

NO. 24-060NG – Request for Information

1. INTRODUCTION

We are pleased to submit this Request for Information (RFI) to the Wyoming Department of Transportation (WYDOT) regarding the posted Request for Information (RFI) associated with the National Electric Vehicle Infrastructure Formula Program (NO. 24-060NG). We appreciate your interest in collaborating with stakeholders on this initiative.

Below is the requested contact information associated with PRECorp's RFI submittal.

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2. TECHNICAL RESPONSE

1. GENERAL

- a. **NO COMMENT** *Which site(s) along the Interstates would your organization be interested in developing? These can be identified in the NEVI plan or other sites along the interstates.*
 - *If there are any additional sites throughout the state that your organization would be interested in developing please state where those locations would be.*
- b. What do you perceive as the biggest challenges or barriers to implementing NEVI sites in Wyoming?

Sparse Population Density: Wyoming has one of the lowest population densities in the United States, which may make it economically unfeasible for businesses to invest in DCFC infrastructure due to the potentially low usage rates.

Limited Electric Vehicle (EV) Adoption: Wyoming has relatively low adoption rates of electric vehicles compared to other states, which may deter businesses from investing in DCFC infrastructure due to uncertain demand.

Infrastructure Costs: Building DCFC sites requires significant upfront investment in infrastructure, including electrical grid upgrades, installation of charging stations, and ongoing maintenance costs. In areas with low population density like Wyoming, the return on investment may be less attractive for investors.

Grid Capacity and Stability: Upgrading the electrical grid to support the increased demand from DCFC sites can be a challenge, especially in rural areas with limited existing infrastructure. Ensuring grid stability and reliability is essential for the effective operation of DCFC sites.

- c. Do you have experience in deploying charging infrastructure in rural, remote, and underserved regions and communities?

No

- d. **NO COMMENT** *How does your organization identify optimal locations for charging? Please provide all factors used for consideration and how your organization evaluates these factors for considered locations.*

- e. If you are an existing EVSE operator along an AFC, would your organization be interested in the potential to upgrade existing DCFC charging stations to meet NEVI requirements?

PRECorp dose not own any EV Charging Stations

2. PARTNERSHIPS AND BUSINESS MODELS

- f. **NO COMMENT** *Is there a business model or procurement contracting method that would prevent you from participating in the WYDOT NEVI plan? If so, what is it?*

- g. **NO COMMENT** Please provide your organization’s viewpoints on contracting methods for DCFC infrastructure, including leasing and/or revenue sharing agreements. Have you implemented any cost/revenue sharing models for the operation of DCFC EVSE? If yes, please share what you can about the terms of those partnerships.

- h. **NO COMMENT** WYDOT may require validation that the charging station operator has site control, such as a lease, option to lease, letter of intent, or other similar agreement between the operator and the property owner (if different entities) that confirms the charging station operator has permission to locate the charging infrastructure on the property for at least five (5) years. Provide an overview of your organization’s approach to installing and operating EVSE on private land. Will you be leasing land or owning?

- i. **NO COMMENT** What information about electrical service at a proposed site can you provide during the application process? How do you plan to coordinate with utility providers to evaluate electrical service at a proposed site in advance of an application?

3. TECHNICAL REQUIREMENTS

- j. **NO COMMENT** Please describe the EV charging equipment you would propose to deploy in Wyoming.

- k. **NO COMMENT** *Are there any facets of the NEVI guidelines that your EVSE cannot meet?*

- i. What functional site design elements (beyond those required by the NEVI Program rules) should WYDOT consider in developing its minimum technical requirements and evaluation criteria for sites? Examples would be the capacity per site, installing more than (four) 4 chargers per site, views on spacing of chargers, traveler amenities, technology solutions, ability to expand locations, etc.

PRECorp recommends that consideration and or preference be given to DC fast chargers and are combing with battery storage, which can make economic sense for several reasons:

Reduced Demand Charges: Commercial and industrial electricity consumers often face demand charges based on their highest level of electricity usage during a billing period. By using battery storage to manage demand and avoid spikes in energy consumption during charging sessions, businesses can lower their demand charges and save money.

Backup Power and Resilience: Battery storage can provide backup power in case of grid outages, ensuring continuous operation of DC fast chargers even during periods of system outages.

Optimized Charging Infrastructure: Coupling battery storage with DC fast chargers allows for more efficient use of charging infrastructure. The batteries can be used to supply energy during periods of high demand or when electricity prices are high, ensuring that the chargers operate at maximum efficiency and profitability.

When considering the potential of low adoption rates of electric vehicles (EVs) in Wyoming, there could still be potential benefits for utilities to partner with entities investing in DCFC (Direct Current Fast Charging) infrastructure coupled with battery storage, if an agreement could be reached that allowed for the utility to dispatch the battery to control systems peaks.

The specifics of such an agreement would need to be worked out amongst the Parties and would be dependent on a number of factors, which would need to be evaluated to determine if there is a potential benefit for the utility, such as the size of the proposed battery storage and the existing infrastructure (is it adequate to support dispatching the batteries in managing system peaks) to name a few. Therefore, it is conceivable that a DCFC combined with battery storage might not make sense everywhere, but where it could be deployed would potentially influence the economic viability of the proposed DCFC project.

4. FUNDING

- m. NO COMMENT *What financial structure is most feasible for your organization, and will you provide the non-federal match required by NEVI Program of 20% or possibly more?*
 - *Please describe the percentage of participation in construction costs would you desire or expect from public, federal, or private partners?*
- n. NO COMMENT *How do you believe the implementation approach could be structured to maximize private sector funding as the match required by FHWA for use of NEVI funds and to reduce the amount needed for a federal subsidy? Insight is welcomed on whether this could vary based on specific site conditions or locations.*

5. OPERATION AND MAINTENANCE

- o. **NO COMMENT** *Would the lack of Operations and Maintenance funding be a barrier to your participation?*
- p. **NO COMMENT** *How will your organization support continued operation of the EV network deployed beyond the five (5)-year agreement under the NEVI Program?*
- q. **NO COMMENT** *Please offer thoughts on the level and types of effort related to staffing requirements, monitoring systems, partnership arrangements, etc., to meet the 97% uptime requirement in the NEVI Program rules. What factors will influence the cost of meeting that 97% uptime requirement, and is there anything you view as within WYDOT's discretion or influence that can aid in achieving 97% uptime?*

6. ADDITIONAL INFORMATION

- r. Please provide any additional information that would be beneficial for WYDOT to consider when developing a Request for Proposal for the deployment of its NEVI plan. Respondents are requested to not provide proposals or marketing material and should instead provide detailed answers to the RFI questions.

WYDOT may invite respondents to meet and discuss the information provided in more detail.

PRECorp is willing to engage in discussions with WYDOT and share further details regarding the integration of DCFC and battery storage. We are open to collaborating with any organization interested in installing a DCFC in our service territory to clarify our existing rate structure.