

Illinois Electric Vehicle (EV) Infrastructure Deployment Plan – 2025 Update

Submitted to the Federal Highway Administration September 12, 2025

The Illinois Department of Transportation (IDOT) submits this state Electric Vehicle Infrastructure Deployment Plan consistent with FHWA’s interim final NEVI guidance released August 11, 2025.

Use of Unobligated Funds for Fiscal Years 2022-2026

As expressly permitted by the interim final guidance, IDOT is resubmitting its previously approved state plan for FY 25. IDOT 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. Illinois 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, IDOT 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 IDOT’s current and future submissions related to the NEVI Formula Program are made subject to this reservation of rights.

The Illinois Department of Transportation has a total of \$5.8 million in unobligated FY2022-2025 funding. This funding is allocated for projects at 8 locations selected as part of the Round 2 Notice of Funding Opportunity detailed in the FY 25 plan. These locations are all within Metropolitan Planning Organization (MPO) boundaries and are in the process of being added to MPO TIPs.

Consistent with previous NEVI plans, IDOT intends to complete full-build out of the Alternative Fuel Corridors (AFCs) through awards made under the second Notice of Funding Opportunity, issued in November 2024 and currently pending public announcement. Illinois intends to submit documentation to FHWA in support of a Full Build Out determination in Fall 2025. Illinois is developing a third Notice of Funding Opportunity to be issued in late fall 2025 using currently-obligated funding. This Notice of Funding Opportunity will focus on the priorities identified in the FY 24 and 25 plan updates, including non-interstate US routes and scenic byways. This Notice of Funding Opportunity will also continue the approach outlined in the FY 24 plan update of considering funding projects designed to support medium and heavy duty vehicles on freight corridors and at other strategic locations.

Illinois is allocated a remaining \$31.6 million in FY 2026 NEVI funds. As detailed in “Phase 3” as outlined in the FY24 NEVI plan, IDOT intends to spend those funds to further expand access to charging off the Alternative Fuel Corridors, including state routes in areas that do not already have sufficient access to EV charging infrastructure and at strategic locations on the alternative fuel corridors that provide additional needed access for electric vehicle drivers in Illinois and economic benefits to local communities. We anticipate additional focus on medium and heavy-

duty charging along key freight corridors and in locations with high potential for electric medium and heavy duty vehicle adoption.

Stakeholder and Public Engagement Outcomes

State Agency Engagement

IDOT continues to coordinate across Illinois agencies to facilitate collaborative progress towards the state's goals around EV adoption, charging infrastructure deployment, workforce development, and EV supply chain development in Illinois. In addition to continued biweekly meetings with the Illinois Electric Vehicle Interagency Working Group (as described in the 2024 plan), IDOT meets regularly with the Illinois Environmental Protection Agency (IEPA) to coordinate between NEVI and IEPA's charging infrastructure funding opportunities, including IEPA's Climate and Equitable Jobs Act (CEJA) EV charging program. When IDOT opened the Illinois NEVI Round 2 application in November 2024, IDOT also provided summary slides covering the NEVI program to the Illinois Commerce Commission (ICC), Illinois Department of Commerce & Economic Opportunity (IDCEO), and the IEPA for inclusion in their upcoming presentations to increase awareness.

Beyond Illinois state agency engagement, IDOT has coordinated with other states through events such as the AASHTO/NASEO annual meeting in Detroit in October 2024, the MAASTO annual meeting in August 2025, and regular virtual meetings to discuss NEVI best practices and lessons learned.

Looking forward, IDOT will coordinate with multiple Illinois agencies to update its communications strategy for the Round 3 application period and to verify that a robust number of stakeholders have an opportunity to apply. Similarly, IDOT will continue to coordinate with other Illinois state agencies while developing the Round 3 Notice of Funding Opportunity (NOFO), evaluating applications, and administering the Round 3 grant awards, so that IDOT can best leverage NEVI funds to advance EV adoption and improve EV accessibility for Illinois residents.

Grantee Engagement

Kickoff Meetings

Following grant agreement execution, IDOT conducted kick-off meetings with each grantee and provided a comprehensive grantee support package to assist the grantee in navigating the grant process. To date, IDOT has completed six of these kickoff meetings.

During each kick-off meeting, IDOT provides an overview of the NEVI Program, Illinois's goals, and key sections of the Illinois NEVI Grant Agreement. The agenda includes a detailed start-up discussion, including reviewing the grantee's responsibilities (e.g., schedule and deliverable requirements) throughout the grant period. The meeting also covers financial responsibility and federal compliance topics, such as specific invoicing requirements, the cadence of invoicing, and project costs that are eligible for NEVI reimbursement.

Monthly Check-in Meetings

IDOT established a monthly progress check-in meeting with each of the grantees. The grantees provide IDOT with updates on each project's progress and discuss any challenges that they are facing through the design and construction periods of the grant. During these meetings, IDOT has assisted grantees with implementation issues such as:

- Resolving permitting issues with local utilities
- Leveraging utility incentives for make-ready work
- Navigating EV supply equipment vendor changes to meet federal compliance
- Formalizing and approving Site Host Agreements to meet federal and state requirements
- Coordinating on submission of key cybersecurity and equipment testing information to adhere to NEVI Final Rule compliance

Going forward, IDOT plans to continue these monthly progress check-in meetings to assist its current and future grantees.

Community Engagement

Virtual Engagement - Website, Email, and Social Media

IDOT has continued to update its NEVI website to publicize program updates, feedback survey opportunities, information on relevant state laws, past NEVI deployment plans, and other resources for applicants and stakeholders. Prior to the Round 2 application cycle launch in November 2024, IDOT posted application information and materials to the website to enable potential applicants to familiarize themselves with requirements and begin preparing application documents.

IDOT and NEVI program stakeholders have also utilized email to communicate about the program. Stakeholders can sign up for the EV email listserv through the IDOT NEVI website to receive program updates, application deadline reminders, and notification of opportunities for program feedback via surveys. To reach stakeholders that may not be on the email listserv, IDOT also posts these updates and opportunities to their Facebook, LinkedIn, and X (formerly Twitter) accounts and encourages other relevant state agencies and community organizations to repost for further reach.

Furthermore, IDOT created a dedicated email account to field questions from interested applicants during the Round 2 application process. Throughout Round 2, IDOT replied to 26 queries from 18 different entities. Commonly asked questions were regularly added to an FAQ document posted to the IDOT NEVI webpage to increase clarity for the wider applicant pool. Providing dedicated support and regularly updating the FAQs helped make the application process more accessible to all stakeholders.

Round 2 Informational Webinar

After the Round 2 application cycle opened on November 8th, 2024, IDOT hosted an

informational webinar for interested applicants on November 21, 2024, at 2:00 pm CT. The webinar covered an overview of the NEVI program, the Round 2 application schedule, application materials and process, evaluation criteria and process, and a Q&A session. There was a total of 64 live attendees, including representatives from utilities, charging network operators, government agencies, non-profit organizations, and other commercial enterprises. To ensure the information covered is available to a wide audience, the webinar was posted on the IDOT NEVI website on November 22nd, 2024.

Equity and Engagement Webinar

In December of 2024, IDOT held a webinar for a collection of stakeholders, both private and public, across Illinois. The webinar provided background on the NEVI Program, how IDOT is administering the Program so far, and how the NEVI Program can impact different communities in Illinois, including DACs. The webinar was also a listening session to receive feedback on the Program, such as how to use siting criteria for the betterment of Illinois residents and how to evaluate the benefits of NEVI projects for DACs and other Illinois communities.

Future Activities

IDOT is actively working to enhance transparency and public engagement by planning updates to their website that will feature a detailed map and database on the Illinois NEVI Program. Through this interactive tool, users will be able to track the status of NEVI-funded charging station development across the state, view site locations, and access up-to-date information as projects advance from planning to construction to operational for public use. This new resource will allow Illinois residents and other stakeholders to easily monitor the progress of NEVI site construction and operations for all NEVI awards. By providing live updates and increased visibility, IDOT aims to keep the public informed and encourage broad community participation in the success of the IDOT NEVI Program.

Similar to the survey IDOT administered during Round 1, IDOT has also prepared a survey for Round 2 grant applicants, which it will administer after announcing Round 2 awards. The survey will focus on the application experience, recommendations for the program's trajectory in Round 3, and potential challenges or risks that IDOT can help mitigate in future rounds.

Based on previous stakeholder feedback, IDOT understands that potential site hosts and applicants are looking for support in connecting with each other to identify partnerships for future NEVI application rounds. As such, in anticipation of the Round 3 NOFO, IDOT will establish tools (e.g., an opt-in partnering database) to facilitate connections between stakeholders.

Utility Engagement

Compiling Utility Requirements

After Round 1 award decisions, IDOT worked to prepare the selected grantees and their utilities for efficient construction of DC Fast Charging stations by coordinating with the utilities to compile a comprehensive list of requirements that will apply to grantees once selected. Utilities

responded with the anticipated processes that selected NEVI grantees should follow to initiate and progress through service requests, including any specific requirements or forms that the grantees would be responsible for completing. IDOT compiled these materials to foster efficient coordination between grantees and utilities as they navigate service request processes.

Following the close of the Round 1 application period, IDOT hosted debrief meetings with utilities that completed the Utility Accelerator Form to solicit feedback on the process of completing the form and its content to improve the form for future application rounds. These discussions also provided an opportunity for IDOT and Illinois utilities to confirm that NEVI grantees were not receiving reimbursement for the same cost from both NEVI and utility funding programs. Finally, utilities were asked about any concerns or challenges that NEVI Round 1 grantees should be aware of as they begin initiating utility service requests.

Utility Coordination Kick-off Meetings

Over the past year, IDOT has conducted nine utility coordination meetings between grantees and their respective utilities, covering all grantee sites within the utility's jurisdiction. Both the grantees and utilities have noted that these coordination meetings enabled faster confirmation of the final site plan design, helped them confirm construction needs, and kickstarted their ongoing coordination. IDOT will continue this practice going into future rounds of funding for the NEVI Program.

Round 2 NOFO Materials

Based on past round success, IDOT replicated the same utility requirements in the NEVI application materials with the Round 2 NOFO. The materials required utility coordination prior to submitting the application, and they were used to evaluate applications and speed up utility engagement following application selection.

Physical Security & Cybersecurity Strategies

Physical Security

During the Round 2 grantee selection, IDOT carefully evaluated each submitted plan to confirm that post-construction measures will effectively protect individuals using the stations as well as the charging infrastructure itself.

Cybersecurity

Cybersecurity Standards

IDOT's approach to cybersecurity has been developed in close coordination with the Illinois Commerce Commission, an agency with specific expertise on cybersecurity related to electrical infrastructure. This coordination ensures that Illinois is developing consistent practices across state programs. IDOT created a list of cybersecurity standards to assist the grantees in developing compliant cybersecurity plans. The list of standards is based primarily on the National Institute of Standards and Technology (NIST) Cybersecurity Framework (CSF), as well

as North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) standards and requirements. The list of cybersecurity standards created by IDOT is intended to guide the grantees on developing compliant cybersecurity plans that include policies and procedures addressing key cybersecurity topics including:

- Risk management
- Asset, change, and configuration management
- Situational awareness
- Event and incident response
- Third-party/supply chain risk management
- Identity and access management
- Threat and vulnerability management
- Payment systems
- Physical security management
- Data protection

Technical Assistance

IDOT offers technical assistance meetings to grantees as they develop their cybersecurity plans. During these meetings, IDOT provides additional guidance on developing compliant cybersecurity plans and answers questions so that grantees can include all required cybersecurity standards and topics in their cybersecurity plans. To date, IDOT has met with two grantees to provide guidance and answer questions.

Compliance Reviews

IDOT also implemented a process to verify that grantees' cybersecurity plans are compliant with all federal requirements. IDOT created a checklist to verify that plans address each required cybersecurity area or topic. IDOT utilizes that checklist to review each cybersecurity plan. If deficiencies are identified, IDOT provides feedback on the deficiencies and requires the grantee to revise their cybersecurity plan no later than six months from the date of feedback. IDOT also offers to meet with the grantee after identifying deficiencies to answer additional questions and provide guidance. To date, IDOT has reviewed two grantee cybersecurity plans covering 16 different site locations and 60 charging ports.