



January 27, 2022

**By ELECTRONIC FILING**

Docket Management Facility  
United States Department of Transportation  
1200 New Jersey Avenue SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590-0001

**Re: Development of Guidance for Electric Vehicle Infrastructure Deployment, Docket No. FHWA-2021-0022**

Dear Secretary Buttigieg and Deputy Administrator Pollack,

On behalf of the National Retail Federation (NRF) and the 52 million working Americans the retail industry represents, thank you for the opportunity to comment on the Department of Transportation's efforts to improve U.S. electric vehicle (EV) infrastructure and to accelerate the decarbonization of the U.S. economy. We strongly support the Department's efforts and believe the retail industry can help with the deployment of EV charging for both cars and trucks, both of which are essential for retail operations. We offer our thoughts below.

NRF, the world's largest retail trade association, passionately advocates for the people, brands, policies and ideas that help retail thrive. From its headquarters in Washington, D.C., NRF empowers the industry that powers the economy. Retail is the nation's largest private-sector employer, contributing \$3.9 trillion to annual GDP and supporting one in four U.S. jobs — 52 million working Americans. For over a century, NRF has been a voice for every retailer and every retail job, educating, inspiring and communicating the powerful impact retail has on local communities and global economies.

The retail industry is at the forefront and leading on sustainability initiatives. More than three dozen retailers operating in the United States have made commitments to reduce their greenhouse gas emissions. Many of these commitments address direct (scope 1) and indirect (scopes 2 and 3) emissions, some of which include the emissions associated with transporting goods to consumers and to consumers' homes. It is in our interest to facilitate the broader adoption of EVs and other low-carbon alternatives to help meet the sustainability goals that companies have set.

As you consider how to best deploy money from the recently enacted Infrastructure Investment and Jobs Act through the National Electric Vehicle Formula Program, we wish to offer the following comments:

**Prioritize Consumer Amenities Near EV Charging Infrastructure:** With current technologies even fast-charging (Level-3) takes longer than refueling with traditional liquid fuels. This means EV chargers must initially be located where consumers can use the time it takes to recharge their vehicles to meet their other needs. Consumers are more likely to adopt EVs when they know that they can grab a quick meal, groceries, or other necessities at a local retail store or restaurant or run other errands while their EV is charging nearby.

It is already possible to drive designated cross-country routes in an EV while recharging only in the parking lots of well-known retailers. To accelerate the adoption of zero-carbon transportation, it is imperative that consumers across the entire country, and not just those who drive along these limited designated routes, have the same opportunities.

**Prioritize EV Infrastructure for Heavy-Duty and Light-Duty Trucks:** Eliminating carbon emissions from the transportation sector also means eliminating the emissions created by moving goods across the country to distribution centers, stores and direct to consumers. Accelerating the transition to a net-zero transportation sector requires substantial charging capabilities for the large trucks and light-duty trucks that provide consumers with needed products.

Retail store locations and distribution centers are already strategically located to minimize delivery times and to maximize overall efficiency. Ensuring that those same locations provide recharging capabilities for the heavy-duty and light-duty trucks can further accelerate the transition to a net-zero transportation sector.

A significant barrier to faster adoption of the charging infrastructure for larger vehicles is the significant cost of the EV infrastructure. The current economics make installing EV chargers for heavy-duty and light-duty trucks cost-prohibitive. The Federal Government can significantly improve the financial equation and return on investment calculations used to make business decisions.

When determining how to prioritize consumer-facing EV chargers, DOT should consider funding or incentivizing co-located infrastructure improvements that meet consumer recharging needs and also meet the recharging needs of the heavy-duty and light-duty trucks that supply consumer needs. If additional electrical capacity is being added to support consumer EV charging, ensure that the additional electrical capacity can also support recharging larger heavy-duty and light-duty trucks.

**Engage Retailers in the Conversation:** No one understands consumers and consumer behavior better than the retail community. Our industry is uniquely positioned to help DOT and the Federal Highway Administration, along with state and local governments, understand how to ensure consumers will be comfortable transitioning to an EV-centric future. We encourage you to consider the retail industry, and in particular our consumer insights and expertise as well as

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the vast number of parking lots which are typically adjacent to our retail locations, as you formulate EV policy. Given appropriate incentives and assistance, retailers can be a vital partner in the coming transition to EVs for both consumers and commercial transportation.

Thank you again for the opportunity to share our perspective. For additional information, please contact [Scot Case](#), NRF's Vice President, CSR and Sustainability.

Sincerely,

A handwritten signature in black ink, appearing to read "David French".

David French  
Senior Vice President  
Government Relations