

Respondents are asked to provide a response in the following format:

1. Introduction

Please provide:

1. Contact name, phone number, and email

**Jay Smith, (804) 771-5302, jay@ChargeAheadPartnership.com**

2. Business name, address, and phone number

**Charge Ahead Partnership, 50 Pear Street, Richmond, VA, (804) 771-5302**

2. TECHNICAL RESPONSE

Respondents are asked to provide the following information within the following categories:

1. Infrastructure Installation, Placement, and Operation

a) What considerations should be taken into account when developing DCFC or hydrogen refueling stationing plans?

**The number of electric vehicles on U.S. roads is projected to reach 18.7 million in 2030, up from 1 million at the end of 2018. Yet a major impediment to the adoption of electric vehicles remains consumer concern about where they can refuel an electric vehicle. It is against this backdrop that federal and state policymakers are looking for solutions to rapidly expand the EV charging network.**

**The most expeditious, efficient and economical way to achieve these environmental advancements in transportation energy technology is through a competitive, market-based approach that removes barriers to purchasing electric vehicles and meets the needs of today's drivers.**

**We must ensure that the nation's network of charging locations is positioned to meet drivers' expectations of quality service, safety and affordable, competitive pricing that they have grown accustomed to with the established refueling network. Consumer satisfaction with the refueling experience is essential for the widespread adoption of electric vehicles. The sooner we can provide this experience, the sooner more consumers will be comfortable buying an electric vehicle.**

**Charge Ahead Partnership believes we can meet this challenge with a fair, efficient, transparent and competitive approach based on the following four tenets:**

**Efficient Expansion**

**With thousands of established fueling locations spanning the nation, existing fuel retailers can replicate today's fueling experience for EV drivers while ensuring that those drivers will not suffer from "range anxiety." The most efficient, cost-effective path to attaining this goal is for power companies and fuel retailers to work in partnership to deploy charging infrastructure, with each focused on their core competencies. Power companies are best suited to perform the electric generation development and power grid restructuring work through their regulated monopoly framework. Fuel retailers are best equipped to own and operate electric vehicle charging stations,**

utilizing their nationwide network of convenient locations to provide transportation energy, including electricity, to America's drivers.

#### Ensuring Customer Fairness and Equity

Allowing power companies to charge all of their customers more money in their monthly electric bills to own and operate chargers, regardless of whether they drive an EV, operates as a regressive tax on those who do not drive an EV – particularly those living in lower-income communities. There are more equitable, effective ways of growing the EV charging network. Regulated utilities should not be placing the burden of providing fuel to EV drivers on the backs of hard-working low- and middle-income individuals, many of whom do not own a vehicle much less an EV, particularly when the private sector is willing to foot the bill. We must ensure that all communities – regardless of location or socioeconomic status – are included in the development of an EV charging network, just as there are refueling stations in every community regardless of geography or income.

#### Competitive, Level Playing Field for Funding and Regulations

Private businesses are eager to sell electricity to EV drivers. However, without changes to policy, businesses cannot compete with regulated power companies who have been given a monopoly on the sale of electricity. To create a nationwide charging system, all players must be on equal footing which will ultimately allow competition to drive down prices and increase the quality of services provided to customers. The first step is ensuring that laws and regulations do not regulate charging stations as power companies. Second, public policy should incentivize and leverage private investment in bringing to market more charging stations. Third, utilities should not be able to bill their retail competitors that sell electricity to EV drivers more than they charge themselves – including through costly “demand charges.” There must be a viable pathway to profitability and the ability to compete on price for any fuel alternative to gain meaningful market share. With the right legal and regulatory framework, the private market can create the infrastructure to serve the millions of EV drivers across the country.

#### Transparent, Uniform Pricing

The retail fuels market is the most transparent and competitive commodities market in the United States. Consumers can easily see fuel prices and decide where to refuel based on the posted price without having to leave their vehicles. This dynamic leads to lower prices for customers. EV drivers should have access to the same competitive, stable and convenient prices that drivers of gas-powered vehicles have enjoyed for decades. The rate charged must be consistent and predictable throughout the country in order for EV charging stations to deliver rates that are competitive with conventional fuels. Any pricing mechanisms considered by Wyoming policymakers must ensure that rates are fair, predictable, transparent, and do not disincentivize private investment into EVSE.

b) How does corridor development and funding help or hinder statewide infrastructure emplacement?

Corridor development and funding – that is to say the development of targeted areas for investment – can both help and hinder the development of a robust charging system in Wyoming. It is important for public policy to strike a commonsense balance that weighs both the needs of highly trafficked

corridors with the needs of more remote areas that would still benefit from capital investment for EV charging. We know that one of the major reasons that people and businesses are hesitant to invest in EVs is “range anxiety.” This fear of not being able to find a place to refuel their vehicle is not unwarranted. This is of particular note for businesses engaged in long-haul trucking and “last-mile” delivery – they must have confidence that their drivers can refuel their EVs along both designated travel corridors as well as more remote areas; otherwise, they could end up stranded.

Private businesses, primarily fuel retailers, are eager to enter the EV charging market; however, the high upfront costs coupled with low utilization rates makes the economic case for installing EV chargers challenging for most private businesses. This is further exacerbated by current public policies surrounding the sale of electricity such as demand charges and “utility” definitions. Taking into account the current market conditions and policies for EVs and EV charging, the locations that are economically feasible are those that are located along major transportation corridors that are utilized for long-distance trips – inclusive of light-, medium-, and heavy-duty vehicles. Indeed, using the US Department of Energy’s Alternative Fuels Data Center as a resource, Wyoming presently has only 60 EV charging locations that include a total of 171 publicly available chargers. Of these, 92 are Level 2 chargers and 75 are DCFC chargers. Most of these are clustered in Jackson, Yellowstone, or located along major travel routes such as I-80, I-90, and I-25.

While many EV drivers have the luxury of charging a vehicle at home or at work, the EV driver of the future may not have that convenience due to the type of residence or workplace where the vehicle may be parked for long periods of time. In addition, even drivers who do have the luxury to charge overnight will travel longer distances at times and need options to refuel quickly and reliably. Therefore, a major barrier to light-duty EV adoption is range anxiety. The private industry recognizes this need for public chargers along highly trafficked corridors as an opportunity to meet consumer demand. That opportunity correlates with private investment going to these targeted corridors as it is the “lowest hanging fruit” in the sense of recovering the high costs of purchasing, installing, and maintaining EV chargers. With this in mind, Wyoming public policy – including any development of target corridors - should be aimed at ensuring that (1) private businesses are not disincentivized to invest in the areas that they would most likely invest in without any public funding (i.e. the highly trafficked areas); (2) that all market participants have the same opportunity to compete for any grants or incentives offered by the state of Wyoming in a designated corridor; and, (3) that public funding and incentives should also address remote areas that are underserved and will likely remain underserved due to the financial constraints present that keep private businesses from funding capital investments.

Simply put, state funding and programs should incentivize private investment in highly trafficked corridors while simultaneously ensuring that remote locations that lack of demand are also included in incentive programs to ensure network coverage across the state. This will lead to a more robust charging network that covers more of Wyoming’s expansive geography. It will serve the constituents of Wyoming better while ensuring that public dollars are put to their highest and best use.

c) How close or far from major travel routes should refueling and charging stations be located?

While many of the refueling and charging stations will naturally gravitate towards major travel routes – just as traditional gasoline refueling stations have – the State of Wyoming should not set any funding or grant program parameters nor guidelines based on the distance from a particular

transportation corridor. For instance, there may be a need for large groupings of chargers along the I-80 corridor; however, there may be cause for the deployment of EV chargers in a more remote location along, for instance, Routes 191 and 14 as well. The government should not discriminate between rural locations or high-traffic transportation corridors – there should be an equal playing field for all applicants to compete on regardless of their location.

d) Are there any additional environmental, safety, or other issues that must be addressed (parking, access, amenities, future expansion)?

**Public policy should incentivize investments by those who can build out a robust and accessible charging network. With millions of Americans visiting refueling locations every day, fuel retailers are poised to rapidly replicate today’s fueling experience – both in terms of location convenience and the provision of “secondary services” such as food and beverage, restrooms, and stores – for EV refueling. These refueling stations are already located at prime real estate for travelers and include many of the secondary amenities that customers have become accustomed to. Additionally, the Infrastructure Investment and Jobs Act did not incorporate provisions that would allow states to unfairly compete with the private sector by installing electric vehicle charging stations at rest areas and the legislation requires that locations for alternative fueling (including EV charging) must take into account the availability of amenities such as food and restrooms.**

There is also the consideration of safety while charging. Many publicly available chargers not attached to refueling stations are located in isolated, poorly-lit locations – such as mall parking lots, train stations, or parking decks. As it can take up to 40 minutes to completely recharge an EV using DCFC chargers, it is imperative that customer safety be at the forefront of public policy decisions. To this end, it is logical to build on the already established network of refueling stations that are not only safer than the remote locations other publicly available chargers are positioned, but they also offer secondary services customers can utilize during the charging period.

e) As a REV West signee, Wyoming voluntarily agreed to mutual coordination of signage and other common infrastructure, are there any other considerations necessary outside of the REV West agreement?

[Charge Ahead Partnership does not have a position on this question]

f) How can revenue be collected from users after refueling?

**Charge Ahead Partnership opposes any mandates regarding payment mechanisms. Just as gas stations continue to evolve their payment options as customers (i.e. the market) dictates what they prefer, we believe that EV chargers should similarly be based on consumer preference and market demand.**

g) If the strategy is route or corridor based, what considerations should be given to prioritizing route or corridor build out?

**If the state decides to prioritize route or corridor build out they should look closely at the existing refueling infrastructure in the state. Traditional refueling stations – i.e. gas stations – organically built out the robust refueling network present in Wyoming today. The locations were chosen with great care after due diligence and market research. They were determined to be locations that were easily accessible for customers in areas that needed refueling services. We would suggest that, if corridor**

**prioritization becomes public policy, that Wyoming work with the refueling industry in the state to determine which areas are ripe for investment.**

**For guidance, the Federal Highway Administration has designated “Alternative Fuel Corridors” – a program created under the FAST Act of 2015. Since the inception of this legislation, the private sector has been working with the FHA to identify locations that can be used to create “Corridor-Ready” highways. Currently, the DOT has designated almost 60,000 miles of highways in 48 states as “Corridor Ready,” meaning drivers can find EV charging stations no more than 50 miles apart from each other, and no more than 5 miles off the freeway. However, Wyoming has no highway stretches determined to be “Corridor Ready.” This federal resource may be a good starting point in determining locations if the state decides to follow a route/corridor based strategy.**

**h) What is the best way to address off corridor or route communities?**

**Off corridor communities – particularly those in areas with little EV saturation – may find themselves at a disadvantage in any attempts to attract investment in EV infrastructure. However, just as gas stations can be found in every community across America, EV charging stations should be and will be similarly positioned. This will naturally and organically occur as regions find saturation points for EV adoption, but it may take some time to reach that point. Furthermore, with the passage of the recent bipartisan federal infrastructure bill, commitments from several automobile manufacturers to make and sell more electric vehicles, as well as other macro-economic trends, the necessary EV saturation point for EV charging infrastructure in rural locales may be coming sooner than previously anticipated. Furthermore, the private sector is highly attuned to traffic patterns and customer demand – they have been studying these trends for decades in an effort to determine the best locations to serve customers. This has led to the proliferation of refueling stations across the country in ideal real estate locations. We believe that EV charging will benefit from similar analyses by the private sector and we encourage the government to allow the private sector to do what they do best – determining the most convenient, affordable, and effective way to compete for and serve customers.**

**Simply put, rural communities and businesses should be able to apply and compete for government incentives to install EV charging equipment on an equal basis as more densely populated communities.**

**i) The National Institute of Standards and Technology (NIST) publishes Handbook 44, Specifications, Tolerances, and Other Technical Requirements for Weighing and Measuring Devices. Currently, Section 3.40, Electric Vehicle Fueling Systems – Tentative Code, has not been fully approved by the National Conference on Weights and Measures and is non-enforceable.**

**1. What is your familiarity with the development of the tentative code?**

**[Charge Ahead Partnership does not have a position on this question]**

**2. Are you manufacturing or installing charging equipment that complies with the current version of the tentative code?**

**[Charge Ahead Partnership does not have a position on this question]**

**3. Do you anticipate any difficulty supplying charging equipment that will meet the requirements of the National Type Evaluation Program administered by NCWM?**

[Charge Ahead Partnership does not have a position on this question]

j) In what ways can we posture aviation infrastructure to be ready for the integration of zero emissions aircraft?

[Charge Ahead Partnership does not have a position on this question]

## 2. Utilities

a) What utility access and capability considerations should be present (power, broadband, wireless, cellular, other)?

**Utility companies are a vital partner in the construction of a robust EV charging network. Their expertise in generation and transmission of electricity will be required for any plan to work as they ultimately will be charged with ensuring that the grid can continue to operate efficiently and effectively while adding more load and transmission resources to the system at-large. For instance, when a new charging station is being constructed, this requires the utility to supply that customer with more electricity and often requires the site to be “made-ready.” This includes running transmission cables, grounding the charging equipment, and adding new meters.**

**Furthermore, EV charging stations typically need to be connected to the internet in some manner in order to process payments. While many stations already have this capability, it may be more efficient to include broadband services in utility upgrades, particularly in rural areas that lack access to broadband presently.**

b) How should demand charges be addressed?

**There is little controversy that demand charges continue to be one of the largest inhibitors keeping the private market from investing heavily in EV charging infrastructure. Demand charges – the fees assessed to a commercial entity’s energy bill for the maximum amount of power drawn in a particular timeframe – make the business of fast charging unviable for many businesses today. The primary problem in most cases is that demand charges make the electricity supplied to the owner of the charging station so expensive that the cost cannot be passed through to customers. The fundamental challenge is to come up with a rate that doesn’t undercut direct-current fast-charger economics and strikes an even balance between the customer, the retailer, and the utility. Presently, demand charges are one of the most significant cost factors in the operation of a fast charger – accounting for up to 90% of total electricity costs for charging sites in some instances. Acknowledging this barrier, some utilities are creating alternative pricing structures for EV charging stations for both residential and public-facing charging. Public policy should work to find the most equitable and fair rate structure that promotes private investment and collaboration between power companies and the refueling industry.**

**Demand charges are what a utility will charge any commercial customer if they have an extraordinarily high electric-use necessity. Traditionally, this has been for utility customers such as factories that require high amounts of electricity to run machinery. The price algorithm dictates the demand charge rate by calculating the single highest 15-minute interval of power consumption over the billing cycle multiplied by the current per kW rate then adding that extra cost to the customers bill. The theory is that the utility must be ready to supply this customer with an elevated amount of energy at any time which, on the back end, requires the utility to make investments in infrastructure**

to serve this customer as well as maintain generation at a level to ensure that they have the raw electricity necessary to supply that customer's load. Thus, the utility needs to apply a demand charge to the customer for the maintenance of those services.

However, in the context of EVs, it makes the economics nearly impossible for retailers. When in use, an EV charger – particularly a DCFC charger – requires a large load to charge the vehicle. If two cars are charging simultaneously, then twice as much energy will be required. This can be extrapolated to the nth degree. However, if only two cars a month use the EV charger, then the refueling station will never make enough to pay the often exorbitantly high demand charge rates unless they charge the customer an equally astronomical price to recharge their EV. These rates can account for up to 90 percent of total electricity costs. Ultimately, this will lead to an untenable system where retailers cannot sell electricity due to the high costs and consumers will be locked out of any opportunity to recharge their EVs other than their home (which often do not have demand charges or use only Level 1 chargers which do not have high spikes of energy usage which is why they can take up to 8 hours to fully recharge an EV).

There are several states that have already looked at alternatives to demand charges for EV charging. Some states have created temporary “holidays” from demand charge fees while others have completely carved EV charging out of demand charges. We believe that the elimination of demand charges would alleviate the economic restrictions that are holding back private investment in EV charging and would allow private retailers to make solid investments knowing that they will be able to make a rate of return on that investment over time. Charge Ahead Partnership would encourage Wyoming policymakers to look at what their colleagues have done across the nation in developing alternative electricity rates for EV charging infrastructure.

c) What utility incentives aid in infrastructure development?

Government incentives should leverage businesses that are willing to utilize private capital and should not be targeted at incumbent, monopoly utilities who can recover costs – without risk – via their rate base. While there may be some sense in allowing utilities to recover costs and a return on investment for certain “make-ready” projects (i.e. electrical upgrades to the grid and site locations necessary to install electric vehicle chargers and supply those chargers with sufficient power), public policy should avoid a system that gives an unfair economic advantage to a particular business or entity. Government should not be in the business of granting monopolies – particularly in a burgeoning market that the private industry is planning on investing heavily into.

To electrify the transportation industry, major stakeholders need to focus on their core competencies. The most efficient, cost-effective path to a nationwide network of electric vehicle charging stations is for fuel retailers and power companies to work in partnership with each focused on their specific areas of expertise. Utilities can focus on their core competency of generating and transmitting electricity while fuel retailers can deliver the electricity to consumers in a price-competitive, convenient and familiar way. With refueling stations already occupying the most accessible real estate across the nation, the industry is poised to quickly and efficiently provide the necessary EV network that will give consumers the comfort needed to make the switch to EVs. With the passage of the Federal Infrastructure package, which includes monies for EV charging as well as upgrading our electric grid, utilities are going to have billions of dollars of upgrades to make to their systems to ensure that they are ready for the demands of an electrified 21<sup>st</sup> century. While we are not opposed

to policies allowing utilities to receive certain incentives to aid in infrastructure development, we believe that current refueling retailers and other private businesses that compete on price and services are in a better position to own and operate charging stations.

With these massive projects on the horizon, utilities must focus on ensuring that the electric generation and transmission systems are ready for the rapid growth of electricity usage across the country and allow the refueling industry to deploy the necessary EV charging infrastructure to accomplish the ambitious EV goals set out by policymakers. Public policy that incentivizes this partnership structure will be the most efficient, cost-effective, and timely method to encourage consumers to adopt EV vehicles and meet climate change goals.

Furthermore, considering equity and fairness, it is not appropriate for utilities to reallocate the costs of owning & operating EV chargers as well as providing electricity (often free of charge) to individuals not utilizing these services – especially given the likelihood of higher electric prices as investments in the aging grid are added to the rate base. This is even more serious given that it becomes a “regressive tax” on low-income individuals as those costs are shifted from EV owners who, on average, are college educated and make over \$75k a year (in fact, other studies have found that the average household income of EV owners is closer to \$150k ) to the entirety of the rate base, including those who are already struggling to pay their monthly power bills.

### 3. Statutory and Policy Considerations

a) What current Wyoming statutes hinder infrastructure development? How should they be changed?

It is also our understanding that currently under Wyoming law, the resale of electricity is not legal unless you are one of the entities carved out or authorized to do so at Wyoming Code Section 37-1-101. Typically, only utility companies are allowed to sell electricity pursuant to traditional public utility monopoly rules; however, this also means that retailers are not allowed to sell electricity to recharge EVs to consumers. Without carving out this segment of the market, it will remain illegal for any private institution to make EV charging commercially available in Wyoming. This must change.

Once the private sector is able to compete in the market, utilities should not be able to bill their competitors for EV refueling electricity more than they charge themselves. Utilities should not be able to price their competition out of the market by hitting them with high electricity bills - including costly demand charges - that they themselves do not have to pay.

There must be a viable pathway to profitability and an ability to compete on price for any fuel alternative to gain meaningful market share. With the right legal and regulatory framework, we are confident that the private sector can create the infrastructure needed to serve the millions of EV drivers across Wyoming in a way that is fair and accessible to all consumers.

b) What state agency rules and regulations hinder infrastructure development? How should they be changed?

As stated above, demand charges continue to be an obstacle for private investment in EV chargers. We would suggest at minimum a multi-year “holiday” from demand charges for EV charging which would offer reprieve from these charges for businesses while allowing the state and stakeholders more time to investigate options moving forward. Alternatively, demand charges for EV charging

should be banned altogether. We further believe that this issue merits additional conversations and we would be happy to offer in-depth concepts on how EV charging prices should be determined for the retail sale of electricity. While this can be handled in individual rate cases put forth by utility companies, this can also be handled via regulation or legislation as well.

In regards to pricing, the retail fuel market is the most transparent and competitive commodities market in the United States. Consumers can easily see fuel prices and decide where to refuel based on the posted price without having to leave their vehicles. This leads to lower prices for customers. EV drivers should have access to the same competitive, stable and convenient prices that drivers of gas-powered vehicles have enjoyed for decades. The rate charged must be measured in a consistent and predictable way for drivers to have confidence that they should buy an EV. While the price of gasoline may differ a few cents from station to station and from day to day, it is entirely possible for the price of electricity to significantly differ by the hour – especially in hot summer days or cold winter nights when electricity usage is at its highest. The recent blackouts in Texas, California, and the Northeast, where in some cases electricity prices rose from \$50 per megawatt-hour to more than \$9,000 per megawatt-hour, are evidence of the already strained grid and massive price fluctuations. This makes it incredibly difficult for private businesses to mitigate risks and calculate potential revenues as balanced against the expenses of installing the charging equipment and supplying the electricity to the end-user. We believe that rules and regulations as well as certain legislation can accomplish this goal.

And, of course, the consumer is at the middle of all of these considerations. With these elevated prices, it is impossible for the average EV driver to be able to afford recharging at a refueling station. This will only exacerbate the “range anxiety” that is, according to multiple studies, the top factor deterring potential new EV drivers from purchasing an EV. If the public policy goal is to encourage drivers to make the switch from internal combustion engines to more environmentally friendly methods of transportation, it is imperative that government policy create a market environment that the average citizen of Wyoming can operate within – and that starts with affordable and stable prices.

c) What incentives should the state implement to encourage infrastructure development? What has worked best in other states?

Public policy should incentivize and leverage private investment in bringing to market more charging stations. In most states, utilities have been given massive financial incentives for the purposes of the purchase and installation of EV charging stations (both public and private) as well as supplying the electricity to end-users free of charge. They are allowed to do this without any risk to private capital as most utilities have a government-approved guaranteed rate of return on their investments. Given this economic climate and financial constrictions of other policies such as demand charges discussed elsewhere in these comments, there is currently no sound financial path forward for the private sector to engage with this market in these present conditions. Charge Ahead Partnership believes that all stakeholders should be able to compete for grants or be eligible for incentives regardless of whether they are a massive incumbent utility or a single rural refueling station. But to achieve the shared goal of creating a statewide, robust charging network, all players need to be on an even playing field and should fairly compete for any grants or incentive programs for the construction of an EV charging network.

Simply put, Charge Ahead Partnership believes that the best way to develop a robust charging network in Wyoming is through a competitive, market-based approach that meets the needs of today's drivers and incentivizes private investment. Should the policy be determined to create incentives, we believe that utilizing the current, established fueling network is the most efficacious and efficient method of providing consumers the refueling services they need in a safe, affordable, and convenient way.

d) Should the use of state lands be considered for infrastructure emplacement? Why or why not?

**We believe that the private market can best serve customers. If the government over-saturates the roads with publicly available chargers funded by electric ratepayers offering charging for free or a discounted rate, it will disincentivize private businesses from investing in EV charging. Private businesses simply cannot compete against the government in this fashion. Any public policy that allows for the use of state lands as host sites for EV charging must be carefully constructed as to not disincentive private capital investments.**

e) What should be considered as "fair" road system maintenance taxation rates for zero emissions vehicles?

[Charge Ahead Partnership does not have a position on this question]

f) What are additional considerations for commercial vehicles?

[Charge Ahead Partnership does not have a position on this question]

g) Are there climate change or carbon policy considerations?

[Charge Ahead Partnership does not have a position on this question]

#### 4. Incentives

a) Should corridor and local travel infrastructure incentives be handled differently? If so, how?

**We do not believe that incentives should vary dependent on geographic location. All incentives should be equally available to all market participants regardless of their location. Any public policy that does treat them differently would be, on its face, discriminatory against Wyoming businesses who do not happen to be located in a government-created "corridor."**

b) What type and amount of financial incentives work best to encourage infrastructure installation?

**Charge Ahead Partnership believes that financial incentives must be carefully considered and balance private business interests against those of utilities and other stakeholders who may already have a financial advantage in competing for consumers.**

**We further believe that any incentives directed at utilities should be focused on "make-ready" construction campaigns. "Make-ready" means that all necessary electrical infrastructure to operate the charging stations, all conduit and wire is pulled to the station location(s), all concrete work is completed properly so the stations can be mounted and any cellular repeaters are installed if required. Simply put, make-ready means the utility has "primed" the station and all the station owner must do is install the charging hardware itself. This type of infrastructure upgrade can be expensive**

**and cost-prohibitive for many private retailers. In these instances, we believe that certain incentive programs may be beneficial for the public.**

c) Other than government financial assistance, what other incentives may be helpful?

**See answers (1)(a) and 2(a)(b)(c) above.**

d) If the strategy is route or corridor based, what is the best way to incentivize infrastructure installation in off-corridor communities?

**See answer 1(h) above.**

e) Are there climate change or carbon policy considerations?

[Charge Ahead Partnership does not have a position on this question]