Record of Categorical Exclusion
for
Installation of EVgo Electric Vehicle Charging Stations

Description of Categorically Excluded Action:

The U.S. Department of Energy (DOE) Loan Programs Office (LPO) is considering whether to issue a Title XVII Innovative Clean Energy Program loan guarantee to a subsidiary of EVgo Services LLC, (hereinafter "EVgo") for the procurement and development of approximately 1,100 EVgo Charging Stations for approximately 7,400 electric vehicle (EV) charging stalls (the Project). The EVgo Charging Stations will be located in up to 44 states. EVgo applied for a loan guarantee under LPO's Title 17 Clean Energy Financing Program established pursuant to Title XVII of the Energy Policy Act of 2005, as amended, which provides for loan guarantees to projects that avoid, reduce, utilize, or sequester air pollutants or anthropogenic emissions of greenhouse gases and employ new or significantly improved technologies as compared to commercial technologies in service in the United States.

Project Description:

The general characteristics of an EVgo Charging Station include: a Point of Connection (POC) to an existing power source (e.g. 12.47 to 34.6 kilovolt (kV) distribution line) which supplies power to a new Utility-supplied transformer, which itself provides power at a lower voltage to a utility meter and the EVgo main switchboard. The EVgo main switchboard distributes power to one or more EVgo power cabinets, each cabinet being connected to one or more EVgo EV charging stalls, which can provide up to a 350 kilowatt (kW) (or more) of charging capacity. Occasionally, the power cabinet and the stall(s) are one and the same unit.

Each EVgo Charging Station deployed will be owned by EVgo, and installed within existing parking spaces and adjacent areas that are previously disturbed/developed that are owned or leased by the site hosts. EVgo will enter into a site lease or license agreement with the retail partners, typically with an initial 10-year term with two 5-year extension options. EVgo anticipates that a typical Charging Station will contain between 4 to 20 EV charging stalls, as dictated by site characteristics (e.g. local EV demand, utility rates).

At each typical EVgo Charging Station, the POC is tapped using a fused disconnect switch on an existing or new utility pole. Conductors from the POC are routed down the utility pole into underground conduit extending to a new concrete pad that houses a new transformer, which lowers the distribution voltage specific to the EVgo Charging Station. For areas with underground distribution runs, the POC is often tapped into these underground service lines utilizing pad mount switches, and is fed to the new utility-supplied transformer. Additional utility equipment such as capacitors may be needed depending on such factors as service size and utility distribution capacity. The sizing of the transformer, which is typically supplied by the utility, is based on studies conducted by the utility in response to EVgo's application for electrical service. The conductors from the utility transformer pad are routed in an underground conduit to a new concrete pad that houses the EVgo main switchboard and EVgo power cabinets. The EVgo

power cabinets are manufactured off-site and delivered to the Charging Station site. The conductors from the EVgo switchboard and power cabinets are routed in underground conduit to the EVgo EV charging stalls. The EVgo EV charging stalls, which include the charging ports/dispensers, are located in or adjacent to existing parking spaces, and deterrent bollards are installed as needed. In certain cases, EVgo power cabinets and stalls are installed on a prefabricated skid and delivered to the site as pre-assembled unit.

EVgo is responsible for the general development of the Charging Station, including pouring the concrete transformer pad, installing the utility-supplied transformer (the utility may occasionally self-perform this installation work), supplying and installing the conductors and conduits, and supplying and installing the EVgo main switchboard, the EVgo power cabinet(s), and the EVgo EV charging stalls and bollards, as well as marking parking spots and other signage. The utility provides and installs billing/metering equipment either at the EVgo main switchboard or at the utility transformer in accordance with the local utility standard, as well as typically supplies the utility transformer. An illustrative list of design considerations for an EVgo Charging Station includes:

- EVgo Charging Station location is consistent with local zoning and land use requirements.
- Distribution system POC to the transformer is typically less than 250 feet, and generally does not cross a major road.
    - If a major road is crossed, EVgo works with the applicable utility and permitting authority to obtain necessary right of way permits to perform overhead or underground trenches or boring needed for line extension. Additionally, when needed, Ground Penetrating Radar (GPR) surveys are completed to ensure proper routing of conduits for underground trenching or boring. The line extension runs from the existing utility point of connection to the transformer are located within private property.
- EVgo Charging Station components, including conduits, are sited in locations with minimal or no impact to protected trees and tree roots.
- Conductor and conduit route from transformer pad to EVgo main switchboard is typically less than 100 feet and does not cross a major road.
- Any needed conductor and conduit route between EVgo main switchboard and power cabinets is less than 250 feet.
- The project site does not generally require grading or installation of a structural retaining wall.
    - If grading or retaining wall installation is required, EVgo generates necessary stamped engineering drawings and designs and obtains necessary permits and approvals required for construction.
- Existing parking area allows for parking stalls up to 20 feet long.

Construction at an EVgo Charging Station site will include trenching and laying conduits, pouring concrete pads, refilling trenching, pulling conductors through conduits, installation of the chargers and switchboard and other preparation for utility-side construction. A staging area and fenced work area will be established at the project site in a previously disturbed area. Following construction, the project site is graded and landscaped to maintain existing location-

specific stormwater management systems and returned to like or better conditions than pre-construction conditions. As needed, EVgo will update site-specific stormwater management plans when required by the local jurisdictions. Construction of each EVgo Charging Station may take approximately 6 months or less from notice to proceed to commencement of operations.

EVgo ensures that all permits and approvals, including construction and utility reviews and approvals, are obtained before commencing site construction. The permitting and approvals are specific to the project locations, and typically includes local building and electrical permits with occasional more specialized local permits (e.g. stormwater in Texas, Planning; in California, Site Plan Reviews and a California Coastal Development Plan if located in proximity of the ocean). Typical timelines for building and electrical permits are 12-to-18-weeks, and 10 to 12 weeks for obtaining utility approvals.

EVgo remotely oversees the day-to-day operation and maintenance of the EV charging network and maintains an in-house field services support team (service technicians and engineers) to support and respond to any on-site preventative and corrective maintenance across the network of EVgo Charging Stations. As part of its operation and maintenance plans, EVgo generally adheres to the following principles: 1) all equipment is operated in accordance with manufacturer recommendations and generally accepted engineering and operating practices, 2) all equipment is maintained in accordance with manufacturer recommendations, including refurbishment and replacement of equipment and components (including replacement of each EVgo charger every 8-10 years), 3) all required renews and replacements are made on a timely basis, 4) the equipment suppliers support their respective warranty provisions, and 5) land leases are extended as needed beyond the 10- year initial term.

Number and Title of Categorical Exclusion:

The actions being proposed under this Title XVII loan guarantee for EVgo are consistent with and are covered by DOE categorical exclusions in 10 CFR 1021, Appendix B (B5.23) because the Project involves the construction and operation of EV charging stations on previously disturbed or developed areas that have been subject to screening reviews, to include land use and zoning, as well as certifications and approvals. The following categorical exclusion to further NEPA review apply:

B5.23 "Electric vehicle charging stations"

> The installation, modification, operation and removal of electric vehicle charging stations, using commercially available technology, within a previously disturbed or developed area. Covered actions are limited to areas where access and parking are in accordance with applicable requirements (such as local land use and zoning requirements) in the proposed project area and would incorporate appropriate control technologies and best management practices.

10 CFR 1021.410 Application of categorical exclusions (classes of actions that normally do not require EAs or EISs).

> (g) The following clarifications are provided to assist in the appropriate application of categorical exclusions that employ the terms or phrases:

(1) "Previously disturbed or developed" refers to land that has been changed such that its functioning ecological processes have been and remain altered by human activity. The phrase encompasses areas that have been transformed from natural cover to nonnative species or a managed state, including, but not limited to, utility and electric power transmission corridors and rights-of-way, and other areas where active utilities and currently used roads are readily available.

Regulatory Requirements defined in 10 CFR § 1021.410(b):

The proposed loan guarantee and related actions described above were subjected to an environmental due diligence by DOE Loan Programs Office (LPO) staff to ensure they are consistent with the specific category of actions (categorical exclusion) contained in Appendix B of 10 CFR Part 1021 and the conditions for applying categorical exclusions specified in Section 410 of Part 1021. To ensure that the requirements of Appendix B were met, LPO staff reviewed numerous project-related documents obtained between August 2023 and May 2024 and participated in several conference calls with EVgo staff to ensure a complete understanding of the activities associated with the Project.

The environmental due diligence review determined that there is no controversy regarding the potential impacts of the proposed EVgo project, and that the actions associated with the loan guarantee would not adversely affect any physical, biological or socio-cultural resources at the site installations and surrounding environment.

The Comment Section below is provided for any necessary clarifications concerning the findings listed above. Signature by EVgo's designated representative in the Corporate Validation section is an indication of EVgo's concurrence with the project description, findings, and determinations presented above.

Comment:_____

Corporate Validation:

Name and Title (Print): Francine Sullivan
Chief Legal Officer

Signature: _____ Date: 9/3/2024

Determination:

Based on my review of information conveyed to me and in my possession concerning the actions associated with the proposed Title XVII loan guarantee described above, as NEPA Compliance Officer (as prescribed by DOE Policy Directive 451.1). I have determined that the actions involve no extraordinary circumstances and fit within the specified category of actions in Appendix B of 10 CFR 1021 described above, and are hereby categorically excluded from further review under the National Environmental Policy Act (42 USC 4321, as amended).

TODD STRIBLEY

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Signature

Date

Todd Stribley, LPO NEPA Compliance Officer
Director, Environmental Compliance
Loan Programs Office