Commonwealth of Massachusetts
Department of Energy Resources

Response to Comments on:

225 CMR 26.00, Massachusetts Offers Rebates for Electric Vehicles (MOR-EV) Program Regulations

November 25, 2026

Regulatory Authority:

M.G.L. c. 25A, § 19

Introduction:

The proposed amendments to the Massachusetts Department of Energy Resources ("Department") MOR-EV Regulations (225 CMR 26.00) aim to streamline the application processes and make the program more cost-effective and equitable. The amendments include a number of proposed changes, including lower vehicle price caps for the Light Duty New and Used Vehicle Rebates and Class 3-8 Vehicle Rebates. The amendments also include changes in rebate amounts for individuals acquiring Pickup Trucks, Class 2b Vehicles, and Class 3-8 Vehicles, as well as the addition of an income threshold as new eligibility criteria for the MOR-EV+ adder.

On July 17, 2026, the Department filed a Notice of Public Review of the proposed amendments to 225 CMR 26.00 with the Secretary of the State for the Commonwealth to be published in the Massachusetts Register. The notice opened the public comment period on July 31, 2026 until September 4, 2026.

The Department hosted two public hearings on the draft regulation changes at the following times and places:

Tuesday, September 1, 2026 at 6:00PM: Virtual

Wednesday, September 2, 2026 at 1:00PM: 100 Cambridge Street Boston, MA 02114

Public Comments on the proposed regulation changes were due to the Department on September 4, 2026.

Purpose:

The Response to Comments provides responses to common topics raised by commenters and further provides the Department's rationale for regulation changes made in response to comments. The Department received 38 comments on the proposed regulation. The comments included input related to vehicle price caps, eligibility criteria for rebate offerings, rebate values, and the application process. The Department is not responding directly to all comments received, but all comments were considered and are posted on our website. All capitalized terms in this Response to Comments have the same meaning 225 CMR 26.02: *Definitions*, unless otherwise stated.

Sales Price Cap:

Sales Price Cap Calculations

Comment: Commenters recommended Sales Price calculations not include destination charges.

Response: The proposed changes are being retained in the final regulation. The Department makes every effort to ensure the MOR-EV rebate process is as easy, predictable, and clear as possible for residents. The Department maintains that defining Sales Price with total manufacturer's suggested retail price (MSRP) best reflects the actual value of the vehicle purchased or leased at the time of the transaction, while simultaneously providing pre-purchase clarity to consumers about vehicle eligibility (e.g., the total MSRP is set by the manufacturer and listed on the window sticker of the vehicle). The current Sales Price definition only excludes vehicle costs that are not set by the manufacturer, such as registration fees and taxes.

Light-Duty New Vehicles Sales Price Cap Reduction to $50,000 Total MSRP

Comment: Commenters recommended that the Sales Price cap for New Light-duty Vehicles be maintained at $55,000 or increased, rather than decreased.

Response: The proposed changes are being retained in the final regulation. A primary goal for these regulation changes is to create a cost-effective program. One of the main ways the Department intends to accomplish this is by focusing funds on vehicles where the rebate can have a larger impact on a decision to buy an electric vehicle. In addition, virtually all manufacturers of vehicles above the $50,000 Sales Price cap that have been rebated in the past offer at least one model or trim below a $50,000 Sales Price. In addition, there are new vehicles that have just become available or will be coming to market soon that will be below the $50,000 Sales Price cap, such as the Kia EV3, Slate Pick-up, and certain trims of the Ford Fathom and Rivian R2.

Light-Duty Used Vehicles Sales Price Cap Reduction to $35,000 Purchase Price

Comment: Commenters recommended that the Sales Price cap for Light-duty Vehicles be maintained at the $40,000 Sales Price cap. One commenter recommended that the Sales Price cap be reduced to below the proposed $35,000.

Response: The proposed changes are being retained in the final regulation. The Department believes that the proposed Sales Price caps strike a balance between improving the program's cost-effectiveness, while still effectively supporting the electric vehicle (EV) industry and Massachusetts' transportation goals. In the Department's analysis of the program, the average Sales Price of used vehicles that have been rebated through the program is $23,457 and 97% of rebated used vehicles had a Sales Price below $35,000. Used EV prices have declined substantially since the original promulgation of these regulations and a $40,000 Sales Price puts the cost of a used EV above the final cost of many new EVs. Since the sale of used EVs does not guarantee the replacement of a gasoline vehicle (since the original owner may or may not elect to purchase an EV again), maintaining the proposed Sales Price cap helps to support the Department's cost-effectiveness goal. The Department did not elect to further reduce the Sales Price cap as this would have further restricted eligibility beyond what the program felt was necessary as a cost-effective measure.

Pickup and Class 2b Vehicles Sales Price Cap

Comment: Commenters recommended that the Sales Price cap for Pickup Trucks and Class 2b vehicles be increased from $80,000 MSRP.

Response: The Department did not propose any changes to the Pickup Truck and Class 2b vehicle Sales Price cap of $80,000. Given the Department's intent to ensure program cost-effectiveness and ensure that public funds are spent judiciously, the Department is not considering increasing the price cap at this time.

Class-Specific Sales Price Caps for Class 3-8 Vehicles

Comment: Commenters recommended that the Sales Price cap for Class 3-8 vehicles remain at one flat $2 million Sales Price cap, rather than adopting class-specific Sales Price caps (Class 3: $100,000, Class 4-6: $500,000, Class 7-8: $2 million), with some specific concerns for a set Sales Price cap of $500,000 for Class 4-6 vehicles.

Response: The Department retains the tiered Sales Price cap structure of $100,000 for Class 3 vehicles, and $2 million for Class 7 and 8 vehicles. The Department did elect to change the Sales Price cap for Class 4 through Class 6 vehicles to $750,000 to consider this concern. Because there is evidence that regularly available Class 4 through 6 vehicles may exceed the $500,000 Sales Price cap.

Eligibility Criteria:

Limiting Individuals to Two Rebates in Any Three-year Period

Comment: A commenter recommended that there be no limit on the number of rebates an individual can receive within any three-year period.

Response: The Department proposed limiting the number of rebates an individual can receive to two rebates within any three-year period. Currently, there is no limit on individual rebates. The proposed changes are being retained in the final regulation. Limiting individual applicants, not households, to two rebates in any three-year period helps to ensure that

program funding is targeted to individuals who need the rebates to acquire an EV. Households with more than one eligible applicant would still be able to receive more than two rebates in any three-year period.

Expansion of Light-duty Used and Used Pickup and Class 2b Applicant Type

Comment: Commenters recommended that Non-Profit and Corporate Fleets be eligible for the used vehicle rebates, similar to the expansion in eligibility to Public Fleets and Tribal Fleets.

Response: The Department retained the exclusion of Corporate Fleets from the MOR-EV Used eligibility but did expand the rebate eligibility to Non-Profit Fleets. In the draft regulation the Department made Public and Tribal Fleets eligible for the Light-duty Used and Used Pickup and Class 2b Rebates due to the use cases of the vehicles and the fact that both types of fleets often have limited funds. In the final regulation the Department also included Non-Profit Fleets as eligible applicants to both used vehicle rebates. This decision and the rationale is consistent with the rationale for expanding rebate access to Tribal Fleets and Public Fleets. Eligibility of the used vehicle rebate was not extended to Corporate Fleets as the Department determined that there is no effective way to gauge need or income qualification of a corporate entity.

Implementing Income Criteria for the MOR-EV+ Adder that Aligns with the Used Vehicle Rebate

Comment: Commenters recommended that there be no income thresholds for MOR-EV rebate offerings across the program, or that there be an increase in the income thresholds for the Used Vehicle Rebates and the MOR-EV+ Adder.

Response: The proposed MOR-EV+ income criteria are retained and the Department made no changes to the income thresholds across the MOR-EV program. The goal of these program changes is to increase the cost-effectiveness of the program and target rebates at use cases where they are most needed; removing or increasing the income thresholds for the two rebates does not align with these goals.

Limit Trade-In Rebate to Individuals

Comment: Commenters recommended that Non-Profit Fleets be eligible for the Trade-In Rebate.

Response: The proposed changes are being retained in the final regulation. The purpose of the program is to incentivize the replacement of internal combustion engine vehicles with qualifying zero emission vehicles. Because the Trade-in Rebates do not require the traded-in combustion engine vehicles to be removed from the road, the Department is not increasing access to this incentive.

MOR-EV+ Adder

Comment: A commenter recommended that the New Light-duty Rebate and the MOR-EV+ Adder have the same eligibility criteria.

Response: The respective and distinct applicant eligibility criteria are being retained in the regulations. The MOR-EV+ Adder offers additional support to income-qualified individuals, as they are more likely to need additional financial support to purchase or lease and EV. Applying this income eligibility criteria to all applicants would significantly restrict applicant eligibility and could have a negative impact on overall EV sales. Inversely, M.G.L. c. 25A, § 19 contains a statutory requirement that the Department offer a $1,500 rebate to low-income individuals with income guidelines and other requirements, therefore the Department does not have the discretion to remove the income eligibility criteria from the MOR-EV+ Adder to match the New Light-duty Rebate.

Trade-In Rebate Vehicle Eligibility – Age of Trade-in Vehicle

Comment: A commenter recommended that the 12-year vehicle age requirement be lowered.

Response: The Department did not propose any changes to the Trade-In Vehicle age requirement. The current vehicle age requirement is being retained in the regulations. An important goal of the Trade-In Rebate is to encourage the removal of internal combustion engine vehicles from the road toward the end of their life. To align with that goal, the Department is not considering lowering the vehicle age requirement at this time.

Off-Road Vehicle Eligibility

Comment: A commenter recommended that off-road zero emission vehicles be eligible for MOR-EV rebates.

Response: The Department did not propose any changes to the lack of eligibility for off-road vehicles. The exclusion of off-road vehicles is being retained in the final regulation. The Department maintains that the purpose of the program is to maximize emissions reductions from the transportation sector. Given the wide variability of usage and miles traveled by off-road vehicles, there is not clear evidence that transitioning these vehicles to electric would help achieve similar goals.

Rebate Values:

Trade-In Rebate Value

Comment: A commenter recommended that the Trade-in Rebate amount be increased from $1,000.

Response: The Department did not propose any changes to the Trade-In Rebate value. The purpose of the program is to incentivize the replacement of internal combustion engine vehicles with qualifying zero emission vehicles. Given the lack of requirement that traded in combustion engine vehicles need to be removed from the road, the Department is not increasing the value of this incentive.

Pickup and Class 2b Reduced from $7,500 to $4,500

Comment: A commenter recommended that the Pickup and Class 2b Rebate values for individuals be maintained at $7,500.

Response: The proposed changes are being retained in the final regulation. The goal of the regulation changes is to increase the cost-effectiveness of the program. The Department is maintaining the $7,500 incentive level for fleets, given that fleet usage patterns will likely have a greater impact on emissions reductions when compared to individuals.

Class 3-8 Rebate Values

Comment: Several commenters made recommendations on the values of the rebates for the Class 3-8 program. Some recommended the values be increased, and some recommended the values be lowered for less efficient vehicles.

Response: The Department proposed a change to the maximum decline between rebate blocks for Class 4-8 vehicles from 15% to 30%. There were no proposed changes to the Class 3 rebate amount. Given the desire to use funding prudently, the Department is not considering increasing rebate values at this time and the rebate values for Class 3-8 Vehicles are retained.

Maximizing Predictability of the Class 4-8 Declining Block Structure

Comment: Several commenters recommended that there not be a declining block structure for Class 4-8 vehicles and that rebates remain static regardless of participation level, with some citing that the steeper decline in rebate value coupled with the declining block structure makes it complicated for fleet planning.

Response: The proposed change to the maximum decline between rebate blocks is being retained in the regulation. To address concerns about fleet planning, the Department amended the block structure in the final regulations so that Vehicle End Users are individually subject to three declining rebate blocks, rather than declining blocks based on overall Class 4-8 rebate participation. When a Vehicle End User uses up all of their respective rebates in Block 1, they will move on to Block 2 where the rebate values will decline by a maximum of 30% for that Vehicle End User. A fleet only has to keep track of their own blocks to determine the amount of rebate available to them. This will help support long-term fleet planning while still maintaining a cost-effective program.

Program Processes:

Effective Date Of Sales Price Cap Changes

Comment: A commenter recommended that the date that an individual is subject to the proposed amendments to the regulations should be based on the Purchase Date or Lease Date, not the date that their application is submitted.

Response: To address this concern, the Department clarified that the Sales Price cap that applies to an applicant is based on the Purchase Date or Lease Date. This means that any

application submitted with a Purchase Date or Lease Date before the effective date of amended regulations would not be subject to the new Sales Price caps. The Department aims to ensure that there is a smooth transition into the new program changes to avoid consumer confusion.

Prequalification for Income Point-of-Sale Applications

Comment: A commenter recommended that there be no prequalification process for the point-of-sale program.

Response: The Department did not propose any changes to the prequalification step of receiving an income qualified rebate at the point of sale. The current requirement for prequalification of Point-of-Sale MOR-EV+ and MOR-EV Used Rebates is being retained in the regulations. Requiring MOR-EV+ or used EV prequalification for point-of-sale rebates is critical to reducing the number of errors in determining eligibility by centralizing the eligibility review process and ensuring that the hundreds of dealers participating in the program are not responsible for reviewing income eligibility.

Class 3-8 and Pickup and Class 2b Point-of-sale Applications

Comment: Several commenters recommended that the program establish a point-of-sale program for Class 3-8 vehicles and for Pickup and Class 2b vehicles.

Response: The Department did not propose any changes to the ways in which applicants can receive the Class 3-8 or Pickup & Class 2b rebates. The exemption of Class 3-8 vehicles and Pickup and Class 2b vehicles from the point-of-sale program will be retained in the regulations. Creating a point-of-sale option for the MOR-EV Trucks program is beyond the scope of these program changes.

Class 3-8 Retroactive Post-Purchase Period

Comment: A commenter recommended one-year retroactive post purchase application period for all Class 3-8 vehicles.

Response: The proposed change to implement a 45-day retroactive period for only Class 3 vehicles is being retained. The voucher system for the Class 3-8 program was created as a budgeting mechanism for the program, specifically for more expensive vehicles that are not able to be bought off of a lot and instead require long pre-order and custom-building time frames. When the Department became aware that some pickup trucks that can be purchased off of the lot fit into the Class 3 category and were therefore subjected to voucher requirements, the Department acknowledged this presented a challenge to applicants. Because Class 3 vehicles will now be eligible for a post-purchase rebate without a rebate reservation voucher, the Department seeks to give applicants who had been denied a rebate for not receiving a voucher a second chance to apply. This scenario does not fit the other vehicle classes therefore it remains limited to Class 3 vehicles.

Program Pause Procedure

Comment: Some commenters recommended minimizing Program Pauses or ensuring that there are no Program Pauses.

Response: Program Pauses will be implemented in narrow circumstances when availability of funds deems it necessary. The expansion of Program Pause procedures aims to clarify the way applicants are affected by a Program Pause, should one be implemented.

Marketing and Outreach:

Outreach to Burdened Communities

Comment: A commenter recommended that the program focuses on outreach to burdened communities.

Response: The Department did not propose any changes to how it conducts outreach. However, the Department does employ, and will continue to employ, a culturally competent outreach program to ensure that MOR-EV rebates are effectively communicated to all residents of the Commonwealth, particularly Burdened Areas.

Utilizing Traditional Marketing Channels

Comment: A commenter recommended that the program increase marketing through traditional channels.

Response: Marketing and outreach of the program is beyond the scope of the regulations.

Program Transparency:

Request for Voucher Timelines and Point of Contact

Comment: A commenter recommended the program establish a defined voucher timeline and a designated point of contact for voucher applications.

Response: This is beyond the scope of this rule change, but the Department will consider this comment when developing new program guidelines.

Updates on Program Budget

Comment: A commenter recommended the program publish an annual budget and give monthly updates on the status of the remaining budget, including clarification by vehicle class.

Response: The Department's proposed changes to the regulations include annual budget setting that will be made public as well as the remaining annual budget on no less than a monthly basis.

Notification of Program Pauses

Comment: A commenter recommended the program provide information on how the Department will notify the public of upcoming Program Pauses.

Response: This is beyond the scope of this rule change, but the Department will consider this comment when developing new program guidelines.

Sharing Data on Applicant Specifics

Comment: A commenter recommended that the program share data on applicant specifics for targeted outreach on charging.

Response: The Department publishes program data as required in the M.G.L. c. 25A, § 19. However, specific information on applicants for the purposes of providing more information for targeted outreach goes beyond the scope of this rule change or purpose of the regulation.

Purpose of the Program:

Targeting Applicants

Comment: A commenter recommended that the program target super gasoline users.

Response: This is beyond the scope of these program changes or the purpose of the regulation.

Expanding Past Electrification

Comment: A commenter recommended that the program target other emissions reduction strategies outside of electrification.

Response: The M.G.L. c. 25A, § 19 requires the program to offer incentives for qualifying zero-emission vehicles therefore the Department does not have the discretion to make this change.

Conclusion

The Department appreciates stakeholders' time and participation in the regulatory process to amend the MOR-EV regulation. The Department carefully considered all comments received and has revised certain portions of the MOR-EV regulation in response to comment.