

Wisconsin Electric Vehicle Infrastructure Plan

Wisconsin Department of Transportation 2025 PLAN





WisDOT Division of Budget and Strategic Initiatives Administrator's Office 4822 Madison Yards Way Room S914 P.O. Box 7910 Madison WI, 53705



September 9, 2025

Linda Swan, Acting Division Administrator FHWA – Wisconsin Division 525 Junction Rd, Suite 8000-S Madison, WI 53717

Dear Ms. Swan,

I am pleased to present the Wisconsin Department of Transportation (WisDOT) 2025 Wisconsin Electric Vehicles Infrastructure Plan. WisDOT is resubmitting its previously approved state plan with modifications that are consistent with and expressly permitted by the Federal Highway Administration's (FHWA) interim final guidance for the National Electric Vehicle Infrastructure Formula Program (NEVI), released on August 11, 2025.

This plan outlines how Wisconsin intends to use NEVI Program funds, both obligated and unobligated, for Fiscal Years 2022-2026. It also includes provisions for a Community Engagement Outcomes Report (as per 23 C.F.R. 680.112(d)) and a description of physical and cybersecurity strategies (as per 23 C.F.R. 680.106(h)).

WisDOT is committed to providing a transportation system that maximizes the safe and efficient movement of people and products throughout the state in a way that enhances economic productivity, Our staff continues to seek opportunities to enhance programs, services, activities, and facilities while partnering with FHWA to achieve our goals.

Sincerely,

Lea Collins-Worachek
Division Administrator
Division of Budget and Strategic Initiatives
Wisconsin Department of Transportation

1	CON	MUNITY ENG	AGEMENT OUTCOMES REPORT	1-1			
	1.1	Community En	ngagement Tools	1-1			
	1.2	Community En	gagement Outcomes				
2	NEVI FUNDS DEPLOYMENT						
	2.1	Plan for Comp	liance with Federal Requirements	2-6			
3	PHYSICAL SECURITY AND CYBERSECURITY						
	3.1	of Payment Information					
	3.2						
	3.3						
FIG	aUR	ES					
			esignated Alternative Fuel Corridors and Round 1 Awarded Locations	2-4			
_			.5 Evaluation Zones				
TAI	BLE	S					
Tabl	e 1-1:	: Key Engagemer	nt Tools and Activities	1-1			
			gagement by Type				
Tabl	e 21	: Wisconsin NEV	I Funds by Fiscal Year	2-3			
ΔC	ROI	NYMS					
		ion / Acronym	Definition				
	CFR 6		National Electric Vehicle Infrastructure Standards and Requirements				
AFC			Alternative Fuel Corridor				
CIA	<u>'</u>		Central Intelligence Agency				
EV			Electric Vehicle				
EVS	E		Electric Vehicle Supply Equipment				
FHWA			Federal Highway Administration				
FY			Fiscal Year				
MPO			Metropolitan Planning Organization				
NEV	1		National Electric Vehicle Infrastructure Program				
PCI-DSS			Payment Card Industry Data Security Standards				
RFP			Request for Proposals				
RPC	•		Regional Planning Commission				
WE			Wisconsin Electric Vehicle Infrastructure				
WisD0T			Wisconsin Department of Transportation				





WEVI PLAN AND NEVI GUIDANCE CHAPTER CORRELATION

The Wisconsin Electric Vehicle Infrastructure (WEVI) Plan is organized into three chapters containing all the content requirements from the updated guidance provided on August 11, 2025. This table correlates the WEVI Plan chapters to the requirements outlined in the most recently released National Electric Vehicle Infrastructure (NEVI) Formula Program Interim Final Guidance document.

WEV	I Plan Chapters (1-3)	NEVI Formula Program Interim Final Guidance Requirements		
1	Community Engagement Outcomes Report	Bullet 2 per 23 CFR 680.112(d)		
2	NEVI Funds Deployment	Bullet 1		
3	Physical Security and Cybersecurity	Bullet 3 per 23 CFR 680.106(h)		

The Wisconsin Department of Transportation (WisDOT) submits this state Electric Vehicle Infrastructure Deployment Plan consistent with the Federal Highway Administration's (FHWA's) interim final NEVI guidance released August 11, 2025. As expressly permitted by the interim final guidance, WisDOT is resubmitting its previously approved state plan for fiscal year (FY) 2025. WisDOT disagrees with the legality of FHWA's revocation of previously approved state plans and the need to resubmit state plans for fiscal years 2022-25. Wisconsin is party to litigation challenging that revocation in *Washington v. Dept. of Transportation*, No. 25-cv-00848-TL (W.D. Wash.), in which the district court enjoined the revocation of certain state plans for fiscal years 2022-25. By submitting this state plan, WisDOT does not waive, and instead expressly reserves, any rights, claims, or defenses it may have regarding FHWA's actions regarding the NEVI Formula Program in that case or otherwise. All of WisDOT's current and future submissions related to the NEVI Formula Program are made subject to this reservation of rights.





1 COMMUNITY ENGAGEMENT OUTCOMES REPORT

The following section provides further detail on the engagement tools used by WisDOT. These strategies have been implemented throughout the WEVI Program and continually employed to gather feedback and input.

Table 1-1 summarizes Wisconsin's public engagement strategies during the WEVI Program and Plan development.

1.1 Community Engagement Tools

Table 1-1: Key Engagement Tools and Activities

Activity	Engagement Highlights		
Electric Vehicles in Wisconsin Website	32,748 total page views		
Informational Material Dissemination	Sent to over 1,250 contacts		
Comment Submissions	427 total comments received		
Webinars	692 total participants 201 total comments		
Stakeholder Meetings	122 meetings		
Metropolitan Planning Organization (MPO) and Regional Planning Commission (RPC) Meetings	155 attendees		
WEVI Presentations	29 events Over 2,100 participants		
Mapping Tools	27,117 total page views		
Social Media	29,984 reached 3,585 engagements 107 clicks		





1.2 Community Engagement Outcomes

1.2.1 Stakeholder Engagement

The stakeholders identified in **Table 1-2** were engaged using the tools described above:

Table 1-2: Stakeholder Engagement by Type

Stakeholder Type	Organizations Engaged
Local and Tribal governments	18
State Agencies	7
Utilities	14
Private Businesses	40
Non-profit organizations	31
Education and Healthcare	11

1.2.2 Outcomes of Community Engagement Activities

This section summarizes Wisconsin's general engagement outcomes. The outcomes include Wisconsin's outreach in educating stakeholders and the public about the NEVI Program and the WEVI Plan, and how this outreach has led to feedback that continues to develop Wisconsin's electrification approach.

Stakeholders were supportive of exploring EV initiatives. The strategic placement of Electric Vehicle Supply Equipment (EVSE) can yield long-term returns and job creation, with local governments and utilities playing critical roles in ownership and operation.

The NEVI Program presented funding opportunities, however, concerns remained about EV affordability, grid capacity, battery range, and the adequacy of EV infrastructure. Specific challenges cited included delays in ongoing installations, supply chain issues, and unclear federal guidelines, especially regarding EVSE specifications and funding. Stakeholders advocated for transparency, public input, and clarity on the allocation of funds. It was suggested that deployment strategies should consider contract bidding for out-of-state companies, accessibility to amenities, local zoning alignment, and site design to accommodate various vehicle types.

Stakeholders, too, sought clarity on the average costs of NEVI-compliant EVSE and funding allocation by WisDOT, as well as plans for site locations and priority areas.

Discussions also focused on the 80%/20% cost match requirement and accessibility. Wisconsin incorporated the feedback that was learned through stakeholder engagement into the first round Request for Proposals (RFP) and the following round.





2 NEVI FUNDS DEPLOYMENT

This section details Wisconsin's overall strategy for installation of EV charging infrastructure and associated policies to meet the compliance standards of the NEVI Program and the vision and goals for EVSE deployment in the state.

To be considered "fully built out," Wisconsin is working to establish a network of publicly accessible charging stations on Wisconsin's Alternative Fuel Corridors (AFCs), which are shown in **Figure 2-1**. The locations awarded through Round 1 of the WEVI Program are also indicated in this figure. WisDOT plans to award projects in the evaluation zones designated in Round 1.5 of the WEVI Program which are shown in **Figure 2-2**. After the selection and award process for Round 1.5 is completed, Wisconsin will submit the necessary materials to certify its AFC system as "fully built out" to FHWA.

Once certified, Wisconsin will address EVSE gaps along other regional routes. The state will prioritize filling these gaps rather than focusing on redundancy until sufficient EVSE infrastructure is established across all areas of the state.

Through the NEVI Program, Wisconsin will receive \$78.65 million and has already obligated \$24 million to awarded projects. Additionally, that state has \$54.6 million in unobligated NEVI funding. A detailed breakdown of funding by fiscal year, including how Wisconsin has allocated obligated funds and plans to utilize the unobligated funds, can be found in **Table 2-1** below.

Table 2--1: Wisconsin NEVI Funds by Fiscal Year

	FY 2022	FY 2023	FY 2024	FY 2025	Estimated FY 2026	Total
Total	\$11,642,061	\$16,753,057	\$16,753,173	\$16,753,188	\$16,753,222	\$78,654,701
Obligated Funds	\$11,642,061	\$12,367,490	\$ 0	\$0	\$0	\$24,009,551
Unobligated Funds	\$0	\$4,385,567	\$16,753,173	\$16,753,188	\$16,753,222	\$54,645,150
Plan for Funding Utilization	Round 1 RFP	Round 1 RFP + Round 1.5 RFP	Round 1.5 RFP	Post-Full Build Out	Post-Full Build Out	

WisDOT has obligated funding for the entirety of FY 2022 and a substantial portion of FY 2023 to projects awarded during the First Round Request for Proposals (RFP). In Round 1, WisDOT awarded 53 projects along the state's Alternative Fuel Corridor system, as illustrated in **Figure 2-1** on the following page.

Currently, WisDOT is soliciting applications for the second round of funding, known as the "Round 1.5 WEVI Request for Proposals." This round of funding will utilize the remaining FY 2023 and FY 2024 funds to support additional projects along the Alternative Fuel Corridor system. As indicated on page 2-5, WisDOT intends to award projects that address "coverage gaps," as shown in **Figure 2-2**, along with additional high-quality and cost-efficient projects in which WisDOT receives applications to add coverage to the AFC system.





BAYFIELD CHIPPEWA DUNN SAINT CROIX MENOMINEE OCONTO MARATHO EAU CLAIRE PIERCE PEPIN ORTAGE BUFFALO GREEN FOND OZAUKEE WEVI Round 1 Awarded Locations **Designated Alternative Fuel Corridors** Source: Planning, Environment, Realty (HEP) GIS Website, Federal Highway Administration, US Department of Transportation

Figure 2-1: Wisconsin's Designated Alternative Fuel Corridors and Round 1 Awarded Locations





DL Superior Marquette US-2 East US-51 North US-51 South US-53 South US-41/US-141 Eau Claire er Bay Appleto Oshkosh Rochester Tomat Fond du Lac M Qukee Milwaukee Jane ville Kenosha Cedar Falls Dubuque Waukegan

Figure 2--2: WEVI Round 1.5 Evaluation Zones

Once certified as fully built out, WisDOT will allocate unobligated NEVI Program funds by focusing on several key areas. These include the following:

- High-demand locations and charging on significant routes
- Tourism and destination charging
- Supporting economic development
- Efficient utilization of funds by cost-efficient projects
- Areas with limited or no public charging availability
- Electrification of medium-and-heavy duty vehicles





2.1 Plan for Compliance with Federal Requirements

Wisconsin will meet all applicable federal laws and satisfy all the requirements of <u>23 CFR 680</u>. All contracts related to the program include the minimum standards and requirements necessary for implementation of the NEVI Program. Program applicants are required to adhere to all state and federal requirements throughout the duration of the WEVI program.

3 PHYSICAL SECURITY AND CYBERSECURITY

The State of Wisconsin and WisDOT recognize cybersecurity's critical role in the successful deployment of EVSE across the state. Protecting the EVSE network, the surrounding infrastructure, and the personal or business information of EVSE users, owners, and operators is integral for EVSE cybersecurity.

Ensuring Wisconsin assets and programs are secure from cyber threats is a high priority. As EVSE is deployed across the state, Wisconsin will apply the same level of cybersecurity rigor it applies to all its infrastructure needs. WisDOT will comply with FHWA guidance regarding cybersecurity as provided in the NEVI Final Rule, <u>23 CFR 680</u>.

EV charging stations transmit information at three connections that may be subject to a cyberattack:

- The transmission of payment information
- The connection of the electrical grid to the charging station
- The connection of the EV to the charging station

3.1 Transmission of Payment Information

Traditional petroleum-based refueling has one avenue of cyberattack: the transmission of payment information. A debit or credit card transmits the customer's personally identifiable information between the fueling infrastructure and their financial institution. This process is comparable to EV charging stations.

NEVI requires chargers and charging networks to comply with appropriate Payment Card Industry Data Security Standards (PCI-DSS). Any security measures taken by the site operator shall meet or exceed published standards, and software updates must be made promptly to prevent a breach of cardholder data.

3.2 Encryption

The connection of EVs to EV charging stations and then to the electrical grid requires an ongoing exchange. Encrypting this data is the primary method of defense against cyberattacks.

Encryption protects data from being stolen, changed, or compromised. It scrambles data into a secret code that can only be unlocked with a unique digital key.

NEVI recommends following the <u>National Institute of Standards and Technology (NIST) guidelines</u> for data encryption. The three core principles that guide encryption are derived from the Central Intelligence Agency (CIA) triad of confidentiality, integrity, and availability.





- Confidentiality: Ensuring information is readable only by intended recipients and is protected from unauthorized third parties
- Integrity: Ensuring any modification can only be made by authorized agents
- Availability: Ensuring queries by the user are responded to within an appropriate timeframe



3.3 Best Practices

Wisconsin continues to evaluate additional requirements to enhance security, which may include:

- In case of any data security breach, the site Owner/Operator must contact the Department within 24 hours and advise on the measures being taken to mitigate adverse circumstances.
- Employees or others involved in operation and maintenance with access to equipment and data shall be in the United States.
- Independent audits shall be performed annually by a third-party qualified security assessor.



