Montana Electric Vehicle (EV) Infrastructure Deployment Plan Update

September 1, 2024

Montana 2024 Electric Vehicle (EV) Infrastructure Deployment Plan Update

Introduction

Montana's 2024 Electric Vehicle Infrastructure Deployment Plan Update (2024 Plan) was developed by the Montana Department of Transportation (MDT) and the Montana Department of Environmental Quality. The Plan update provides a summary of public engagement activities, changing market conditions, challenges, and implementation strategies to ensure compliance with 23 CFR 680 and meet the goals of the National Electric Vehicle Infrastructure (NEVI) program, to facilitate a national EV charging network.

The 2024 Plan includes a community engagement outcomes report that identifies outreach to Disadvantaged Communities (DACs) and describes a strategy for more direct community outreach after the State has selected priority communities for NEVI funding.

The State identified which alternative contracting method is most appropriate for NEVI projects that will minimize risk and maximize value. The State used a Project Delivery Selection Process in 2023 to identify a Design-Build delivery method for NEVI projects. A project solicitation has not been executed as of the submittal date of this Plan. This Plan provides an outline of the process the State would follow for soliciting projects and evaluating proposals.

Updates from Prior Plan

Sections of the Plan that have been updated:

- Public Engagement: update on Community Engagement Activities, Table 1, input from public webinars and comments, and Tribal outreach efforts.
- Contracting: update on delivery method for NEVI Title 23 projects.
- Existing and Future Conditions Analysis: addition of new fast charging locations.
- EV Charging Infrastructure Deployment: prioritization of round 1 of NEVI locations pending final approval before a funding opportunity is announced.
- Physical Security & Cybersecurity: addition of possible physical security requirements at NEVI-funded locations.

State Agency Coordination – No Change

Since Montana submitted the initial Electric Vehicle Deployment Plan in 2022, the Montana Department of Transportation and Montana Department of Environmental Quality (the Agencies) have entered into a Memorandum of Agreement (MOA) that outlines the roles and responsibilities of each agency in implementing the NEVI Program. The Agencies continue to work collaboratively to develop Montana's project delivery approach, prioritize locations and establish data collection and operation and maintenance procedures. The Agencies continue to work with other state agencies and policy makers, as appropriate, to provide input on the deployment of electric vehicle charging infrastructure.

Memoranda of Understanding with other agencies

The Montana Department of Transportation and Department of Environmental Quality entered into a Memorandum of Agreement (MOA) on April 24, 2023. The purpose of this MOA is to cooperatively implement Montana's National Electric Vehicle Infrastructure (NEVI) Program. Specifically, the MOA delineates and identifies duties and responsibilities of both agencies in developing and implementing Montana's NEVI program. The MOA specifies each agency's responsibility to comply with NEVI updating the EV Deployment Plan, NEVI project development and construction, data collection and

reporting, and operation and maintenance of NEVI funded projects. Additionally, it acknowledges the expertise of each agency and seeks to leverage areas of expertise to establish an interconnected network of electric vehicle charging stations and facilitate access, data collection and reliability.

Public Engagement – Update

MDT and DEQ will work with vendors to conduct more targeted outreach to individual communities and stakeholders after the agencies finalize priority communities for NEVI projects along the corridors. Vendors will be required to develop a community engagement strategy that will identify community priorities, benefits, metrics, and impacts of electric vehicle supply equipment (EVSE) projects in the respective community and surrounding area. The community engagement strategy will focus on priority locations and communities along the Alternative Fuel Corridors and smaller communities where residents commute to locations along the AFCs for employment, healthcare, shopping, and other essential services.

Community Engagement Outcomes Report

Table 1 – Community Engagement Activities

Activity/Date	Stakeholders Engaged	Communities represented	Topics Discussed	Key Outcomes
Montana Clean Energy Fair* [1], August 2024	Current & potential electric vehicle drivers, OEM"s, members of non-profit community organizations	Statewide	Montana's NEVI Plan, funding, financing, and incentives for EVs	Disseminated information on upcoming funding opportunities and federal/state incentives for EVs
Climate & Clean Energy Fair, September 2023	Current & potential electric vehicle drivers, OEM"s, members of non-profit community organizations	Statewide	Montana's NEVI Plan, funding, financing, and incentives for EVs	Disseminated information on upcoming funding opportunities and federal/state incentives for EVs
Montana Renewable Energy Association's Exploring Energy Webinar Series, March 2024	Businesses and individuals interested in renewable energy as well as electric utilities	Statewide	Montana's NEVI Plan, general state of EVs and charging infrastructure in Montana	Provided educational information to those interested in EVs and how it intersects with renewable energy development

[1] **Bolded*** indicates participation and outreach activity that included Disadvantaged Communities

Yellowstone-Teton Clean Cities (YTCC) quarterly board & stakeholder meetings, November 2023 & April 2024	YTCC members & partners focused on clean transportation alternatives	Northern Rocky Mountains region	Montana's NEVI Plan, general state of EVs and charging infrastructure in Montana	Disseminated information on upcoming funding opportunities and federal/state incentives for EVs
Carroll College engineering & environmental science class, April 2024	Students interested in EV technology	Helena	Montana's NEVI Plan, general state of EVs and charging infrastructure in Montana	Discussed EV & charging technologies and DEQ's role in expanding
Montana Technological University senior design team, April 2024	Students interested in EV technology	Butte	Montana's NEVI Plan, general state of EVs and charging infrastructure in Montana	Discussed EV & charging technologies and DEQ's role in expanding

Statewide Listening Session – Update

On July 15 & 16, 2024, DEQ and MDT hosted virtual listening sessions to provide updates on Montana's EV Deployment Plan, answer questions, and accept comments to inform Montana's Deployment Plan and implementation of NEVI funds. Nearly 70 people attended the webinars and 123 people registered. Attendees included members of local governments, state agencies, utilities, community organizations, charging networks, and those representing DACs. Following the webinar, DEQ and MDT sent out an e-mail to attendees and registrants of the webinar with links to the recordings and notification of an opportunity to provide comments and meet with both agencies about the update to the NEVI Plan. The Agencies also told attendees on the webinars and via e-mail that public comments would be accepted until August 23, 2024. The Agencies received three comments that generally encouraged new fast charging locations to ease EV travel.

During the listening sessions, participants' comments and questions focus on the following areas.

- Status of ability of non-Tesla vehicles to use Tesla SuperChargers in Montana.
- Can NEVI funds be used for dedicated medium- and heavy-duty vehicle charging locations?
- Can battery storage be attached to NEVI-funded chargers in locations where there is not the capacity to meet the charging requirements?
- Can NACS/J3400 plugs be a part of NEVI-funded projects?
- Status of DEQ-funded fast-charging projects.
- What type of entities make the best site partners?
- How is the State prioritizing tourist charging needs?
- What is the status of the NEVI RFP?
- Will there be any additional minimum requirements such as a canopy over the chargers, battery storage, or pull-through parking?

The Agencies addressed questions during the webinars and plan to incorporate this feedback into the

solicitation process, as appropriate.

Tribal Engagement – Update

Montana has seven federally recognized Indian reservations. Each of these reservations is a DAC. Five of the seven reservations are located along the AFCs, which are critical travel routes for each of the tribal communities. The Agencies will continue to reach out directly to Tribes, tribally based community and business development organizations and will include a specific Tribal outreach strategy in our community engagement strategy and plan.

DEQ reached out to several Tribal governments working on Climate Pollution Reduction Grants (CPRG) and offered assistance on any clean transportation measures the Tribes were considering. The Confederated Salish & Kootenai Tribes of the Flathead Indian Reservation are working without CPRG funds but are working to transition the tribally owned fleet to EVs. DEQ connected the Tribes' climate change coordinator with the Joint Office on Energy & Transportation and the National Renewable Energy Laboratory on technical assistance to determine the carbon footprint of the tribal fleet. DEQ also shared NEVI related updates and plans for the Flathead Reservation area AFC, US-93. DEQ intends to continue work with the CSKT climate change coordinator and to conduct more meaningful outreach to other tribal governments.

Utility Engagement – No Change

The Agencies maintain a collaborative relationship with Montana's investor-owned utilities and rural electric cooperatives on electric vehicle charging station planning. The State has had meetings with these utility providers to discuss electric vehicle infrastructure, load impacts, and Montana's NEVI Plan. In September 2023, the Agencies met with Montana-Dakota Utilities (MDU), to discuss the utility's role and interest in electric vehicle charging stations and the NEVI program since initial NEVI projects may occur within MDU's service territory. DEQ also worked closely with several rural electric cooperatives on locations in their service territory that were part of Montana's application for a CFI discretionary grant. Two rural electric cooperatives were included as project partners to own and operate CFI-funded charging locations in four communities within their service territory.

The Agencies are also working with each of the utility providers along designated AFCs on a new construction form for DCFC stations. This form will be used for NEVI applications to demonstrate that charging station owners, operators and site hosts have worked with their utility to provide and gather information about charging station capacity, load impacts, necessary upgrades, additional costs and distributed generation and storage needs at NEVI sites.

Montana's Electric Vehicle Infrastructure Prioritization Study [2] also included an electric supply assessment which analyzed the community-level capacity for each recommended charging location along the AFCs, based on information provided by the electric utilities. This study is a starting point to identify general locations that may be capacity constrained or where additional upgrades may be necessary. Of the FY22-23 priority locations, Columbus and Superior were identified in the EV Prioritization Study as possibly having capacity constraints at certain locations. The analysis also evaluated locations where battery storage may help reduce utility upgrade costs. A more thorough site-specific analysis will need to be conducted in coordination with the electric utilities, site hosts, and owners and operators to determine whether upgrades are necessary and the extent of these upgrades. This analysis will be a critical step to help ensure that charging stations are sited in locations that minimize costs and grid impacts.

[2] AECOM, *Montana Electric Vehicle Infrastructure Prioritization Study,* June 2022.

Site-Specific Public Engagement – No Change

The priority locations the Agencies have identified are preliminary until a final competitive solicitation is issued. Until the Request for Proposals (RFP) is issued, the Agencies will work with the third-party charging station owners and operators to develop a plan to engage with communities on the preliminary list to gauge interest and understand specific costs associated with each location. The Agencies will continue to monitor investment from private charging station owners/operators in publicly available charging locations in communities along AFC's. After the RFP is issued, the Agencies will work with successful vendors to focus on more site-specific public engagement to ensure that there is community input into siting, design, operation, and maintenance of NEVI-funded projects.

In spring 2023, MDT issued a Request for Information (RFI) to better understand interested parties' preference on project solicitation methods and project details. The RFI included questions regarding the potential number of locations and cost thresholds for bundling EV charging locations to ensure project solicitations are sized appropriately to garner broad interest. There were 20 respondents to the RFI. Overall, MDT learned interested parties prefer bundling locations and would submit proposals with a project cost in the $1.5-$10-million-dollar range.

Plan Vision and Goals – No Change

Montana's 2024 Plan update lays out the same vision and goals that were described in the state's 2022 EV Deployment Plan. The vision of Montana's Plan is to efficiently, equitably, and strategically deploy funding to support an interconnected network that provides Montana EV users and visiting EV drivers reliable and affordable access to EV charging infrastructure. Montana's These goals include:

1) Corridor build-out
2) Rural connectivity
3) Affordability
4) Outcome-oriented data collection
5) Reliable operation

Since Montana's 2022 EV Deployment Plan was approved, FHWA has provided additional guidance on data collection and reliability. This includes submitting data from EVSE stations funded with NEVI dollars to the EV Charging Analytics and Reporting tool (EV-ChART). Montana will also participate in the EV-ChART pilot group to help support development of the tool, so it is useful for states and other project partners.

Additionally, the Agencies will work to develop monitoring, reporting, and enforcement strategy that ensures that EVSE infrastructure meets 97 percent uptime requirements in the final NEVI rule. This strategy will focus on avoiding downtime by requiring that project owners/operators have experience and a track record of reliable operation. Additionally, the Agencies will work with EVSE owners/operators to develop a charging station performance management plan that outlines steps to remedy uptime defaults as quickly as possible.

Montana plans to meet the final NEVI rule requirement that at least four 150kW CCS charging ports be installed at each location. Montana's 2022 EV Deployment Plan contemplated a phased approach, which would have considered installing two rather than four 150kW CCS ports at certain locations that have low utilization. The Agencies will continue to evaluate approaches such as battery storage and charging demand management to address the economic challenges at locations along corridors that will have lower utilization.

Year 1 Quantitative goal: Montana considers Year 1 to be the year that the state releases the first RFP for NEVI-funded projects. Montana will continue to focus on filling large charging gaps with stations no

more than 100 miles apart along Interstates 15 (I-15), 90 (I-90), and 94 (I-94). Approximately 10 new locations will be needed to fill these large gaps with spacing of no more than 100 miles. The total number of locations funded may change depending on private investments along interstate highways and locations with higher traffic volume and potential utilization relative to other sites on the priority location list.

Subsequent Annual Focus Areas: After large gaps along interstates are addressed, the State will prioritize locations that fill large charging gaps along US-2 and US-93 with stations no more than 100 miles apart. After stations are built out and 100-mile charging gaps are filled, the State will prioritize locations spaced no more than 50 miles apart as required by NEVI. Gateway communities to national parks and recreation/tourism destinations will also be a priority for investment. The State does not expect to nominate additional U.S. Highways as AFC's.

Montana does not anticipate that there will be additional NEVI funding remaining after the corridors are built-out. Montana has over 2,000 miles of interstates/highways currently designated as AFC's. The 2021 EV Infrastructure Prioritization study estimated that the state would need at least 36 additional locations to meet the 50-mile spacing requirements in the NEVI final rule. Montana will continue to track non-NEVI funded investments and locations to determine how to prioritize funding for additional locations along designated corridors.

Contracting – Update

Status of Contracting Process

Progress since the last plan submission: The MDT Transportation Commission approved for the first NEVI project prioritizing EV charging stations along the Interstate Highway System utilizing an alternative contracting method. MDT completed the required Project Delivery Selection Process which selected the Design-Build (DB) alternative contracting method for delivery of the first NEVI project. The DB firm will also be required to provide operations and maintenance necessary to meet the requirements of the NEVI program including uptime and reporting requirements. Currently, there are no active solicitations for development of EV charging stations in Montana. MDT is in the process of developing solicitation documents. The following paragraph describes what the process will likely look like when the solicitation documents are ready.

For round 1, the State will use a DB alternative contracting delivery method, which was selected through the Project Design Selection Process in 2023. The DB firm will also be required to provide operations and maintenance necessary to meet the requirements of the NEVI program including uptime and reporting requirements. For Round 1, MDT will issue a request for qualifications to which proposing entities will respond with a statement of qualifications. MDT will score the statements of qualifications and establish a short-list of proposers that are eligible to receive a request for proposals and respond with a technical proposal, and a price proposal. MDT will score the proposals and select the best-value firm to enter into a separate NEVI contract for each EV charging station. Progression of the design, construction, operation, and maintenance of each EV charging station will be managed through a series of notices to proceed. MDT anticipates beginning the procurement of its first round of EV charging stations by issuing an RFQ in the fall of 2024. MDT anticipates a timeline of approximately eight months from issuance of the request for qualifications to award of round 1 NEVI contracts.

Awarded Contracts – Update

Currently, no contracts have been awarded under Montana's NEVI program. MDT has been developing new procurement materials and contract to address the uniqueness of NEVI projects. Anticipate finalizing materials over the next few months and issue the first NEVI solicitation late fall/early winter.

Scoring Methodologies Utilized – Update

As mentioned above, currently there are no solicitations or contracts for the delivery of EV charging stations in Montana. The state will score the technical proposals and select the best-value firm based on the price proposal and technical proposal scores.

The technical proposal will also require applicants to describe how they will engage with community organizations and members to site, design and operate charging locations. Scoring will take into consideration proposals that include letters of support from local community organizations and individuals. Additionally, there will be scoring criteria for applicants proposing for locations in Justice40 communities, as well as for applicants who have addressed the physical security of the location. Other non-price scoring methodologies will include accessibility of the EV charging station, available amenities, existence of environmental impacts, approach to utility coordination, approach to design and construction (including quality control), and approach to operations and maintenance.

Plan for Compliance with Federal Requirements – No Change

Montana intends to ensure compliance with 23 U.S.C, 23 CFR 680, and all applicable requirements under 2 CFR 200 through the solicitation process. Applicants will be required to demonstrate how they will meet all requirements, and how any subcontractors they may use will do the same. The scoring criteria will favor those applicants who are able to successfully demonstrate their plans for compliance.

Civil Rights – No Change

Montana intends to ensure compliance with State and Federal civil rights laws, including Title VI of the Civil Rights Act and accompanying USDOT regulations, the American with Disabilities Act, and Section 504 of the Rehabilitation Act. All NEVI funded projects will comply with applicable civil rights requirements. An additional consideration Montana will make to address compliance with EV charging infrastructure minimum standards under 23 CFR 680 is to require that charging station owners comply with the U.S. Access Board Design Recommendations for Accessible Electric Vehicles[3]. This includes requiring that charging stations include secure payment methods that are accessible to persons with disabilities and include at least one contactless payment method that accepts major credit and debit cards. Additionally, Montana will consider scoring criteria that includes site, facility, building, and elements, parking, and route accessibility to persons with disabilities.

Existing and Future Conditions Analysis – Update

Alternative Fuel Corridor (AFC) Designations – No Change

Montana has not submitted additional nominations for new AFC corridor designations since the 2022 EV Deployment Plan was submitted.

Existing Charging Stations

State EV Charging Location Unique ID*	Route	Location (street address or AFC + mile marker)	Number of Charging Ports	EV Network (if known)	Meets all relevant requirements in 23 CFR 680?	Intent to count towards Fully Built Out determination?
121706	I-90 &	3555 Mullan Rd, Missoula	4	Electrify America	No	No

[3] U.S. Access Board. Design Recommendations for Accessible Electric Vehicles. *Updated 8/11/2022.* *https://www.access-board.gov/ta/tad/ev/usab-evse-guide.pdf*

	US-93					
121712	I-15	24 Main Street, Dell	4	Electrify America	No	No
168410**	I-90	31908 Frontage Road, Bozeman	2	EV Connect	No	No
170364	I-15 & I-90	122000 W. Browns Gulch Road, Butte	4	Electrify America	No	No
186597	I-90 & US-93	8500 Truck Stop Road, Missoula	1	Non-networked	No	No
186598	US-93	105 Ridgewater Drive, Polson	1	Non-networked	No	No
204510-12 & 204514	US-93	6024 U.S. 93 S, Whitefish	4	ChargePoint	No	No
205871	I-90 & US-93	5243 Trumpeter Court, Missoula	1	ChargePoint	No	No
227212 & 227236	US-93	2915 U.S. 93 S, Kalispell	2	ChargePoint	No	No
250811	I-90	403 Main Street, Billings	4	Electrify America	No	No
279488	I-94	1210 S Haynes Street, Miles City	6	Electrify America	No	No
279489	I-94	73 MT-16, Glendive	6	Electrify America	No	No
279565	I-90	2550 Catron Street, Bozeman	4	Electrify America	No	No
306699	I-90 & US-93	3663 N Reserve Street, Missoula	1	EV Connect	No	No
309364	I-90	270 Automotive Avenue, Bozeman	2	Blink	No	No
314198	US-93	2000 Rose Crossing, Kalispell	7	EV Connect	No	No

322263 & 350069	I-90	8474 Huffine Lane, Bozeman	4	EV Connect	No	No
349557	US-2	4514 US Highway 2 W, Havre	1	EVGateway	No	No

*Locations & information downloaded from the U.S. Dept. of Energy's AFDC Station Locator on August 6, 2024. Data search included only CCS connectors.
**Funded in part by Montana's Volkswagen Settlement funds.

EV Charging Infrastructure Deployment – Update

Stations Under Construction
The only station the Agencies are aware that is under construction is a new Electrify America location in Helena. The location will include six 350kW capacity chargers once activated. As of August 26, 2024, the location was not online.

Planned Charging Stations

State EV Charging Location Unique ID*	Route (note if AFC)	Location	Number of Ports	Estimated Quarter/Year Operational	Estimated Cost	Funding Sources (Choose No NEVI, FY22/FY23, FY24, FY25, FY26, or FY27+)	New Location or Upgrade?
Great Falls	I-15 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23	New
Custer	I-94 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23	New
Forsyth	I-94 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23	New
Livingston	I-90 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23	New
Three Forks	I-90 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23	New
Columbus	I-90 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23	New
Crow Agency	I-90 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23 or FY24	New
Craig	I-15 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23 or FY24	New
Melrose	I-15 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23 or FY24	New
St. Regis or Superior	I-90 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23 or FY24	New
Terry	I-94 (AFC)	Unknown	At least 4	2025	$900,000	FY22/23 or FY24	New

*Locations are tentative and will not be finalized until the State issues a solicitation for projects

The main addition to the "Planned Charging Stations" table above is Great Falls. Electrify America previously indicated plans for a charging location in Great Falls but has since decided not to move forward. In the absence of that private investment, the Agencies decided to add Great Falls which is Montana's third largest city and the only major city without any CCS fast charging stations.

Planning Towards a Fully Built Out Determination

How many stations are still needed to achieve Fully Built Out status (based on the State's EV AFCs as of the date of this update's submission)?	***51***[4]
Provide the estimated month/year to achieve Fully Built Out status:	***Unlikely to reach Full-Built-Out status on any AFC***

EV Charging Infrastructure Deployment After Build Out

Montana does not anticipate fully built out status on any AFC without inclusion of existing Electrify America locations as NEVI-eligible locations.

Implementation – No Change

The State will execute an agreement with third parties to construct, operate, and maintain the charging infrastructure according to the requirements established in 23 CFR 680. Applicants for NEVI funding will be required to submit a detailed operation and maintenance plan that includes snow removal, operation during inclement and extreme weather, and public safety considerations.

The state will require that applicants provide documentation to ensure that work is performed by qualified laborers and technicians. Additionally, the state will require documentation that all electricians installing, operating, or maintaining electric vehicle infrastructure are Electric Vehicle Infrastructure Training Program (EVITP) certified or have graduated from a registered apprenticeship program for electricians that includes charger-specific training that has been approved by the Department of Labor per 23 CFR 680.106(j). The Agencies will continue to work with labor unions and other workforce development programs to discuss and receive their feedback on workforce development and requirements as they relate to the NEVI programs.

Equity Considerations – Update

The Agencies have conducted statewide outreach as part of the development of this Plan update. Representatives from DAC's participated in the NEVI Plan listening sessions. The Agencies plan to work with successful vendors on developing a community outreach and engagement strategy after the priority communities for each fiscal year of NEVI-funding are finalized. The Agencies plan to use the Justice40 Map[5] tool, U.S. Department of Transportation's Equitable Transportation Community (ETC) Explorer[6],

[4] Based on combined number of locations identified as "Proposed Charging Station," "Planned Charging Station," and Existing Charging Station" on page 29 of Electric Vehicle Infrastructure Prioritization Study. Based on 23 CFR 680 requirements, there are no NEVI-compliant charging locations in Montana so a full build-out will be required. AECOM, *Electric Vehicle Infrastructure Prioritization Study*, June, 2022.

[5] Argonne National Laboratory, Electric Vehicle Charging Justice40 Map tool. https://anl.maps.arcgis.com/apps/webappviewer/index.html?id=33f3e1fc30bf476099923224a1c1b3ee

[6] U.S. Department of Transportation, Equitable Transportation Community Explorer. https://experience.arcgis.com/experience/0920984aa80a4362b8778d779b090723/page/Homepage/

the Council on Environmental Quality's Climate and Economic Justice Screening Tool[7], and other tools to help identify communities that are underserved and burdened when it comes to access, environmental impacts, and other indicators.

Identification and Outreach to Disadvantaged Communities (DACs) in the State

The Agencies have conducted statewide outreach as part of the development of this Plan update. Representatives from DAC's participated in the NEVI Plan listening sessions. The Agencies plan to work with successful vendors on developing a community outreach and engagement strategy after the priority communities for each fiscal year of NEVI-funding are finalized. Representatives from DAC's participated in the NEVI Plan listening sessions. The Agencies plan to use the Justice40 Map tool, U.S. Department of Transportation's Equitable Transportation Community (ETC) Explorer, the Council on Environmental Quality's Climate and Economic Justice Screening Tool, and other tools to help identify communities that are underserved and burdened when it comes to access, environmental impacts, and other indicators.

Process to Identify, Quantify, and Measure Benefits to DACs

Table 6: EV Infrastructure Benefits and Metrics to Track Benefits

Benefits Categories identified in EV Deployment Plan	Strategy for Tracking Benefits (Metrics, Baseline, Goals, Data Collection &Analysis Approach, Community Validation)
Increasing access to clean transportation options	Number of EV chargers installed in locations along AFC's with a focus on DAC's. Number of charging locations outside of DAC's that serve residents of DAC's who commute to locations for work, healthcare, commerce, or other essential services. Outreach to communities will be conducted prior to site selection to determine if certain sites are or are not accessible to residents of DAC's.
Supporting local economies and businesses by providing an additional service for residents and visitors	Dollars spent on EV charging infrastructure, owned by, or providing revenue to organizations located in DACs. Number and percentage of charging infrastructure owned that provide revenue to organizations and residents of DAC's.
Reducing public exposure to transportation emissions and public health impacts	Estimate of reduced tailpipe emissions from EV's served by charging infrastructure in DAC's and communities that serve DAC's. New modeling tools will likely need to be developed to estimate per charging station tailpipe emission reductions. Baseline emissions will be based on average light duty vehicle miles travelled and percentage of EV's in light duty vehicle registrations in each county. EPA MOVES emission modeling and EPA's EJ Screen, and other tools will be used to determine baseline emissions and public exposure to transportation emissions, particularly vulnerable populations.
Improving air quality	Estimate current air quality impacts from transportation emissions and estimated increased electric vehicle adoption after charging stations are installed. Estimate reduction in air pollutants including carbon monoxide, nitrogen oxides, ozone, and particulate matter will be estimated.
Increasing equitable adoption of EV's by increasing access to affordable charging options	Comparing EV registration data before and after charging stations are installed. Estimate dollars per year saved by EV drivers in fuel, maintenance and other operating costs compared to equivalent gas-powered vehicles.

These initial benefit categories will be refined as the Agencies engage with communities where NEVI

[7] Council on Environmental Quality, Climate and Economic Justic Screening Tool. https://screeningtool.geoplatform.gov/en/

projects will be located. Additional or alternative benefit categories may be included to address each communities' priorities for clean, affordable, and equitable transportation access and the benefits that are important to them.

Labor and Workforce Considerations – Update

Montana will ensure that installation and maintenance of EV infrastructure is carried out by a highly skilled and trained workforce. In compliance with 23 CFR 680.106(j) to ensure that the installation and maintenance of chargers is performed safely by a qualified and increasingly diverse workforce of licensed technicians and other laborers, all electricians installing, operating, or maintaining EVSE must receive certification from the EVITP or a registered apprenticeship program for electricians that includes charger-specific training developed as part of a national guideline standard approved by the Department of Labor in consultation with the Department of Transportation, if and when such programs are approved**.** Language will be included in the operations and maintenance agreement that requires charging station owners and operators to submit regular reports that demonstrate compliance with 23 CFR 680.106(j). All projects using NEVI funds will be required to pay Davis Bacon wages.

Physical Security & Cybersecurity – Update

The State will comply with requirements in 23 CFR 680(106) as well as state law to ensure that consumer data is protected as well as the physical and cybersecurity of EV charging infrastructure. The State will require the owners and operators of NEVI-funded EV charging stations to submit a cybersecurity plan that demonstrates compliance with state and federal laws. The State will also require an operations and maintenance plan that includes a schedule and action plan for preventing and addressing risks and damage to charging station hardware. The State is considering what physical security measures to require including, but not limited to, security cameras, overhead covering/shelter, and overhead lighting.

Program Evaluation – No Change

After NEVI locations are installed, Montana will include an assessment on the performance of the chargers based on data the state will collect from owners and operators on quarterly, annual, and one-time bases. This includes verifying that peak charging session power for each port does not fall below 150kW, that a 97% uptime per port is maintained, and that maintenance and repair costs do not significantly exceed costs estimate by station owners. The State will continue to monitor any third-party hosted website that tracks charging station uptime, charging session success rates, and other operations data. The State will at minimum require self-reporting of necessary data and may conduct site visits to NEVI locations after installation and at regular intervals over the 5-year monitoring and reporting period.

The State will evaluate the success of each NEVI-funded charging location based on the following factors:

1. Each charging station and location is delivering economic and environmental benefits identified in Table 6 of this plan and verified in coordination with communities that are served by each of the locations.
2. EV charging infrastructure is being maintained according to the operations and maintenance plans submitted by the vendors and approved the State.
3. Each port is achieving at least 97% uptime.

Discretionary Exceptions – No Change

Montana is not seeking any discretionary exceptions at this time. The State will continue to monitor progress as the program develops and will continue to work closely with the FHWA Division Office and Joint Office on any issues that may trigger the need for an exception waiver on future annual updates to the Plan.

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