure to confirm users are being reasonably charged. The rate should offset the lifetime cost of the charging station, including:

- Need to recover fixed operating costs
- Need to recover usage-based or other variable operating costs
- Management of vehicles left in EV parking spaces for extended periods or other misuse patterns
- Incentivizing charging during lower-cost off-peak hours
- Ability of targeted users to pay for and afford charging rates
- Need for networked versus non-network stations to apply charges and process payment

Station owners will be encouraged to take advantage of offerings from local utilities to minimize up-front and operational costs. Additionally, electric utility providers may offer electricity rates that encourage the recharging of vehicles during off-peak, overnight times that may be much lower than on-peak, midday times.

Civil Rights

ADOT will comply with NEVI Standards and Requirements as they relate to civil rights. To ensure all EV customers and participants are provided with opportunities to engage in EV offerings, the plan complies with state and federal civil rights laws and regulations. See the 2024 EV Plan for more information.

Planning Towards a Fully Built-Out Determination

Construction is expected to begin following contract execution and design. At this time, ADOT is not able to determine if full build-out is achievable due to the early status of the program. ADOT plans to re-investigate locations that did not receive proposals from private developers to understand whether it will be feasible to re-advertise at these locations. ADOT expects the NEVI funding amount will be sufficient to build-out the identified and potential AFCs in this plan. If full build-out status is achieved, ADOT expects to utilize the remaining funds to deploy EV stations on non-NHS routes in Phase 4. In addition, funds may be used to support data monitoring and other contingencies if needed.

Physical Security and Cybersecurity

Owners of EV stations will be responsible for meeting the cybersecurity requirements defined within this section of the plan, the cybersecurity specification is attached in Appendix D, and other applicable state and federal regulations. Appendix D may need to be revised if federal regulations change. The cybersecurity requirements posed here will ultimately work to verify the safety and security of planned EV charging infrastructure. Requirements will include considerations for secure system updates, event logging and intrusion detection, secure operation of Electric Vehicle Service Equipment (EVSE) during communication outages, ensuring appropriate encryption systems are in use, and identifying and accessing management processes. The following requirements in this section are primarily based on compliance with those defined within the NEVI Standards and Requirements (23 CFR Part 680 including 23 CFR 680.106(h)). EV infrastructure owners are expected to describe their approach to meeting the following requirements, including any current implementations and future plans.

Arizona is following the NEVI guidance regarding states or other direct recipients—EV station owners shall implement physical and cybersecurity strategies consistent with their respective EV Infrastructure Deployment Plans to ensure charging station operations protect consumer data and protect against the

risk of harm to, or disruption of, charging infrastructure and the grid.

Physical security strategies may include topics such as lighting, siting and station design for sufficient visibility from onlookers, driver and vehicle safety, video surveillance, emergency call boxes, fire prevention, charger locks, and strategies to prevent tampering and illegal surveillance of payment devices.

Cybersecurity strategies may include user identity and access management; cryptographic agility and support of multiple Public Key Infrastructures; monitoring and detection; incident prevention and handling; configuration, vulnerability, and software update management; third-party cybersecurity testing and certification; and continuity of operation when communication between the charger and charging network is disrupted.

Requirements

- Provide feasible plans and agreements to address how service will persist in the event of a communications outage. Required output from EV charger owners must properly define the minimum amount of information necessary to continue providing service to customers, describe how that information will be securely stored on the EV charger, and illustrate ways that the physical connection to the vehicle will be secured while operating in this mode.
- Enact appropriate physical security measures. These practices must include procedures pertaining to physical access allowed to EV chargers by customers and service technicians in order to prevent physical tampering of equipment. Enact physical security strategies to address lighting, siting, driver and vehicle safety, fire prevention, tampering, charger locks, and illegal surveillance of payment devices. Additionally, siting and EV charging station design shall provide visibility from onlookers, video surveillance, or emergency call boxes.
- Adhere to strict identity and access management procedures based on industry best practices to prevent administrative or technological access to equipment by unauthorized personnel.
- Adopt the most current and stable encryption mechanisms to secure any data stored and communicated for service provision to customers. Provide a plan to meet the National Institute of Standards and Technology's (NIST) Transition to Post-Quantum Cryptography Standards (NIST IR 8547).
- Adhere to update and patch management procedures aligned with industry standards and best practices. This adherence works to mitigate the possibility of malware installation and propagation throughout the EVSE network and its vehicular connections.
- Employ mechanisms to detect malware and intrusion attempts into the system. Documented proof is required to verify the functional capabilities of these mechanisms, which allows the ability to detect and respond to cybersecurity exposures and potential breaches and additionally, to reduce the risk of malware installation and propagation throughout the charging network and vehicular connections.
- Employ event logging and reporting of auditable events, such as logins, failed logins, high-value transactions, warnings and error messages, input validation errors, etc. Documented proof is required to ensure accountability, visibility, incident alerting, and forensics.

- Demonstrate that appropriate cybersecurity assessments are conducted at least annually on deployments and equipment in accordance with the NIST Special Publication 800-115.
- Verify the protection of collected, stored, and communicated customer payment information. Only the minimum required customer payment information is collected, stored, and communicated with appropriate payment services and administration centers as applicable.
- Provide feasible plans for how the EV station operator will address future cybersecurity considerations pertaining to the equipment and EV charging network. As new cybersecurity incidents occur and exposures are discovered, the cybersecurity posture of EV chargers deployed must be scaled and adapted to meet the growing security requirements and best practices.
- Submit a plan detailing how third-party software components, hardware dependencies, and supply chain risks are identified, assessed, and managed. The plan must include procedures for generating and maintaining Software Bills of Materials (SBOMs) and Hardware Bills of Materials (HBOMs) for all relevant systems and components. It must also describe how updates to SBOMs and HBOMs will be tracked and securely shared with appropriate stakeholders. SBOMs and HBOMs must be readily available upon request to support transparency, vulnerability tracking, and timely remediation efforts.
- Cybersecurity requirements and guidance provided by the latest revisions of applicable standards and regulations shall be adhered to. These include, but are not limited to:
    - NEVI Standards and Requirements (23 CFR Part 680)
    - Conformity to Architecture Reference for Cooperative and Intelligent Transportation
    - NIST
        - SP 800-53
        - SP 800-115
        - IR 8473
        - IR 8547
    - Arizona Statewide Policy (8130) System Security Acquisition and Development
    - Payment Card Industry Data Security Standard
    - Health Insurance Portability and Accountability Act
    - North American Electric Reliability Corporation Critical Infrastructure Protection
- The EV Station owner is solely responsible for complying with the aforementioned requirements. ADOT is not responsible for oversight of physical security and cybersecurity. The Project Agreement will require that the EV station owner indemnify ADOT from third party claims for its breach of these requirements.

Appendix A: Previous Approved ADOT EV Infrastructure Deployment Plans

Below are links to the approved 2022-2024 EV Plans found on the azdot.gov website:

- 2022 ADOT EV Infrastructure Deployment Plan
  https://azdot.gov/planning/transportation-studies/arizona-electric-vehicle-program/2022-adot-ev-deployment-plan
- 2023 ADOT EV Infrastructure Deployment Plan
  https://azdot.gov/planning/transportation-studies/arizona-electric-vehicle-program/2023-ev-plan-update
- 2024 ADOT EV Infrastructure Deployment Plan
  https://azdot.gov/planning/transportation-studies/arizona-electric-vehicle-program/2024-ev-plan-update

Appendix B: Arizona DOT Alternative Fuel Corridor 2025 Nominations

Below is a document of the Arizona Department of Transportation Alternative Fuel Corridor Nominations for the 2025 ADOT Electric Vehicle Infrastructure Plan. See also accompanying PDF.

Arizona DOT Alternative Fuel Corridor Nominations for the 2025 Electric Vehicle (EV) Infrastructure Plan

Note: This proposal presents recommended highway segments for alternative fuel corridors for the

State of Arizona Department of Transportation. Dated: September 2025

Purpose of Proposal

All across our nation, considerable efforts continue toward making alternative fuel vehicles more available for both private and public use. The Fixing America's Surface Transportation (FAST) Act of 2015 set forth requirements for the United States Department of Transportation (USDOT) to initially designate alternative fuel corridors. The Infrastructure Investment and Jobs Act (IIJA) of 2021 updated these requirements by requiring the USDOT to establish a recurring process for alternative fuel corridor designations and updates.

The Arizona Department of Transportation (ADOT) successfully submitted alternative fuel corridor nominations for Electric Vehicles (EV), Compressed Natural Gas (CNG), Liquefied Petroleum Gas (LPG)/Propane, and Hydrogen fuel in Rounds 2, 3, 4, 5, 6, 7, and 8. ADOT sincerely appreciates FHWA approval of our nominations for these earlier rounds. For the 2025 update, ADOT is focusing on nomination of key EV corridors on the National Highway System (NHS) for designation. This will set the stage for the 2025 State of Arizona Electric Vehicle Infrastructure Deployment Plan.

Nearly three years after the November 15, 2021 enactment of IIJA, the focus on EV continues to grow stronger. Among other important provisions, IIJA set up the National Electric Vehicle Infrastructure (NEVI) Formula Program, to provide funding to states for strategic deployment of EV charging infrastructure along designated alternative fuel corridors. Through this Program and its associated funding, an interconnected network is developing to reduce range anxiety and increase charging, access and reliability. ADOT is working to optimize the state's share of NEVI funding to serve not only Arizona, but also travelers across the nation.

Existing Designated EV Corridors and Prospective New Nominations

In Arizona, the following highway corridors have previously been designated as either EV "corridor-ready" or EV "corridor pending:"

- SR 77, Show Low to Holbrook
- SR 77, Tucson to Pima County Border
- SR 69, I-17 to Prescott
- SR 89A/89, from SR69 to just north of Paulden
- SR 179, I-17 to Sedona
- SR 89/89A, Cottonwood to Sedona
- SR 260, I-17 to Cottonwood/SR89A
- SR 85, I-8 (Gila Bend) to I-10 (Buckeye)
- SR 287, Casa Grande to I-10

In the course of developing the Arizona Electric Vehicle Infrastructure Deployment Plan, ADOT continued its strategy of soliciting information from stakeholders and the public about what our primary focus should be moving forward and what additional routes should be considered for EV Corridor nomination. The first priority should continue to be upgrading any remaining EV corridor pending segments to the EV corridor-ready designation, as appropriate. The next priorities should be to: upgrade applicable segments of non-Interstate National Highway System (NHS) corridors previously designated as EV corridor pending to EV corridor ready status, as merited; and identify additional corridors on the non-Interstate NHS for EV nomination/designation, since only routes on the NHS are currently eligible for nomination as EV Corridors.

Following approval of the 2023 and 2024 Arizona Electric Vehicle Infrastructure Deployment Plan, and in preparation for the anticipated 2025 Alternative Fuel Corridor (AFC) Request for Nominations, ADOT has worked to develop a preliminary list of potential AFC candidates. The evaluation of candidates for EV corridor nomination has been based upon stakeholder and public involvement and ADOT's set of nomination (and ultimately Plan deployment) criteria and other relevant considerations.

The criteria, which are designed to help prioritize and support an efficient, and utilized EV charging network, included the following:

- Connectivity to neighboring states;
- Connection to major Arizona routes and destinations;
- The level of need for allowed Exceptions from the Designation criteria;
- Proximity to other EV Supply Equipment (EVSE) stations; and
- Relative Traffic Volume

Other considerations that will be used to influence deployment will include public transportation access/service, especially related to community needs, and routes critical to the movement of freight.

ADOT plans to focus on increasing the number of EV charging stations to support EV access to national highway networks (the Interstate Highway System and then the non-Interstate National Highway System) before seeking additional redundancy, in accordance with federally established eligibility provisions. ADOT may, based on additional stakeholder and public input and other factors, address redundancy in future EV Plan updates. ADOT plans to utilize NEVI Formula Program funding to deploy Electric Vehicle Supply Equipment (EVSE) infrastructure along newly designated AFCs, as appropriate.

Designation lays the groundwork, providing guidance for the continued investment in alternative fuels and enabling residents, freight transporters, and others to travel more readily within their state and between neighboring states using EV, compressed natural gas (CNG) vehicles, low emission propane vehicles and the emerging technology of heavy-duty commercial hydrogen for use by fuel cell electric vehicle trucks.

Arizona's geographical position serves as a crucial link for expanding the network of fuel stations. Critical stretches of highway connect regions in all directions for personal and business travel and freight transport, additionally assisting in the travel of goods and people to and from the ports of entry along the Arizona-Mexico border. Surrounding states such as California, New Mexico, Utah, and Nevada are building their alternative fuel infrastructure as well. Adding new alternative fuel infrastructure along these highway systems will be beneficial, creating an opportunity to lower vehicle emissions and support emerging industries.

Team Development – City, Tribal, Utility, and Non-Governmental Organizations (NGO)

Building on our successful designations in Rounds 2, 3, 4, 5, 6, 7 and 8, additional information has been made available for this proposed alternative fuels corridor designation. The core team includes the Arizona Department of Transportation (ADOT), the Valley of the Sun Clean Cities Coalition (VSCCC), which represents the entire State of Arizona, and the Pima Association of Governments (PAG).

The City of Phoenix has also been active with the Clean Cities Coalition. Other state agencies, such as the Arizona Department of Environmental Quality have also been involved with the Coalition. Arizona's Clean Cities Coalition also has full cooperation with utilities, including Arizona Public Service (APS), Salt River Project (SRP), Tucson Electric Power (TEP) and Southwest Gas. Clean Cities members include the full spectrum of fleet managers, agencies and suppliers. The State of Arizona also participates with Native American Communities via the Inter Tribal Council of Arizona.

ADOT AFC Corridor Nominations for 2025

The Arizona Department of Transportation is responsible for the submission of proposed "corridor ready" and "corridor pending" highway segments. As noted above, ADOT is focusing nomination on prospective EV corridors, and based on our prioritization exercise, we are nominating the following NHS highways for EV corridor pending designation:

- SR 77, Show Low to Holbrook
- SR 77, Tucson to Pima County Border
- SR 69, I-17 to Prescott and
- SR89, from SR69 North Paulden
- SR 179, I-17 to Sedona
- SR 89A, Cottonwood to Sedona
- SR 260, I-17 to Cottonwood/SR89A
- SR 85, I-8 (Gila Bend) to I-10 (Buckeye)
- SR 287, Casa Grande to I-10

A map showing all of the above corridors highlighted on a state highway system map is provided on Map 1. (The map also shows all previously designated EV corridors in Arizona.) The following is a brief description of each of the nominated NHS routes:

SR 77, Show Low to Holbrook

SR 77 is under ADOT jurisdiction. The length of this corridor is approximately 44.9 miles. The route begins at SR 77 and extends through Snowflake, Arizona (2020 Census population of 6,104), Town of Taylor in Arizona (2020 Census population of 3,995), and is within Navajo County (population 106,717). Navajo Nation (2020 Census population of 165,158 for AZ, NM, and UT); Navajo Nation reports population of over 180,000 post-COVID).

The average annual daily traffic (AADT) volume on the corridor is 9,887 (both directions), with the highest traffic volume being 16,541 near Town of Taylor (2020 Census population of 3,995). SR 77 is on the National Highway Freight Network.

SR 77, Tucson to Pima County Border

SR 77 is under ADOT jurisdiction. The length of this corridor is approximately 20.1 miles. The route begins near the Pima County border to the City of Tucson, Arizona and within the Town of Oro Valley (2020 Census population of 47,070) and extends through the city of Tucson (population 542,629) and then farther South to Interstate-10 in Tucson. The AADT on the corridor is 27,343 (both directions), with a maximum traffic volume of 36, 496 near the southern end of the Town of Oro Valley (2020 Census population of 47,070)

SR 69, I-17 to Prescott and SR89, North Paulden

SR 69, I-17, and SR 89 are under ADOT jurisdiction. The length of this corridor is approximately 34.4 miles. The route begins at SR 69 and intersects with the I-17 in Town of Dewey–Humboldt (2020 Census

population of 4,326) in Yavapai County (2020 Census population of 236,209). It continues into the City of Prescott (2020 Census population of 45,827) near Prescott Valley (2020 Census population of 46,785), intersecting with SR89. It continues northbound into North Paulden, a census designated place (CDP), (2020 Census population of 5,567) in Chino Valley (2020 Census population of 13,020). The AADT on the corridor is 28,543 (both directions), with a maximum traffic volume of 41, 328 near Prescott Valley.

SR 179, I-17 to Sedona

SR 179 and I-17 are under ADOT jurisdiction. The length of this corridor is approximately 13.7 miles. The route begins at the intersection of SR 179 and I-17 within the borough of Rimrock (population of 5,229) and extends northbound to Sedona, Arizona (2020 population of 9,684) where it meets SR 89. It extends adjacent to the City of Flagstaff (2020 population of 76,831). The AADT along the corridor is 10,764 (both directions) and the maximum traffic volume is 13,432 near Sedona. Also, note that SR 179, I-17 to Sedona (13.7 miles) is on the National Highway Freight Network.

SR 89/89A, Cottonwood to Sedona

SR 89/89A is under ADOT jurisdiction. The length of this corridor is approximately 20.4 miles. The route begins in Cottonwood, Arizona (2020 Census population of 12,029), extending southbound for 2.35 miles where it intersects with SR 260 in Yavapai County (2020 Census population of 236,209). The route continues north-east from that intersection, throughout the unincorporated community of Cornville (2020 population of 3,362) and Town of Clarkdale (2020 populations of 4,424), and ends in Sedona, Arizona (2020 Census population of 9,684) where SR 89/89A intersects with SR179. The AADT on the corridor is 19,886 (both directions), with a maximum traffic volume of 24,707 eastbound from Sedona.

EV fuel stations will be proposed at appropriate intervals along the entire SR 89/89A corridor.

Please see the map for the SR 89/89A corridor location in the context of the Arizona state highway system.

SR 260, I-17 to Cottonwood/SR89A

SR 260, SR89A, and I-17 are under ADOT jurisdiction. The length of the corridor is approximately 12.4 miles. The route begins at the intersection of SR 260 and I-17 in the Town of Camp Verde (2020 population of 12,147) and near the Yavapai-Apache Nation Reservation (2020 population of 1,234). The corridor extends northwest through the Cottonwood, Arizona (2020 Census population of 12,029) where the SR 260 intersects with SR 89A. The AADT on the corridor is 20,306 (both directions), with a maximum traffic volume of 27,127 near the north end of the corridor in Cottonwood-Verde Village (2020 Census population of 12,019).

EV fuel stations will be proposed at appropriate intervals along the entire corridor.

Please see the map for the SR 260 corridor location in the context of the Arizona state highway system. Also see the map showing SR 260 as part of the National Highway System.

SR 85, I-8 (Gila Bend) to I-10 (Buckeye)

SR 85 is under ADOT jurisdiction. The length of this corridor is approximately 36.4 miles. The route begins at the intersection of SR 85 and I-8 in the Town of Gila Bend, Arizona (2020 population of 1,892). The corridor extends north where SR85 intersects with I-10 in City of Buckeye, Arizona (2020 population of 91,502) in Maricopa County (2020 population of 4,420,568).

The AADT on the corridor is 17,120 (both directions), with a maximum traffic volume of approximately 22, 907 near Buckeye. The southern end of this corridor begins at SR 85, which is on the National Highway Freight Network.
EV fuel stations will be proposed at appropriate intervals along the entire corridor.
Please see the map for the SR 85 corridor location in the context of the Arizona state highway system. Also see the map showing SR 85 as part of the National Highway System.

SR 287, Casa Grande to I-10

SR 287 is under ADOT jurisdiction. The length of the corridor is approximately 4.5 miles. The route begins in the City of Casa Grande (2020 population 53,658), passes eastbound through the junction of SR 287 and I-10. The AADT on the corridor is 6,720 (both directions), with a maximum traffic volume of 10,283 at the west end of the corridor.
EV fuel stations will be proposed at appropriate intervals along the entire corridor.
Please see the map for the SR 287 corridor location in the context of the Arizona state highway system. Also see the map showing SR 287 and I-10 as part of the National Highway System.

Narrative on Nominated Corridors

All of the nine corridors that are introduced above and are proposed for nomination by ADOT are nominated for "corridor pending" status. These corridors do not meet "corridor ready" criteria, but are all NHS routes considered strong candidates for use of NEVI formula program funding. The next priorities should be to: upgrade applicable segments of non-Interstate National Highway System (NHS) corridors previously designated as EV corridor pending to EV corridor ready status, as merited; and identify additional corridors on the non-Interstate NHS for EV nomination/designation, since only routes on the NHS are currently eligible for nomination as EV Corridors.

For EV, this is the best strategy for Arizona to fulfill the national goal of connecting communities, cities, states, and regions to further develop a national network of alternative fuel facilities. The following is a table of information for each AFC Nominated corridor.
SR 77, Show Low to Holbrook

Information Element	Information Included
Name of State or local agency nominating the corridor	State Agency: Arizona Department of Transportation Contact Name: Jesse Schneider Title: Planning Section Manager, Arizona Dept. of Transportation Email address: jschneider@azdot.gov Phone number: 602.712.4576
Approval of agency with jurisdiction of the highway (if different from the agency above)	Same agency (Arizona Dept. of Transportation).
Corridor being proposed for a new designation (including extensions of existing AFCs)	SR 77, Show Low to Holbrook (44.9 miles).

Type of alternative fuel corridor	EV Charging
Current station locations	180 N. 9th Street Show Low, AZ 85901 Fuel Type: EV Number of Ports: 4 Power Level by Port: 2 x 350kW ports & 2 x 150kW ports Connector Type(s) by Port: CCS (4) Charging Network: APS Show Low (Electrify America) 2096 Navajo Blvd Holbrook, AZ 86025Fuel Type: EV Number of Ports: 4 Power Level by Port: 2 x 350kW ports & 2 x 150kW ports 12 x 150kW ports, 12 J3400 Plugs Connector Type(s) by Port: CCS (4) Charging Network: Tesla Supercharger Holbrook 1606 Navajo Boulevard Number of Ports: 4 Power Level by Port: 2 x 350kW ports & 2 x 150kW ports 12 x 150kW ports, 12 J3400 Plugs Connector Type(s) by Port: CCS (4) Charging Network: Rivian Adventure Network
Corridor ready vs. corridor pending	Corridor Pending.

A map of each corridor nominated	A map showing this corridor and all of the other nominated corridors for 2025. See map showing corridor and indicates one proposed eligible fuel station currently along this corridor.
GIS Shapefile or ESRI file geodatabase	Please refer to shapefile information submitted separately as prescribed in the June 14 FHWA Request for Nominations document, downloaded at: National Highway System-FHWA HEPGIS Maps (dot.gov).
Public Information	The nominated corridor would contribute to the charging and fueling network as follows: Based on ADOT's prioritization criteria and evaluation, factors that indicate this corridor would contribute to a network include the following: Public support among all AZ corridors to be nominated. The Hopi Trust Land and the White Mountain Apache Community is also in this region and will benefit from EV opportunities.

	The corridor nominated is in a rural area? Yes. The corridor begins in Show Low and continues to Holbrook. Does the corridor serve disadvantaged communities? Yes.

SR 77, Tucson to Pima County Border

Information Element	Information Included
Name of State or local agency nominating the corridor	State Agency: Arizona Department of Transportation Contact Name: Jesse Schneider Title: Planning Section Manager, Arizona Dept. of Transportation Email address: jschneider@azdot.gov Phone number: 602.712.4576
Approval of agency with jurisdiction of the highway (if different from the agency above)	Same agency (Arizona Dept. of Transportation)
Corridor being proposed for a new designation (including extensions of existing AFCs)	SR 77, Tucson to Pima County Border (20.1 miles).
Type of alternative fuel corridor	EV Charging
Current station locations	None found.
Corridor ready vs. corridor pending	Corridor Pending
A map of each corridor nominated	A map showing this corridor and all of the other nominated corridors for 2025 is provided. See map of this document (shows station distance to Coronado National Forest).
GIS Shapefile or ESRI file geodatabase	Please refer to shapefile information submitted separately as prescribed in the June 14 FHWA Request for Nominations document, downloaded at: National Highway System-FHWA HEPGIS Maps (dot.gov).
Public Information	The nominated corridor would contribute to the charging and fueling network as follows: Based on ADOT's prioritization criteria and evaluation, factors that indicate this corridor would contribute to a network include the following: Strong public support for the corridor to be nominated. Connectivity to key Arizona destinations. Considerable charging infrastructure along the corridor with potential to build

	out in Oro Valley. Serves communities near Oro Valley as well. The corridor nominated is in a rural area? No, the majority of the corridor is located in and serves suburban Arizona. Total length of the corridor is 17.65 miles Does the corridor serve disadvantaged communities? Yes.

SR 69, I-17 to Prescott and SR89, North to Paulden

Information Element	Information Included
Name of State or local agency nominating the corridor	State Agency: Arizona Department of Transportation Contact Name: Jesse Schneider Title: Planning Section Manager, Arizona Dept. of Transportation Email address: jschneider@azdot.gov Phone number: 602.712.4576
Approval of agency with jurisdiction of the highway (if different from the agency above)	Same agency (Arizona Dept. of Transportation)
Corridor being proposed for a new designation (including extensions of existing AFCs)	SR 69, I-17 to Prescott and SR89, North to Paulden (34.4 miles)
Type of alternative fuel corridor	EV Charging
Current station locations	Shell/Subway Travel Center Tesla Supercharger 8x 150kW ports, 8 J3400 Plugs 14925 Cordes Lakes Rd Mayer, AZ 86333 APS Prescott (Electrify America) 2x 350kW ports & 2x 150kW ports, 4 CCS Plugs 1100 E Sheldon Street Prescott, AZ 86301
Corridor ready vs. corridor pending	Corridor Pending
A map of each corridor nominated	A map showing this corridor and all of the other nominated corridors for 2025 is provided. See map on page 26 of this document (shows corridor and indicates 2 existing fuel stations currently along this corridor).

GIS Shapefile or ESRI file geodatabase	Please refer to shapefile information submitted separately as prescribed in the June 14 FHWA Request for Nominations document, downloaded at: National Highway System-FHWA HEPGIS Maps (dot.gov).
Public Information	The nominated corridor would contribute to the charging and fueling network as follows: Based on ADOT's prioritization criteria and evaluation, factors that indicate this corridor would contribute to a network include the following: Public support for the corridor to be nominated. The corridor provides connectivity to tribes and other communities. Serves Northern Arizona areas currently with no designations. The corridor nominated is in a rural area? Yes. The Corridor serves primarily rural areas. Does the corridor serve disadvantaged communities? Yes.

SR 179, I-17 to Sedona

Information Element	Information Included
Name of State or local agency nominating the corridor	State Agency: Arizona Department of Transportation Contact Name: Jesse Schneider Title: Planning Section Manager, Arizona Dept. of Transportation Email address: jschneider@azdot.gov Phone number: 602.712.4576
Approval of agency with jurisdiction of the highway (if different from the agency above)	Same agency (Arizona Dept. of Transportation)
Corridor being proposed for a new designation (including extensions of existing AFCs)	SR 179, I-17 to Sedona (13.7 miles)
Type of alternative fuel corridor	EV Charging
Current station locations	The Collective Sedona Tesla Supercharger 14x 150kW ports, 14 J3400 Plugs 7000 AZ-179 Sedona, AZ 86351 Rivian Adventure Network 6x 480kW ports, 6 CCS Plugs 7000 AZ-179

	Sedona, AZ 86351
Corridor ready vs. corridor pending	Corridor Pending
A map of each corridor nominated	A map showing this corridor and all of the other nominated corridors for 2025 is provided. See map of this document (shows station distance to corridor)
GIS Shapefile or ESRI file geodatabase	Please refer to shapefile information submitted separately as prescribed in the J 14 FHWA Request for Nominations document, downloaded at: National Highway System-FHWA HEPGIS Maps (dot.gov).
Public Information	The nominated corridor would contribute to the charging and fueling network as follows: Based on ADOT's prioritization criteria and evaluation, factors that indicate this corridor would contribute to a network include the following: Public support for the corridor to be nominated. The corridor provides good access to Forest Service land. Connectivity to key Arizona destinations. The corridor nominated is in a rural area? Yes. Virtually all of the corridor is located in rural Arizona and serves rural Arizona. Does the corridor serve disadvantaged communities? Yes.

SR 89/89A, Cottonwood to Sedona

Information Element	Information Included
Name of State or local agency nominating the corridor	State Agency: Arizona Department of Transportation Contact Name: Jesse Schneider Title: Planning Manager, Arizona Dept. of Transportation Email address: jschneider@azdot.gov Phone number: 602.712.4576
Approval of agency with jurisdiction of the highway (if different from the agency above)	Same agency (Arizona Dept. of Transportation)
Corridor being proposed for a new designation (including extensions of existing AFCs)	SR 89/89A, Cottonwood to Sedona (about 7.22 miles)
Type of alternative fuel corridor	EV Charging
Current station locations	APS Sedona (Electrify America) 2x 350kW ports & 2x 150kW ports, 4 CCS Plugs 525 Posse Grounds Road

	Sedona, AZ 86336
Corridor ready vs. corridor pending	Corridor Pending
A map of each corridor nominated	A map showing this corridor and all of the other nominated corridors for 2025 is provided. See map of this document (shows station distance to corridor)
GIS Shapefile or ESRI file geodatabase	Please refer to shapefile information submitted separately as prescribed in the J 14 FHWA Request for Nominations document, downloaded at: National Highway System-FHWA HEPGIS Maps (dot.gov).
Public Information	The nominated corridor would contribute to the charging and fueling network as follows: Based on ADOT's prioritization criteria and evaluation, factors that indicate this corridor would contribute to a network include the following: Public support for the corridor to be nominated. The corridor provides good access to Prescott National Forest. Connectivity to key Arizona destinations. The corridor nominated is in a rural area? Yes. Most of the corridor is located in rural Arizona and serves rural Arizona. Does the corridor serve disadvantaged communities? Yes.

SR 260, I-17 to Cottonwood/SR89A

Information Element	Information Included
Name of State or local agency nominating the corridor	State Agency: Arizona Department of Transportation Contact Name: Jesse Schneider Title: Planning Section Manager, Arizona Dept. of Transportation Email address: jschneider@azdot.gov Phone number: 602.712.4576
Approval of agency with jurisdiction of the highway (if different from the agency above)	Same agency (Arizona Dept. of Transportation)
Corridor being proposed for a new designation (including extensions of existing AFCs)	SR 260, I-17 to Cottonwood/SR89A (20.4 miles)
Type of alternative fuel corridor	EV Charging
Current station locations	Confirmed No fuel sites.
Corridor ready vs. corridor pending	Corridor Pending

A map of each corridor nominated	A map showing this corridor and all of the other nominated corridors for 2025 is provided. See map of this document (shows corridor and indicates no fully eligible fuel stations currently along this corridor).
GIS Shapefile or ESRI file geodatabase	Please refer to shapefile information submitted separately as prescribed in the June 14 FHWA Request for Nominations document, downloaded at: National Highway System-FHWA HEPGIS Maps (dot.gov).
Public Information	The nominated corridor would contribute to the charging and fueling network as follows: Based on ADOT's prioritization criteria and evaluation, factors that indicate this corridor would contribute to a network include the following: Public support for the corridor to be nominated. Connectivity to key Arizona destinations. Provides access to BLM lands and Yavapai-Apache Nation. The corridor serves the Yavapai-Apache Nation. The corridor nominated is in a rural area? Yes, the Corridor is located in rural Arizona and serves rural Arizona. The length of the corridor is 12.31 miles Does the corridor serve disadvantaged communities? Yes.

SR 85, I-8 (Gila Bend) to I-10 (Buckeye)

Information Element	Information Included
Name of State or local agency nominating the corridor	State Agency: Arizona Department of Transportation Contact Name: Jesse Schneider Title: Planning Section Manager, Arizona Dept. of Transportation Email address: jschneider@azdot.gov Phone number: 602.712.4576
Approval of agency with jurisdiction of the highway (if different from the agency above)	Same agency (Arizona Dept. of Transportation)
Corridor being proposed for a new designation (including extensions of existing AFCs)	SR 85, I-8 (Gila Bend) to I-10 (Buckeye) (approx. 34.07 miles)
Type of alternative fuel corridor	EV Charging
Current station locations	Gila Bend Tesla Supercharger 16x 150kW ports, 16 J3400 Plugs 826 826 W Pima St. Gila Bend, AZ 85337

	Rivian Adventure Network 6x 480kW ports, 6 CCS Plugs 942 East Pima Street Gila Bend, AZ 85337 Walmart 3407 Electrify America - Buckeye, AZ 2x 350kW ports & 2x 150kW ports, 4 CCS plugs 1060 S. S. Watson Buckeye, AZ 85326 Tesla Supercharger 12x 150kW ports, 12 J3400 Plugs 416 S Watson Rd Buckeye, AZ 85326
Corridor ready vs. corridor pending	Corridor Pending
A map of each corridor nominated	A map showing this corridor and all of the other nominated corridors for 2025 is provided. See this map of this document (shows corridor and indicates no fully eligible fuel stations currently along this corridor).
GIS Shapefile or ESRI file geodatabase	Please refer to shapefile information submitted separately as prescribed in the June 14 FHWA Request for Nominations document, downloaded at: National Highway System-FHWA HEPGIS Maps (dot.gov).
Public Information	The nominated corridor would contribute to the charging and fueling network as follows: Based on ADOT's prioritization criteria and evaluation, factors that indicate this corridor would contribute to an network include the following: Public support for the corridor to be nominated. The corridor from SR 85, I-8 to I-10 has connectivity to the Tohono O'odham Nation. Serves Southern Arizona areas currently with no designations. Connects to the City of Goodyear, City of Buckeye, and Gila Bend. The corridor nominated is in a rural area? Yes. Does the corridor serve disadvantaged communities? Yes.

SR 287, Casa Grande to I-10

Information Element	Information Included
Name of State or local	State Agency: Arizona Department of Transportation

agency nominating the corridor	Contact Name: Jesse Schneider Title: Planning Section Manager, Arizona Dept. of Transportation Email address: jschneider@azdot.gov Phone number: 602.712.4576
Approval of agency with jurisdiction of the highway (if different from the agency above)	Same agency (Arizona Dept. of Transportation)
Corridor being proposed for a new designation (including extensions of existing AFCs)	SR 287, Casa Grande to I-10 (about 26.16 miles)
Type of alternative fuel corridor	EV Charging
Current station locations	Walmart 218- Casa Grande (Electrify America) 2x 350kW ports & 2 x 150kW ports, 4 CCS Plugs 1741 E. Florence Casa Grande, AZ 85122 Culvers Tesla Supercharger 6x 150kW ports, 12 J3400 Plugs 2453 E. Florence Blvd Casa Grande, AZ 85194
Corridor ready vs. corridor pending	Corridor Pending
A map of each corridor nominated	A map showing this corridor and all of the other nominated corridors for 2025 is provided. See this map of this document (shows station distance to corridor).
GIS Shapefile or ESRI file geodatabase	Please refer to shapefile information submitted separately as prescribed in the May 18 FHWA Request for Nominations document, downloaded at: National Highway System-FHWA HEPGIS Maps (dot.gov).
Public Information	The nominated corridor would contribute to a charging and fueling network as follows: Based on ADOT's prioritization criteria and evaluation, factors that indicate this corridor would contribute to an network include the following: Public support for the corridor to be nominated. Serves Southeastern Arizona areas currently with no designations. The corridor nominated is in a rural area? The vast majority of the corridor is located in rural Arizona and serves rural Arizona. The length of the corridor is 4 09 miles.

	Does the corridor serve disadvantaged communities? Yes.

Other Considerations related to FHWA Areas of Interest for Nominations

ADOT is nominating the following nine NHS corridors for EV Designation in 2025 (all for "Corridor Pending"):

- SR 77, Show Low to Holbrook
- SR 77, Tucson to Pima County Border
- SR 69, I-17 to Prescott
- SR 89A/89, from SR69 to just north of Paulden
- SR 179, I-17 to Sedona
- SR 89/89A, Cottonwood to Sedona
- SR 260, I-17 to Cottonwood/SR89A
- SR 85, I-8 (Gila Bend) to I-10 (Buckeye)
- SR 287, Casa Grande to I-10

The following information addresses each of the FHWA Areas of Interest for the corridors as a group as well as for individual proposed corridors as applicable.

Information Element	Information Included
Use of fuels and associated fueling infrastructure that achieve the greatest reduction in greenhouse gas emissions (FHWA particularly interested in nomination of EV and hydrogen corridors along Interstates)	This nomination is for EV designation for the full length of nine NHS corridors. This comprises 669.77 centerline miles of NHS routes with a combined Average AADT of 167,996. This has the potential for significant reduction of greenhouse gases compared to emissions associated with current fossil fuel use. Consider that, according to the U.S. Department of Energy Alternative Fuels Data Center, the electricity produced to charge the average EV emits 2,817 pounds of carbon dioxide equivalents per year compared to 12,594 emitted by an average gasoline-powered vehicle. The Vision of the State of Arizona Electric Vehicle Infrastructure Deployment Plan is: "The Plan seeks to increase long-range mobility for EV drivers by closing the current gaps in charging station infrastructure placement along Arizona's AFCs and supporting the development of a national EVSE network."
Improve alternative fueling corridor networks by converting corridor-pending corridors to corridor-ready corridors	As noted earlier in this document, the first priority should continue to be upgrading any remaining EV corridor pending segments of SR77, SR69, SR179, SR89/89A, SR260, SR85 and SR287 to the EV corridor-ready designation, as appropriate. The next priorities should be to: upgrade applicable segments of non-Interstate National Highway System (NHS) corridors previously designated as EV corridor pending to EV corridor ready status, as merited; and identify additional corridors on the non-Interstate NHS for EV nomination/designation, since only routes on the NHS are currently eligible for nomination as EV Corridors.

	Through this approach, and by concentrating on EV initially, we believe we will achieve the greatest improvement in our alternative vehicle fueling/charging network, converting EV "corridor-pending" Interstate highway corridors, and then the best NHS corridors, to the EV "corridor-ready."
Expand access to charging or fueling within rural areas underserved communities.	As shown in this nomination document, all of our nine nominated NHS corridors span considerable rural lands. The vast majority of the mileage in our nine nominated corridors is in rural areas. Also, every nominated corridor serves at least one Native American Nation/Indian Tribe. These areas are underserved in respect to charging infrastructure.
Meet Current or anticipated market demands for charging of or fueling infrastructure… and … Provide access to charging or fueling infrastructure in areas with a current or forecasted need.	EVs made up 95,819 of the total 6,370,790 (1.5%) of vehicles registered in Arizona in FY2024. However, the Plan also developed a projected growth scenario estimating that by 2030 EV registrations with high adoption could increase to 402,293 and comprises 8.3 percent of the vehicle market in Arizona. By 2040, these numbers could rise to 1,145,084 and 23.8 percent, respectively. The Vision of the State of Arizona Electric Vehicle Infrastructure Deployment Plan is: "The Plan seeks to increase long-range mobility for EV drivers by closing the current gaps in charging station infrastructure placement along Arizona's AFCs and supporting the development of a national EVSE network." Thus, our first priority is the status upgrade of remaining EV "corridor-pending" designated Interstate highway corridors to the EV "corridor-ready" designation. The next priority is to identify EV corridors on the non-Interstate National Highway System (NHS) for nomination/designation, since only routes on the NHS are currently eligible for nomination as EV Corridors. Based on all factors, including achievement of the greatest reduction in greenhouse gas emissions, we are putting forward the nomination of the nine high priority corridors in this submittal. ADOT intends to optimize the use of our available NEVI funding toward this end. According to the U.S. Department of Energy Alternative Fuels Data Center, Arizona have 1,270 of the stations have Level 2 chargers, hosting 2,652 EVSE ports. The DC FAST charging consists of 1,034 EVSE ports. Clearly, the demand will grow (electric vehicle sales are growing rapidly), and the number of charging stations will need to grow significantly to meet increasing demand. It is also noteworthy that the vast majority of the stations are in urbanized areas of Arizona, so this set of NHS corridor nominations is very important to serve rural Arizona and the many underserved communities throughout. The federal funding associated with the IIJA and the NEVI program will be a boost toward meeting more of the demand. ADOT is developing its NEVI plan and will pay attention to market considerations in the process.

	ADOT carefully considered the need and other important factors in completing the second NEVI Plan and is continuing to do so as we work to update the Plan for 2025. This will also be an ongoing factor in future requests for alternative fuel corridor designations. During FHWA Alternative Fuel Corridors 2024 Round 8 – Request for Nominations, it was noted that "If a corridor is being designated as corridor-pending and currently has no alternative fuel facilities located on it, then a strategy or plan and timeline for infrastructure build-out should be submitted." ADOT has such a strategy embodied in the approved 2024 State of Arizona Electric Vehicle Infrastructure Deployment Plan, as noted above. Building out corridors that are currently without adequate facilities will be important.
Establish charging or fueling infrastructure for medium- and heavy-duty vehicles including along the National Highway Freight Network and in proximity to ports, intermodal centers, and warehousing locations.	ADOT is not pursuing any additional heavy-duty commercial hydrogen fuel corridor nominations at this time. We plan to look for new opportunities in future rounds as this emerging technology continues to develop. With respect to EV corridor development and conversion of corridors from "Corridor-Pending" to "Corridor-Ready," ADOT will be alert to services for medium-duty vehicle charging in addition to light-duty vehicles. Ports, intermodal centers, and warehousing locations will be considered. Arizona recently produced a statewide Truck Parking Plan, where we took a brief look at alternative fueling opportunities, as well. Plan stakeholders include the Arizona Trucking Association and business leaders.
Since corridors extend beyond state boundaries, nominations that take into consideration the next fueling site over State or international borders are encouraged. Coordination between neighboring states is highly encouraged.	In previous Alternative Fuel Corridor Nomination rounds, Arizona nominated and received designations for key Interstate highway corridors. This included I-10 and I-40, involving our neighboring states of California and Mexico (and associated fueling sites in those states). Our work to build-out EV corridors through the NEVI program, we will continue to work with other states, for the benefit of not only Arizona, but also those neighboring states and in the interest of meeting broader national goals. Several of our newly nominated NHS corridors for EV have a terminus at/near another state's border. This includes SR85i in Arizona, and completes a connection to Mexico.
States are encouraged to coordinate nominations with the State's EV Infrastructure Deployment Plan and other related planning work such as State Freight Plans and Long Range Transportation Plans.	This set of 2025 nominations is a direct outgrowth of the 2024 State of Arizona Electric Vehicle Infrastructure Deployment Plan the purpose for an input to the draft 2025 Arizona Electric Vehicle Infrastructure Deployment Plan. The Arizona Long Range Transportation Plan (LRTP) was approved in October 2023. The LRTP, a policy-oriented plan rather than a project specific plan, considered EV (and other alternative fuel) needs and associated revenues as we developed our recommended investment choices. The 2022 State Freight Plan also considered alternative fuel potential, primarily in the context of a recommended Truck Parking Plan (completed November 2023). It is likely there will be more focus on fuel considerations for freight in the planning

	associated with the 2026 Freight Plan update.
States are encouraged to coordinate nominations with communities located along the corridors.	The 2024 of Arizona Electric Vehicle Infrastructure Deployment Plans have involved considerable public and stakeholder involvement. This included a large stakeholder group (including communities statewide). Public and stakeholders from the 2023 Plan outreach effort provided input that was used to develop a priority scheme for subsequent corridor nominations. This input was used to determine ADOT's Round 8 nominations. ADOT has hosted 6 public meetings with over 1,500 attendees and 2,800 survey responses to date were recorded. There were 5 stakeholder meetings scheduled with Arizona government agencies. Round 8 corridor nominations were shown at these meetings and the 2024 Plan development was discussed. Public comments and questions have also been documented and addressed on an ongoing basis.

Designation of Freight AFC Corridors

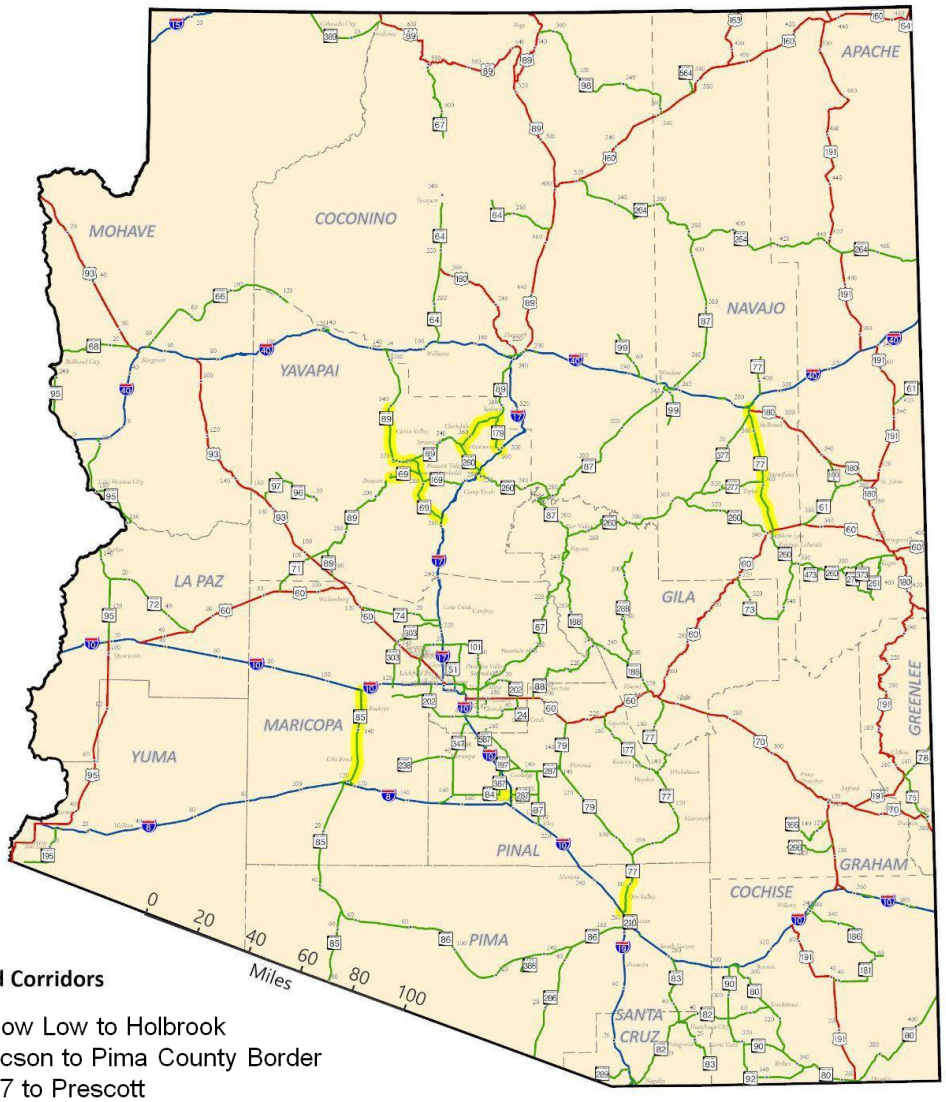
ADOT is evaluating whether or not to add mileage to its currently designated National Highway Freight Network to determine whether or not to add mileage to the Critical Urban Freight Corridors and Critical Rural Freight Corridors as allowed under IIJA. This will be evaluated during the State Freight Plan 2026 update. As part of our work, we will consider future implications for alternative fuels like EV, including corridor proximity to underserved communities, air quality nonattainment areas, and communities with health indicators related to poor air quality, as recommended by FHWA.

The ADOT NEVI EV Charging Sites are developed for light-duty and medium-duty vehicles. The heavy-duty vehicles (Class 6-8) are not intended to be covered in this report.

Alternative Fuel Corridor Maps:

Statewide Maps, EV Corridor Maps and Associated Maps/Information
The following pages present Arizona statewide maps and other maps/information relevant to Arizona's requested designations of NHS corridors as "corridor pending" for EV. These maps were referenced earlier in this document.

State Highway System



Proposed Corridors

- SR 77, Show Low to Holbrook
- SR 77, Tucson to Pima County Border
- SR 69, I-17 to Prescott
- SR 89A/89, from SR69 to north of Paulden
- SR 179, I-17 to Sedona
- SR 89/89A, Cottonwood to Sedona
- SR 260, I-17 to Cottonwood/SR 89A
- SR 85, I-8 (Gila Bend) to I-10 (Buckeye)
- SR 287, Casa Grande to I-10

State Highway System

- Interstate
- US Route
- State Route
- Proposed Corridor

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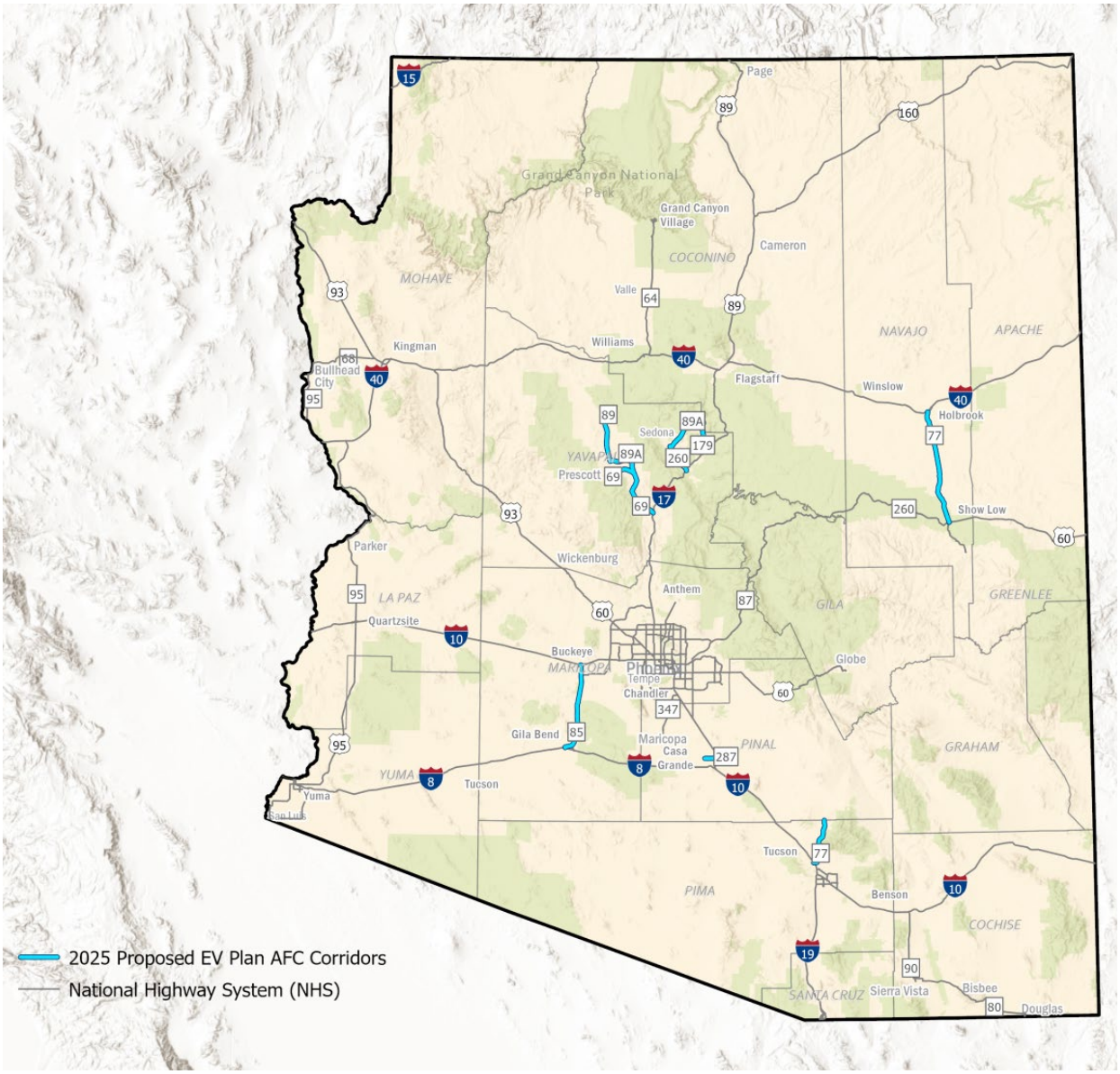
Arizona Department of Transportation
Multimodal Planning Division
Geospatial Analysis Section
MPDgis@azdot.gov ID#2025022 April 2025

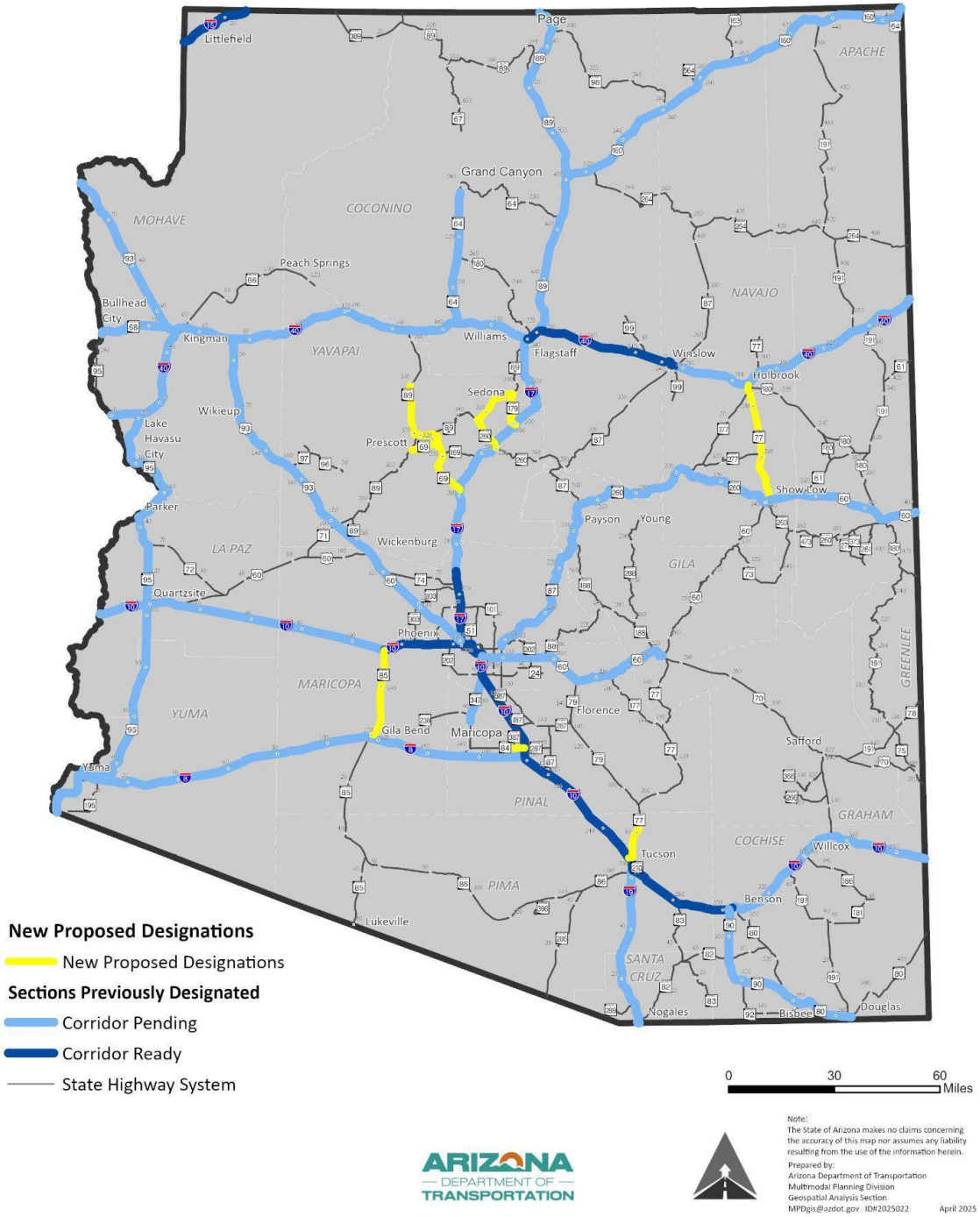
Map 1

National Highway System



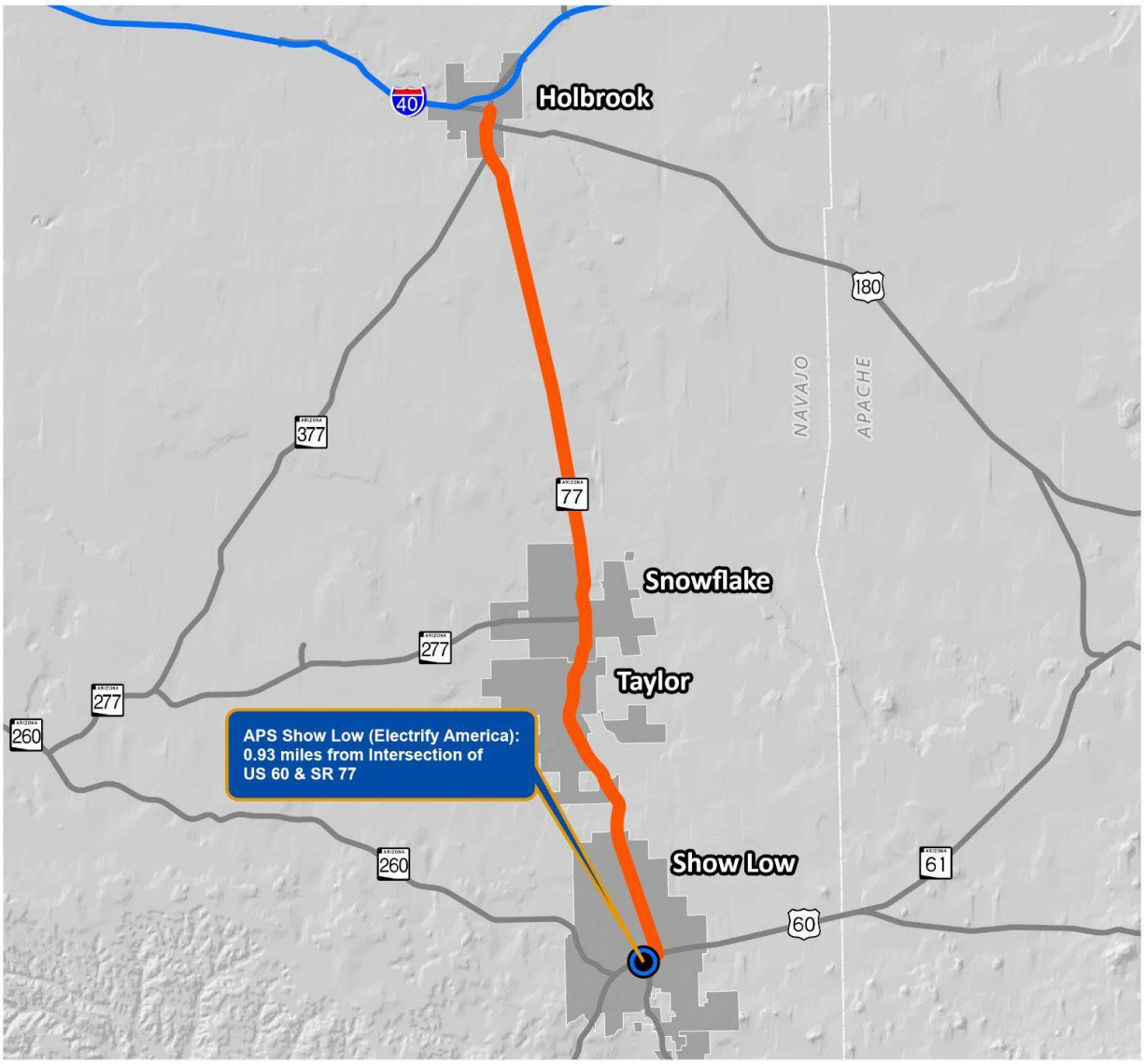
Map 2

Electric Vehicle
2025 EV Plan: Proposed New Designations for Arizona



Map 3

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SR 77 - Show Low to Holbrook



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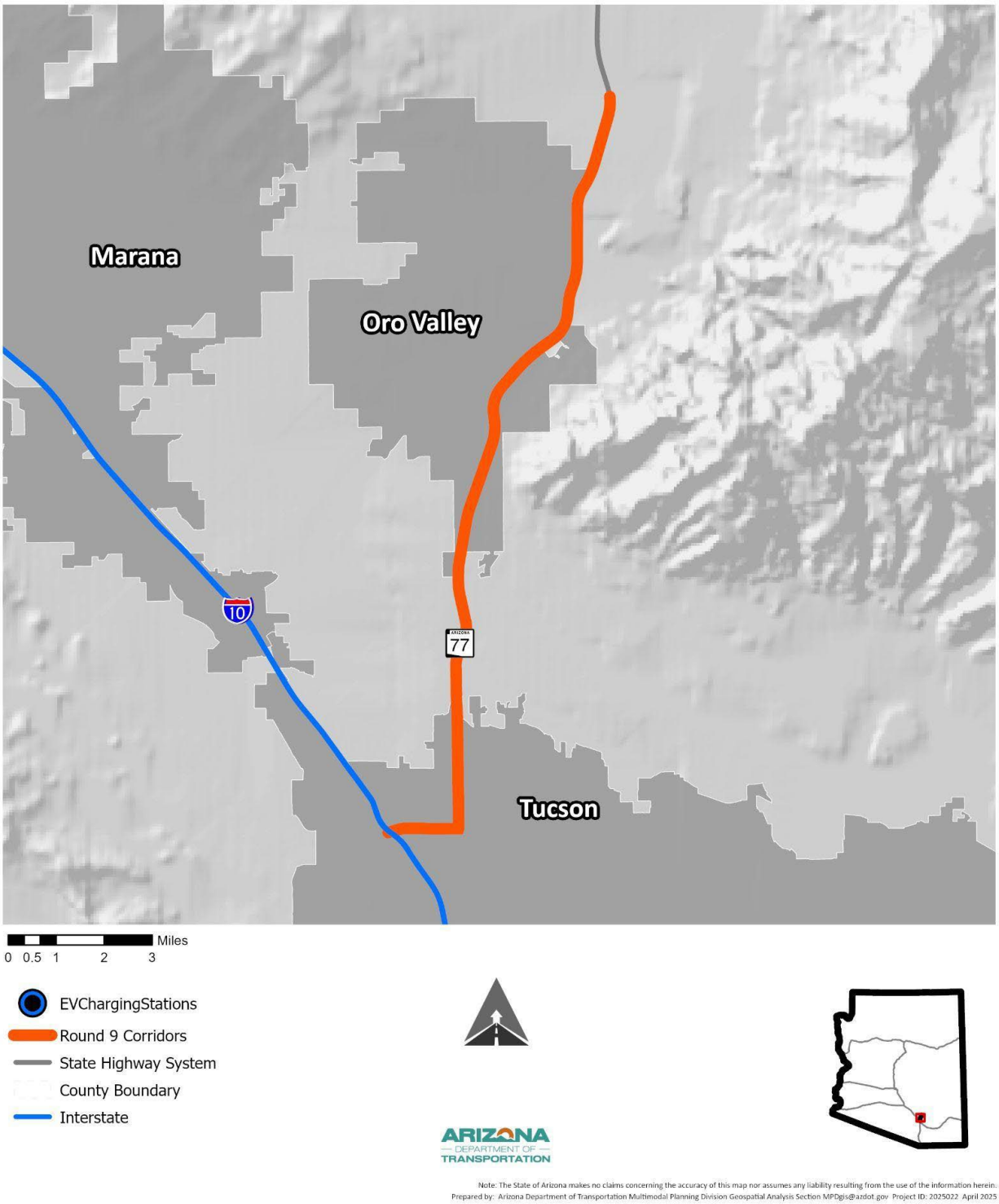
Map 4

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SR 77 - Tucson to Catalina



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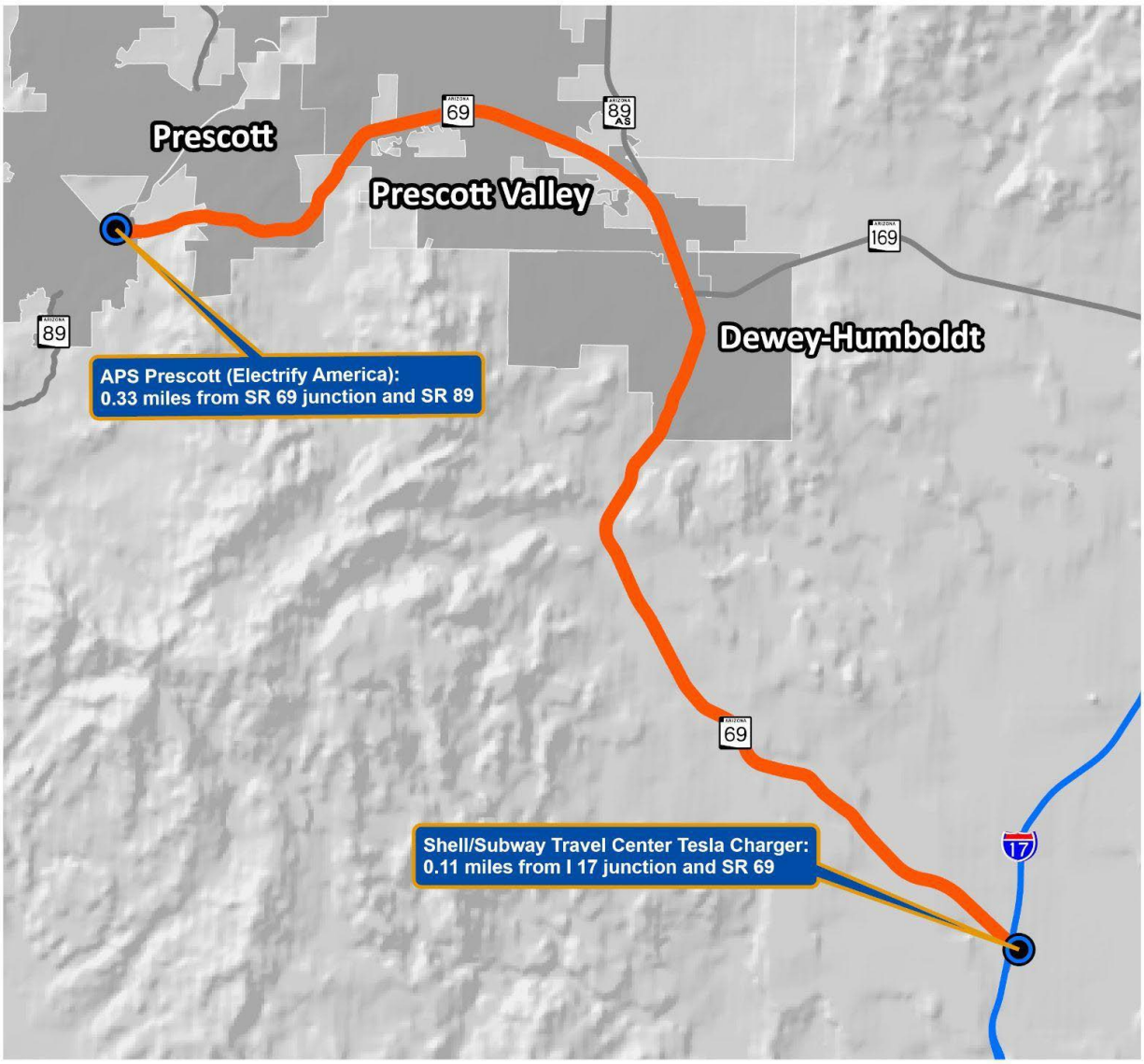
Map 5

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SR 69- I-17 to Prescott and SR89



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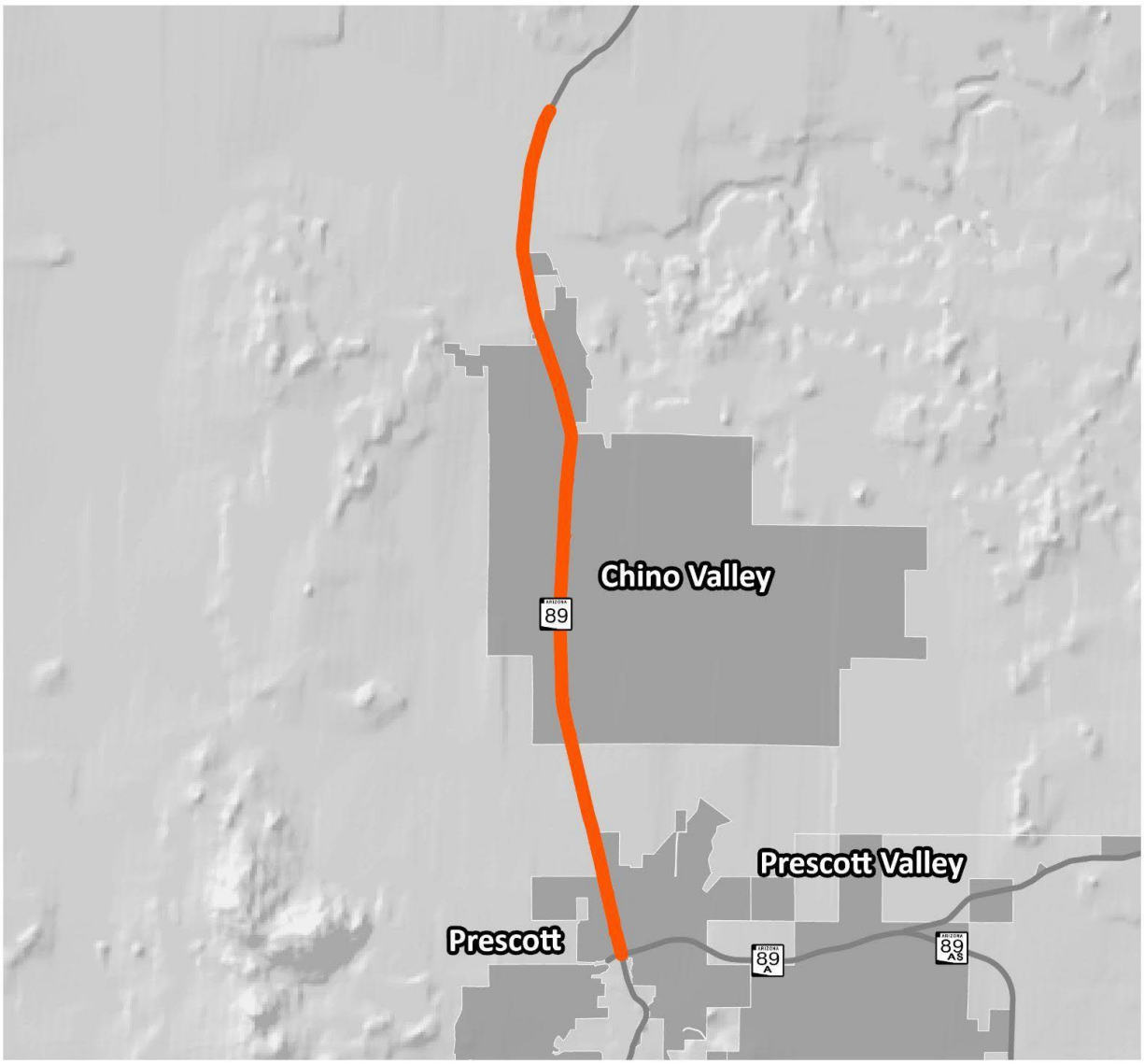
Map 6

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SR 89- SA89/Granite Dells to North Paulden



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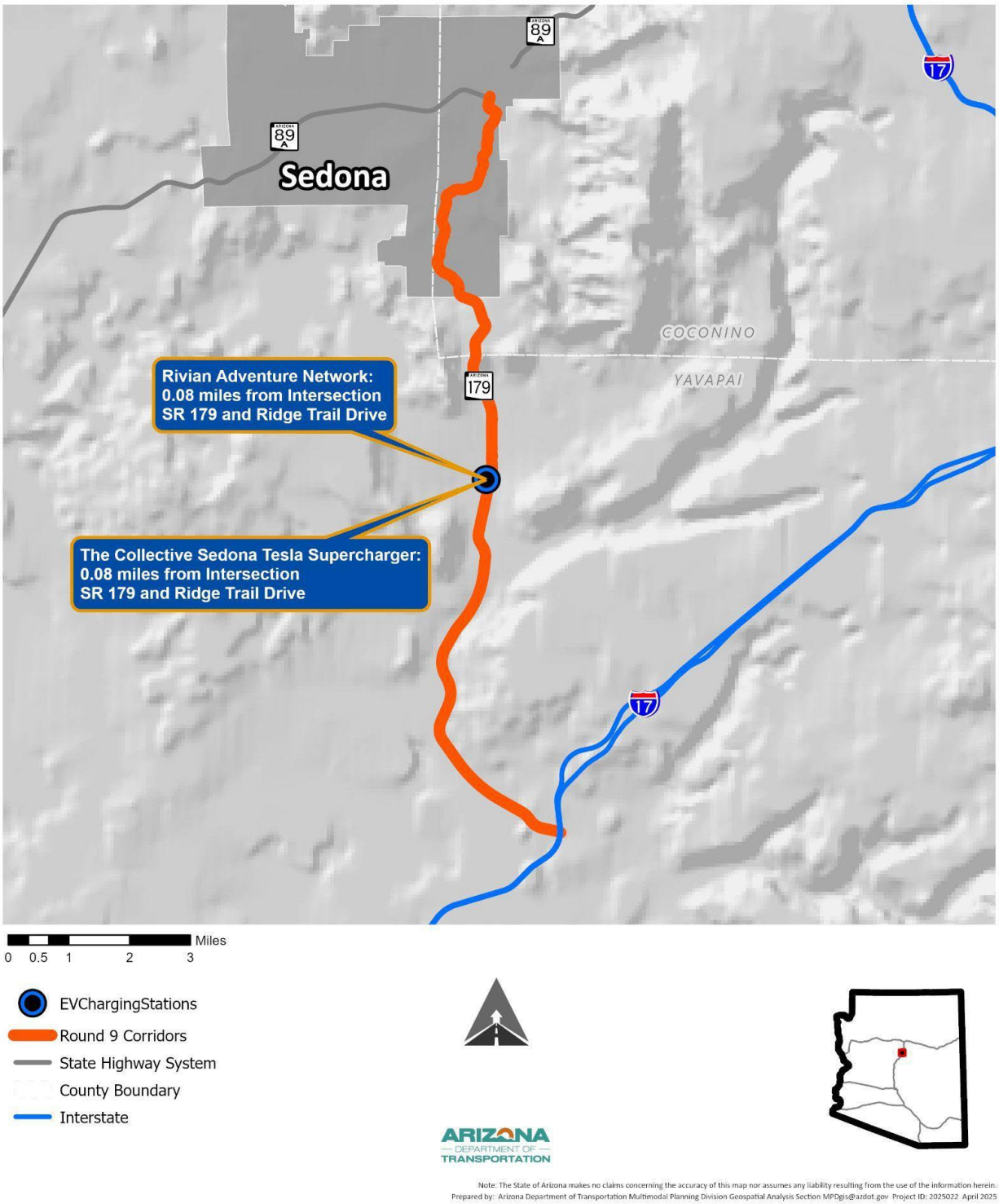
Map 7

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SR 179- I-17 to Sedona



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Map 8

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SA 89- SR 89 to SAS89

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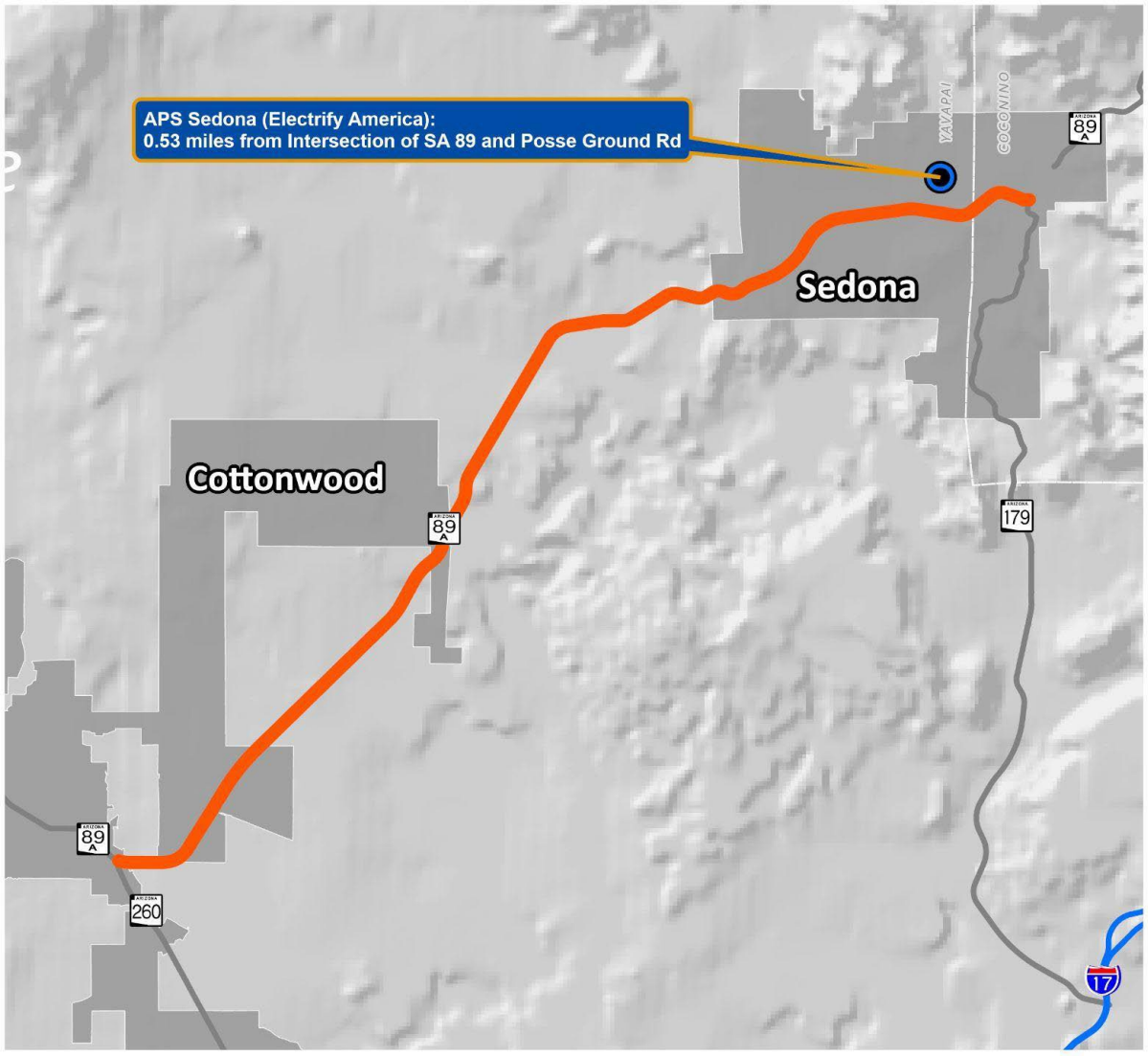
Map 9

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SA89- Cottonwood to Sedona



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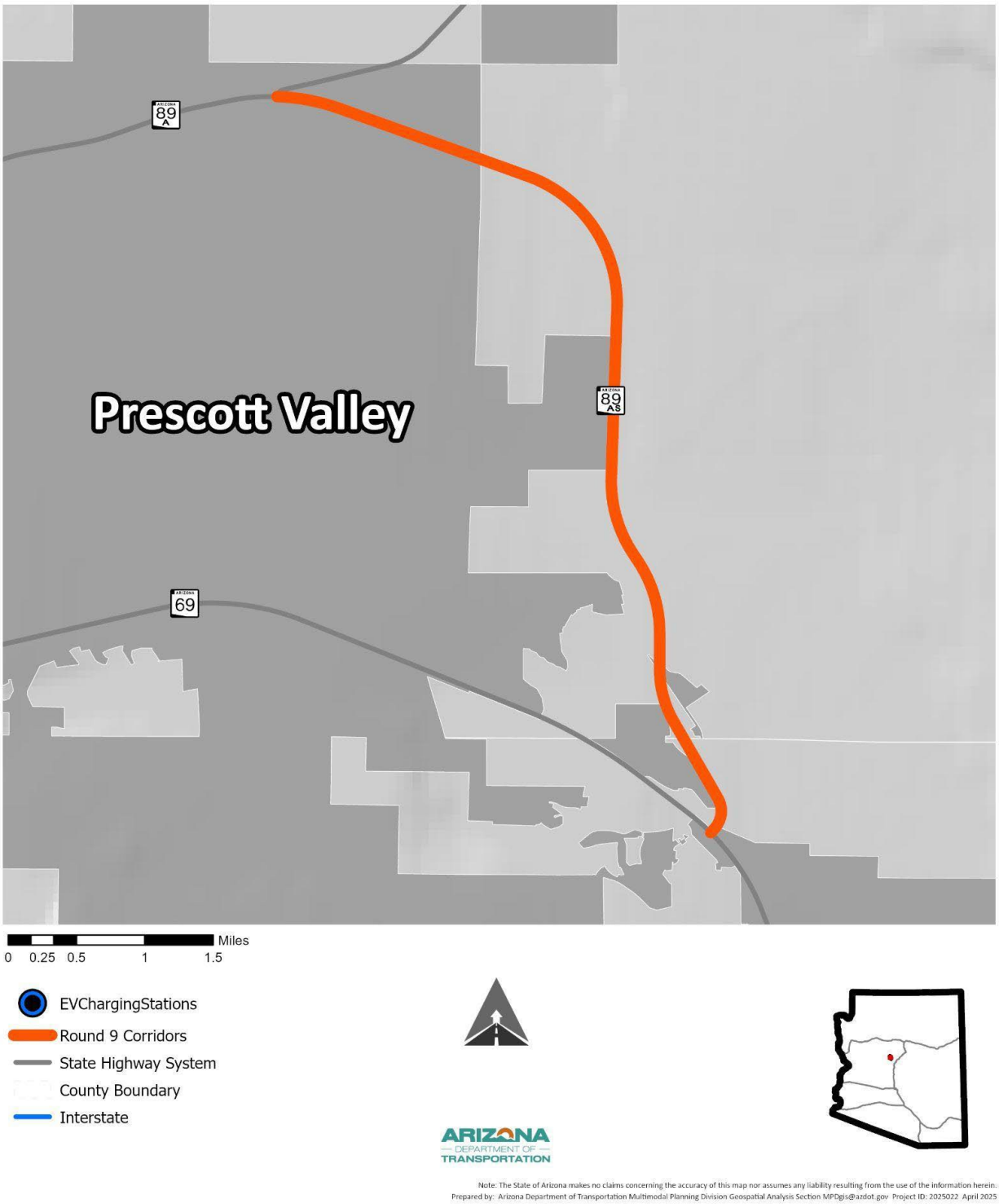
Map 10

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SAS 89- SA89 to SR69



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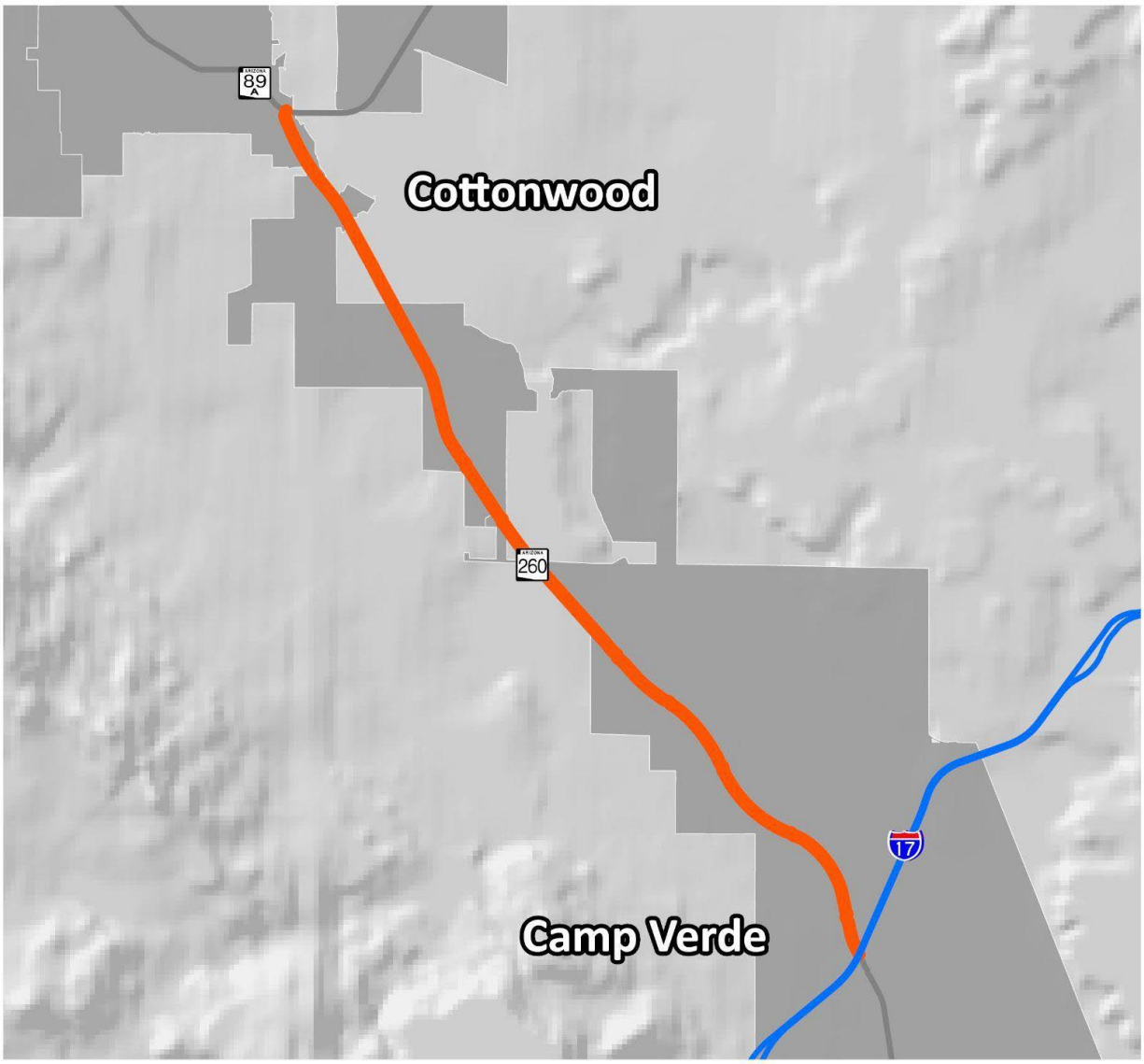
Map 11

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SR 260- I-17 to Cottonwood/SR89A



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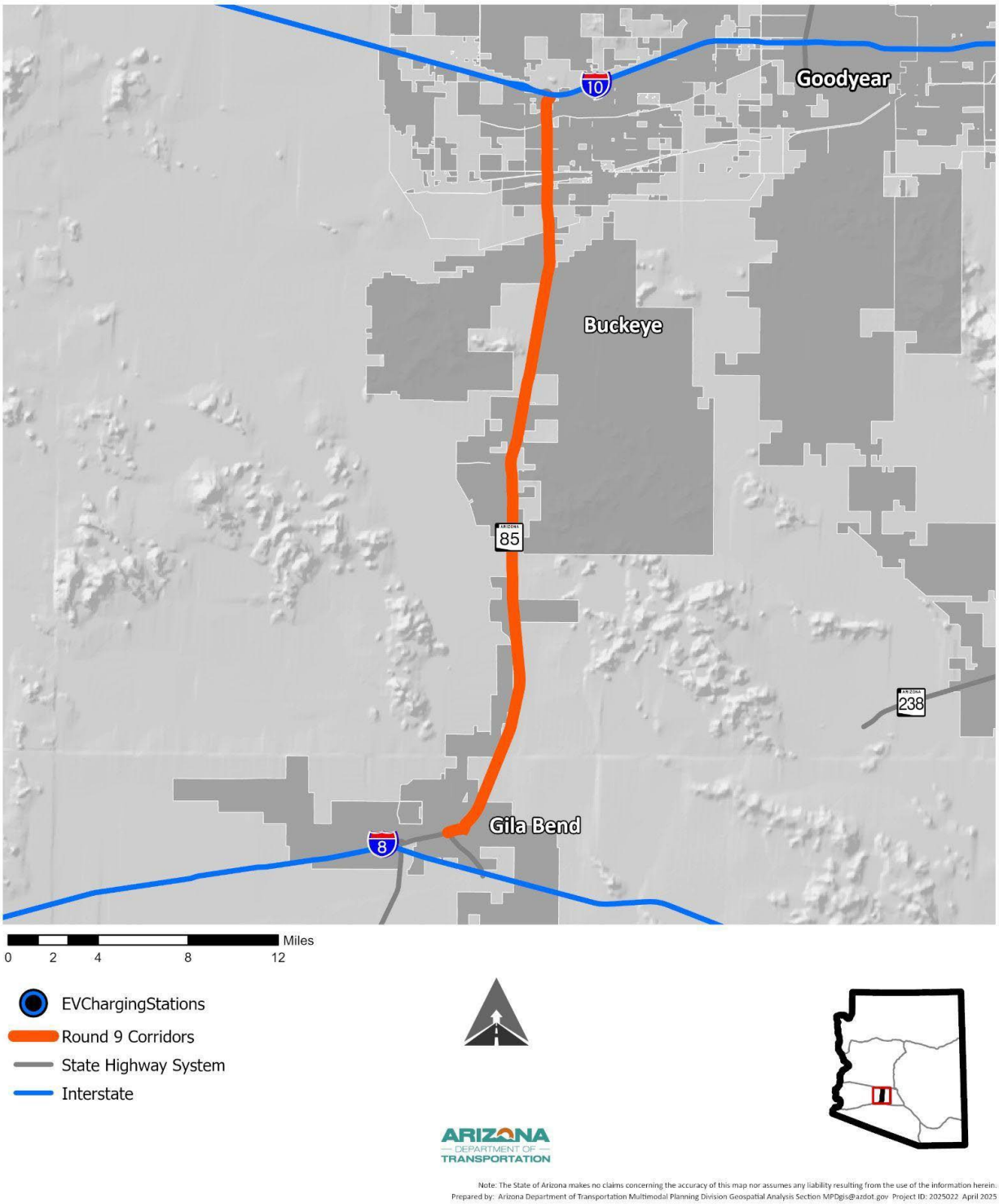
Map 12

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SR 85- I-8 (Gila Bend) to I-10 (Buckeye)



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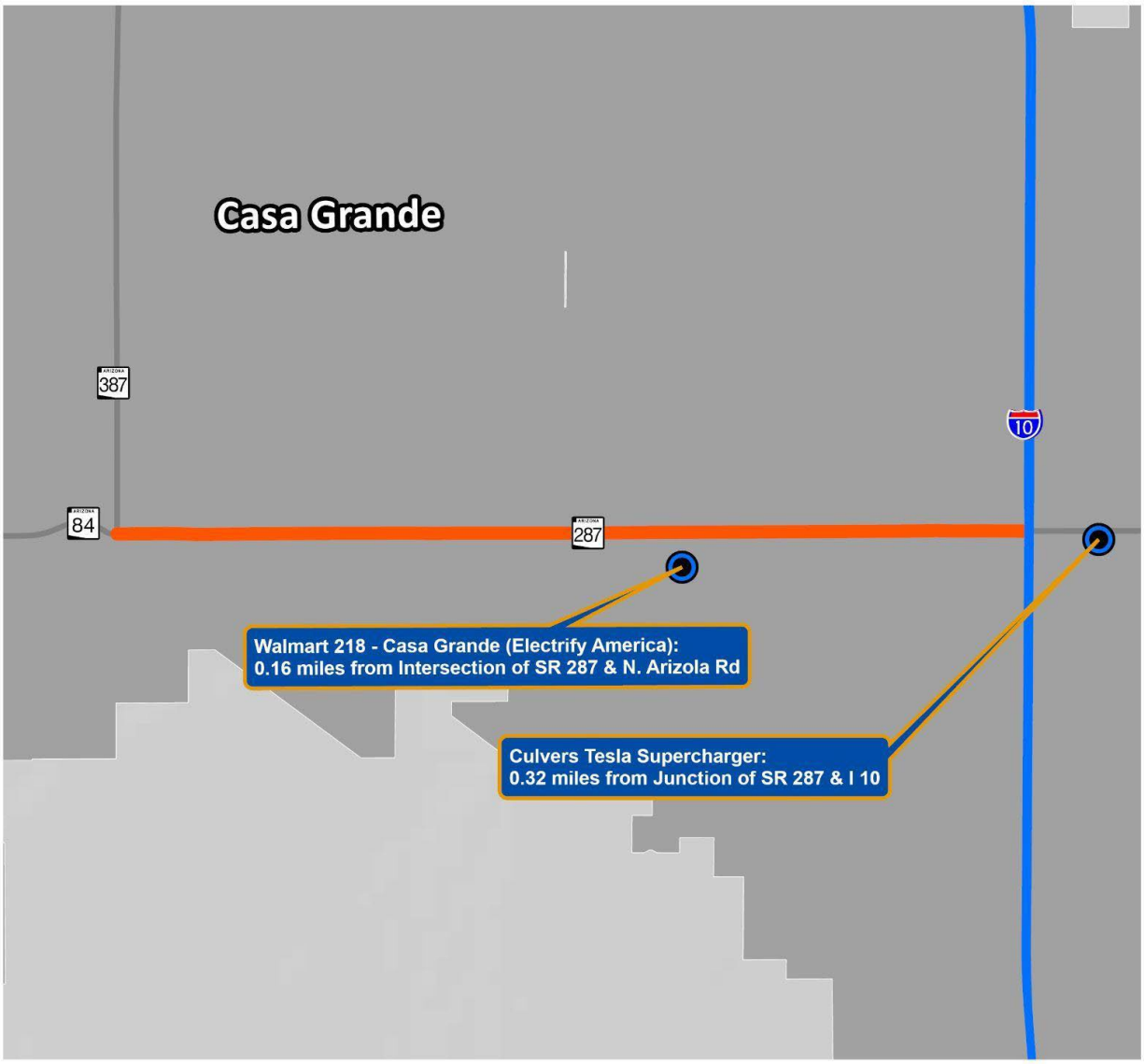
Map 13

2025 EV Plan: Proposed New Designation, Existing Fuel Sites
SR 287- Casa Grande to I-10



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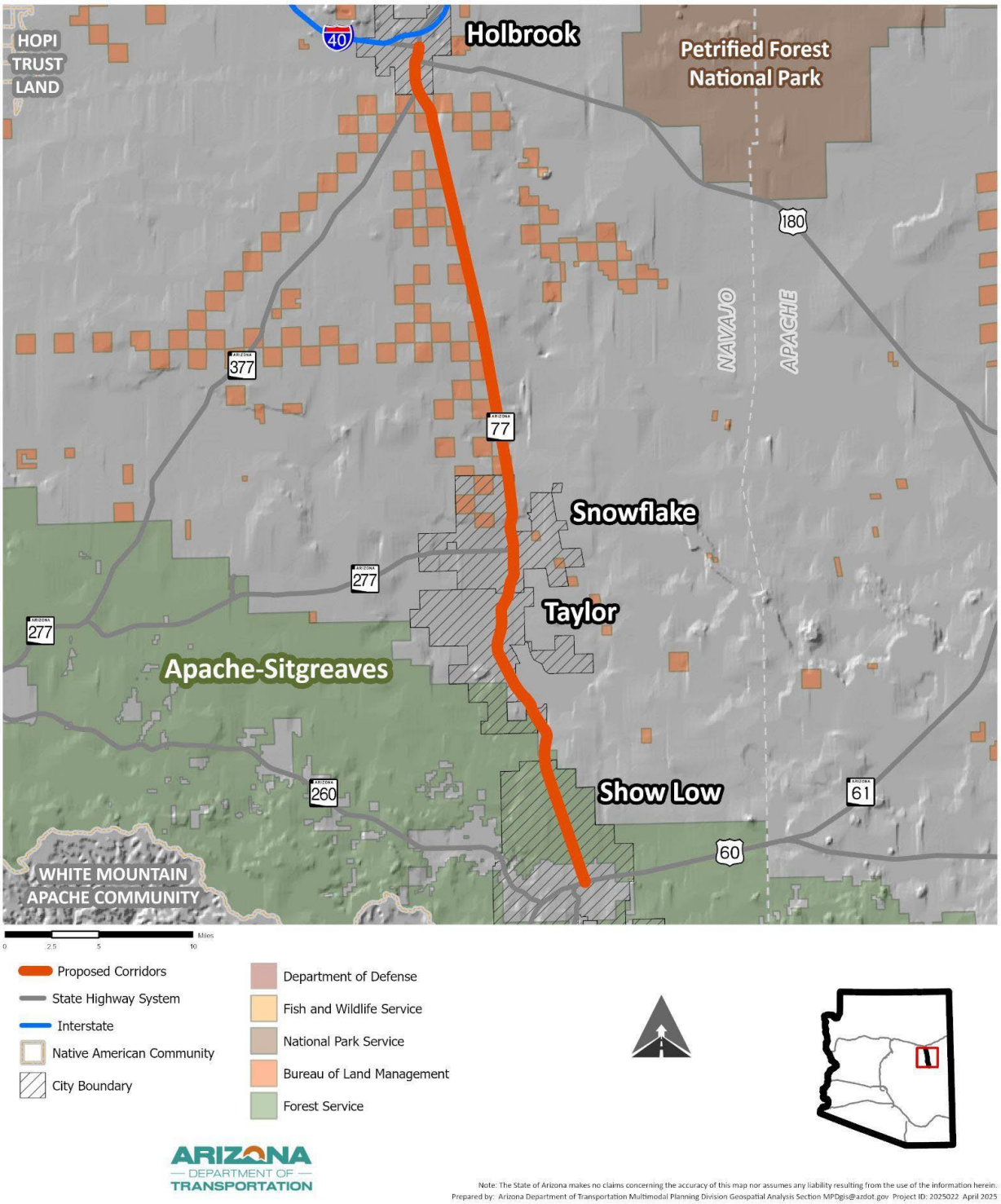
Map 14

Federal Areas of Interest - EV Proposed Corridor

SR 77 - Show Low to Holbrook



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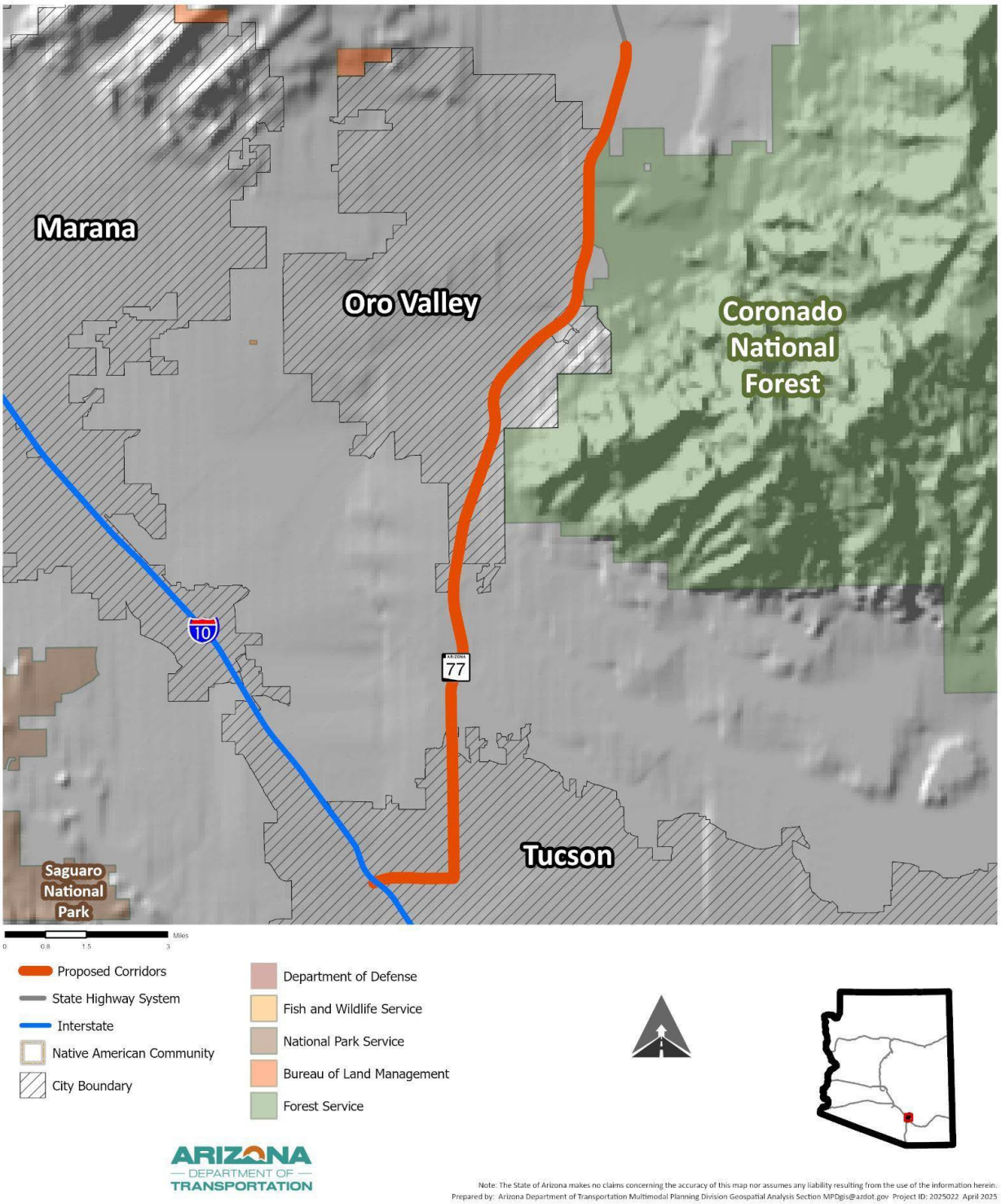
Map 15

Federal Areas of Interest - EV Proposed Corridor

SR 77 - Tucson to Catalina



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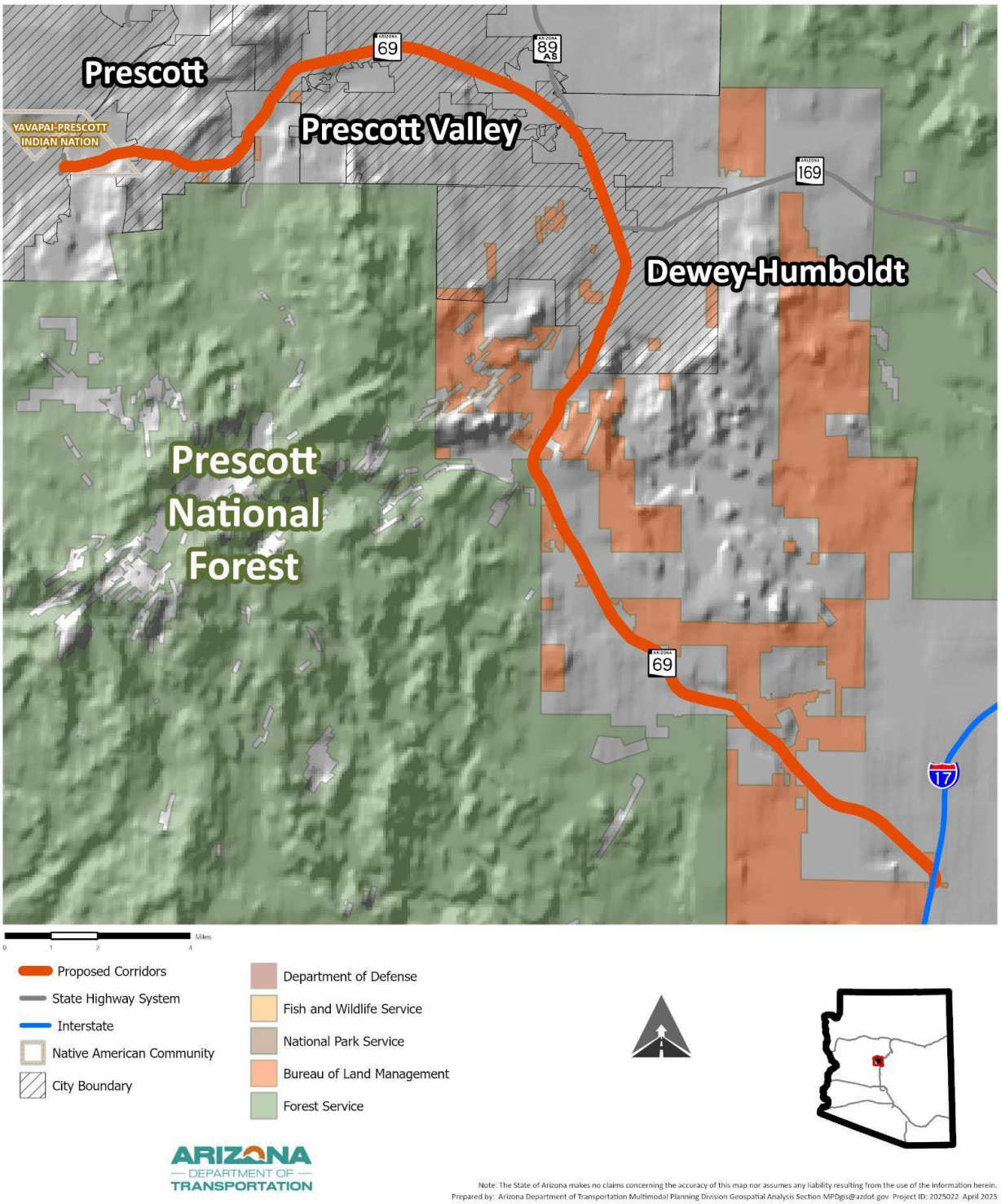
Map 16

Federal Areas of Interest - EV Proposed Corridor

SR 69- I-17 to Prescott and SR89



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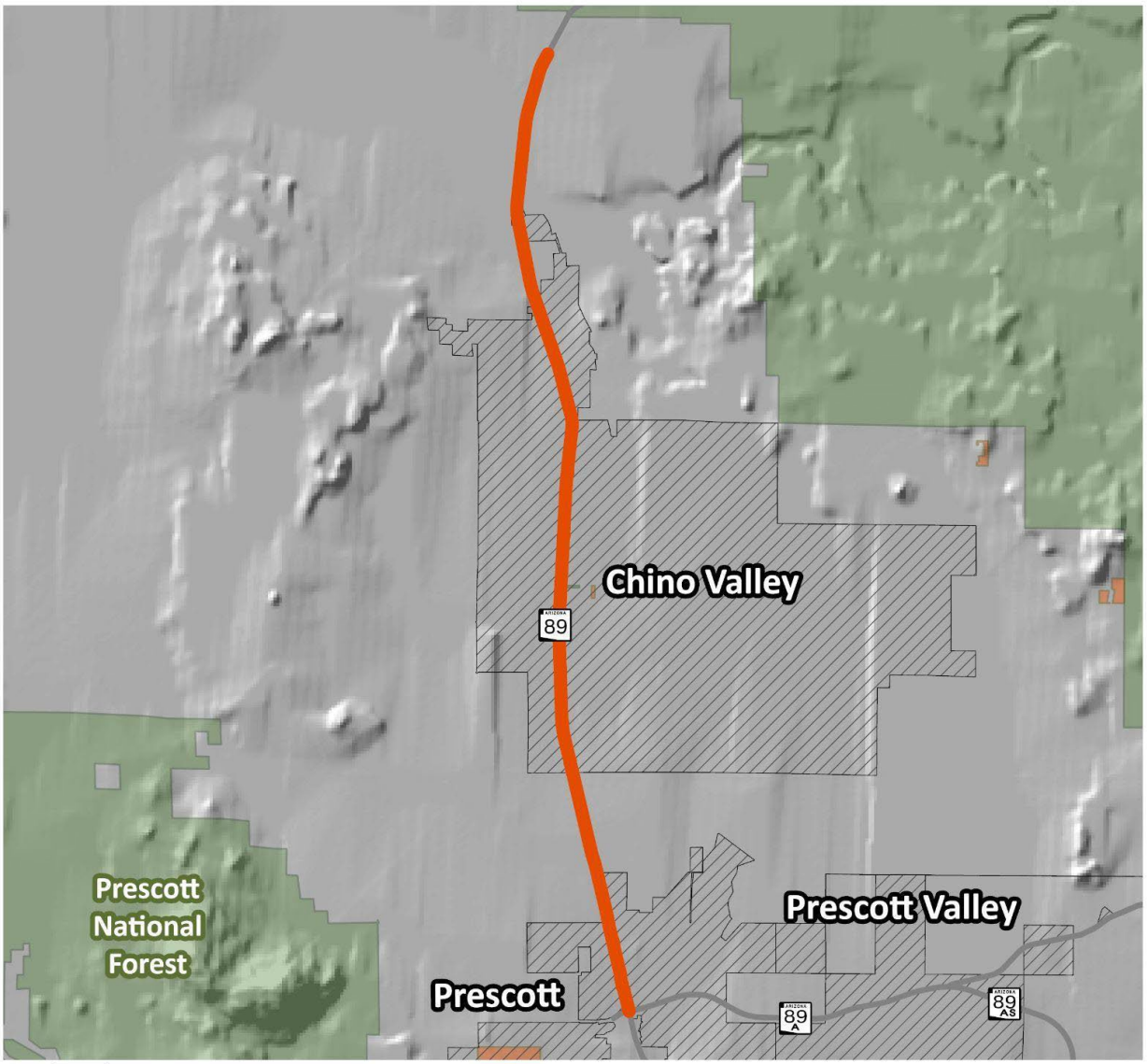
Map 17

Federal Areas of Interest - EV Proposed Corridor

SR 89- SA89/Granite Dells to North Paulden



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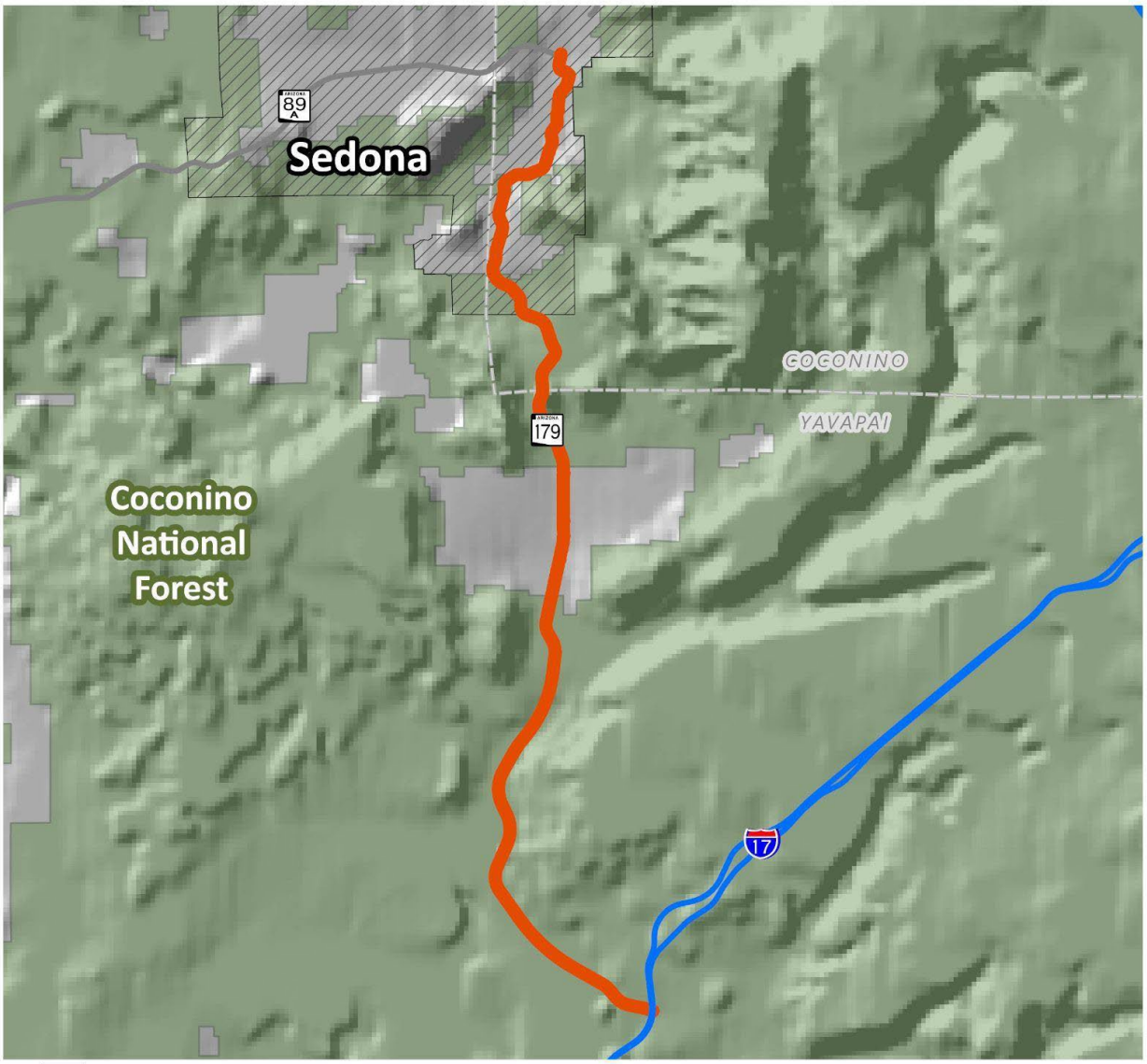
Map 18

Federal Areas of Interest - EV Proposed Corridor

SR 179- I-17 to Sedona



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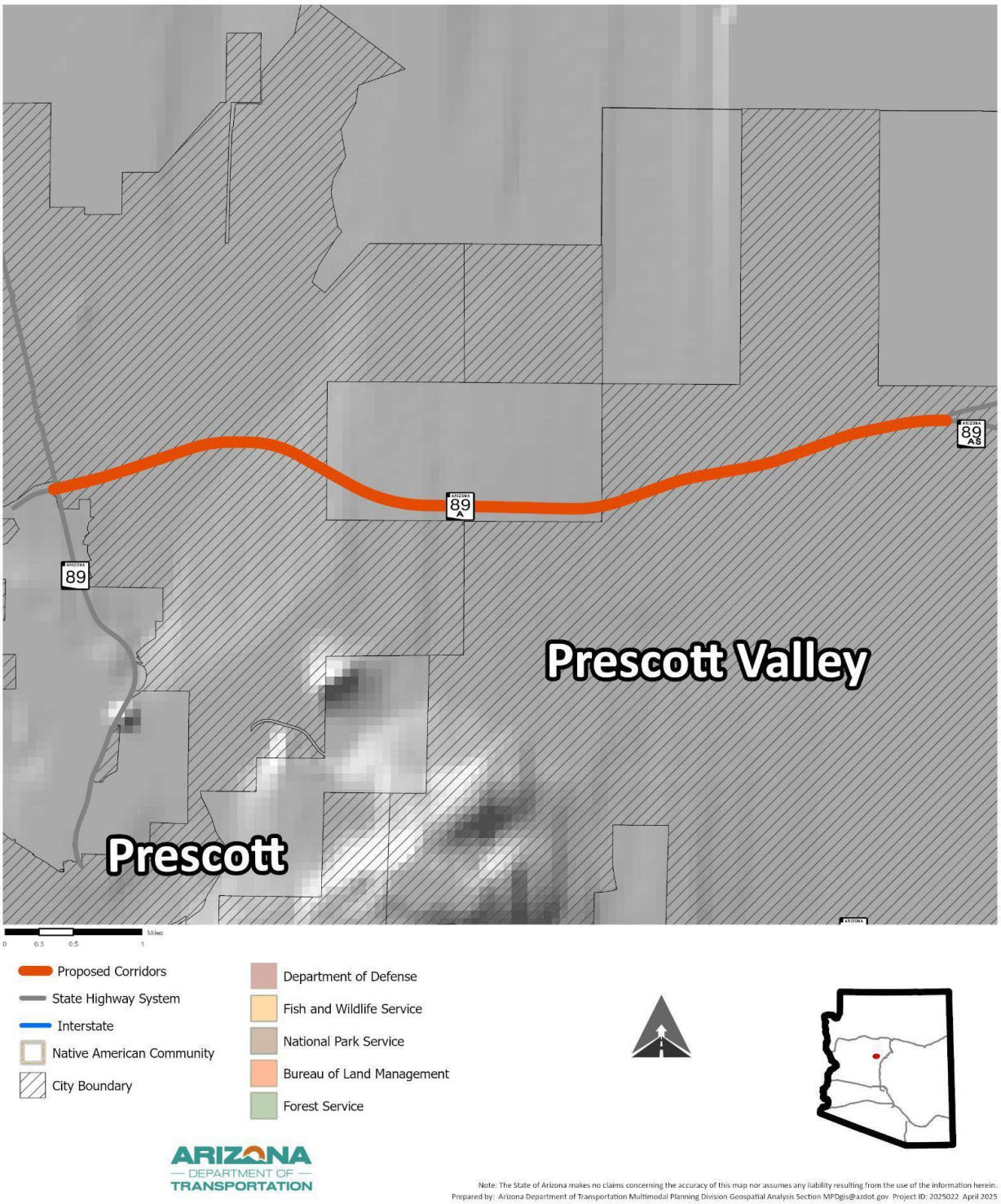
Map 19

Federal Areas of Interest - EV Proposed Corridor

SA 89- SR 89 to SAS89



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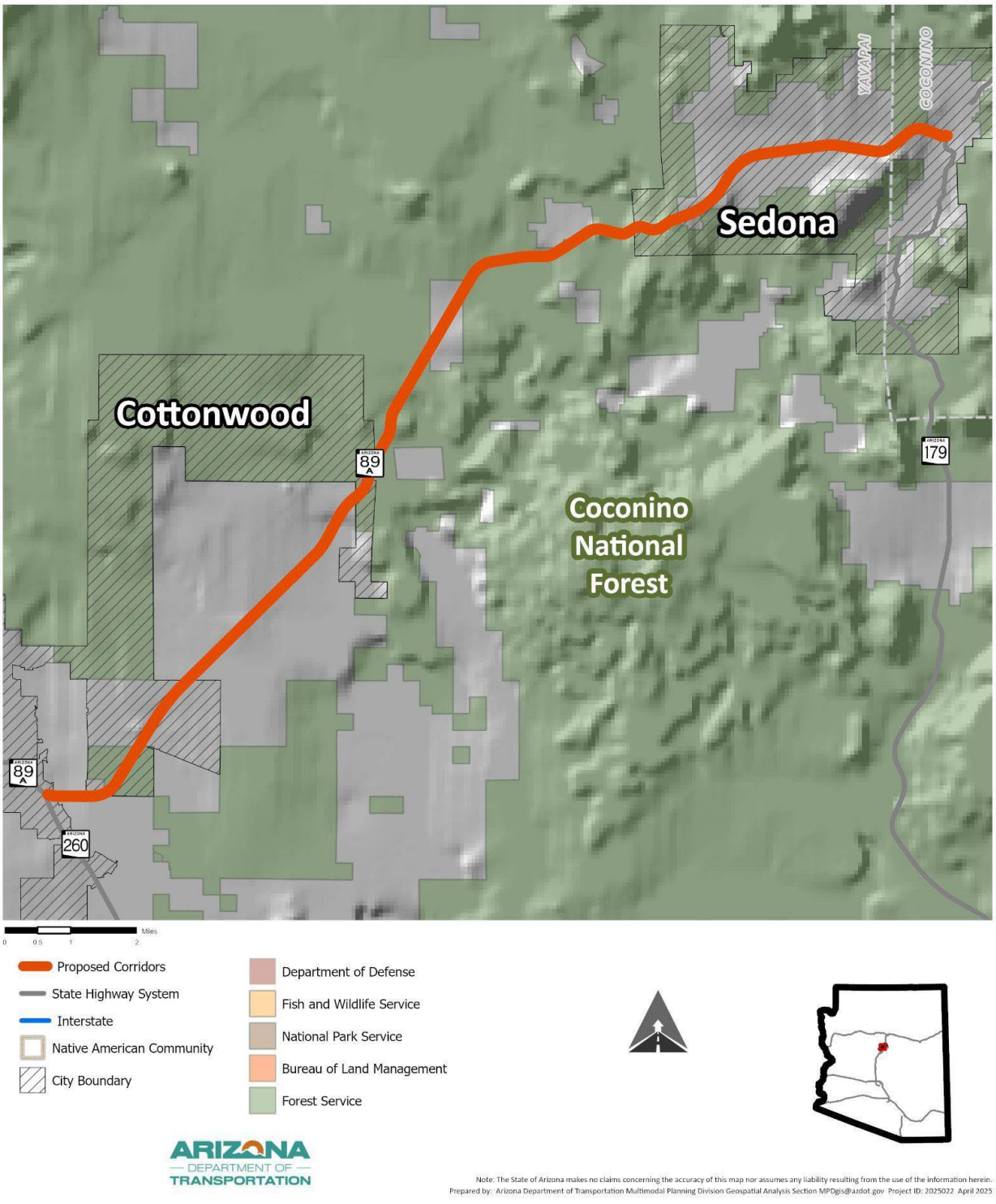
Map 20

Federal Areas of Interest - EV Proposed Corridor

SA89- Cottonwood to Sedona



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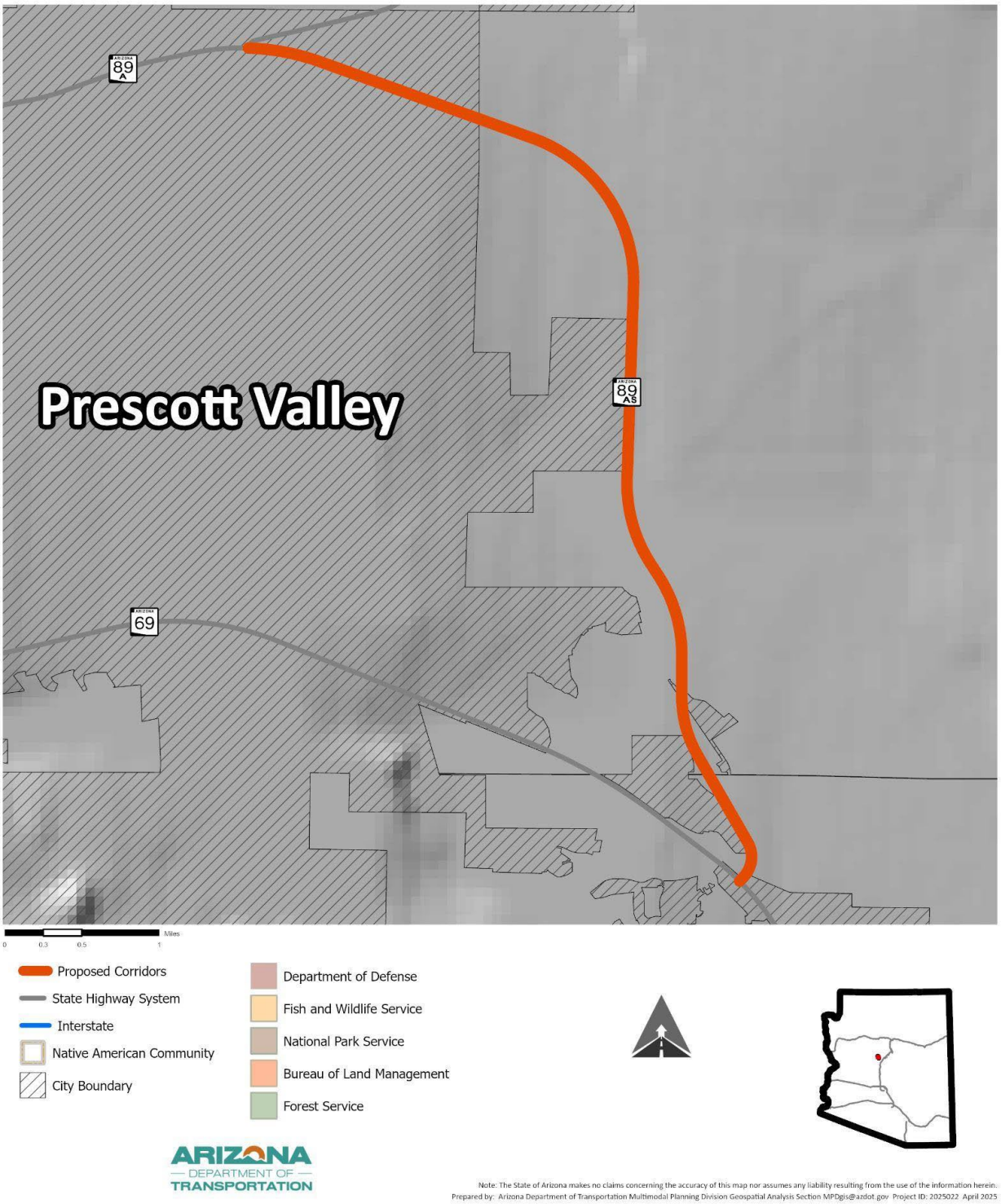
Map 21

Federal Areas of Interest - EV Proposed Corridor

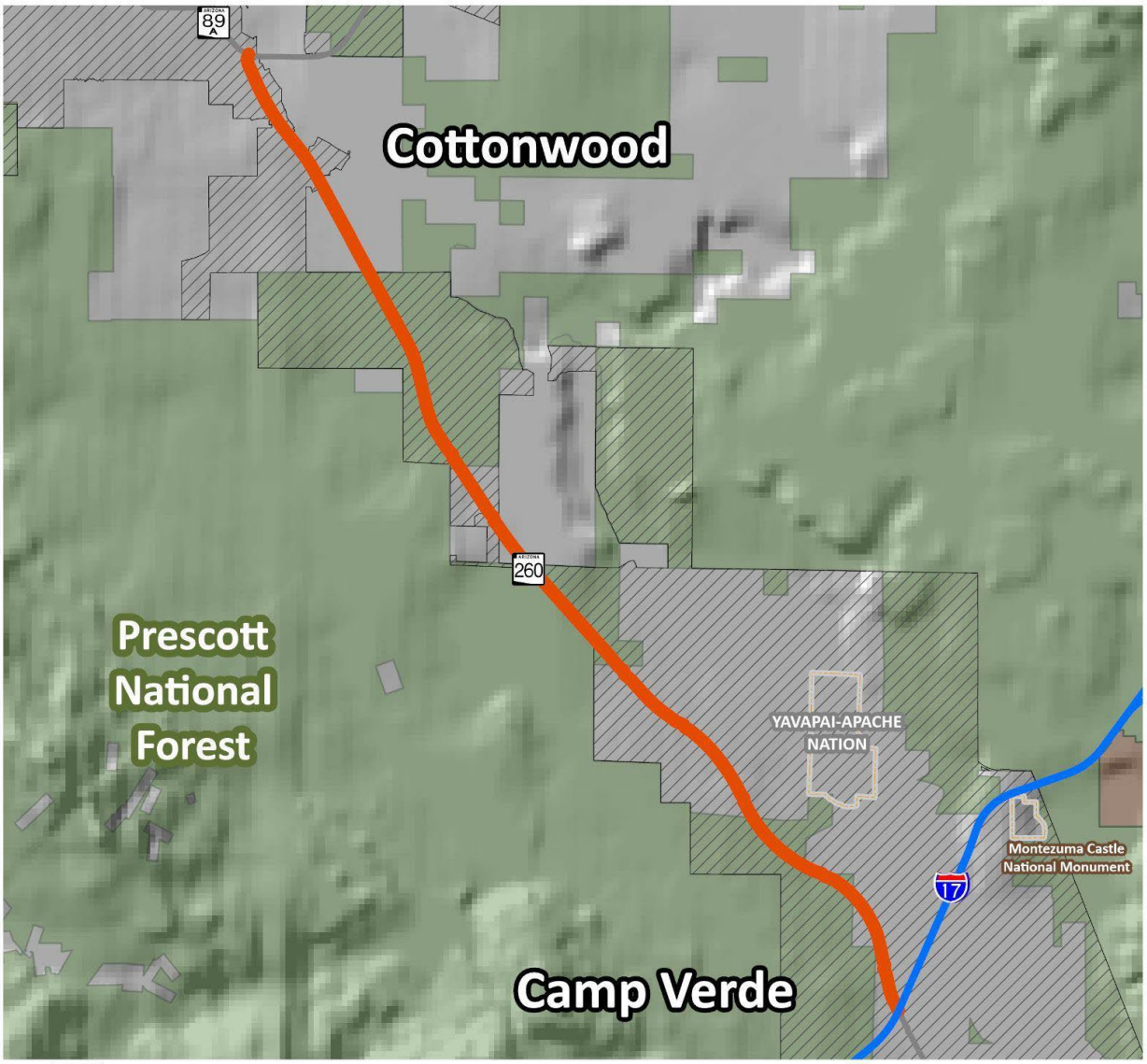
SAS 89- SA89 to SR69



Map 22

Federal Areas of Interest - EV Proposed Corridor

SR 260- I-17 to Cottonwood/SR89A



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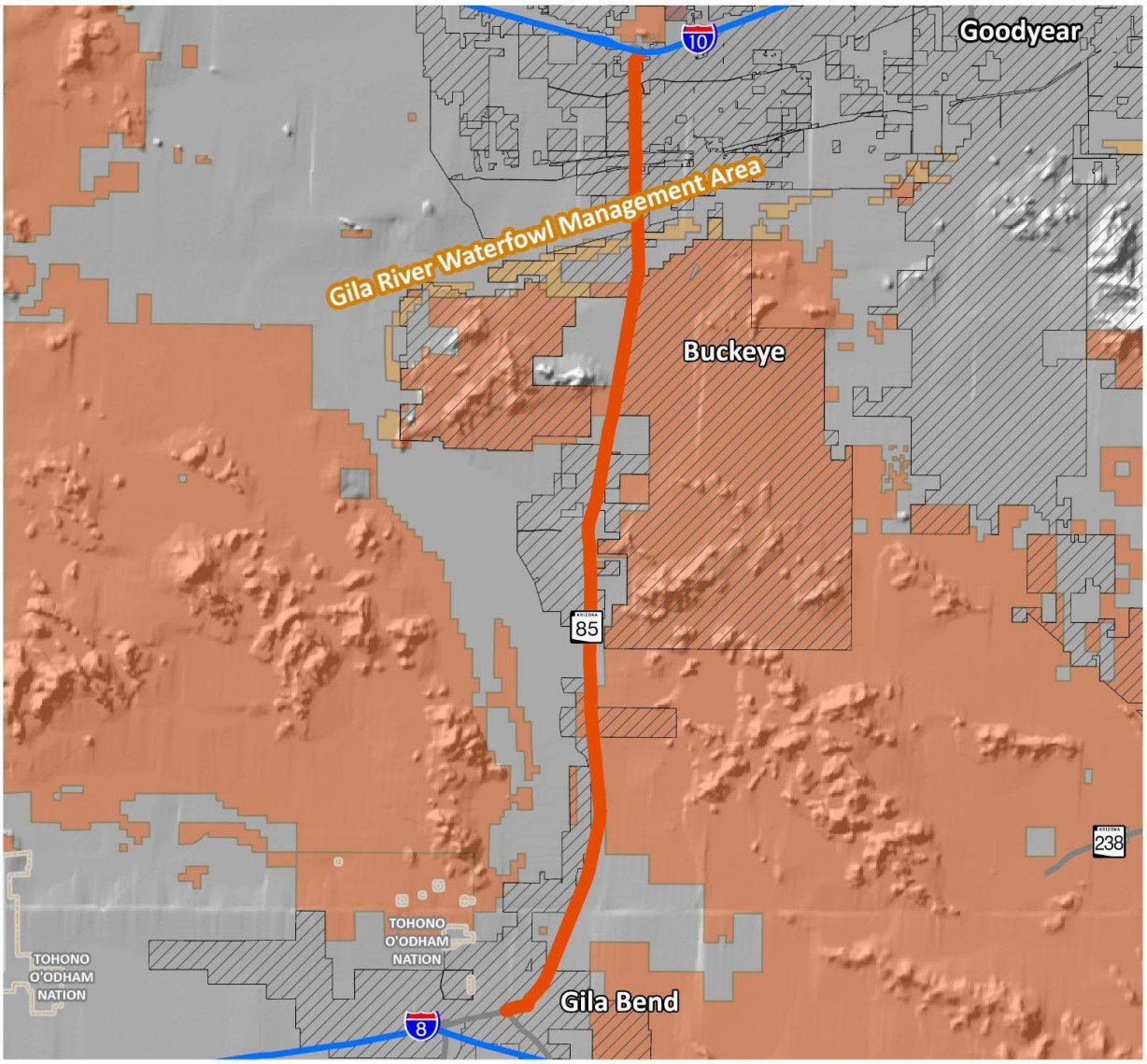
Map 23

Federal Areas of Interest - EV Proposed Corridor

SR 85- I-8 (Gila Bend) to I-10 (Buckeye)



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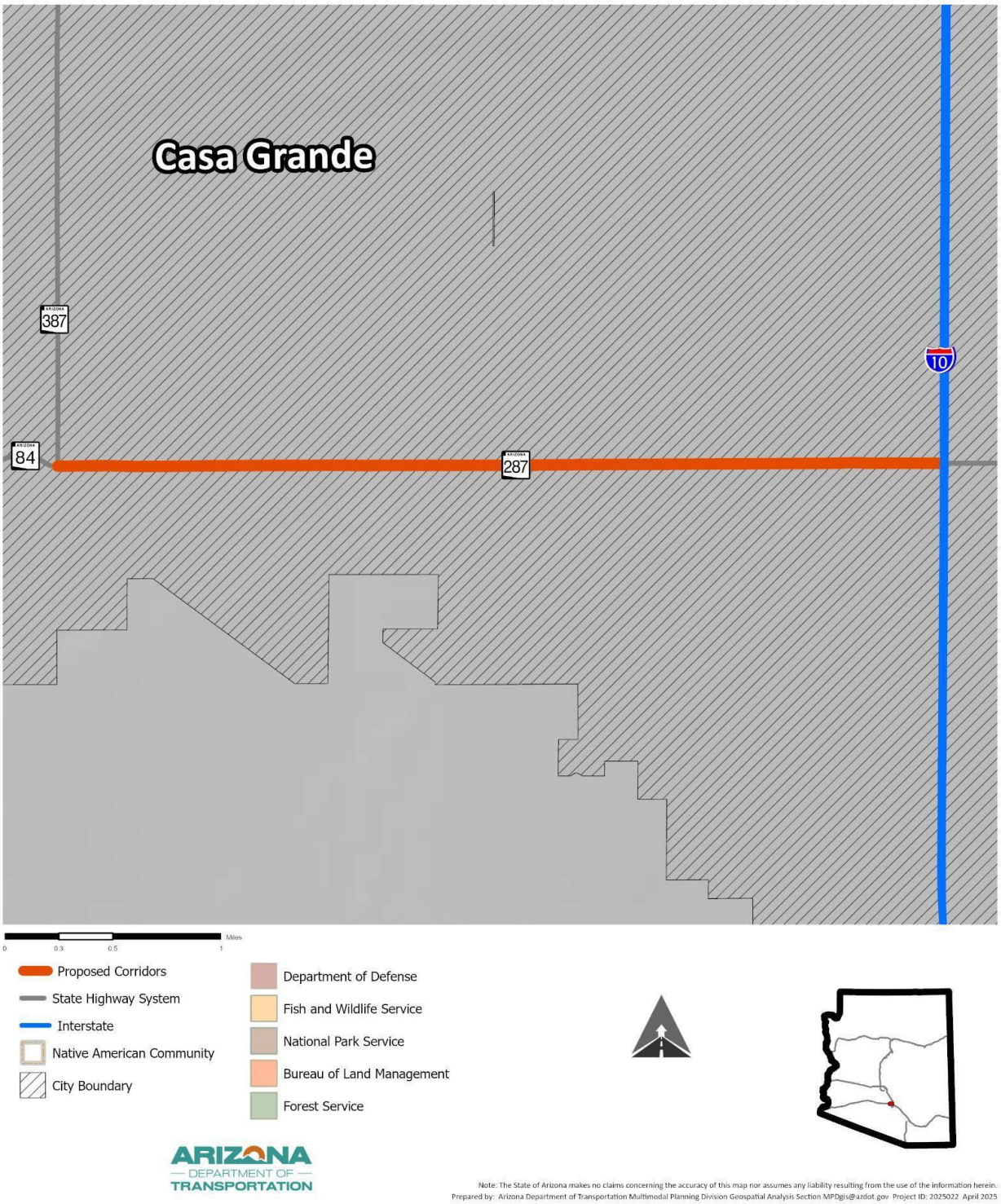
Map 24

Federal Areas of Interest - EV Proposed Corridor

SR 287- Casa Grande to I-10



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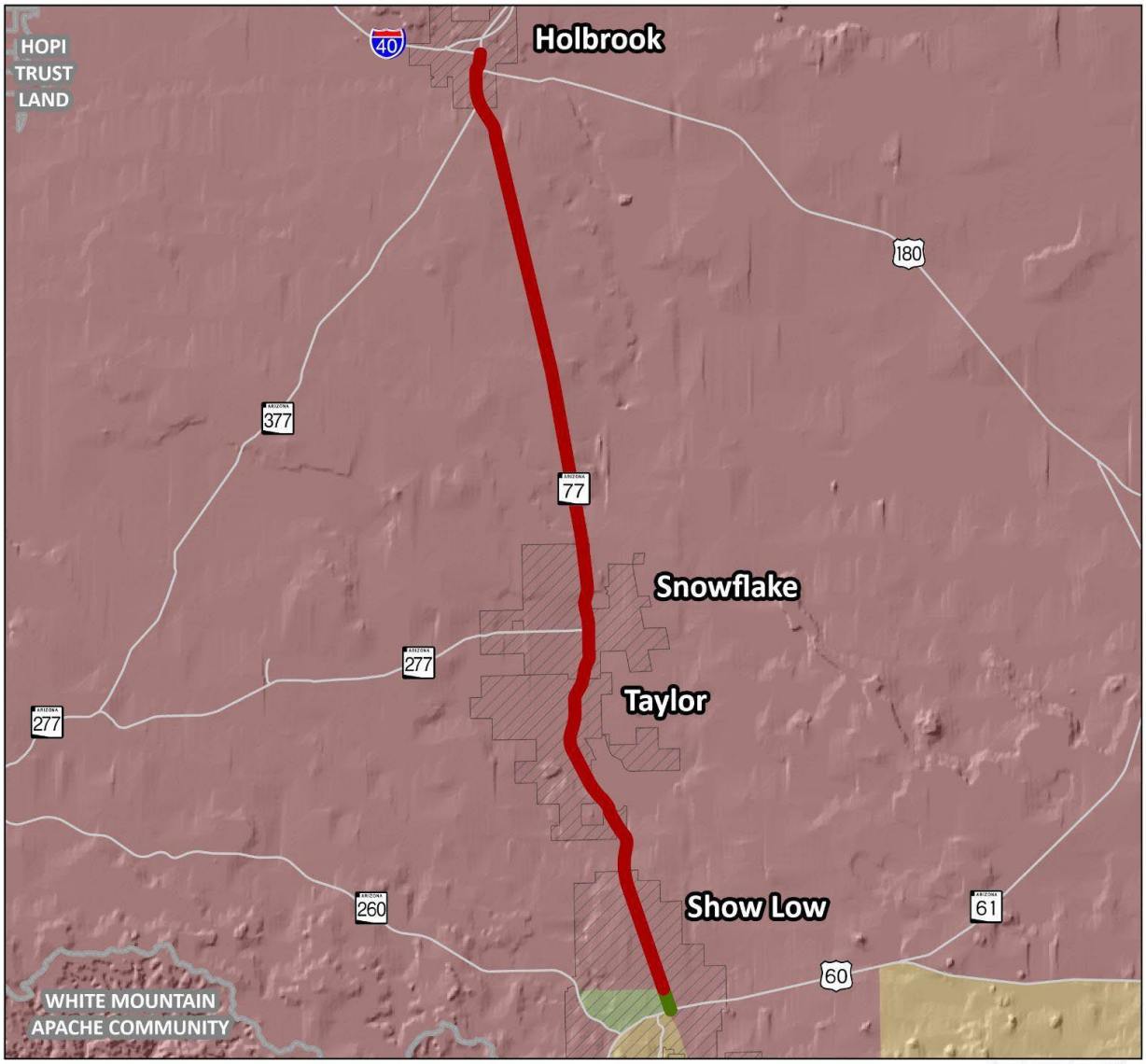
Map 25

Disadvantaged Areas - EV Proposed Corridor

SR 77 - Show Low to Holbrook



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SR 77	Fully Disadvantaged	97.77	45.25	46.28
SR 77	Not Disadvantaged	2.23	1.03	46.28

ARIZONA DEPARTMENT OF TRANSPORTATION

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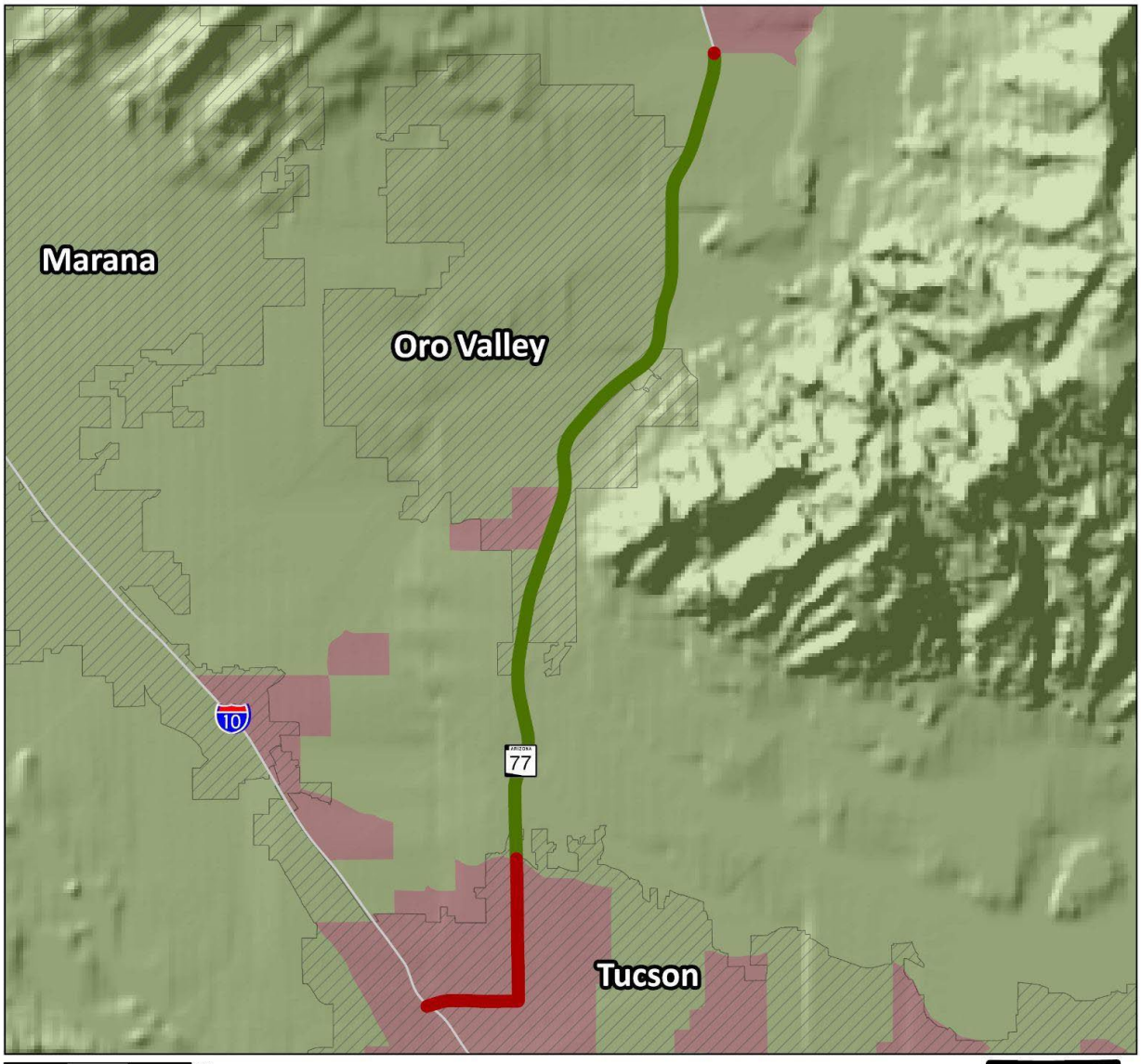
Note: The data used to conduct this analysis was provided by the climate and economic justice screening tool. https://screeningtool.geoplatform.gov

Map 26

Disadvantaged Areas - EV Proposed Corridor

SR 77 - Tucson to Catalina



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SR 77	Not Disadvantaged	78.58	13.87	17.65
SR 77	Fully Disadvantaged	21.42	3.78	17.65

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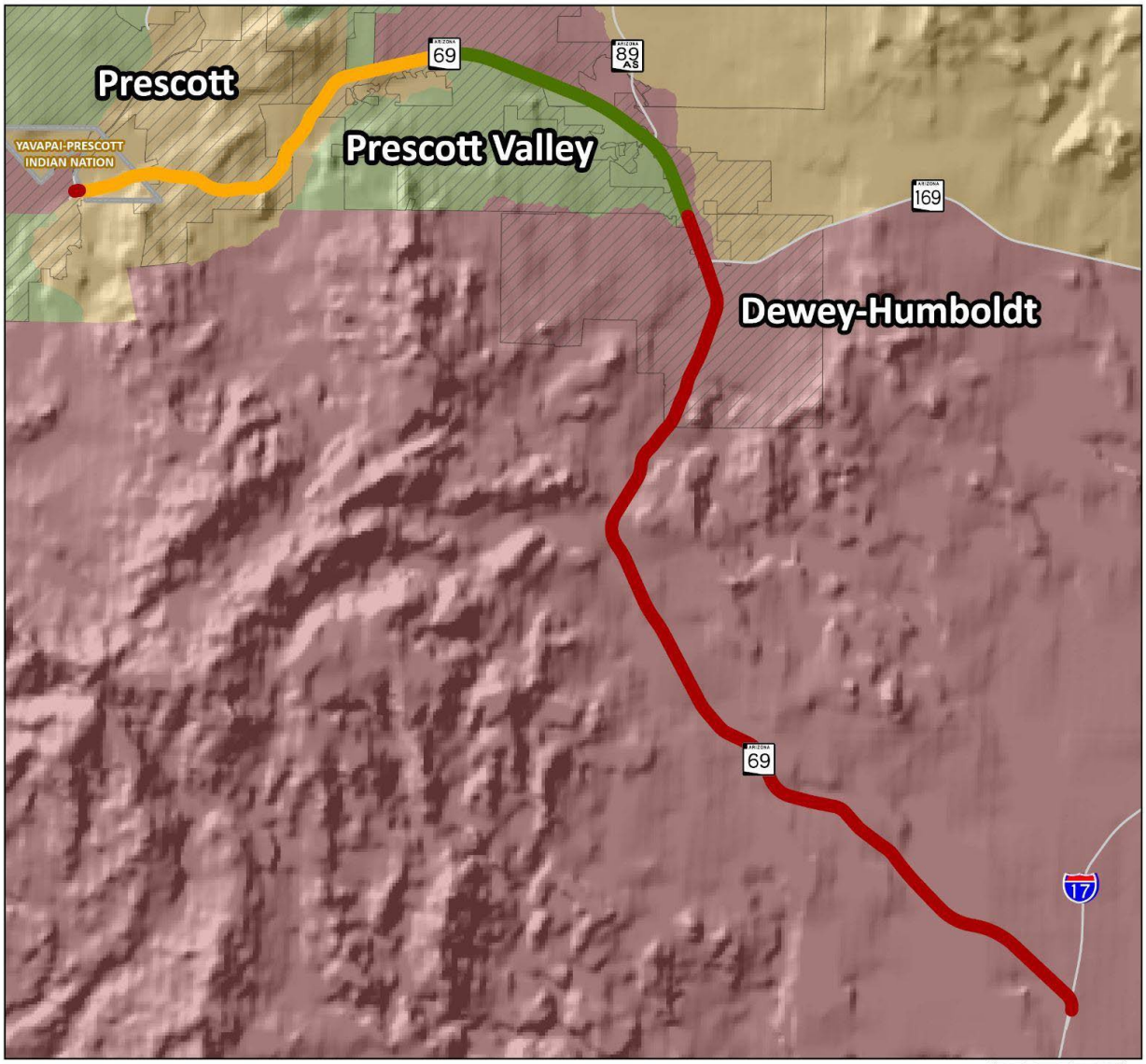
Map 27

Disadvantaged Areas - EV Proposed Corridor

SR 69- I-17 to Prescott and SR89



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SR 69	Not Disadvantaged	17.37	5.84	33.62
SR 69	Partially Disadvatataged	24.15	8.12	33.62
SR 69	Fully Disadvantaged	58.48	19.66	33.62

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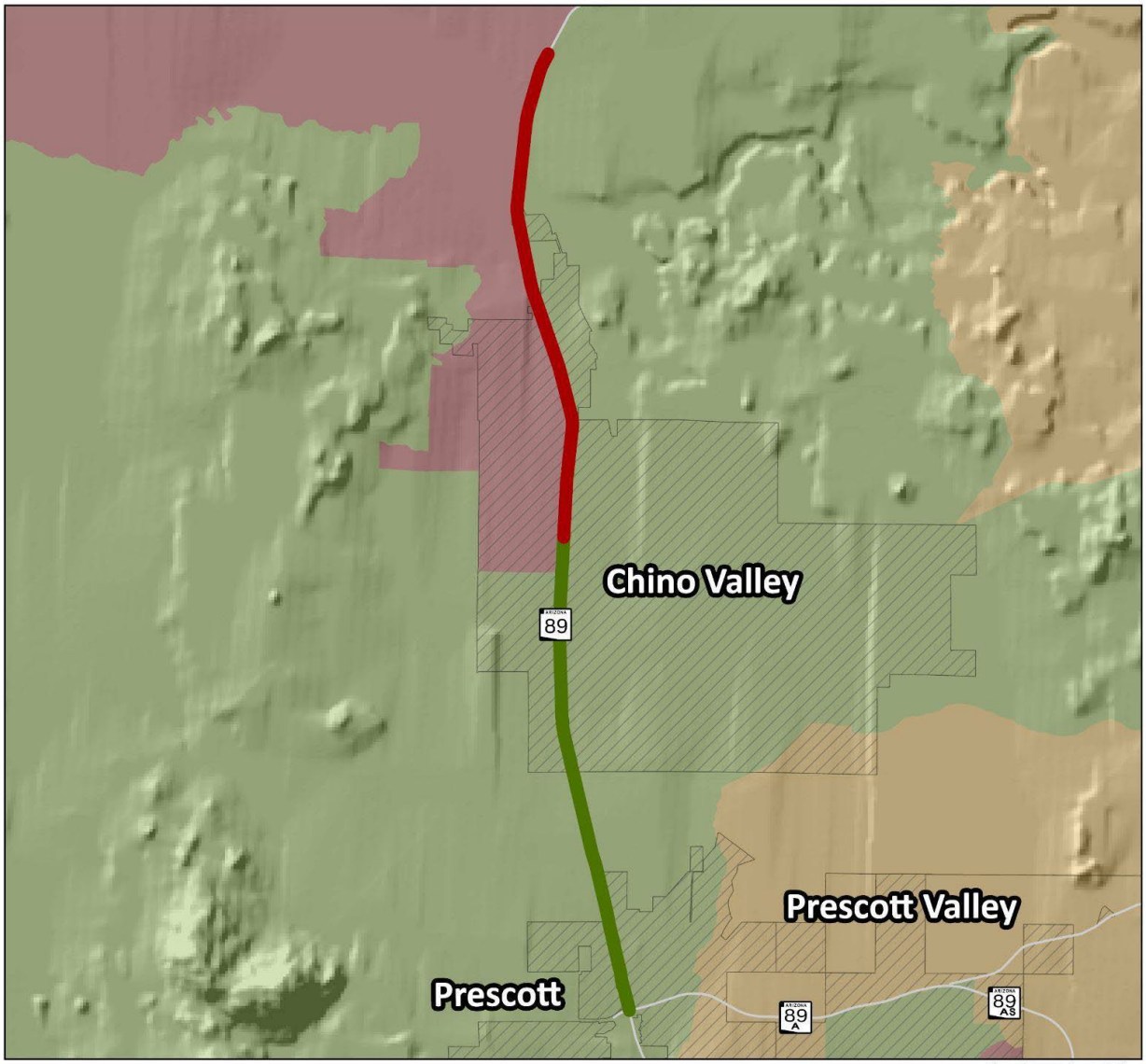
Note: The data used to conduct this analysis was provided by the climate and economic justice screening tool. https://screeningtool.geoplatform.gov

Map 28

Disadvantaged Areas - EV Proposed Corridor

SR 89- SA89/Granite Dells to North Paulden



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SR 89	Not Disadvantaged	50.76	10.01	19.72
SR 89	Fully Disadvantaged	49.24	9.71	19.72

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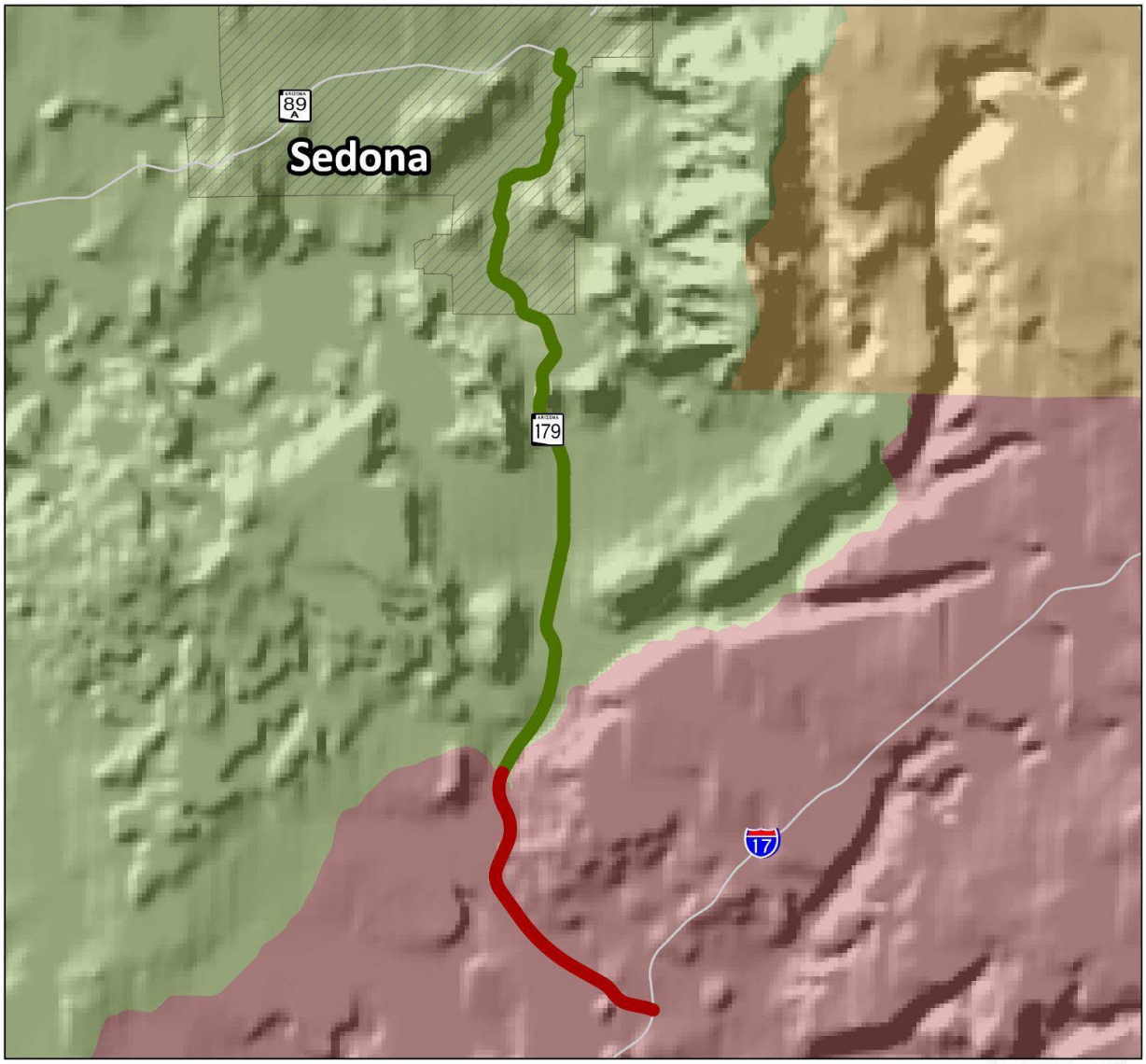
Map 29

Disadvantaged Areas - EV Proposed Corridor

SR 179- I-17 to Sedona



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SR 179	Not Disadvantaged	71.69	10.38	14.48
SR 179	Fully Disadvantaged	28.31	4.1	14.48

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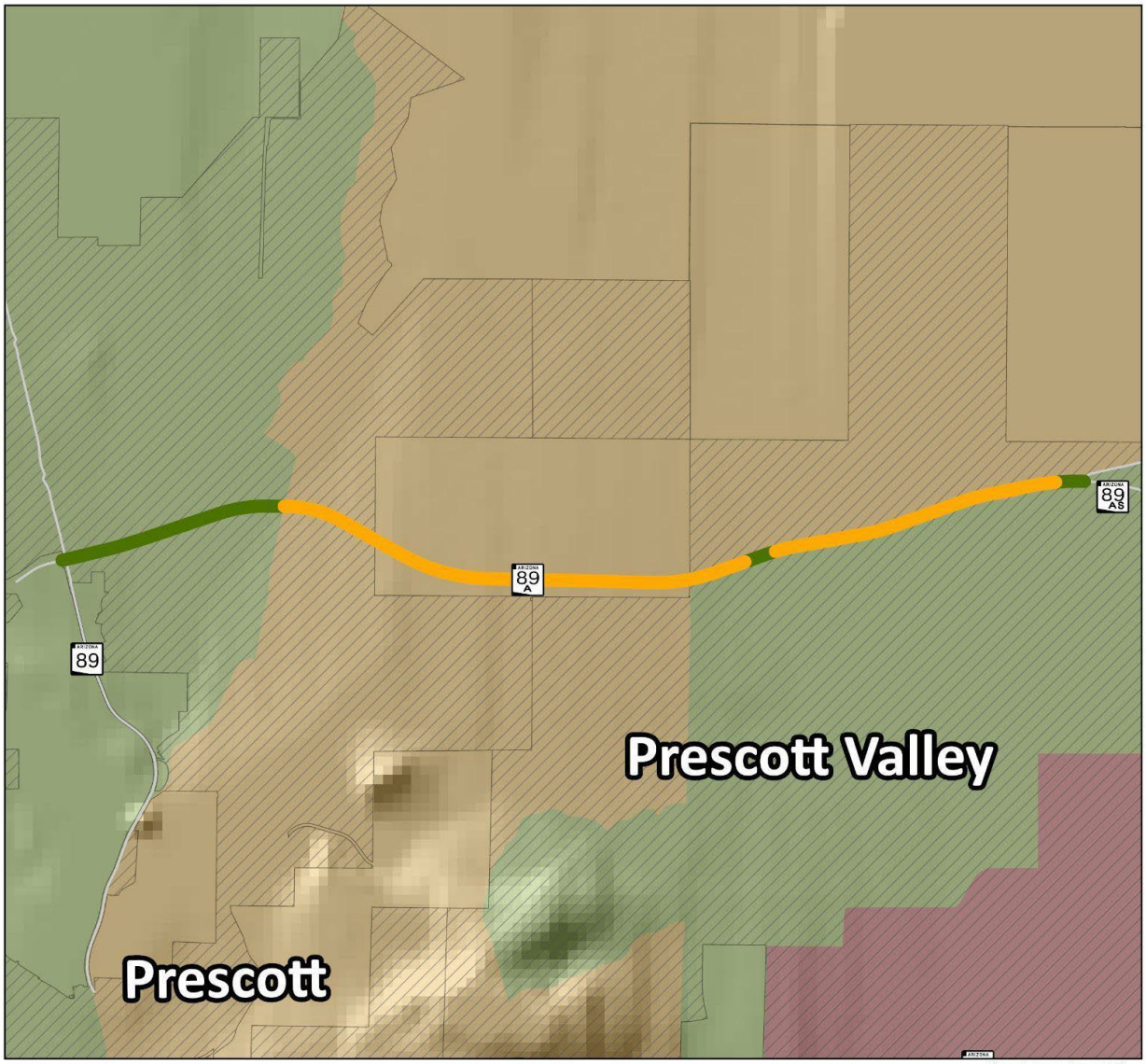
Map 30

Disadvantaged Areas - EV Proposed Corridor

SA 89- SR 89 to SAS89



Miles
0 0.25 0.5 0.75 1

Areas and Segments of Disadvantaged Populations

Not Disadvantaged	Not Disadvantaged
Partially Disadvantaged	Partially Disadvantaged
Disadvantaged	Disadvantaged

Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SA 89	Not Disadvantaged	27.42	1.84	6.71
SA 89	Partial	72.58	4.87	6.71

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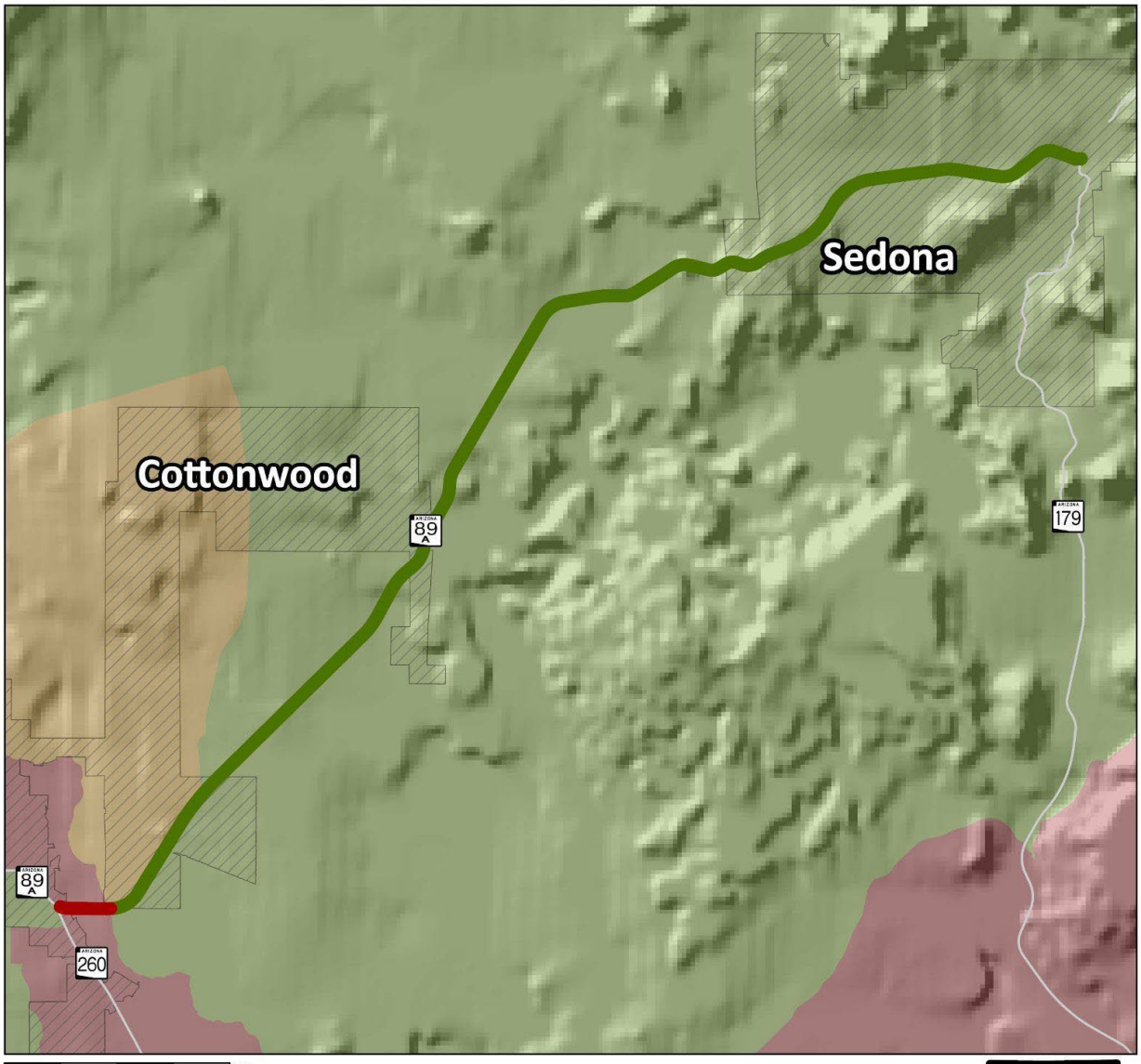
Map 31

Disadvantaged Areas - EV Proposed Corridor

SA89- Cottonwood to Sedona



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SA89	Not Disadvantaged	96.34	17.91	18.59
SA89	Fully Disadvantaged	3.66	0.68	18.59

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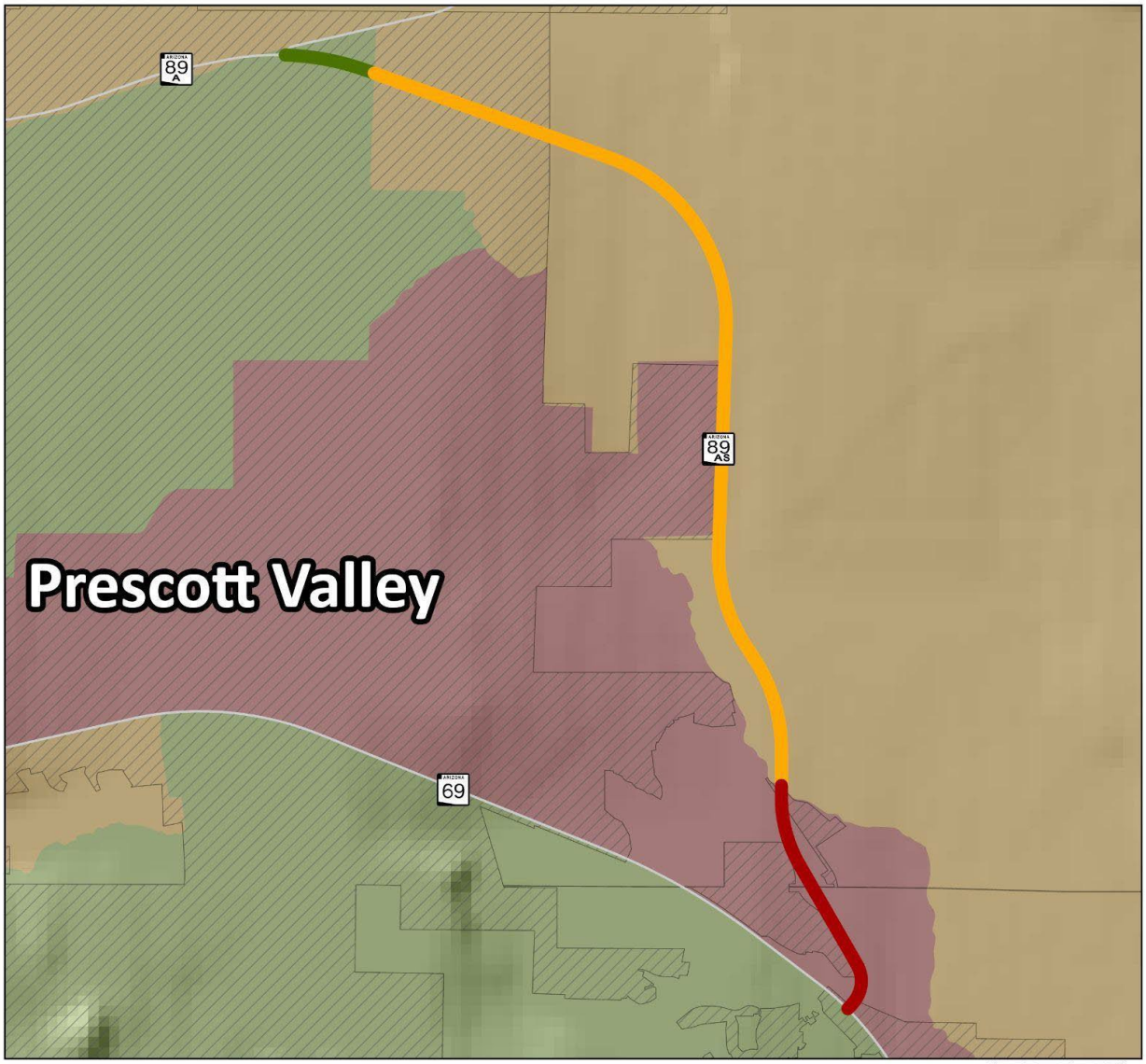
Map 32

Disadvantaged Areas - EV Proposed Corridor

SAS 89- SA89 to SR69



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SS 89	Not Disadvantaged	7.2	0.52	7.22
SS 89	Partially Disadvatataged	73.55	5.31	7.22
SS 89	Fully Disadvantaged	19.25	1.39	7.22

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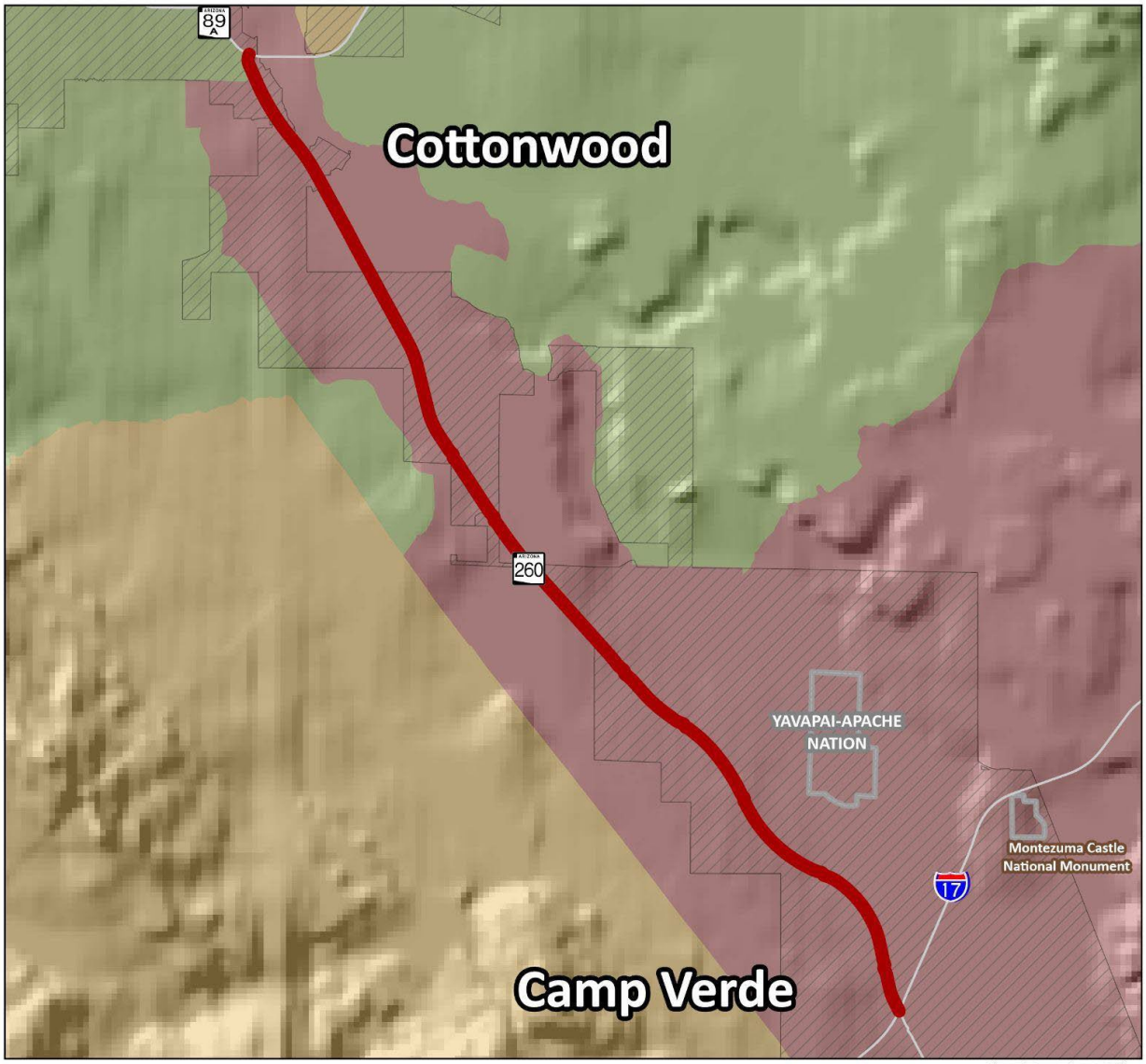
Map 33

Disadvantaged Areas - EV Proposed Corridor

SR 260- I-17 to Cottonwood/SR89A



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SR 260	Fully Disadvantaged	100	12.31	12.31

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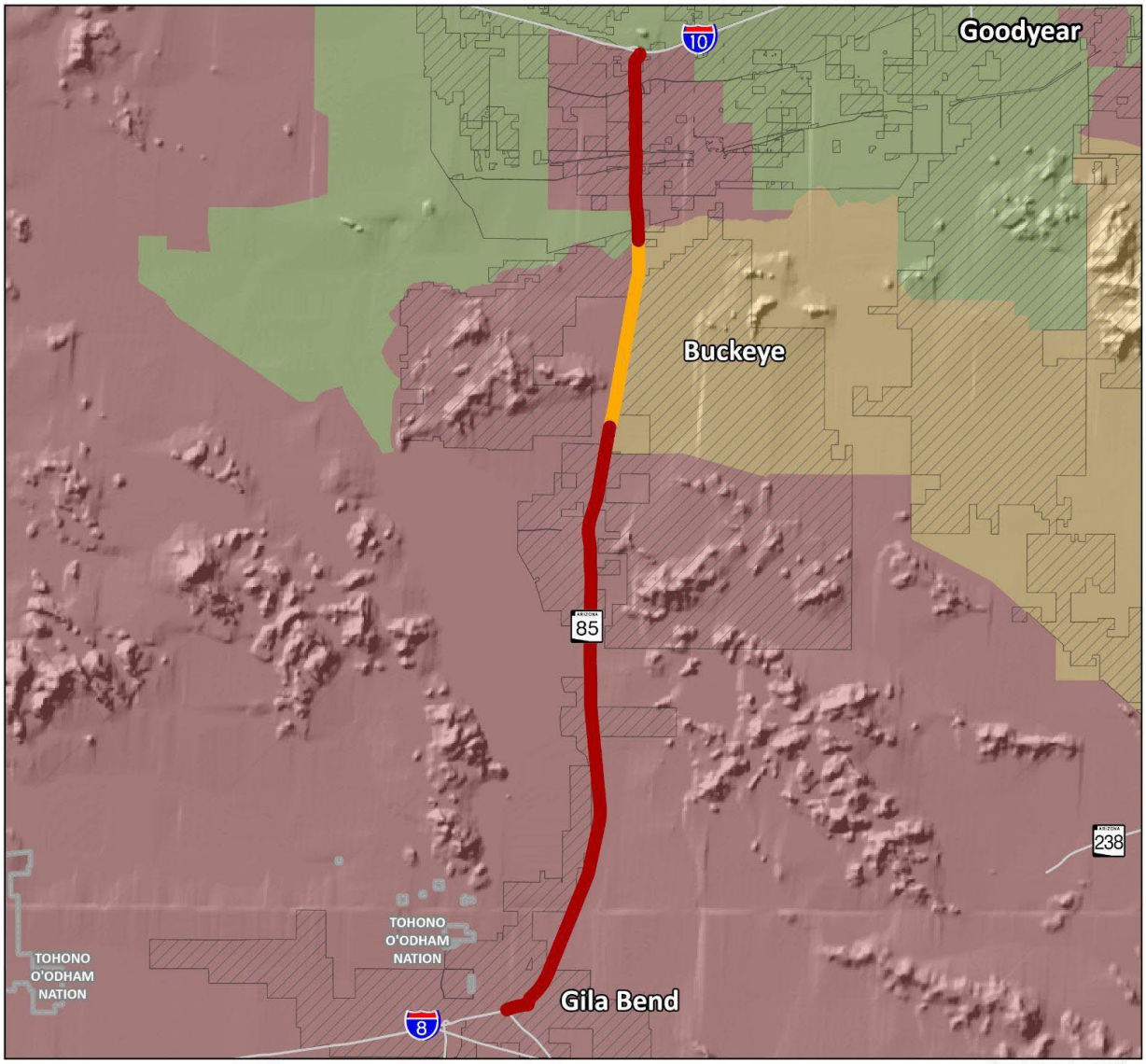
Map 34

Disadvantaged Areas - EV Proposed Corridor

SR 85- I-8 (Gila Bend) to I-10 (Buckeye)



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SR 85	Partially Disadvatataged	19.02	6.48	34.07
SR 85	Fully Disadvantaged	80.98	27.59	34.07

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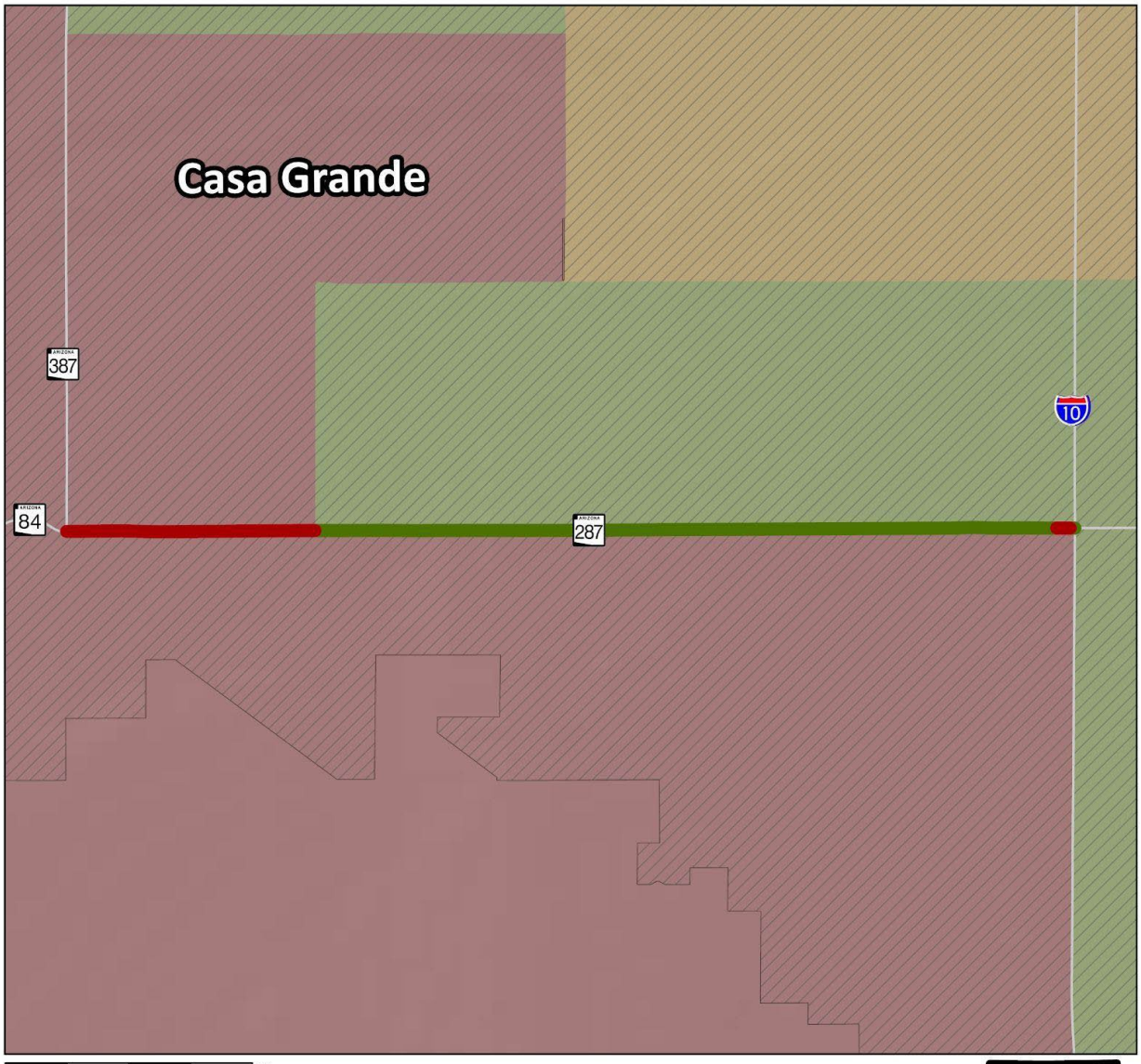
Map 35

Disadvantaged Areas - EV Proposed Corridor

SR 287- Casa Grande to I-10



Route	Category	PercentOfCorridor	CategoryLength	TotalCorridorLength
SR 287	Not Disadvantaged	73.84	3.02	4.09
SR 287	Fully Disadvantaged	26.16	1.07	4.09

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Map 36

Appendix C: Public Engagement Links

Below is a list of hyperlinks to the ADOT webpages with more detailed information for the 2025 EV Plan Community Engagement Outcomes Report:

- Arizona Electric Vehicle Program Website: ADOT hosts a project website at https://azdot.gov/EVPlan. The project website is intended to increase accessibility by serving as a resource that provides a project overview, including information about all the EV Plan updates along with meeting presentations and recordings.
- News Release: Past and future ADOT news releases are included in the following link: www.azdot.gov/adot-news.
- The August 25, 2025, news release on the proposed 2025 EV Plan update is available at https://azdot.gov/news/adot-seeks-input-plan-nine-new-ev-charging-corridors
- Self-Guided Virtual Public Presentations:
  - 2025 EV Plan Update Presentation in English: https://youtu.be/r_s6Si8F0DI
  - 2025 EV Plan Update Presentation in Spanish: https://youtu.be/xR4W3wtXNWg
- Comment Log: Comments received during the commenting period through the official commenting methods are available at https://azdot.gov/EV2025PublicComments
- Social Media Posts: Social Media posts made during the comment period can be found at https://azdot.gov/2025EVPlanSocialMedia
- Govdelivery Notices: https://azdot.gov/2025-EV-Plan-GovDelivery-Notices
- Earned Media: The earned media report is available at: https://azdot.gov/sites/default/files/2025-09/Special-Report-ADOT-EV_Charging-Plan.pdf

Appendix D: Cybersecurity

Arizona Department of Transportation Electric Vehicle Charging Infrastructure Cybersecurity Specification

Note: This Infrastructure Cybersecurity Specification has been updated as part of the 2025 plan to adhere to the latest regulations, standards, and best practices on securing charger ecosystems.

CHAPTER 1. TERMINOLOGY AND ABBREVIATIONS

ACRONYMS

Abbreviation	Meaning
ADOT	Arizona Department of Transportation
ARC-IT	Architecture Reference for Cooperative and Intelligent Transportation
CSO	Charging Station Operator (synonymous with CPO, "*Charging Point Operator*" in other external documents)
CSMS	Charging Station Management System
EV	Electric Vehicle
EVSE	Electric Vehicle Supply Equipment
ITS	Intelligent Transportation Systems
NEVI	National Electric Vehicle Infrastructure
NERC CIP	North American Electric Reliability Corporation Critical Infrastructure Protection
NIST	National Institute of Standards and Technology
OCPP	Open Charge Point Protocol
OCPI	Open Charge Point Interface
PCI DSS	Payment Card Industry Data Security Standard
SP	(NIST) Special Publication

TERMS

Term	Definition
Charging station	The physical system where electric vehicles can be charged.
Charging station operator	The mobility partner who operates the charging station infrastructure. For purposes of this specification this term will simultaneously refer to the charging station vendor since the vendor is fulfilling this same role.
Connector/plug	An independently operated and managed electrical outlet on a charging station that corresponds to a single physical connector.
Electric vehicle supply equipment	An independently operated and managed part of the charging station that can deliver energy to one electric vehicle at a time.

REQUIREMENTS TERMINOLOGY

The key words "MUST," "MUST NOT," "REQUIRED," "SHALL," "SHALL NOT," "SHOULD," SHOULD NOT," "RECOMMENDED," "MAY," and "OPTIONAL" in this document are to be interpreted as described in the Internet Engineering Task Force Requests for Comment 2110 and 2119, which are defined in the below table.

Key Word	Definition
MUST	This word, or the terms "REQUIRED" or "SHALL," means that the definition is an absolute requirement of the specification.
MUST NOT	This phrase, or the phrase "SHALL NOT," means that the definition is an absolute prohibition of the specification.
SHOULD	This word, or the adjective "RECOMMENDED," means that there may exist valid reasons in particular circumstances to ignore a particular item, but the full implications must be understood and carefully weighed before choosing a different course.
SHOULD NOT	This phrase, or the phrase "NOT RECOMMENDED" means that there may exist valid reasons in particular circumstances when the particular behavior is acceptable or even useful, but the full implications should be understood and the case carefully weighed before implementing any behavior described in this label.
MAY	This word, or the adjective "OPTIONAL," means that an item is truly optional. One vendor may choose to include the item because a particular marketplace requires it or because the vendor feels that it enhances the product while another vendor may omit the same item. An implementation that does not include a particular option MUST be prepared to interoperate with another implementation that does include the option, though perhaps with reduced functionality. In the same vein, an implementation that does not include a particular option MUST be prepared to interoperate with another implementation that does not include the option (except, of course, for the feature the option provides.)

CHAPTER 2. INTRODUCTION

PURPOSE

The purpose of this specification is to establish a statewide cybersecurity standard for the deployment of electric vehicle (EV) charging infrastructure along the state's National Electric Vehicle Infrastructure (NEVI) Formula Program-funded EV charging installations by illustrating cybersecurity provisions derived from federal laws and regulations and industry best standards to create cybersecurity requirements that the charging station operator (CSO) MUST strictly and completely fulfill regarding the deploying and maintaining of EV charging infrastructure throughout the State of Arizona's EV charging installations.

Through strict adherence to the requirements in this document, the CSO can assure the Arizona Department of Transportation (ADOT) that the EV charging infrastructure met a baseline of substantial cybersecurity controls throughout ADOT's EV Infrastructure Deployment Plan.

SCOPE

- Requirements in this specification apply strictly to and are the responsibility of the CSO.
- Requirement items in this specification MUST be strictly and completely fulfilled by the CSO and submitted to ADOT for assessment.

CHAPTER 3. CYBERSECURITY RATIONALE

To establish the foundation of cybersecurity for the State of Arizona's EV charging installations, ADOT has constructed a set of requirements that correspond with both federal laws and regulations and industry best practice cybersecurity controls. These requirements are based primarily on cybersecurity provisions from the following federal laws:

- NEVI Formula Program Guidance and the NEVI Standards and Requirements (23 CFR Part 680); and
- National Intelligent Transportation System Architecture and Standards (ARC-IT) conformity requirements from the Intelligent Transportation System Architecture and Standards (23 CFR Part 940).

The narrative for requirement creation and steps are described herein.

Electric Vehicle Supply Equipment Security Requirements Narrative

Requirements defined within the Electric Vehicle Supply Equipment (EVSE) Security Requirements section of this document (Chapter 5) have references to applicable National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53xlvi controls, which themselves were derived from analysis of standards and best practices encompassing relevant domains of the EV charger itself. This section describes the primary and supplemental (secondary) impetus behind these cybersecurity requirements.

PRIMARY

National Electric Vehicle Infrastructure

In order to address the cybersecurity provisions in 23 CFR Part 680, each provision was mapped to applicable cybersecurity controls defined in NIST SP 800-53r5 Security and Privacy Controls for Information Systems and Organizations.

Intelligent Transportation System Architecture and Standards

Next, the cybersecurity requirements defined in ARC-IT's Device Class 5 Areas (the security class applicable to ARC-IT's "Electric Charging Station" physical object) were mapped to applicable NIST SP 800-53 controls in the same manner.

SECONDARY

Statewide Policy (8130): System Security Acquisition and Development

ADOT relied on its own System Security Acquisition and Development Statewide Policy (P8130), which

contains relevant third-party information system acquisition and deployment controls for the Payment Card Industry Data Security Standard (PCI DSS) and the Health Insurance Portability Act in order to meet the customer and payment info cybersecurity considerations defined in 23 CFR Part 680. The PCI DSS and Health Insurance Portability and Accountability Act controls, contained within this statewide policy document, were mapped to the applicable NIST SP 800-53 controls.

North American Electric Reliability Corporation Critical Infrastructure Protection

To address the cybersecurity consideration contained within 23 CFR Part 680 defining the security of Charging-Network-to-Grid Communication, North American Electric Reliability Corporation Critical Infrastructure Protection (NERC CIP) standards were utilized (NERC CIP-011-2 "Information Protection" Requirements 1.1 & 1.2) and mapped to NIST SP 800-53.

CONTROL BASELINE

An initial cybersecurity baseline was constructed in accordance with NIST SP 800-53Br5 Control Baselines for Information Systems and Organizations tuned to the Security Control Baseline of "High," which was further modified with supplemental controls that were a product of a mapping crosswalk exercise conducted as part of the creation of this document.

CREATION OF REQUIREMENTS

The below requirements are what ADOT requires in its own efforts to meet federal requirements, regulations, and laws, in addition to ensuring a strong cybersecurity posture of field-deployed equipment.

Fulfillment of Electric Vehicle Supply Equipment Security Requirements

This requirement was created to meet cybersecurity provisions defined in 23 CFR Parts 680 and 940 by taking each particular cybersecurity provision therein and citing the cybersecurity baseline and component each provision should apply to. From there, the CSO MUST submit their plan to meet each requirement in the *EVSE Security Requirements* table in Chapter 5 of this document and submit the plan to ADOT for assessment.

Security Testing and Assessment

CSOs must conduct security testing and assessment activities at least annually, following the guidance in NIST SP 800-115 (*Technical Guide to Information Security Testing and Assessment*). These activities include policy reviews, vulnerability assessments, and penetration testing to validate cybersecurity across EVSE systems. A documented plan MUST define how these assessments are performed. This approach supports broader cybersecurity objectives outlined in NIST IR 8473, verifying alignment with risk management and resilience goals for EV infrastructure.

CHAPTER 4. ELECTRIC VEHICLE CHARGING INFRASTRUCTURE COMPONENTS

This section defines and illustrates the multiple components that comprise EV charging infrastructure as defined in ARC-IT and Open Charge Point Protocol (OCPP) diagrams and documentation. For the purpose

of this specification, the CSO MUST address requirements for each relevant component listed when filling out requirements (see Chapter 5. Cybersecurity Requirements for further details) as applicable.

COMPONENT LIST

Below is a list of components owned by the CSO that facilitate the charging station's functionality.

Component	Description
EV Charging Station	Provides access to EV supply equipment that is used to charge hybrid and all-electric vehicles. For the purpose of this specification, this component will include the EVSE and connector(s). This component is provided, owned, and managed by the CSO.
Charging Station Management System (CSMS)	The system utilized by the CSO to manage charging stations. A majority of the CSMS core functions, including collection and management, overlap with that of the Traffic Information Center defined in ARC-IT. This system is owned and managed by the CSO.
PCI DSS-Compliant Vehicle Payment Service	Supports vehicle payments for charging of EVs. Charging stations may utilize various methods of payment, to include an interface on the charging station itself, which accepts debit/credit payment or contactless methods in which the operator engages with the charging station remotely via either a mobile phone application or other on-board equipment methods such as in-vehicle applications via the EV's In-Vehicle Infotainment Center. Payment service mechanisms are provided, owned, and managed by the CSO.
PCI DSS-Compliant Payment Administration Center	Provides general payment administration capabilities and supports the electronic transfer of funds from the customer to the CSO for charging services rendered. This system may be owned and managed by the CSO.

COMPONENT DIAGRAMS

Below are physical and interface diagrams of EV charging stations from ARC-IT and OCPP documentation. These are included as a resource for the CSO and others to describe the various components of EV charging infrastructure. (Note: "Electric Charging Station" as labeled by these ARC-IT diagrams is synonymous with "EV charging station" as utilized in this document.]

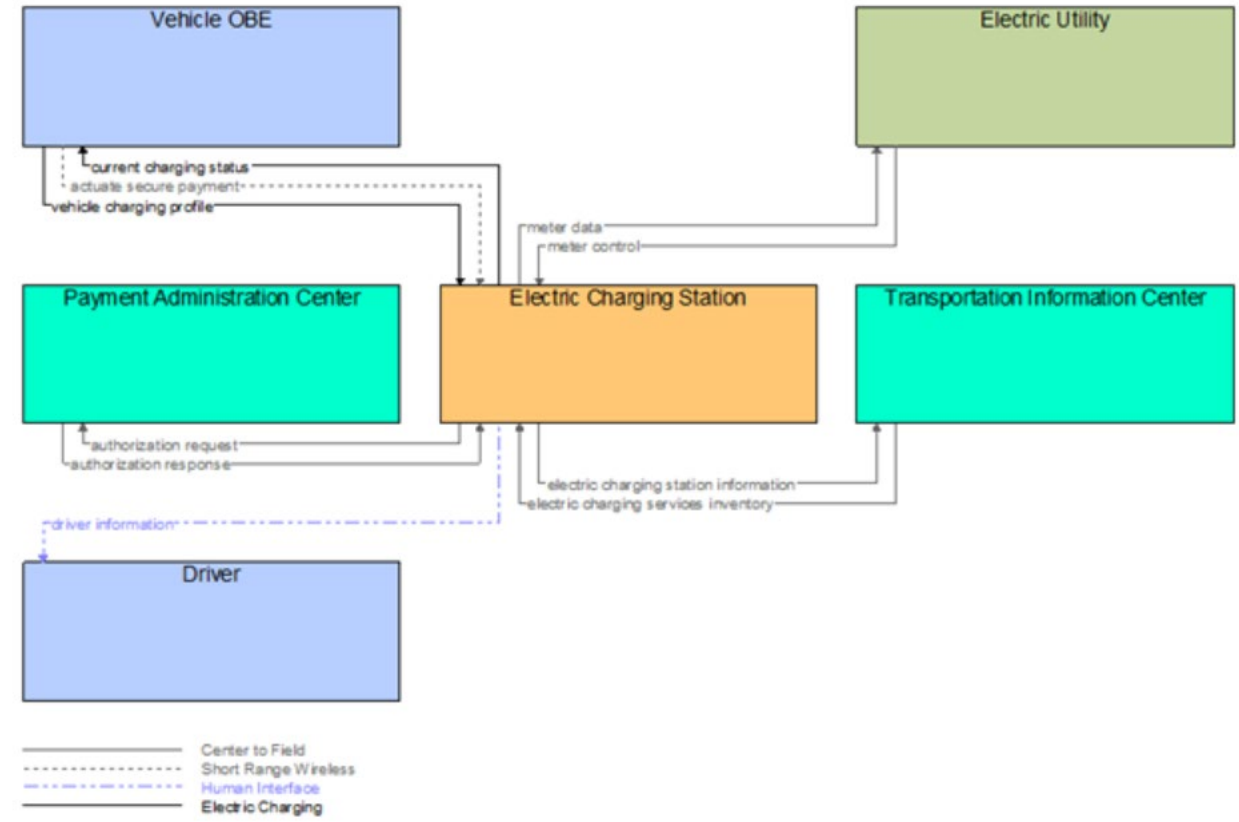

Figure E-4-2. ARC-IT Interfaces Diagram – Electric Charging Station

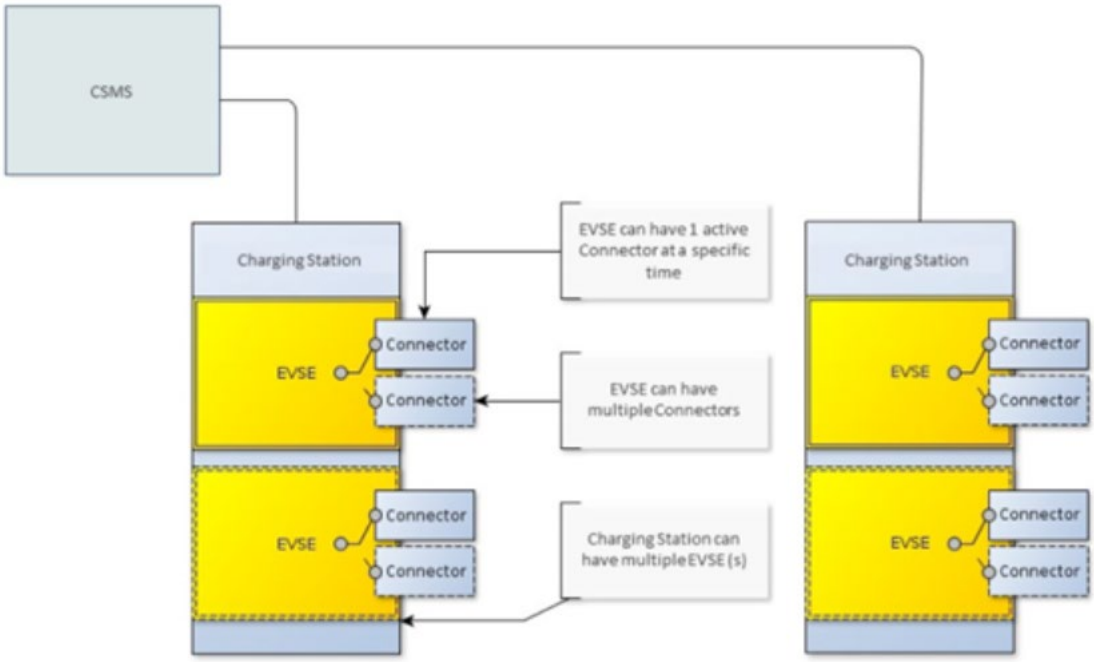

Figure E-4-3. Three-tier model as used in Open Charge Point Protocol (OCPP)

CHAPTER 5. CYBERSECURITY REQUIREMENTS

This section contains mandatory cybersecurity requirements the CSO must fulfill. These requirements exist to fulfill the following cybersecurity provisions:

- Cybersecurity considerations present in the NEVI Formula Program and requirements defined the NEVI Formula Program Guidance and the NEVI Standards and Requirements (23 CFR Part 680). View Appendix D for exact definitions.
- Device Class 5 Areas (Security Controls) defined in the National ITS Architecture Reference/Architecture Reference for Cooperative and Intelligent Transportation for Electric Charging Station and Vehicle Payment Service. View 2024 ADOT EV Plan for exact definitions.

The mandatory cybersecurity requirements are detailed in section *Requirement Submission Guidelines* below. Steps include:

1. Fulfillment of Cybersecurity Compliance Controls Table
2. Security Testing and Assessment – NIST SP 800-115

REQUIREMENT SUBMISSION GUIDELINES

Electric Vehicle Supply Equipment Security Requirements

Each requirement listed in the EVSE Security Requirements table must be addressed and filled out in full by the CSO. As of the time of this document's creation, there is no required submission document format. However, all submissions MUST address each requirement listed in this section. The EVSE Security Requirements table MAY also be extracted from this document and filled out separately if suitable to the submitter.

EVSE Security Requirements - Column/Field Descriptions

EVSE Security Requirements Columns	
Column	**Description**
#	Numeric identifier of each requirement.
Requirement	The stated cybersecurity requirement that MUST be met by the CSO.
Baseline Controls	The controls that fulfill the stated requirement.
Comp. Code	Component code for each component a requirement applies to. The codes are as follows: • CS: EV Charging Station • MS: CSMS • PS: Vehicle Payment Service • PA: Payment Administration Center • CT: Cloud/Third-Party Systems If one or more of the components listed above are deemed non-applicable to the charging station deployment by the CSO, then the CSO must provide in detail which components meet non-applicable status and a detailed explanation as to why it is non-applicable. The CSO may also add listed component codes to this cell that were not previously listed by default and must provide a detailed explanation on that component's inclusion into the requirement. Requirements will apply to all newly added component(s).

EVSE Security Requirements Columns	
Column	**Description**
Compliance Status	The CSO must denote compliance status by inputting a bold and capitalized: • **YES**, if the requirement is fully and strictly met for all listed component codes for the relevant requirement. • **NO**, if requirements are not fully and strictly met for one or more of the listed component codes for the relevant requirement.
Compliance Description	This is where the CSO must describe: • Compliance status. • The plan to address compliance for the relevant requirement item. • Any components that are deemed as non-applicable for the charging infrastructure deployment and a detailed explanation as to why. • Any added components outside of the default listed components that are deemed as applicable to the charging infrastructure deployment, and a detailed explanation as to why. Each cell contains default pre-filled text that may contain additional information or description needs that the CSO must address in their entry.

EVSE Security Requirements

#	Requirement	Initial Baseline Control and Reference	Comp. Code	Compliance Status (YES/NO)	Compliance Description

#	Requirement	Initial Baseline Control and Reference	Comp. Code	Compliance Status (YES/NO)	Compliance Description
1	Ensure contactless remote payment methods are secure.	23 § 680.106 (f); NIST SP 800-53 Control Numbers: AC-4; AC-8; AC 10-11; AC-25; CA-2; CA 7-8; PE-3; PL-8; PM-4; RA-3; RA-5; SA-3; SA 4-5; SA-8; SA 10-11; SA-15; SA-17; SC 2-3; SC-7; SI 2-3; SI 4-5; SI 12-14; SI 16-17; SR 2-10	CS; MS; PS; PA; CT		A detailed plan shall be provided that addresses how contactless payment methods are secured on the charging station. Include payment methods applicable to the charging station in explanation (e.g., mobile app, terminal payment, in-vehicle apps, etc.). This plan shall additionally incorporate and maintain compliance with all elements of the latest versions of the PCI DSS and PCI Security Standards Council.
2	Physical security strategies to address EV charging station tampering and unauthorized access.	23 § 680.106 (h)(1); NIST SP 800-53 Control Numbers: AC-22; PE 1-18	CS		A detailed plan that addresses physical security strategies of the charging station shall be provided.

#	Requirement	Initial Baseline Control and Reference	Comp. Code	Compliance Status (YES/NO)	Compliance Description
3	Cybersecurity strategies to address user identity and access management, selection of appropriate encryption systems, intrusion and malware detection, event logging and reporting, management of software updates, and secure operation during communication outages.	23 § 680.106 (h)(2); NIST SP 800-53 Control Numbers: AC 1-3; AC 5-8; AC 10-12; AC-14; AC 17-22; AU 1-12; IA 1-8; IA 11-12; MA 1-6; SC 2-4; SC-39; SI 1-8; SI 10-12; SI-16; SI-18	CS; MS; PS; CT		A detailed plan shall be provided which addresses user identity and access management, selected encryption systems, intrusion and malware detection, event logging and reporting, management of software updates, and secure operation during communication outages. To address "…secure operation during communication outages," describe in detail how services would persist service under this circumstance.

#	Requirement	Initial Baseline Control and Reference	Comp. Code	Compliance Status (YES/NO)	Compliance Description
4	Ensure secure collection, processing, and retention of only the personal information strictly necessary to provide charging service to the customer, to include information required to complete the charging transaction.	23 § 680.106 (l); NIST SP 800-53 Control Numbers: AC 1-3; AC 5-8; AC 10-12; AC-14; AC 17-22; AT 1-4; AU 1-12; CA 1-3; CA 5-9; IR-1-8; MP 1-7; PL 1-2; PL-4; PL-8; PL 10-11; PM-3; PM-5; PM 18-22; PM 24-27; PT 2-6; SA 1-5; SA 8-11; SA 15-17; SA 21-22; SC 2-4; SI 1-8; SI 10-12; SI-16; SI-18	CS; MS; PS; PA; CT		A detailed plan shall be provided that addresses how the charging station accounts for and enacts secure collection, processing, and retention of personal information strictly necessary to provide charging service.
5	Ensure Charger-to-Charging-Network communications make use of a secure communication method. Utilize appropriate cybersecurity use cases and requirements in their communications with any charging network provider.	23 § 680.114 (a)(1); OCPP v2.0.1 Part 2 – A2; NIST SP 800-53 Control Numbers: AC-8; AC-11; SC 1-5; SC 7-8; SC-10; SC 12-13; SC-15; SC 17-18; SC 20-24; SC-28; SC-39; SI-11; SI-16	CS; MS; CT		A detailed plan shall be provided that addresses how the charging station secures communications to its charging network and which applicable use cases and requirements are fulfilled and explains how they are met (OCPP v2.0.1 Part 2 – A2).

#	Requirement	Initial Baseline Control and Reference	Comp. Code	Compliance Status (YES/NO)	Compliance Description
6	Ensure charging stations have the ability to receive and implement secure remote software updates, conduct real-time protocol translations, encryption and decryption, authentication, and authorization in their communications with charging networks.	23 § 680.114 (a)(2); NIST SP 800-53 Control Numbers: AC 1-14; AC 17-22; AU 1-12; IA 2-8; IA-11; IA-12; MA 1-6; SC 1-5; SC 7-8; SC 10-13; SC-15; SC 17-18; SC 20-24; SC 28-39; SI-1; SI 1-8; SI 10-12; SI-16; SI-18	CS; MS; CT		A detailed plan shall be provided that addresses how the charging station secures its remote software updates and implementation, conducts real-time protocol translations, handles encryption and decryption, and enacts authentication and authorization in communications within their charging networks.
7	Ensure charging stations and charging networks securely measure, communicate, store, and report energy and power dispensed; real-time charging-port status; real-time price to the customer; and historical charging-port uptime.	23 § 680.114 (a)(4); NIST SP 800-53 Control Numbers: AC 1-8; AC 10-12; AC-14; AC 17-22; AU-5; AU 8-10; SC 1-5; SC 7-8; SC-10; SC 12-13; SC-15; SC 17-18; SC 20-24; SC-28; SC-39; SI-11; SI-16	CS; MS; CT		A detailed plan shall be provided that addresses how the charging station securely measures, stores, communicates, and reports required information in their charging networks.
8	Ensure charging stations are designed to securely switch charging network providers without any changes to hardware.	23 § 680.114 (a)(6); NIST SP 800-53 Control Numbers: AC-8; AC-11; SC 2-4; SC-39; SI-11; SI-16	CS; MS		A detailed plan shall be provided that addresses the design strategy for securely switching charging network providers without any changes to hardware.

#	Requirement	Initial Baseline Control and Reference	Comp. Code	Compliance Status (YES/NO)	Compliance Description
9	Ensure the charging network must be capable of communicating with other charging networks to enable an EV operator to utilize a single credential to charge at charging stations that are a part of multiple charging networks.	23 § 680.114 (b); NIST SP 800-53 Control Numbers: AC-8; AC-11; SC 2-4; SC-39; SI-11; SI-16	CS; MS; PS; CT		A detailed plan shall be provided that addresses how the charging network enables utilization of a single credential for EV operators to charge at charging stations that are members of multiple charging networks.
10	Ensure charging networks are capable of secure communication with electric utilities, other energy providers, or local energy management systems.	23 § 680.114 (c); NIST SP 800-53 Control Numbers: AC-8; AC-11; SC 2-4; SC-39; SI 1-8; SI 10-12; SI-16; SI-18; SR 1-3; SR 5-6; SR 8-12	CS; MS		A detailed plan shall be provided that addresses how the charging network secures its communication with electric utilities, energy providers, and local energy management systems.

#	Requirement	Initial Baseline Control and Reference	Comp. Code	Compliance Status (YES/NO)	Compliance Description
11	Ensure implementation of domain-specific control subcategories of the domains "XFC/EVSE," "Cloud/Third-Party," and "Utility/Building Management Systems" as applicable, where domains are defined in Section 1.2 of NIST IR 8473.	NIST IR 8473 Subcategories: ID.AM 1-6; ID.BE 1-5; ID.GV 1-4; ID.RA 1-6; ID.RM 1-3; ID.SC 1-5; PR.AC 1-7; PR.AT 1-5; PR.DS 1-8; PR.IP 1-12; PR.MA 1-2; PR.PT 1-5; DE.AE 1-5; DE.CM 1-8; DE.DP 1-5; RS.AN 1-5; RS.CO 1-5; RS.IM 1-2; RS.IM 1-3; RS.RP 1; RC.CO 1-3; RC.IM 1-2; RC.RP 1	CS; MS; PS; PA; CT		A detailed plan shall be provided that addresses how the CSO and charger meet the specific considerations (as applicable) within each relevant domain subcategory of NIST IR 8473.

Security Testing and Assessment

Active assessment and testing of cybersecurity controls across EV charging infrastructure, including EVSE, site networks, cloud interfaces, and utility integrations, are essential to validate the effectiveness of security measures and ensure resilience against evolving threats. These assessments must address both technical and procedural controls, with emphasis on the unique characteristics of EVSE systems, such as remote access capabilities, physical exposure, and integration with operational technology.

NIST SP 800-115 shall serve as the guiding standard for security testing and assessment. Contractors, system integrators, vendors, and CSOs must apply its guidance to evaluate the security posture of EVSE components, site networks, and associated cloud services.

Vendor responsibilities include secure code reviews, vulnerability scanning of embedded systems, and white-box and black-box testing of EVSE firmware and software. Testing should cover protocol-level weaknesses, such as improper authentication, insecure over-the-air update mechanisms, and exposure to cellular-based threats. Physical security controls, including tamper detection and port lockdown, must also be validated.

CSOs and system integrators shall conduct site-level assessments focused on network segmentation, firewall configurations, and secure remote access. Interfaces with cloud services, payment systems, and

utility networks must be evaluated. Penetration testing of internal and external interfaces, including Wi-Fi, cellular, and Ethernet connections, shall be performed by certified professionals using modern tools and frameworks.

Assessment planning shall follow Section 6 of NIST SP 800-115 and include:

- Development of a security assessment policy that defines requirements and assigns accountability. This policy must be reviewed annually and updated as needed.
- Prioritization and scheduling of assessments based on system criticality, regulatory requirements, and operational changes.
- Selection and customization of testing techniques appropriate to EVSE architecture and deployment context.
- Determination of logistics, including assessment team composition, testing environments, and toolsets.
- Creation of an assessment plan that defines scope, testing boundaries, data handling requirements, and incident response procedures.
- Consideration of legal implications, especially for intrusive testing or assessments conducted by external parties.

In accordance with Section 3544 of the Federal Information Security Modernization Act of 2014, the CSO shall conduct periodic testing and evaluation of cybersecurity policies, procedures, and practices. These assessments must occur at least annually and whenever new requirements or risks emerge. NIST SP 800-53 provides additional guidance on assessment frequency. Vulnerability scanning and penetration testing shall be included in these activities.

Assessments of EVSE payment systems must comply with PCI DSS. A PCI SSC-certified quality security assessor shall determine appropriate assessment frequency, verify compliance with current PCI DSS requirements, and recommend changes to controls and procedures. Payment software must also comply with PCI SSC Software Standards.

The CSO shall actively monitor threat intelligence, including new vulnerabilities and ICS-CERT advisories relevant to EVSE systems. Reassessment may be required in response to emerging threats. Vendors must promptly notify CSOs of any vulnerabilities affecting their systems and provide guidance for mitigation.

CHAPTER 5. CYBERSECURITY REQUIREMENTS

APPENDIX A. DEFINITIVE TEXT

The excerpts below are extracted from normative references in this document and MUST NOT be accepted by the CSO as applicable cybersecurity requirements for the CSO, but instead the text is meant specifically as a reference.

National Electric Vehicle Infrastructure Formula Program Guidance

Section III. STATE EV INFRASTRUCTURE DEPLOYMENT PLAN – B. Plan Format – Cybersecurity

This section of the plan should discuss how the state will address cybersecurity. The plan should identify considerations when software updates are made to ensure the station or vehicle is not compromised by

malicious code, or that a vehicle infects other stations during future charges.

National Electric Vehicle Infrastructure Formula Program Guidance and the National Electric Vehicle Infrastructure Standards and Requirements – 23 C.F.R. Part 680

§ 680.106 – Installation, operation, and maintenance by qualified technicians of EV charging infrastructure.

(f) Payment methods.

(1) Charging stations must provide for secure payment methods, accessible to persons with disabilities, which at a minimum shall include a contactless payment method that accepts major debit and credit cards, and Plug and Charge payment capabilities using the ISO 15118 standard (incorporated by reference, see § 680.120);

(h) Security. States must implement physical and cybersecurity strategies consistent with their respective State EV Infrastructure Deployment Plans to mitigate charging infrastructure, grid, and consumer vulnerability associated with the operation of charging stations.

(1) Physical security strategies may address lighting, siting, driver and vehicle safety, fire prevention, tampering, charger locks, and illegal surveillance of payment devices.

(2) Cybersecurity strategies may address user identity and access management, selection of appropriate encryption systems, intrusion and malware detection, event logging and reporting, management of software updates, and secure operation during communication outages.

(k) Customer service. States must ensure that EV charging customers have mechanisms to report outages, malfunctions, and other issues with charging infrastructure. States must comply with the American with Disabilities Act of 1990 requirements and multilingual access when creating reporting mechanisms.

(1) Customer data privacy. Charging Station Operators must collect, process, and retain only that personal information strictly necessary to provide the charging service to a consumer, including information to complete the charging transaction and to provide the location of charging stations to the consumer. Charging Stations Operators must also take reasonable measures to safeguard consumer data.

§ 680.114 – Charging network connectivity of EV charging infrastructure.

(a) Charger-to-Charger-Network communication.

(1) Chargers must communicate with a charging network via a secure communication method.

(2) Chargers must have the ability to receive and implement secure, remote software updates and conduct real-time protocol translation, encryption and decryption, authentication, and authorization in their communication with charging networks.

(3) Chargers and charging networks must securely measure, communicate, store, and report energy and power dispensed, real-time charging-port status, real-time price to the customer, and historical

charging-port uptime.

(4) Chargers must be capable of using OCPP (incorporated by reference, see § 680.120) to communicate with any charging network provider.

(5) Chargers must be designed to securely switch charging network providers without any changes to hardware.

(b) Charging-Network-to-Charging-Network communication. A Charging Network must be capable of communicating with other charging networks to enable an EV driver to use a single credential to charge at charging stations that are a part of multiple charging networks.

(c) Charging-Network-to-Grid communication. Charging Networks must be capable of secure communication with electric utilities, other energy providers, or local energy management systems.

Architecture Reference for Cooperative and Intelligent Transportation
Device Class 5 Areas

Device Class 5:

- Confidentiality: HIGH
- Integrity: HIGH
- Availability: HIGH

Devices of this class must meet controls from NIST 800-53 and ISO/IEC 15408 in the following areas:

- Access Control
- Audit and Accountability
- Configuration Management
- Contingency Planning
- Identification and Authentication
- Incident Response
- Media Protection
- Personal Privacy
- Risk Assessment
- System and Services Acquisition
- System and Communications Protection
- System and Information Integrity

In addition, organizations that develop, operate, or maintain devices of this class must meet controls from NIST 800-53 and ISO/IEC 15408 the areas above and the following additional areas:

- Awareness and Training
- (Security] Assessment and Authorization
- Maintenance
- Physical and Environmental Protection
- Planning
- Personnel Security