

ODOT Medium- and Heavy-Duty EV Charging Infrastructure - Funding Opportunity Updates and FAQ

Updated Aug. 31, 2026

Introduction

This document provides a brief update on changes made to the medium and heavy-duty (M/HD) funding opportunity and answers key questions raised during the public comment period. It is intended to support applicants and stakeholders by clarifying common questions and highlighting recent adjustments. The information below reflects feedback received to date and aims to ensure transparency, consistency and ease of participation as the funding process moves forward.

Summary of Changes

- 1) During the public comment period, ODOT received several comments recommending that the scoring criteria for battery energy storage systems be broadened to include all distributed energy resources, such as battery energy storage systems, microgrids, and onsite energy generation. Commenters also suggested increasing the points available in this section to reflect the significant benefits distributed energy resources can provide for a project.

ODOT agrees with these recommendations. In response, ODOT updated this section to apply more generally to distributed energy resources, and the total points available have been increased from 10 to 15.

- 2) During the public comment period, ODOT received feedback regarding the planned approach for scoring cost proposals. The original framework proposed evaluating projects based on the amount of match funding provided. Several commenters noted that match level alone is not the most effective measure of a project's cost efficiency.

ODOT agrees with this perspective. In response, ODOT revised the scoring methodology to evaluate cost proposals using each project's cost per installed kilowatt. This approach provides a more consistent and meaningful comparison of overall cost effectiveness. Further details are provided in section 7.1.2 of the funding opportunity.

- 3) During the public comment period, ODOT received multiple comments regarding the connector requirements and the requirement that charging ports provide 150 kW or greater. Commenters expressed concern that requiring CCS connectors could unnecessarily limit station design, particularly for applicants interested in meeting the 3-megawatt threshold through megawatt-level charging.

When Federal Highway Administration published the final rule for Title 23 CFR 680 on Feb. 28, 2023, they stated:

“FHWA decided not to broaden the applicability of this final rule to include minimum standards for medium- and heavy-duty EV charging infrastructure primarily so as not to preempt the pace of technological innovation.”

This flexibility supports allowing a range of connector types and charging configurations.

ODOT agrees with the comments received. Accordingly, ODOT has removed the requirement to provide specific connector types. Under ODOT’s grant agreement with FHWA for medium- and heavy-duty charging projects, each station must provide a minimum of four ports capable of delivering at least 150 kW simultaneously. This is a **minimum** standard. Applicants may propose **any configuration or connector type** that best serves the vehicles expected to use the station, provided that at least four ports meeting the 150kW minimum are included.

FAQ

How are projects going to be ranked upon their ability to exist beyond the minimum 5-year Period of Performance?

Section 2.1 of the scoring criteria requests that applicants provide their plan for continued operation of the charging infrastructure beyond the 5-year Period of Performance. This section is worth up to 15 points, and ODOT will consider this plan in its evaluation of that section.

Are these programs at risk of rescission because of federal Executive Order 14154 “Unleashing American Energy”?

The State of Oregon is currently engaged in active litigation related to the pause on obligations for the Charging and Fueling Infrastructure program that was implemented under Executive Order 14154. This issue is being addressed through the courts, so ODOT cannot speculate on potential like outcomes rescission of funds. The current litigation

concerns the pause on obligations, not the cancellation of funding, and ODOT will continue to follow all federal guidance as the situation evolves.

What specific connector type requirements are there?

ODOT has not included a specific connector type requirement in this funding opportunity. Please refer to the Summary of Changes section of this document for further information.

Will ODOT work with awardees on things like NEPA clearance and BABA requirements?

Yes, ODOT has a defined NEPA process for EV charging infrastructure projects. Post award, ODOT's NEPA team will work with the grantee to acquire all documentation necessary to gain NEPA clearance. For BABA, ODOT has adopted the American Association of State Highway Transportation Officials [Domestic Materials Self-Certification Form](#). Interested applicants should familiarize themselves with this form and work with their manufacturer(s) accordingly.

Is this funding only for new sites, or can it go towards existing sites that have megawatt-scale capacity and are looking to expand higher powered truck charging?

Existing sites are eligible for funding if they can provide at least 3 megawatts of new nameplate capacity beyond what is already available at the site.

Can you combine the grant with financing for the infrastructure by third parties?

These grants are subject to a 30% match requirement (see section 3.2 of the NOFO).

Are there any location requirements for the sites, or can they be located anywhere along the interstate provided that they are within 1-mile of the nearest interstate exit for the I-5 projects, and 5-miles of the nearest interstate exit for the I-84 project?

Applicants may propose any location along the interstate provided that the two CFI funded project sites on I-5 are within one mile of the nearest interstate exit, and the CRP funded project site on I-84 is within five miles of the nearest interstate exit.

Can you confirm these projects are "previously obligated" and thus have only the 55% Buy America threshold, vs 100%?

As of Aug. 31, 2026, FHWA has not yet updated its Build America Buy America requirements for EV chargers from 55% to 100%. ODOT is actively monitoring this situation, and prospective applicants are encouraged to track BABA updates via the [federal register](#). The State of Oregon is currently engaged in active litigation related to the pause on obligations for the Charging and Fueling Infrastructure program that was implemented under Executive Order 14154. This issue is being addressed through the courts, so ODOT cannot speculate on potential like outcomes rescission of funds. The current litigation concerns the pause on obligations, not the cancellation of funding, and ODOT will continue to follow all federal guidance as the situation evolves.

If a hazardous site was remediated/capped by the state or federal government, would it fail the NEPA readiness evaluation?

The specific type of remediation matters. First, grantees need to verify the depth and extent of contamination beneath any cap and assess whether planned infrastructure or excavation work will disturb areas below that level. This information can be found on [Department of Environmental Quality's Environmental Cleanup page](#). If that documentation shows that the proposed project would intrude into the contamination zone, then Applicants would receive a score of zero for their NEPA readiness criteria. If that documentation shows that the proposed project would not impact the contamination zone, then Applicants may check the box for no on the NEPA readiness criteria response form. Ultimately, grantees must exercise due diligence—confirming that their design adheres to DEQ remediation criteria and does not exceed allowable contamination thresholds—to avoid triggering expanded NEPA review.

Does the 9/30/27 NEPA deadline apply for the CRP funded site?

Yes.

Can you provide a PDF version of the application form outside of Cognito for review of all the required responses?

Yes, if you'd like a PDF copy of the application form, please email MHDZEV@odot.oregon.gov to request a copy. Please note, **all applications must be submitted online via the Cognito response form.** The PDF should only be used as a preview of the application form.

