



Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 3rd Floor
Boston, MA 02110

March 18, 2025

Shonda Green, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 600
Boston, MA 02118

Re: Public Comment on D.P.U. 25-10/D.T.C. 25-1

Dear Secretary Marini and Secretary Green:

The Massachusetts Department of Public Utilities and the Department of Telecommunications and Cable (“the Departments”) requested public comment in a January 17, 2025 *Joint Notice of Inquiry* in DPU 25-10/DTC 25-1 on their own Motion to explore utility pole attachment, conduit access, double pole, and related considerations applicable to utility work conducted on public rights-of-way in the Commonwealth.

The Massachusetts Clean Energy Technology Center (“MassCEC”) would like to offer the following comments on right-of-way (“ROW”) and pole-mounted electric vehicle supply equipment (“EVSE”) that may be useful to the Departments.

In January 2024, the Healey-Driscoll administration provided American Rescue Plan Act (“ARPA”) funds to MassCEC through the Electric Vehicle Infrastructure Coordinating Council (“EVICC”) to develop a program that will increase access to reliable electric vehicle (“EV”) charging infrastructure for residents without private parking¹. Access to charging is a significant barrier to EV adoption for renters and residents without a dedicated garage, driveway, and/or private parking space.² On-street charging, such as pole-mounted, streetlight, or curbside

¹ See the press release here: [Healey-Driscoll Administration Announces \\$50 Million Investment in Electric Vehicle Charging Infrastructure | Mass.gov](#)

² See, e.g., the first biennial report developed by EVICC and provided to the Massachusetts General Court on August 11, 2023, pursuant to St. 2022 c. 179 § 81(d) (First EVICC Assessment), which identified the importance of ensuring convenient access to charging facilities for all residents to meet the Commonwealth’s climate goals and the acute barriers to delivering this outcome for individuals who live in multi-unit dwellings. First EVICC Assessment, pp. 53, 56, available at: <https://www.mass.gov/doc/evicc-final-assessment/download>. Accordingly, the First EVICC

charging stations, has become increasingly appealing for municipalities looking to ensure all residents have sufficient charging options. However, despite the scalable potential of on-street charging, it has not been widely adopted in Massachusetts due to high upfront costs and complex technical and regulatory landscapes that are challenging for municipalities to navigate. To address these complexities, MassCEC’s On-Street Charging Solutions Program (the “Program”) will provide technical and financial support to municipalities interested in piloting on-street charging stations. The Program, administered by Commonwealth Electrical Technologies (“CET”), began in November 2024 and is scheduled to run through December 2026. As of March 2025, the Program solicited and selected a cohort of forty (40) municipalities to receive Program services. The no-cost services provided to participating municipalities are as follows:

Twenty-five (25) municipalities will receive on-street charging technical assistance and feasibility studies. Feasibility studies will include the following information and will be delivered to municipalities by September 2025.

- Summary of the results of stakeholder and community engagement, mapping efforts, and recommendations for future community engagement best practices;
- Summary of the results of on-site assessments including infrastructure requirements and constraints;
- Permitting and zoning considerations;
- Regulatory or policy suggestions to remove barriers to on-street charging;
- Recommendations for on-street charging station locations and models (i.e. curbside, pole-mounted, streetlight, etc.);
- Recommended Charging Station ownership structure (i.e. lease, own, third-party ownership);
- Parking enforcement and payment recommendations;
- Parking spot accessibility requirements and charging station language accessibility considerations;
- Estimated benefits to the surrounding communities (i.e. Charging Station access, pollution reduction, cost savings, etc.);
- Recommended maintenance plan at the end of Charging Station manufacturer warranty;
- A community education plan to assist municipalities with providing accurate and linguistically accessible marketing and educational materials to ensure that the community knows about the stations once installed and understands how to operate the stations;
- Estimated project costs including Charging Station hardware, installation, operation, maintenance, software, and identification of potential utility and state incentives; and
- Estimated timelines for project implementation.

Assessment recommended that the Commonwealth explore strategies for placing charging infrastructure in residential areas with a high concentration of overnight curbside parking and encouraging municipalities to allow residents and building owners to charge across and under sidewalks. Id., pp. 56-57.



Fifteen (15) municipalities will receive funding and technical support to install on-street charging projects. Implementation projects will fund the purchase and installation of pole-mounted, streetlight, and/or curbside Charging Stations at selected locations within participating municipalities. The Program will offer an Expedited Pathway that includes the installation of up to five (5) Flo SmartTWO Charging Stations at up to three (3) sites per municipality. If the Expedited Pathway does not meet the needs of a municipality, they will be offered a Custom Pathway to identify and install on-street charging that meets resident’s needs (see table below). All Charging Stations will be installed and energized by January 2026.

	<u>Expedited</u>	<u>Custom</u> *Any variation from the Expedited Pathway
Original Equipment Manufacturer (“OEM”)	FLO	FLO or other OEM
Charging Station Type	SmartTWO Level 2 Charging Station <ul style="list-style-type: none"> • Dual-Port • Pedestal-mounted • 7 kW power output per port 	Any Level 2 Charging Station <ul style="list-style-type: none"> • Single or Dual Port • Pedestal, pole, streetlight mounted • 7-19 kW power output per port
Charging Station Quantity	2-5 Dual-Port Stations (10 Ports)	Up to 10 Charging Ports
Distribution Cabinet	One of electrical cabinet options: <ol style="list-style-type: none"> 1. 150A 120/208V three-phase 2. 225A 120/208V three-phase 3. 225A 120/240V single-phase 4. 400A 120/240V single-phase 	
Ownership Model	Municipal-owned	<ul style="list-style-type: none"> • Municipal-owned • Third-party owned • Leased
Power Supply	Single- or three-phase power from utility transformer on pole or in manhole	
Bollards	One bollard in front of dual-port station	Additional bollards

Lastly, CET will develop a comprehensive On-Street Charging Guidebook that will include the following information. The Guidebook will be finalized by November 2026 and made available to the public.

- Examples of on-street charging models in municipalities within both public utility and Municipal Light Plant territory;
- Level 1, Level 2, and Level 3 charging station models, and pros and cons of each;
- On-street charging station ownership models (public, private, public-private partnerships, leases);
- Average timelines for procurement and installation;

- On-street charging location and siting considerations, specifically as it relates to Environmental Justice Communities (EJCs);
- Cost and revenue estimates for planning, installation, operation, and maintenance;
- Identification of key stakeholders and communication, education, and coordination best practices between municipalities, residents, EJC representatives, utilities, and network service providers;
- Identified decision points and municipal, utility, and network service provider decision makers;
- Land use ordinances/by-laws and recommended expedited permitting processes;
- Zoning, regulatory, policy, and permitting challenges and recommended solutions;
- Parking regulation and enforcement examples and recommendations;
- Parking spot accessibility considerations, lighting safety guidelines, and cable management;
- Language accessibility of charging stations and corresponding apps;
- Recommendations for a maintenance plan extending beyond the manufacturer warranty;
- Sample "right to charge" ordinance template;
- Sample land use ordinances and by-laws;
- Liability considerations;
- Education plan for how municipalities can engage landlords, property owners, and housing/condo associations on the benefits and considerations of on-street charging. The guidebook should include general support materials and guidance for stakeholder engagement and public outreach; and
- Funding opportunities.

Data collected through the Program will include, as available:

- Program throughput (number of municipalities receiving feasibility studies/number municipalities receiving implementation funding/Charging Stations installed/sites assessed, community members reached);
- Community outreach efforts (number of events attended or hosted, CBOs reached and engaged, estimated number of residents reached)
- Costs, savings, and revenue (permitting costs, Charging Station costs, infrastructure and installation costs, maintenance and operations costs, electricity costs, Charging Station revenue);
- Grid impacts (kWh consumed/day, kW max per site); and
- EJC impacts (Total Number of Chargers installed and operating in EJCs).

Piloting pole-mounted and streetlight charging stations remains a critical goal of this Program. In preparation of the Program, MassCEC staff spoke with Eversource and National Grid to determine the viability of pole-mounted and streetlight charging stations in their service territories. Eversource and National Grid signaled unwillingness to participate in pole-mounted charging station projects due to the complexity of ownership structures and competition for pole



space amongst the municipality(ies), electric utility company(ies), and telecommunications companies. National Grid and Eversource sited additional concerns with safety and insurance – specifically referencing the complexity of charging station ownership and liability in the event of a vehicle collision with the pole or other accident. Conversely, MassCEC staff spoke with Municipal Light Plants (“MLPs”) within the Commonwealth on the viability of installing pole-mounted and streetlight charging stations, MLPs expressed interest in piloting pole-mounted and streetlight charging stations in their communities. As a result of these discussions, MassCEC staff are pursuing piloting pole-mounted and streetlight charging stations in MLP service territories.

Municipalities serviced by MLPs selected to receive on-street charging technical assistance and feasibility studies include the City of Taunton and the Town of South Hadley. If sites within their MLPs are conducive, CET will provide recommendations for installing pole-mounted and/or streetlight Charging Stations in their communities. These learnings will be made public and can be shared with the DPU through the Feasibility Study Final Reports, which have a target delivery date of September 2025.

Municipalities serviced by MLPs selected for on-street charging implementation include the City of Holyoke and the Town of Norwood. As their MLPs are willing, CET will prioritize working with them to pilot pole-mounted and streetlight charging stations. If pole-mounted or streetlight Charging Stations are installed in these municipalities, the Charging Station types, and selected sites can be shared with the DPU around August 2025. If installed, MassCEC will share learnings from pole-mounted or streetlight Charging Station Installation and Commissioning beginning January 2026. All Program learnings will be included in the On-Street Charging Guidebook and will help to inform future on-street, pole-mounted and streetlight Charging Station projects throughout the Commonwealth.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rachel Ackerman'.

Rachel Ackerman
Senior Director