

# Commonwealth of Massachusetts EXECUTIVE OFFICE OF HOUSING & LIVABLE COMMUNITIES

Maura T. Healey, Governor 🔶 Kimberley Driscoll, Lieutenant Governor 🔶 Edward M. Augustus, Jr., Secretary

TO:	All Local Housing Authorities
FROM:	Greg Abbe, Sustainability Program Developer, and other EOHLC Staff
RE:	Guidance Related to Electric Vehicle Charging Infrastructure
DATE:	August 8, 2023

This notice provides guidance to Local Housing Authorities (LHAs) with respect to electric vehicle (EV) charging at state-aided public housing. The Federal government is increasing incentives for purchasing EVs, and Massachusetts introduced increased incentives for income-eligible customers. These make it more likely that LHAs will see EVs at their developments soon. As such, EOHLC recommends the following.

# Guidance on LHA Response to EV Charging Requests from Residents

Providing EV charging infrastructure should be deliberate and thoughtful. Residents should not be allowed to charge via extension cords, or by plugging into exterior outlets. Running extension cords to cars not only poses a danger for trip and fall, but also increase utility costs to the authority with no recourse for repayment. Most importantly, it poses a risk of electric shock and even electrical fires.

## Installation and Equipment Choices

EV chargers are now available at competitive rates from NGRID and Eversource, with additional rebates available through the <u>DEP's EVIP Program</u>. The service providers will both update service to the site as well as provide a list of qualified installers for the Housing Authority to work with to install stations. The installers are also familiar with all associated rebates for the installation. The process is a first come first serve basis, although you may be able to receive recommendations from the installers for the purposes of planning for your charging stations. The information from the two utilities can be found here:

National Grid (NGRID): Commercial and Fleet EV Charging Programs | National Grid (nationalgridus.com)

Eversource: Charging Stations | Eversource

EV chargers have varying rates of charge from the slowest Level, 1 to the fastest level 3 typical to highways. Discuss the charging level with the service provider to determine which will be the most beneficial for the LHA's needs. This will most likely be Level 2. LHAs must procure EV charging equipment in accordance with normal procurement rules including a revision to Capital Plans.

EOHLC recommends that LHAs evaluate their EV charging needs anytime they are planning to re-pave a parking lot. While EV charging stations can be installed at any time, installing electrical conduit under a parking lot in

anticipation of chargers will allow new paving not to be cut and patched in the future. It is recommended that you contact potential installers listed on the NGRID or Eversource EV charging sites to discuss optimal locations.

Please note that LHAs located in utility territories other than NGRID or Eversource can access the EVIP program. As more utility rebates are identified, this document will be updated.

This statewide contract applies to installation of charging stations. LHAs are advised to seek advice of legal counsel regarding whether their project would fall under MGL ch. 149 and ch. 30. https://www.mass.gov/doc/veh102/download

Please see the links at the bottom of this document for further information. EOHLC will update this document from time to time as new information develops.

### **Operations Policies**

LHAs may charge residents for the direct cost associated charging the vehicle plus a surcharge to defray maintenance of the stations, the subscriptions required to run the service, and any other incurred expenses related to the system. LHAs should speak with their HMS for additional guidance. If the LHA would like to offer the stations for public consumption, they should discuss with their provider appropriate fees to charge for this service. It is not necessary to limit that cost as noted above.

## Additional Considerations

### LHA Fleet Vehicles

LHAs can procure electric vehicles for their own fleets. These vehicles, especially when fully electric, have dramatically reduced maintenance needs and costs, as well as lower fuel costs. With fleet vehicles typically traveling only between LHA developments there is less concern about range constraints with some electric vehicles.

If LHAs are interested in procuring electric vehicles they may look to <u>statewide contract VEH110</u> and the <u>Leading by</u> <u>Example program</u>. LHAs can purchase trucks, vans, SUVs, cars, golf carts, and other types of vehicles all of which are full-electric, plug-in hybrids, or regular hybrid vehicles. There is a list of current vehicles available as part of the statewide contract: <u>https://www.mass.gov/doc/greening-your-fleet-with-statewide-contracts-32522/download</u>

#### Risk and Property Management

There are many links below which detail items LHAs may wish to consider when installing EV chargers. Best practices EOHLC recommends include the following, and EOHLC encourages LHAs to practice due diligence when installing EV chargers.

- Install chargers away from buildings and site-infrastructure such as fuel tanks, transformers, etc.
- Install chargers in areas that are not flood-prone.
- Chargers should have emergency manual electrical cut-off switches.

# Links to EV-Related Topics

General Information about EVs and charging

https://www.mass.gov/doc/considerations-to-inform-ev-charging-station-decision-making/download

https://www.mass.gov/service-details/mccormack-building-electronic-vehicle-charging (policy/chargepoint)

https://www.mass.gov/info-details/electric-vehicle-charging

https://www.mma.org/wp-content/uploads/2022/12/MMA-Webinar-EV-Policy-Municipal-Opportunities 12.12.22.pdf

Federal and State EV incentive programs (vehicles and charging systems)

https://www.whitehouse.gov/briefing-room/statements-releases/2023/04/17/fact-sheet-biden-harrisadministration-announces-new-private-and-public-sector-investments-for-affordable-electric-vehicles/

https://afdc.energy.gov/laws/all?state=MA

https://www.mass.gov/how-to/apply-for-massevip-public-access-charging-incentives

https://www.mass.gov/how-to/apply-for-massevip-workplace-fleet-charging-incentives

https://www.mass.gov/how-to/apply-for-massevip-multi-unit-dwelling-educational-campus-charging-incentives

Property Management and Risk Management Considerations

https://www.usfa.fema.gov/prevention/vehicle-fires/electric-vehicles/

https://www.marsh.com/uk/industries/transportation/insights/ev-charge-points-new-risk-considerations.html

https://static.aviva.io/content/dam/document-library/risk-solutions/aviva\_electric\_and\_hybrid\_vehicle\_charging -\_property\_risk\_management\_guidance\_lps.pdf

https://www.facilitiesnet.com/energyefficiency/article/Practical-Considerations-for-EV-Charging-Station-Installation--19805#:~:text=Additionally%2C%20it's%20best%20to%20install,a%20reliable%20Wi%2DFi%20connection.