
EV Charging Contractor Working Group - Program Feedback - Executive Summary

Submitted to: Massachusetts EV Infrastructure Coordinating Committee (EVICC)

Date: July 9, 2025

Submitted by: EV Charging Contractor Working Group

Overview

On May 30th, the EVICC hosted a 30-minute listening session with a small group of EV charging contractors to solicit feedback on state and utility incentive programs. Due to the limited timeframe, participants were unable to fully convey the breadth of challenges facing the industry.

In response, a group of contractors reconvened independently on June 24th to further discuss shared experiences and determine how best to communicate ongoing programmatic issues. Since then, additional contractors have expressed interest in contributing to the feedback process. Other contractors are fearful of participation due to the risk of negative utility response to contractor feedback.

This memo represents a collective submission from a coalition of EV charging contractors participating in the MA EV charging programs, responsible for delivering hundreds of funded projects. It outlines persistent operational barriers within the utility make-ready and MasseVIP programs—barriers that are materially impacting project delivery, business viability, and customer satisfaction.

Notably, contractor experiences have varied by program. MasseVIP has improved over time, increasing communication and transparency. National Grid has demonstrated clear and consistent communication that supports effective collaboration. Eversource's program has been defined by delays, lack of transparency, and systemic obstacles that hinder progress toward deployment goals.

We also note that the EVICC released its draft program assessment on June 25th, requesting formal feedback by July 11th. Given the significance of these programs and the short timeline overlapping the July 4th holiday, this comment period allows limited opportunity for comprehensive industry input.

This document summarizes key challenges and offers specific, actionable recommendations to improve program performance through 2027 and beyond. Where applicable, feedback is attributed to a specific utility; otherwise, recommendations apply broadly across all participating utility programs.

Key Challenges

- **Changing Approved Incentives:** Eversource incentives are changed retroactively after the customer and Eversource fully execute a contract. This can happen at any stage of the project: pre-, during, or post-construction at the invoicing stage, and is often due to an Eversource incentive calculation error or retroactive change in the program rules. The incentives are calculated under one understanding of the program rules, then recalculated (sometimes years later) under the current program rules based on the utility questioning the value of the costs previously approved. The customer is then asked to pay the difference, which often is not an option for them, so the vendors end up either taking up the cost burden or cancelling the project (after having invested thousands of dollars of development costs). Changing a contract retroactively and unilaterally is not acceptable; failure to honor contracts is eroding the integrity of the program and disincentivizing applicants as they often depend on the funding promised when budgeting a project.

Eversource recently added a Disclaimer to their e-mail signatures outlining their intent to not finalize an incentive award until the project is complete and payment is due. It reads:

Disclaimer:

Any incentives and/or rebates referenced in this email are estimates only, are non-binding and are subject to change. This email should not be interpreted as a commitment for Eversource to pay any incentives and/or rebates of any kind. Estimates are made based on information provided by participants, vendors providing services for participants, or other sources and are not guaranteed to be error-free. Estimates may change due to program changes, calculation errors, inaccurate project data discovered through pre-inspection or post inspection or for any other reason. Only a Letter of Agreement (LOA) signed by Eversource AND counter-signed by the program participant is a valid estimation of incentives and/or rebate. The final incentive and/or rebate for

each project depends on several factors including but not limited to the actual installed equipment, costs, and the participant providing supporting documentation - so any change in project parameters may result in a change in incentives and/or rebates.

- **Payment Delays:** Incentive reimbursements have been frequently delayed, with some invoices under scrutiny despite pre-approved scopes. This payment issue creates severe cash flow pressure and creates major operational hurdles for vendors, including payroll and supply chain impacts.
- **Application Inactivity:** Long stretches of application inactivity are followed by sudden documentation requests. Incorrect portal statuses often block vendors from uploading required materials, leading to further delay and cancellations. Delays with Eversource applications occur at all stages of the project life cycle, from Engineering pre-assessment to pre-approval to construction approval.
- **Communication Gaps:** Contractors and customers experience months-long delays in responses from the utility and State funding sources. The absence of communication creates major challenges in managing operations and supply chain activity, and undermines program confidence and performance from the end customers.
- **Loss of Stacking:** Elimination of incentive “stacking” between MassEVIP and utility programs has halted or postponed hundreds of projects that are no longer financially viable for the end customers.
- **Program Design Issues:** Current program requirements and guidelines, unclear eligibility language, and inconsistent rules are creating confusion and inefficiencies. Program rules and requirements have been redefined and change arbitrarily, without clear communication to vendors or customers. Examples include civil construction cost cap adjustments, approved hardware/software providers, project approval (letter of agreement) processes, site definition (e.g. public versus private), insurance requirements, engineering review processes, ground utility infrastructure reviews (e.g. LIDAR site details for water, sewer, gas, etc.)

- **State of Funding:** The state of Eversource program funding is never communicated to vendors or customers, with entire programs being shut down overnight. Projects that were submitted 6-12 months prior with limited or no movement from Eversource are then cancelled without warning.
- **Programs never materializing:** Eversource has not launched its \$5.6M EJC DCFC Hub Pilot Program, which would benefit customers whose DCFC project applications were cancelled when the Public/Workplace budget ran out.
- **Project Cost Data Requests:** Eversource has been issuing requests to the contractor network, seeking submission of detailed raw cost data for internal Eversource review, both prior to new project approval and after older projects have been fully completed (and incentive award was previously defined). Upon requesting clarification, contractors were challenged on their margins and informed that the intent was to explore opportunities for cost reduction. The inquiry excluded customer acquisition costs from consideration, ignoring stranded costs associated with project development and supply chain management. In several cases, Eversource has reduced their incentive award and put the project cost delta back on the contractor to “figure out with the customer.” The incentive program is currently defined around a set of guidelines and incentives are set to be awarded based on these guidelines such as hardware and network software compliance, geographic location (e.g. EJC communities), port counts, etc. and not contractor raw cost structures. If the utility wants to define project cost guidelines for critical components of a project, then this should be clearly laid out in the program design.

Real-World Impacts

- Previously contracted projects have been formally notified not to proceed or have been canceled due to continual requests for additional “justifications of costs”.
- Contractors are carrying unreimbursed project costs for months or years, making business planning unsustainable.

- Extended timelines are eroding customer trust. Many site hosts expect timely turnkey solutions and are growing frustrated with delays and complexity.
- Contractors are unable to confidently staff, scale, or commit to future projects under current conditions.

Recommendations

1. **Establish Clear Processes:** Create a more uniform, and consistent process for all utility programs. Provide publicly available application roadmaps with timeline expectations and real-time status tracking. Utilize the EV Charging Contractor Working Group for program design input, focusing on customer experience and deployment goals.
2. **Assign Project Liaisons:** Designate a dedicated utility or program contact to manage communication for each project from submission to completion. Define and uphold communication standards within the programs. As an example, recommend Eversource staff to their full, DPU-approved amounts (12 full-time employees). There are currently three employees managing all Commercial, Fleet, and Large Residential EV projects, but there are eight employees approved in DPU 21-90 (see Exhibit ES-KB-5).
3. **Restore or Rethink Stacking:** Reintroduce optional funding stacking, decouple MassEVIP such that each program will cover discrete elements of the project (hardware/SOW/ADA) to eliminate conflict over who covers what, or fully decouple MassEVIP from utility dependencies to enhance project viability.
4. **Simplify and Align Requirements:** Streamline application workflows and adopt sector-specific technology guidelines to right-size infrastructure.
5. **Improve Payment Standards:** Enforce predictable reimbursement timelines with consistent documentation practices across programs.
6. **Require contracted awards be honored:** When contracts are forced to be rewritten with lower incentive award, customers feel this is a “bait and switch” tactic by the contractors. This impacts the contractor’s integrity and the program’s integrity.

7. **Prohibit retroactive changing of standards:** Only at program redesign, or new Phase implementation, should any new standards and guidelines be defined. All standards should be clear and concise to contractors and customers.
8. **Prohibit delay in payment due to requests for additional documentation that is not clearly identified within the program contract:** There are currently no component cost guidelines defined in the program design for customer-side activity. If an award was defined, and the project fully executed, payment should be made per the program agreement terms.

Next Steps

Contractors are compiling project-specific examples to illustrate the systemic nature of these challenges. These findings will be submitted as part of our follow up contribution to the EVICC's upcoming report. We are also exploring external representation and a long-term coalition structure to provide continued industry input.

We appreciate the access to the programs and funding sources and welcome partnership with the EVICC and state agencies to refine these programs and ensure they are scalable, responsive, and effective in supporting the end customers and the Commonwealth's EV infrastructure goals.

EV Charging Contractor Working Group

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