NEVI Implementation in Colorado: Case Study

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Contents

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Introduction and Objective

The National Electric Vehicle Infrastructure (NEVI) Formula Program is a $5 billion federal program with a primary investment in Direct Current Fast Chargers (DCFCs) along the nation's major highways and interstates. State Departments of Transportation (DOT) and State Energy Offices that administer the NEVI formula funds are implementing the program by soliciting project proposals, issuing contracts, monitoring the reliability and performance of the chargers, and other responsibilities to ensure the success of the program.

As states announce awards and issue contracts for the first round of NEVI funds, there is an opportunity for other states to learn from the successes and challenges of the NEVI program. The National Association of State Energy Officials (NASEO) and the American Association of State Highway and Transportation Officials (AASHTO) partnered with Atlas Public Policy to conduct a series of case studies with the first few states that have announced awards and issued contracts to NEVI recipients. The case studies are intended to delve deeper into the states' solicitation design and stakeholder process; outline the scoring rubric and application evaluation process; discuss the applicant pool variety and quality; highlight state, utility, and site host coordination; and illustrate the successes and challenges of the program. These case studies are part of a larger initiative led by NASEO and AASHTO to enhance coordination and collaboration between State Energy Offices and State DOTs to ensure that NEVI and other EV charger investments are made in a strategic, coordinated, efficient, and equitable manner.

OVERVIEW

On March 8, 2023, the Colorado Energy Office (CEO) and the Colorado Department of Transportation (CDOT) released the state's official National Electric Vehicle Infrastructure (NEVI) Program Notice of Funding Opportunity (NOFO). Released just ten days after the Federal Highways Administration published final guidance for NEVI, the NOFO solicited proposals for public fast charging projects along the state's thirteen alternative fuel corridors (AFCs). CDOT initially received the remit to implement the NEVI Program. Rather than develop an entirely new solicitation for NEVI proposals, however, CDOT signed an interagency agreement with CEO in February 2023, authorizing the Energy Office to distribute NEVI funds and serve as the lead department for the program, with CDOT supporting the NOFO implementation process, ensuring Colorado adheres to NEVI guidelines, and participating in proposal review and grantee selection. As the NEVI lead, CEO is able to apply its subject matter expertise, leverage its experience running state charging grant programs, and efficiently integrate NEVI into the department's existing statewide direct current fast charging (DCFC) Plazas Program.[1]

1 The DCFC Plazas Program is a state-funded Colorado initiative designed to increase access to high-speed charging across the state. For more see DCFC Plazas | Colorado Energy Office.

The NEVI and DCFC Plazas programs folded into a single program, while still allowing the state to funnel both NEVI-compliant corridor applications and other proposals eligible under state criteria into a singular program with two separate funding streams. Proposals ineligible for NEVI funding were placed in the state-specific funding process supported by the Colorado Community Access Enterprise.[2] To maximize program impact and statewide charger deployment, CEO encouraged applicants to submit corridor- or community-focused proposals for locations across the state, and depending on project parameters, reviewers decided which funding source was most applicable.

In the NEVI Round One NOFO, CEO and CDOT identified key gaps in the charging network where new projects were most desired, with a focus on rural areas along the Eastern Plains and the Front Range. For the sake of transparency and to ensure applicants submitted complete proposals, CEO provided applicants with the evaluation criteria (including a rubric), itemized all required documents, and enumerated the proposal sections expected in each application. Following a two-month submittal process that ended on May 5, 2023, CEO, CDOT, and the Colorado Department of Public Health and the Environment (CDPHE) – who have collaborated for years on EV charging infrastructure – evaluated a total of 43 proposals from 28 distinct applicants.

On August 3, 2023, CEO announced first-round NEVI grantees, issuing awards for 24 proposed projects submitted by 10 distinct entities, representing nearly $12 million in awarded funding. With this funding, it is anticipated that grantees will deploy 130 new fast charging ports across the state, with nearly all awarded entities building sites that exceed the 600-kilowatt (kW) power capacity minimum for NEVI.

The awards represented a diversity of applicant types, from large electric vehicle service providers (EVSPs) to truck plazas and convenience stores. Of the 24 awards, eight, or one-third, went to Tesla, and seven went to other established EVSPs (EVgo, eCAMION, Francis Energy, and ChargePoint). Five grants were awarded directly to truck plazas (Love's, Pilot, and Travel Centers of America). The remaining awards went to convenience store site hosts.

CEO staff viewed the NEVI Round One process as a major success in terms of filling charging gaps in the state's network. Once operational, the awarded sites will result in a completed charger network along the rural Eastern Plains. Having released its Round Two solicitation in October 2023 and its Round Three solicitation in July 2024 and awards for each in April 2024 and December 2024, respectively, the state will continue to focus on filling gaps in the corridor charging network not yet served by existing infrastructure, particularly locations in rural Colorado and along the Front Range.

Figure 1: Timeline of Major CO Round One NEVI Milestones

2 The Community Access Enterprise (CAE) was created by the Colorado legislature in 2021 to support statewide use of electric transportation options. The Enterprise invests in transportation infrastructure that makes it easier for Coloradans to transition to electric vehicles (EVs). It also provides funding to offset the cost of electric vehicles, e-bikes, and other electric alternatives to gas- and diesel-fueled vehicles. For more information, please visit: https://energyoffice.colorado.gov/about-us/boards-commissions/community-access-enterprise.

SOLICITATION DESIGN PROCESS

In designing its NOFO, CEO engaged with relevant stakeholders to solicit input, identified key charging gaps along state AFCs, gathered feedback on equity considerations, and developed a scoring rubric and evaluation criteria. In the lead up to solicitation release, the agency conducted outreach around the state to promote the opportunity with prospective applicants, potential site hosts, and the general public.

Stakeholder Engagement

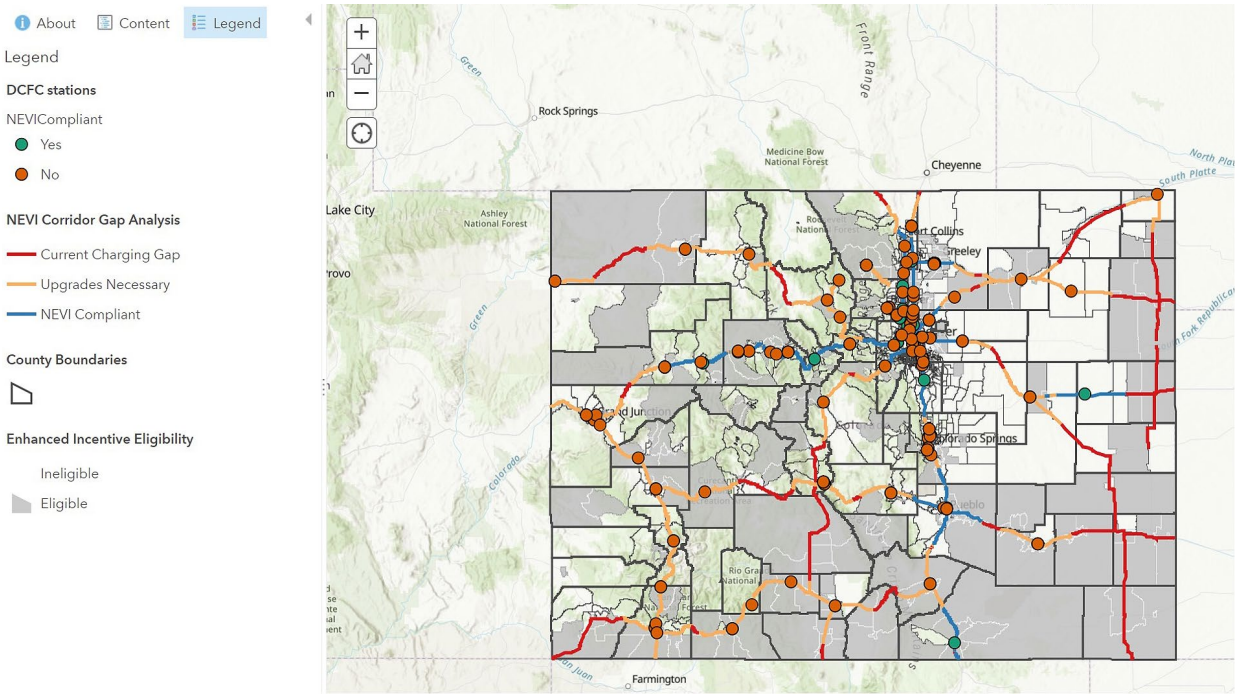
Prior to the NOFO release, CEO and CDOT engaged prospective applicants and site hosts around the state through a targeted outreach process. Leading up to the solicitation launch, CDOT aggregated information about potential applicants, site host communities, and other stakeholders interested in participating in Colorado's NEVI program, based on the state's experience with its existing EV charger grant program and interest expressed via the Program Partnering List created by the state. This list provided government staff with an outline of the NEVI stakeholder landscape and helped potential applicants identify possible partners, such as site hosts, network providers, and battery storage providers.

CEO staff spoke at several in-person and virtual engagement sessions around Colorado, both prior to the NOFO release and during the submission window. Some of these presentations specifically focused on outreach to Tribal nations within Colorado and state environmental justice organizations, while others were tailored to electric vehicle (EV) hardware providers. CEO published on their website responses to questions asked during Q&A periods for stakeholders who could not attend these events. CEO also provided a point of contact in their office to whom stakeholders could direct questions related to the NEVI and DCFC Plazas Program. This centralized inquiries and streamlined feedback to interested parties.

Site Identification and Prioritization

As part of the NOFO, CEO provided a GIS mapping tool that identified charging gaps across the state AFCs (Figure 2). While the NOFO did not identify any specific priority locations (e.g., cities, exits, or designated regions) for charging sites, CEO clearly stated that it would prioritize projects that fill the identified gaps and provide charging access to new or underserved segments of the market. CEO offered enhanced per-port incentives and preferential scoring for sites outside of the Denver metropolitan area in the more rural Eastern Plains and Front Range areas.

Figure 2: CEO's NEVI GIS Site Mapping Tool



The mapping tool highlights NEVI-compliant stations and AFCs (green dots and blue lines, respectively), AFC sections where chargers require upgrades and are not NEVI-compliant (orange line and red dot), and full charging gaps (red line). The state also overlayed the map with an equity-adder indicator (grey areas) to help applicants identify which sites qualify for enhanced per-port funding.

Source: CO NEVI Project Planning Resource Map 2023

NOFO Design

To set expectations and ensure applicants submitted complete proposals, the NOFO clearly enumerated all sections required in each proposal, including site requirements and minimum specifications, and all necessary forms, such as a project schedule, maintenance plan, and utility letter of service. The agency also provided applicants with a general scoring rubric in the NOFO, which delineated each section of the proposal, its point value, and the share of the total score it comprised (Figure 3). No further granularity was provided in the scoring rubric and points allocated within these larger proposal sections were not itemized further. Still, in offering some transparency on evaluation criteria, CEO better enabled applicants to allocate their resources to align with state priorities and maximize their score.

Figure 3: Scoring Rubric as Provided in NOFO

EVALUATION CRITERIA	
Category	**Points**
1. Project Abstract and Project Narrative	5
2. Plaza Locations(s) and Access to Amenities	20
3. Plaza Design, Facilities Requirements, Minimum Station Specifications, Equipment Reliability	20
4. Project Communication and Strategic Partnerships	10
5. Project Cost, Match and Proposed Pricing Structure	15
6. Organization, Staff Experience, Qualifications (Same score will apply to all proposed Plaza locations in a single application)	10
7. Sustainability, Equity	15
8. Project Schedule	5
Total	**100**

Source: CEO DCFC Plazas Grant Application Guide

More than half of the total points available to each proposal were from the combined categories of site location and amenities, site design, technical requirements and charger reliability, and project cost. CEO encouraged applicants to include specific futureproofing strategies such as larger or additional concrete pads, transformers and other utility-related equipment, and larger and/or additional conduits to avoid some costs in the future. A significant points emphasis was placed on elements relevant to the driver experience, including site amenities, site design, and charger reliability. Critically, CEO required that pricing for charging should be transparent and easily understood for drivers so that drivers could know what they would be expected to pay at the charging station. CEO also required that all plazas have lit restrooms and drinking fountains, as well as access to shelter in the event of inclement weather. Recognizing the need to provide drivers with a safe experience when charging throughout the day, CEO incorporated safety and lighting requirements into their minimum specifications, such as placing chargers at a site central or near to the front entrance of a business. CEO would not accept site proposals that placed chargers in a secluded area or lacked overnight lighting.

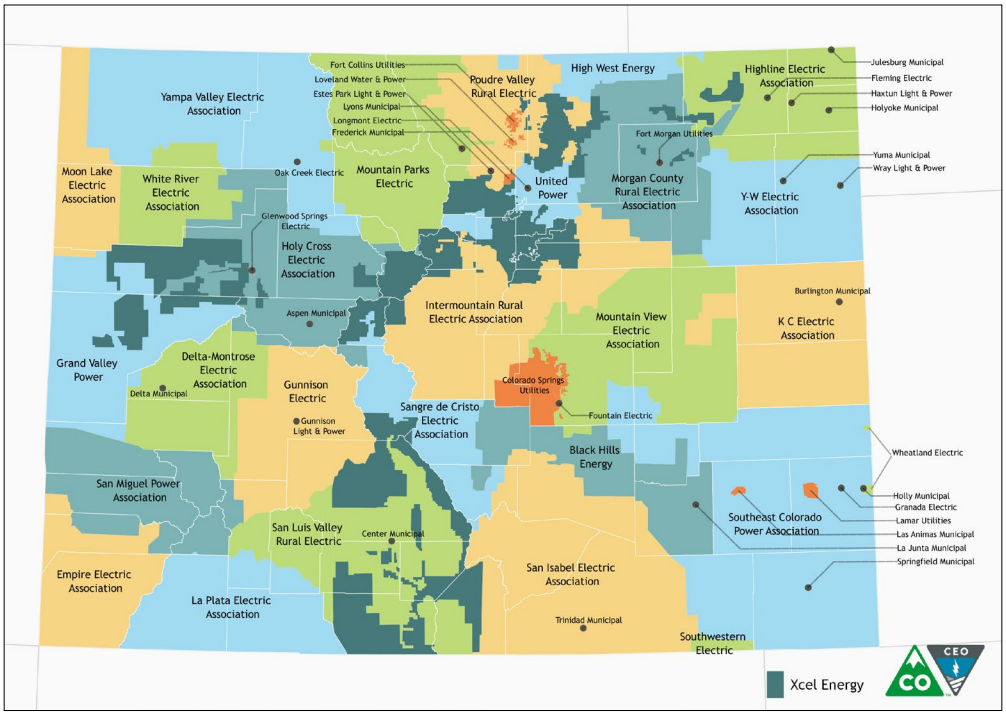
Another significant portion of the total proposal score came from equity (15 percent). Considerations, such as how a project benefits underserved or disadvantaged communities and applicant engagement with local communities, were important elements of proposal design. CEO offered applicants an additional $5,000 per port if a proposed charging site was sited in a location that met one of the following criteria:

- Colorado SB21-260 Disproportionately Impacted Community Definition;
- Justice40 Definition;
- Colorado Enviroscreen Disproportionately Impacted Community;
- Transportation Equity Community; or
- Tribal Lands.

To provide applicants with a clear understanding of which proposed sites would qualify for this enhanced incentive, CEO shared a mapping tool that highlights areas that fall under one or more of the above five geographical categories (gray areas illustrated in Figure 1). The NOFO also strongly encouraged applicants to collaborate with local and county governments on every site proposal and work with these stakeholders to craft community benefits agreements outlining a project's social, environmental, and economic benefits.

Colorado has a diverse utility ecosystem, with 54 utilities active across the state (Figure 4). CEO acknowledged that some utilities have less staffing capacity than others, therefore CEO did not require specific utility forms or signatures on cost estimates in proposals. Because CEO prioritized filling rural gaps across the state, they recognized that projects in those areas would be powered by utilities with relatively fewer resources than those operating in major urban areas.

Figure 4: Map of Colorado Utility Ecosystem



Source: [CO Utilities Boundaries (CDOT)]

CEO accepted records of electronic communications or site assessments from the applicant's local utility provider. CEO reported that the most salient factor considered in these assessments was around electrical capacity. If a utility did not believe it could bring sufficient power to a proposed site, regardless of cost, that would, of course, affect the decision to issue an award. As such, CEO required a confirmation from the utility in the form of a letter or service notice indicating that a site could have adequate power supply installed.

Similarly, CEO did not require applicants to provide site host agreements as part of the initial proposal. While the Office generally prefers to see strong coordination between the applicant, the site host, and the utility (assuming the applicant is not the site host), they also recognize that those agreements or in-depth estimates are time consuming and not guarantees of success. Therefore, in order to maintain a high number of competitive applicants, CEO did not require them up front. However, CEO did require that the applicant provide documented proof that the applicant had access to the property for a proposed site to allow them to install charging infrastructure.

APPLICATION EVALUATION

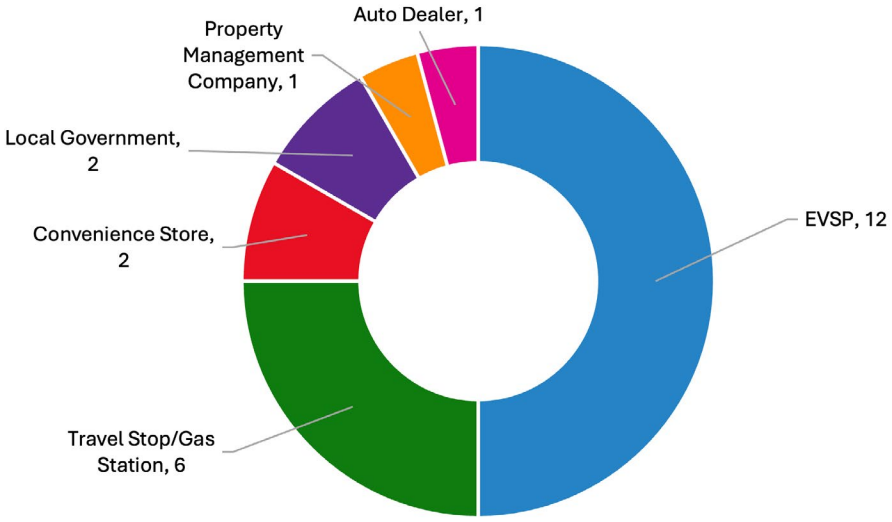
When CEO released the NOFO for NEVI Round One on March 8, 2023, they also opened a three-week Q&A period to allow applicants and stakeholders an opportunity to provide feedback, ask questions, and request modifications. Within one week following the close of the Q&A period, CEO published the questions and answers publicly to help all prospective applicants in their proposal development.

Once applications were submitted, CEO underwent a two-stage review process during which they cut proposals down to a short list of competitive applicants, followed by a second, more in-depth review to make final selections. In addition to CEO staff, staff from CDOT and CDPHE were also involved in the first round of reviews.

The Applicant Pool

By the time the application period closed on May 5, 2023, CEO had received 43 site proposals from 28 unique applicants. These proposals were split between the state DCFC Plazas Program and NEVI. CEO noted that this round of proposals saw more diversity in terms of the types of businesses applicants represented than in previous charging programs before NEVI (Figure 5). In previous state-funded program solicitations, large retailers like Target or Walmart dominated applications for charging site grant funding; this round included traditional fueling providers and travel stop companies like Travel Centers of America, Love's, and Kum & Go.

Figure 5: Colorado Applicants by Type



Twelve EVSPs submitted NEVI site proposals, with five receiving awards. Eight convenience stores and travel stops/gas stations (i.e. site hosts) applied, with five also receiving awards. See the section on *The Awardees* for a detailed breakdown.

While most of the applicants were national companies, some smaller entities also applied. Proposals from smaller companies were not necessarily ruled out, but CEO believed that they might be relatively less equipped—both financially and organizationally—to manage a large, expensive, and complex federal grant project, and that was reflected in the quality of those proposals. However, CEO noted that those smaller organizations may be more competitive in the Plazas program or other state-funded programs.

CEO had several concerns about certain applicants and proposals. For instance, some applicants were unresponsive when they contacted them to ask questions about their proposals. They also received proposals where the applicants demonstrated little effort or experience with grant proposal writing, such as drafting very short and nondescriptive narrative portions, not understanding electricity demand charges, or including unreasonably aggressive timelines to deploy chargers. Despite this small number of proposals which were deemed uncompetitive, CEO reported that the overall quality of NEVI proposals was much higher than they had seen in previous state-funded program solicitations.

State Priorities

As outlined above, CEO wrote the NOFO to emphasize several key priorities, including filling charging gaps, equity, and community benefits. These evaluation priorities set selected awardees apart.

Chief among these priorities was filling gaps across the state. Most existing DCFC charging infrastructure is operational around the greater Denver metro area. Other parts of the state had much more significant gaps in fast charging, particularly the rest of the Front Range and the Eastern Plains. Prior to NEVI, Colorado struggled to start charging projects outside of the greater Denver metro area, but the infusion of funding through NEVI enabled them to make those projects more attractive to applicants. CEO offered enhanced financial incentives for proposals in these critical areas (Table 1).

Table 1: Colorado Applicant Breakdown by Type

Location	DCFC Output	Number of DCFC Ports	Incentive Per Charging Port	Maximum Funding Share
Seven County Denver Metro Area	150kW+	4+	$90,000	50%
Front Range Urban	150kW+	4+	$115,000	65%
Rural	150kW+	4+	$140,000	80%

Source: DCFC Plazas | Colorado Energy Office

CEO also prioritized proposals that demonstrated intent or ability to install onsite energy storage and renewable energy generation to help improve the reliability of power at a site, particularly in rural areas with difficult or more limited power capacity from utilities.

As demonstrated by the number of points allocated to amenities and the priorities outlined in the NOFO, CEO favored proposals that addressed full-service amenities that would support local economic development, futureproofing, sites with 350kW chargers, sites with more than four chargers, and pull-through parking. CEO staff emphasized the importance of leveraging NEVI chargers to not only expand the fast-charging network across the state, but also to provide second- and third-order benefits to the communities in which the chargers would be installed. As such, CEO prioritized sites located near downtown or commercial areas, which potentially offer more nearby amenities for drivers. More diverse amenities would facilitate longer dwell and charge times better than convenience stores or gas stations located just off the highway.

In reviewing applications, CEO also heavily prioritized total cost. For instance, they scored more highly proposals that would exceed the cost-match minimum—even if total costs may have been higher. Recognizing that some of the aforementioned elements of a positive driver experience may drive total cost up, the Office balanced those considerations during their review.

Developing community engagement strategies that include individuals from communities historically underserved by EV charging infrastructure was another priority for CEO. CEO viewed applicants favorably if they could supply letters of support from these local stakeholders, documenting this collaborative exchange. Overall, CEO found that very few applicants provided strong, well-rounded answers to narrative questions focused on the equity impact of their projects. Given that equity was a heavy priority for CEO, the general responses that most applicants included did not meet staff expectations.

CEO favored applicants who could describe how their proposed project would improve equitable access to transportation electrification. To encourage applicants to address this priority, CEO staff provided a menu of qualifiable actions or activities for sites, such as siting in or near:

- Rural areas;
- Low-income communities;
- Colorado Economic Opportunity Zones;
- Transit-oriented developments;
- Affordable housing; or
- High-density residential areas.

THE AWARDEES

After reviewing the 43 proposals against their criteria and priorities, CEO issued awards for 24 sites from 10 distinct applicants, totaling approximately $12 million in Round One NEVI funding (Table 2).

Table 2: Colorado NEVI Round 1 Awardees

Applicant	Applicant Type	Network	Awards	Total Ports	Total Power	NEVI Funding
Tesla	EVSP	Tesla	8	64	2,000 kW	$3.88M
ChargePoint	EVSP	ChargePoint	3	12	800 kW	$1.75M
Kum & Go	Site Host	ChargePoint	3	12	640 kW	$1.03M
eCAMION	EVSP	Jule	2	8	600 kW	$1.01M
Pilot Travel Centers	Site Host	EVgo	2	8	1,400 kW	$1.02M
Love's	Site Host	ChargePoint	2	8	640 kW	$1.07M
Francis Energy	EVSP	Driivz	1	4	600 kW	$560,000
EVgo	EVSP	EVgo	1	6	2,100 kW	$468,000
Alta Convenience	Site Host	EV Connect	1	4	800 kW	$585,000
Travel Centers of America	Site Host	Electrify America	1	4	1,400 kW	$605,000
Total			24	130		$11.94M

Source: Colorado Energy Office

Interestingly, all but three of the 24 sites expect to exceed the minimum NEVI power requirement of 600kW. This reflects CEO's preference for futureproofing sites and ensuring reliable operations as utilization and battery capacity both increase over time. Eight sites will have eight ports, one site will have six ports, and 15 sites will have four ports (the NEVI minimum requirement). Tesla won one-third (i.e., eight) of the total awards in Round One, with no other awardee receiving more than three awards directly. Aside from Tesla, four EVSPs and five site hosts won awards.

On average, CEO awarded $497,500 per site and $91,846 per port—making them very cost-effective in issuing awards in Round One of NEVI funding. Notably, only Tesla sites included eight ports and they also had the most inexpensive per-port cost of all awardees, averaging just $60,671 per port. Even without Tesla, CEO's awards averaged just $122,000 per port, reinforcing their cost-effective array of awards.

CEO reported that they were pleased with the first round of NEVI. Although some selected proposals fell through and will not move forward, CEO will focus on filling those gaps in subsequent rounds. Overall, they had more proposals in more locations than they anticipated. CEO awarded sites to fully build out the Eastern Plains region in Round One—which was the area of greatest concern for the Office.

POST AWARDS PROCESS

After CEO issued awards, they received multiple Freedom of Information Act (FOIA) requests about the proposals and review process. As such, they posted all the applications they received on the Colorado NEVI website, allowing applicants to review the proposals and see what information successful proposals included. Additionally, CEO stated that they were willing to provide feedback to individual applicants in order to help them improve for future rounds.

All applicants received a model contract during the NOFO submission period to allow them ample time to review the terms and conditions. Once CEO issued awards, they required awardees to finalize their scope of work and sign the contract within four weeks of receiving it. CEO maintained a five percent retainage in the contracts to encourage good performance and uptime compliance. They also implemented a series of payment milestones associated with various stages of the project (Figure 6). Withholding funding until a project reached a certain stage of development made it easier to retain grant funding in the event an award fell through. In order to comply with the terms of the agreement, the awardees must submit monthly progress reports on all activities for their awarded sites until all of an awardees' sites are open to the public. Failure to comply with this requirement may result in the delay of funds disbursement or termination of the grant.

Figure 6: Colorado NEVI Award Payment Milestones

Payment Milestones	
Milestone	**Percentage**
Delivery and Payment for Charging Stations	20%
Design, Engineering, Permitting and Utility Interconnection Approval	20%
Final Commissioning and Activation	55%
Retainage for Ongoing Operations and Reporting	5%

These milestones reflect that over half (60 percent) of total NEVI funding for a site is withheld until a site becomes operational, encouraging awardees to bring their sites online. Forty percent of the funding is provided during the development of the sites. The five percent retainage for operations and reporting is disbursed over five years after a site becomes operational.

Source: CEO DCFC Plazas Grant Application Guide

As of February 2025, none of the Round One NEVI sites in Colorado have yet become operational, though two of the state's Round Two sites – in Frisco and Longmont – opened in January 2025.

KEY FINDINGS AND LESSONS LEARNED

Key Findings:

- Colorado's enhanced financial incentives for rural and region-specific site proposals yielded very successful results in Round One, with CEO successfully covering the entire Eastern Plains region and making good progress in the Front Range region as well. Other states may benefit from offering similar incentives to fill gaps or low utilization areas.
- CDOT's decision to nest the NEVI program under Colorado's existing state-run EV charging infrastructure program and lean on the expertise CEO developed through running its state-funded programs led to an effective Round One for NEVI. Other state DOTs may benefit from working with their respective energy offices that have EV charging expertise.

Lessons Learned:

- Applicants were unfamiliar with the all-in-one process for applying to both NEVI and state-funded EV charging infrastructure grant programs because most states do not have both a NEVI and state-funded option in one grant program. CEO acknowledged this confusion stemmed partially from miscommunication on their part. In subsequent rounds, CEO will ensure that new applicants attend monthly EV coalition meetings that facilitate circulation of accurate and clear information.
- CEO acknowledged that their two-stage review process was inefficient. In subsequent rounds, CEO will clearly schedule and organize the process for the review committee and develop a tiered system to make review a smoother process. CEO plans to update their rubric to make scoring more precise and effective. CEO also shared that they acquired new application software which will further improve scoring and review.

ACHIEVING NEVI GOALS

CEO and CDOT continue to work closely with NASEO, AASHTO, and the Joint Office of Energy and Transportation to achieve NEVI program goals, participate in direct technical assistance to address challenges as they arise, and engage with peers from other states to share best practices and lessons learned . While Colorado took a unique approach to NEVI implementation, the state made strides toward achieving NEVI program goals (see Table 3).

Table 3: Colorado's Actions to Meet NEVI Goals

NEVI Goal	State Action
Engage with Relevant Stakeholders in Program Design	• Conducted outreach prior to solicitation release • Distributed draft contract during solicitation period • Provided Q&A before, during, and after submission period
Ensure Positive Driver Experience	• Scored amenities in site proposal rubric categorically • Provided examples of relevant amenities in solicitation • Prioritized sites with nearby attractions for drivers • Prioritized sites with above minimum charger and power requirements
Establish a Reliable Charging Network	• Grantees required to demonstrate experience operating EV charging infrastructure • Retained five percent of funds for disbursement over five years, upon meeting reporting and uptime requirements • Requires development milestones be met before disbursing non-retainage funding
Fill Gaps Across All Geographies, Including Rural Areas	• Provided financial incentives for rural and low EV-charging penetration areas • Awarded sites to completely fill critical gap regions
Prioritize Equity and Disadvantaged Communities	• Provided financial incentives for sites that address equity concerns or are placed in low income/disadvantaged communities • Provided GIS tool to help applicants determine which areas would meet equity priorities

Note, these actions come from direct interviews with CEO and its applicants, as well as publicly available information. CEO may have taken more actions to meet NEVI goals than listed in this table.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