EV CHARGING RELIABILITY & EXPANSION ACT

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I. INTRODUCTION & STATEMENT OF PURPOSE

Colorado stands at an inflection point. Global surface temperatures are already about 2°F warmer than pre-industrial levels, with human activity as the unequivocal cause and climate-related extremes (heat, drought, floods, wildfires) increasing in frequency and severity.[i] In the United States, 28 separate billion-dollar weather and climate disasters were recorded in 2023 alone, the highest annual count on record.[ii] Unless governments adopt materially different strategies, we risk destabilizing ecosystems, straining public infrastructure, and endangering both human and non-human life.

State governments have a unique and powerful role in shaping the policy structures that either accelerate or reverse these trends. Colorado has already chosen a path toward climate leadership: transitioning its electric grid, expanding renewable-energy deployment, and driving the adoption of electric vehicles (EVs) as a central decarbonization strategy. The state's Greenhouse Gas Pollution Reduction Roadmap sets targets for deep emissions cuts by 2030 and mid-century, and subsequent planning work is oriented around achieving roughly 100% clean electricity by 2040.[iii]

The Transportation Sector: Colorado's Largest Climate Lever

Transportation remains one of the highest-emitting sectors in both the U.S. and Colorado. Nationally, direct and indirect greenhouse gas emissions from transportation account for about 29% of total emissions—more than any other sector.[iv] In Colorado, transportation emissions remain comparable in scale to the utility sector and are projected to decline only if vehicle electrification and driving-reduction strategies succeed.[v]

Internal-combustion engine (ICE) vehicles are the single largest component of transportation emissions. By contrast, battery-electric vehicles produce significantly lower lifetime climate pollution. A major lifecycle analysis by the Union of Concerned Scientists finds that a typical battery-electric car generates roughly half the global-warming emissions of a comparable gasoline car, even after accounting for battery manufacturing and today's grid mix.[vi]

Colorado has deployed a suite of incentives to accelerate this transition, including:

- **State EV tax credits** (recently expanded in 2024–25 for new and used EVs).[vii]

- **Utility rebates and make-ready programs** through investor-owned and cooperative utilities for home, workplace, and public charging.[viii]
- **CDOT/Colorado Energy Office (CEO) corridor grants** using federal National Electric Vehicle Infrastructure (NEVI) formula funding and complementary state programs.[ix]
- **Local incentives and municipal fleet-transition policies**, including city-level rebates, preferential parking, and electrification of public fleets.[x]

But adoption cannot exceed infrastructure. A driver considering an EV is ultimately making a confidence decision: *Will the charging network be there when I need it, and will it work?* Current gaps—regional, technological, and reliability-related—pose real barriers, especially outside the Front Range.

This memo provides Colorado legislators with a structured, evidence-driven framework for addressing those barriers through a statewide reliability and infrastructure investment package. It also establishes a clear justification for backfilling the recently cancelled **$8.34 million** federal award that would have funded maintenance and reliability improvements for **363 charger ports** across **197 locations statewide**.[xi]

II. PROBLEM STATEMENT: ADOPTION IS SURGING, INFRASTRUCTURE IS NOT

A. Colorado is an EV Leader

Colorado is now a national leader in EV adoption.

- In the third quarter of 2025, Colorado topped the country in EV sales, with *nearly one in three* new vehicles sold being electric—a national record.[xii]
- Statewide EV registrations have grown from tens of thousands earlier in the decade to **more than 210,000 registered EVs** as of 2024.[xiii] This represents one of the fastest adoption curves in the Mountain West.

B. Regional Disparities Persist

Adoption is not evenly distributed.

- EV uptake is strongest along the **Front Range urban corridor**, where incomes are higher, trip distances are shorter, and public charging is more dense.[xiii]
- **Rural regions**—including the Western Slope, San Luis Valley, and Eastern Plains—show slower adoption, driven largely by sparse corridors, limited redundancy, and site-host uncertainty about maintenance and revenue.[xiii]
- **Tourism corridors** such as I-70, I-76, US-50, and US-160 experience heavy seasonal load but still have stretches with limited fast-charging coverage or older equipment with poor reliability.[xiii]

C. Charging infrastructure is insufficient and unreliable.

Colorado's charging network has grown rapidly but not yet proportionally to the EV fleet.

- As of 2024, Colorado has **over 6,500 public charging ports**, including more than **5,000 Level 2 ports** and about **1,400 DC fast-charging ports**, distributed across urban, suburban, and rural areas.[xiii]
- The **2023 Colorado Electric Vehicle Plan** sets a target of **7,500 public charging ports by 2030** and **1 million EVs on the road by 2030** as part of a broader strategy to support a clean transportation system.[xiv]
- Public data collected through state and federal tools (such as EValuateCO and NEVI reporting) show that many legacy or rural stations experience uptime significantly below the 97% performance standard now recommended in federal guidance for NEVI-funded chargers, with some stations reporting functional uptime closer to 80%.[xv]

Limited redundancy means that a single station failure can destabilize an entire corridor, creating "charging deserts" along otherwise critical routes and eroding consumer confidence.

D. Ambition vs. Adequate Funding

Colorado's goals are ambitious but achievable:

- **7,500+ charging ports installed by 2030**.[xiv]
- **1 million EVs on the road by 2030**. [xiv]
- **Roughly 100% clean electricity by 2040** in the power sector pathway that underpins the state's climate goals.[iii]

To date, the state has awarded roughly **$19.3 million in state dollars** for charging projects since 2018, helping build an initial network of stations in all regions.[ii] However, that level of state investment is modest when compared to:

- The size of the current EV fleet (over 210,000 EVs),
- The 2030 target of 1 million EVs, and
- The need to maintain and upgrade thousands of ports to meet modern reliability standards.

A rough planning heuristic is that maintaining and upgrading several hundred priority ports and filling remaining rural coverage gaps will require an order-of-magnitude investment beyond the cancelled $8.34 million grant—especially if Colorado wants to maximize NEVI and Inflation Reduction Act (IRA) matches. The proposed **$25 million one-time state appropriation** is calibrated to:

- **Backfill the cancelled $8.34 million** in reliability funding, and
- State match dollars attract federal NEVI formula and discretionary funds at upwards of 70–90% federal share, meaning every dollar the state commits can help unlock $2–$4 in federal investment — bringing total leveraged investment into the range of $50–$75 million or more for rural coverage and reliability.[xvi]

III. FEDERAL FUNDING LOSS & WHY THE STATE MUST ACT

On December 16, 2025, the Trump administration cancelled **$109 million** in previously awarded environmentally focused transportation grants for Colorado, including **$8.34 million dedicated to EV charging reliability and expansion.**[xi]

The cancelled award, provided through the **Electric Vehicle Charger Reliability and Accessibility Accelerator** under the Federal Highway Administration and U.S. Department of Transportation, would have:

- Repaired or replaced **363 existing charging ports**;
- Supported **197 locations statewide**, with a significant share in rural and corridor sites;
- Complemented **more than $60 million in recent state and federal investments** in public EV charging; and
- Advanced the federal goal of **500,000 EV chargers nationwide by 2030**, alongside Colorado's own goal of **1 million EVs by 2030**.[xi] [xiv]

Its cancellation creates an immediate reliability and maintenance gap and risks leaving aging, unreliable stations in service just as EV adoption accelerates.

Why the State Must Backfill the $8.34 Million

- **Colorado risks falling behind its EV plan targets.**
  Without dedicated maintenance funding, uptime and user experience will degrade faster than new chargers can be brought online, jeopardizing both the 2030 EV and port targets.[xiv]
- **Federal leveraging opportunities shrink.**
  NEVI formula and discretionary programs routinely match state dollars at 70–90% for priority corridors, particularly in rural and disadvantaged communities.[xvii] A **$8.34 million state backfill** can unlock roughly **$16–$25 million in federal support** for the same set of projects.
- **Rural reliability will deteriorate first.**
  Many of the cancelled projects were geared toward keeping existing corridor stations operable in rural regions. Without that funding, outages will cluster in places where redundancy is weakest—undermining rural confidence in EVs and harming tourism.[xi]
- **Colorado's climate and air-quality commitments depend on EV adoption.**
  Transportation electrification is a central strategy in the state's Greenhouse Gas Pollution Reduction Roadmap; experts note that no state can meet its climate goals without large-scale vehicle electrification.[v] [xiii]
- **Business and tourism impacts will compound.**

Corridor outages reduce visitor traffic, hurt small businesses at highway interchanges, and create reputational risk for Colorado as a clean-transportation leader.

Colorado has already invested **$19.3 million** in charging infrastructure since 2018.[xi] A **one-time $25 million state supplement** that both backfills the cancelled federal award and funds a broader reliability and rural-coverage program is squarely consistent with the state's existing strategy and prevents loss of federal match opportunities.

IV. EXECUTIVE SUMMARY

Colorado's transition to electric vehicles is accelerating quickly—EVs now make up nearly one in three new vehicle sales, and federal rules are pushing manufacturers rapidly toward electrification.[xii] But the charging network is not yet keeping pace. Reliability is inconsistent, rural gaps persist, and many existing stations have uptime around 80%, far below emerging best practice.[xv] That undermines public trust, especially outside the Front Range.

To secure Colorado's clean-transportation goals and maintain consumer confidence, the **EV Charging Reliability & Expansion Act** establishes a statewide framework to guarantee station uptime, rural corridor coverage, business-friendly deployment, and federal match maximization.

Core Pillars of the Act

1. **Reliability Standards**
    - Require public DC fast-chargers that receive state funds to meet a **97% uptime performance metric**, verified via automated reporting and periodic audits.
    - Align state standards with federal NEVI guidance so that stations qualify for future federal funds.
2. **Rural Corridor Buildout**
    - Provide **$18 million** in competitive grants for stations along **I-70, I-76, US-50, US-160, US-550**, and key tourism/agriculture corridors.
    - Prioritize redundancy (at least two DCFCs per site), 24/7 access, and co-location with existing rural businesses.
3. **Small-Business Charging Fund**
    - Dedicate **$5 million** for locally owned businesses and rural site hosts to add Level 3 chargers, with predictable revenue support and interconnection assistance.
    - Use grants and low-interest financing to ensure mom-and-pop stations and independent lodging operators can participate.
4. **Data & Accountability Center**
    - Invest **$2 million** to build a centralized dashboard and data platform for uptime, outages, utilization, and equity tracking.
    - Provide legislators, JBC staff, and the public with transparent, corridor-level performance metrics.

One-time state investment: $25 million

Expected federal leverage (NEVI + IRA + other grants): $50–$75 million

Projected outcomes:

- 200+ high-reliability stations statewide;
- Eliminated “charging deserts” along rural and tourism corridors;
- Increased EV adoption among cost-sensitive and rural households;
- Lower ozone and wildfire-related air pollution through accelerated fleet turnover.

This is the reliability-focused infrastructure package Colorado needs to make EVs genuinely viable for every region, not only the Front Range.

V. FISCAL MODEL & COST CURVE

2.1 Proposed Funding (One-Time Appropriation)

1. **Total: $25 million General Fund** (or Clean Air/Transportation-related cash fund, at the General Assembly's discretion).
    - **$18 million** — Rural corridor and reliability grants (capital and major maintenance).
    - **$5 million** — Small-business site-host & interconnection program.
    - **$2 million** — Reliability monitoring, data integration, and statewide dashboard.

2.2 Long-Term Costs

The program is intentionally structured as **non-recurring**. Ongoing oversight and data management can be absorbed by existing staff at CEO and CDOT with federal administrative match. No permanent FTE expansion is required beyond **1–2 time-limited positions** for program rollout and data analytics.

2.3 Federal Leveraging

Projects funded under the Act are expected to qualify for:

- **NEVI formula funding (FHWA)** — typically **80/20** cost share;
- **NEVI discretionary grants** — up to **70–90%** match for rural and disadvantaged communities;[xvi]
- **DOE grid-resilience grants** for interconnection and distribution upgrades;
- **IRA tax credits** for up to **30% of hardware investment** for eligible hosts.

Every **$1 state dollar** is expected to unlock **$2–$3** in federal and private investment, depending on corridor designation and project design.

2.4 Fiscal Risk: Low

- Hard appropriation cap;
- Competitive, criteria-based grants;
- No ongoing entitlement or automatic renewals;
- Uptime standards and minimum-usage requirements reduce stranded-asset risk for utilities and site hosts.

VI. EQUITY & COMMUNITY IMPACT

The Act is explicitly designed to improve energy and transportation equity by:

- Prioritizing **disadvantaged census tracts** and communities with high asthma, ozone, and $PM_{2.5}$ burdens for corridor and small-business grants.
- Ensuring **renters and lower-income households**, who are more likely to rely on public charging instead of at-home Level 2, have reliable and affordable options.
- Reducing **fuel-cost volatility** for vulnerable households by enabling cost-stable EV ownership.
- Lowering emissions along heavily trafficked freight and commuter routes that run adjacent to historically marginalized neighborhoods.
- Requiring station operators receiving state funding to adopt **transparent, posted pricing** and to publicly report fees and idle-time charges to prevent predatory practices.

VII. RURAL & REGIONAL BENEFITS

EV adoption will stall in Colorado unless rural confidence increases. The Act ensures that:

- Agricultural workers, tourism-sector employees, and Western Slope residents have **guaranteed corridor coverage** on key routes.
- Highway travelers stop and spend money in **rural towns** where charging is available, boosting local sales-tax revenue and small-business resilience.
- **Power-system upgrades** associated with new DCFC sites also support farm electrification, backup power, and rural grid resilience.
- As EV adoption grows and rural communities gradually reduce reliance on aging gasoline and diesel storage systems, rural fire-response agencies will face **fewer ignition risks associated with underground tanks, above-ground fuel storage, and liquid-fuel handling**, all of which are documented sources of fires, spills, and hazardous releases in rural areas.[xviii]

VIII. ECONOMIC DEVELOPMENT & JOB CREATION

Economic benefits include:

- **Skilled-trade job creation** for electricians, contractors, civil crews, and lineworkers;
- **New revenue streams** for small businesses—gas stations, diners, cafes, lodges, and attractions that host chargers;
- Improved **travel reliability** for tourism and outdoor-recreation hubs, supporting a core pillar of Colorado's economy;
- Expansion of a **Colorado-based EV services, software, and maintenance sector**, including data analytics and network operations;
- **Reduced long-term transportation costs** for firms that electrify fleets, freeing capital for wages and investment.

This is a high-return infrastructure upgrade with strong private-sector complements.

IX. IMPLEMENTATION PLAN

Lead Agencies

- **Colorado Energy Office (CEO)** – lead agency for grant awards, data collection, and reliability monitoring;
- **Colorado Department of Transportation (CDOT)** – corridor planning, federal compliance, and NEVI coordination;
- **Public Utilities Commission (PUC)** – rate design, interconnection standards, and utility program alignment.

Milestones

- **0–3 months:** Rulemaking; corridor and site-selection criteria; data-standard definition; initial application window.
- **3–12 months:** First rural corridor installations and major reliability upgrades; statewide uptime dashboard launch.
- **Year 1–2:** At least **80% of targeted corridors** completed; full integration with NEVI reporting; steady-state operations.
- **Year 3:** Program sunset unless reauthorized, with final performance report guiding any follow-on investments.

Staffing Plan

Minimal new hiring—1–2 limited-term FTEs at CEO/CDOT for program administration and data analytics, supported in part by federal administrative cost recovery.

X. ACCOUNTABILITY, METRICS & SUNSET

Key Performance Metrics

- Station uptime (target **≥ 97%**);
- Corridor completion percentage and redundancy (minimum number of DCFCs per site);
- Cost per kW delivered and cost per corridor mile;
- Utilization rates, by site and corridor;
- Station repair turnaround times;
- Equity-tract coverage (percentage of chargers located in or serving disadvantaged communities).

Sunset Clause

> "This program terminates automatically three years after the first appropriation unless the State Energy Office certifies—and the Joint Budget Committee concurs—that performance thresholds established in statute have been met or exceeded."

Annual public reports to the **Joint Budget Committee** and relevant **transportation and energy committees** will ensure transparency and offer a basis for any reauthorization or adjustment.

XI. STATUTORY/BUDGET LANGUAGE (DRAFT SCAFFOLDING)

Below is **scaffolding**, not full bill text—intended so drafters and LCS staff can quickly translate this memo into statutory language.

1. **New Article Creation**
   Create article XX in title 24, Colorado Revised Statutes, concerning the "EV Charging Reliability and Expansion Program," and, in connection therewith, establishing reliability standards for public DC fast-charging infrastructure, creating a rural corridor grant program, creating a small-business charging fund, and requiring public reporting on program performance.
2. **Program Creation & Administration**
   - Create a new part in **Title 24, Article XX** assigning program administration to the **Colorado Energy Office**, in consultation with **CDOT** and **PUC**.
   - **Grant CEO rulemaking authority to:**
     - Define "covered charger," "publicly accessible," "uptime," and "corridor site";
     - Establish minimum 97% uptime standards for chargers receiving state funds;
     - Set grant eligibility criteria, scoring formulas, and reporting requirements;
     - Align state requirements with federal NEVI guidance.
3. **Grant Programs**
   - **Rural Corridor Reliability Grants** – authorized to fund capital construction, major component replacements, site upgrades, and limited operating support where necessary to meet reliability standards.
   - **Small-Business Charging Fund** – authorized to provide grants and low-interest loans to locally owned businesses and non-profits for DCFC installation, interconnection upgrades, and associated site work.
4. **Appropriation Clause**
   - For FY **2025–26**, appropriate **$25 million** from the **General Fund (or designated clean-transportation cash fund)** to the **Colorado Energy Office**:
     - $18 million for the rural corridor and reliability grant line item;
     - $5 million for the small-business charging fund line item;
     - $2 million for program administration, data systems, and limited-term FTE.
   - Authorize roll-forward of unexpended funds for up to **three fiscal years** to match federal grant timelines.
5. **Reporting & Evaluation**
   - Require CEO to submit an **annual report** to the JBC and the House and Senate committees of reference covering:
     - Uptime metrics by site and corridor;

- Number and location of funded stations;
- Utilization and equity-tract coverage;
- Federal and private dollars leveraged per state dollar.

6. **Sunset & Repeal**

    - Add a statutory repeal date three years after the effective date of the article, unless continued by the General Assembly following a sunset review based on performance metrics.

XII. COALITION SUPPORT (PROSPECTIVE)

This section is intended as a **coalition map for the bill**, not a list of organizations already committed. It signals where sponsorship and testimony can be cultivated.

- Western Slope business associations and chambers of commerce;
- Rural electric cooperatives and municipal utilities;
- Tourism boards and ski-town alliances;
- Urban transportation-equity and environmental-justice groups;
- Automakers and charging-network companies;
- Statewide climate and public-health organizations;
- AAA and other mobility-advocacy groups;
- Counties and municipalities seeking reliable corridor coverage and economic development.

APPENDIX: STATUTORY/BUDGET LANGUAGE

MOCK BILL EXCERPT — EV CHARGING RELIABILITY & EXPANSION ACT

SECTION 1. Legislative Declaration.

The general assembly hereby finds and declares that:

1. Colorado's transition to electric vehicles is essential to achieving statewide greenhouse gas reduction goals, improving air quality, reducing transportation costs, and meeting the state's target of one million EVs on the road by 2030.
2. Public confidence in electric vehicles depends on the availability, reliability, and geographic distribution of public DC fast-charging infrastructure throughout the state, including in rural, tourism-dependent, and underserved communities.
3. The loss of federal EV charging reliability funds awarded under the Electric Vehicle Charger Reliability and Accessibility Accelerator Program has created an immediate statewide funding gap that threatens the reliability of existing chargers and the deployment of new infrastructure.
4. State investment is necessary to maintain corridor coverage, leverage federal matching funds, support rural economic development, and ensure that Colorado remains a national leader in transportation electrification.

Therefore, the general assembly declares that it is in the best interests of the state to establish the EV Charging Reliability and Expansion Program within the Colorado Energy Office and the Department of Transportation.

SECTION 2. In Colorado Revised Statutes, add article XX to title 24, as follows:

ARTICLE XX

EV CHARGING RELIABILITY AND EXPANSION PROGRAM

24-XX-101. Definitions.

As used in this article, unless the context otherwise requires:

1. **"DC fast charger" or "DCFC"** means a publicly accessible direct-current charging station capable of charging electric vehicles at twenty kilowatts or greater, including higher-speed equipment.

2. **“Eligible applicant”** means a local government, tribal government, small business, utility, rural electric cooperative, or site host approved by the Colorado Energy Office.
3. **“Program”** means the EV Charging Reliability and Expansion Program created in section 24-XX-102.
4. **“Rural corridor”** means any state or federal highway segment identified by the Colorado Department of Transportation as a corridor of statewide significance or containing underserved charging geography.
5. **“Uptime”** means the percentage of time a public charging station is operational and capable of delivering energy, measured according to rules adopted pursuant to this article.

24-XX-102. Program Creation – Administration – Rulemaking.

1. **Program creation.**

   The EV Charging Reliability and Expansion Program is hereby created in the Colorado Energy Office, in coordination with the Department of Transportation.

2. **Duties.**

   The program shall:

   (a) Establish minimum uptime performance standards of no less than ninety-seven percent for all publicly funded DC fast chargers;
   (b) Administer competitive grants for rural corridor charging infrastructure;
   (c) Administer a small-business charging fund to support site hosts with installation and interconnection costs; and
   (d) Collect and publish real-time charging-station reliability, utilization, and outage data.

3. **Rulemaking.**
   The Colorado Energy Office shall promulgate rules necessary to implement this article, including application procedures, scoring criteria, reporting requirements, and technical standards.

24-XX-103. Rural Corridor Grant Program.

1. The program shall award grants for the construction, repair, or replacement of public DC fast-charging infrastructure along designated rural corridors, including but not limited to I-70, I-76, US-50, US-160, US-550, and other routes identified by CDOT.

2. Grants shall prioritize:

   (a) Geographic gaps in coverage;
   (b) Sites demonstrating risk of seasonal overload;
   (c) Areas with high tourism, agricultural, or freight reliance;
   (d) Collaborations with local governments, tribes, and rural utilities.

24-XX-104. Small Business Charging Fund.

1. The small business charging fund is created to assist eligible small businesses in hosting DC fast chargers and Level 2 chargers.

2. Funds may be used for:
   (a) Interconnection upgrades;
   (b) Make-ready infrastructure;
   (c) Site improvements necessary for ADA compliance;
   (d) Backup power or battery storage to ensure uptime.

24-XX-105. Reporting – Accountability – Sunset.

1. **Annual reporting.**

   No later than November 1 of each year, the Colorado Energy Office shall submit a report to the Joint Budget Committee and the transportation and energy committees summarizing:

   (a) Uptime performance;
   (b) Corridor completion percentages;
   (c) Utilization rates;
   (d) Expenditures;
   (e) Federal funds leveraged;
   (f) Geographic distribution of projects.

2. **Sunset.**
   This article is repealed, effective September 1, 20XX, unless extended by the general assembly after a sunset review by the Department of Regulatory Agencies.

SECTION 3. Appropriation.

(1) For the 2026–27 state fiscal year, **$25,000,000** is appropriated from the General Fund to the Colorado Energy Office for the implementation of the EV Charging Reliability and Expansion Program, including rural corridor grants, small-business charging support, and reliability monitoring.

(2) The Colorado Energy Office is authorized to expend such funds over multiple fiscal years as needed, and may use up to three percent for administrative costs.

(3) The appropriation serves as eligible state match for federal programs under the Infrastructure Investment and Jobs Act, including NEVI formula and discretionary grants.

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[i] Intergovernmental Panel on Climate Change, Climate Change 2023: Synthesis Report. Summary for Policymakers, AR6 (Geneva: IPCC, 2023), 3–5, https://www.ipcc.ch/report/ar6/syr/

[ii] NOAA National Centers for Environmental Information, "Assessing the U.S. Climate in 2023," January 9, 2024, https://www.ncei.noaa.gov/news/national-climate-202312

[iii] Will Toor, "Greenhouse Gas Pollution Reduction Roadmap 2.0" (presentation, State of Colorado, 2024), slides on clean-energy pathway to 2040, https://cleanenergyeconomy.net/wp-content/uploads/2024/08/Will-Toor-presentation.pdf

[iv] U.S. Environmental Protection Agency, "Transportation Sector Emissions," March 31, 2025, https://www.epa.gov/ghgemissions/transportation-sector-emissions

[v] John Ingold, "Colorado Releases Its Plan to Slash Greenhouse Gases, but Critics Say It Falls Short," Colorado Sun, October 1, 2020, https://coloradosun.com/2020/10/01/colorado-greenhouse-gas-reduction-roadmap-release/

[vi] Rachael Nealer, David Reichmuth, and Don Anair, Cleaner Cars from Cradle to Grave: How Electric Cars Beat Gasoline Cars on Lifetime Global Warming Emissions (Cambridge, MA: Union of Concerned Scientists, 2015), 2–3, https://www.ucs.org/resources/cleaner-cars-cradle-grave

[vii] Colorado Energy Office, "Tax Credits for Electric Vehicles," accessed December 20, 2025, https://energyoffice.colorado.gov/transportation/grants-incentives/electric-vehicle-tax-credits

[viii] See, e.g., Xcel Energy, "Electric Vehicle Programs in Colorado," accessed December 20, 2025, https://www.ecmweb.com/power-quality-reliability/article/21176696/xcel-energy-unveils-electric-vehicle-programs-in-colorado

[ix] Colorado Department of Transportation, "Colorado Carbon Reduction Strategy," 2023, https://www.codot.gov/programs/environmental/greenhousegas/assets/colorado-carbon-reduction-strategy-repaired.pdf

[x] City of Boulder, "Vehicle & Building EV Pilot," City of Boulder, accessed December 2025, https://bouldercolorado.gov/projects/vehicle-building-ev-pilot; and Denver South Economic Development Partnership, "Fleet Electrification Feasibility Study," Denver South, accessed December 2025.

[xi] John Ingold, "Trump Administration Cancels $109M in Environmentally Focused Transportation Grants for Colorado," Colorado Sun, December 16, 2025, https://coloradosun.com/2025/12/16/trump-administration-cuts-transportation-grants-colorado/

[xii] Office of Governor Jared Polis, "Colorado Tops the Country in EV Sales for the 3rd Quarter of 2025, Setting National and State Record for Highest Market Share," Governor's Office News Release, 2025, https://governorsoffice.colorado.gov/governor/news/colorado-tops-country-ev-sales-3rd-quarter-2025-setting-national-state-record-highest

[xiii] Colorado Energy Office, "Colorado Secures Federal Funding for Fast-Charging Network as State EV Registrations Top 200,000," press release, October 9, 2025, accessed December 2025, https://energyoffice.colorado.gov/press-releases/colorado-secures-federal-funding-for-fast-charging-network-as-state-ev-registrations.

[xiv] Colorado Energy Office, Colorado EV Plan 2023 (Denver: State of Colorado, 2023), targets section, https://energyoffice.colorado.gov/transportation/ev-education-resources/2023-colorado-ev-plan

[xv] Federal Highway Administration, "Electric Vehicle Charger Reliability and Accessibility Accelerator," program description and FAQs, accessed December 20, 2025, showing recommended 97% uptime standard and reporting expectations, https://www.fhwa.dot.gov/environment/alternative_fuel_corridors/ev/accessibility_accelerator

[xvi] Federal match ratios under the National Electric Vehicle Infrastructure (NEVI) Program allow relatively small state appropriations to unlock significantly larger federal investments. NEVI formula funding administered by the Federal Highway Administration (FHWA) requires a minimum 20% non-federal match, creating an 80/20 federal–state cost share for most corridor projects. In disadvantaged or rural-designated regions, the non-federal match may fall to 10%, increasing the federal contribution. Under this structure, every $1 in state funding can leverage up to $4 in NEVI funds.

Using the memo's proposed $25 million state appropriation as the match pool:

- At an 80/20 cost share, a $25 million state match can support approximately $100 million in total project value (~$80 million federal, $20 million state, with the remaining $5 million state available for discretionary or small-business funds).
- Under NEVI discretionary grant pathways or DOE grid-resilience programs, rural and disadvantaged area projects may qualify for 70–90% federal shares, enabling scenarios in which $1 million in state investment could attract up to $9 million in federal support.
- Additional private-sector leverage through utility make-ready programs, investment tax credits, and site-host contributions further increases total mobilized capital, extending the reach of state funds.

These federal cost-share rules and associated leveraging mechanisms underpin the memo's assertion that state match dollars can unlock $2–$4 in federal investment, yielding $50–$75 million or more in total project value for rural coverage and charging-network reliability.

[xvii] U.S. Department of Transportation, "Charging and Fueling Infrastructure Discretionary Grant Program: Notice of Funding Opportunity," 2023, and FHWA NEVI guidance, both describing 70–90 percent federal match levels for eligible projects, https://www.transportation.gov/rural/grant-toolkit/charging-and-fueling-infrastructure-grant-program

[xviii] Older gasoline and diesel storage infrastructure—including underground storage tanks (USTs) and above-ground tanks commonly used in rural areas—poses documented ignition and spill risks. EPA compliance reports show elevated leak and corrosion rates among aging UST systems, and NFPA identifies liquid fuel storage and delivery as significant ignition hazards, especially in rural or low-maintenance contexts. As EV charging replaces liquid-fuel infrastructure, rural fire agencies encounter fewer vapor-related ignition points and fewer combustible storage systems. (EPA Office of Underground Storage Tanks; National Fire Protection Association Codes 30 & 30A; Colorado Division of Fire Prevention and Control advisories on fuel-storage hazards.)