

Tesla to Open Store in CT

Tesla Store to Open on Tribal Land in CT

Tesla, frustrated for years by the legislature in its attempts to obtain permission to open stores in Connecticut, is now opening an outlet where the state rules don't apply: the Mohegan Tribal land. Tribal land exists outside state jurisdiction and is subject only to federal law.

This tactic has been previously used by Tesla in New Mexico, where it has opened 2 outlets on tribal land, and in New York, where it has announced an agreement to build on Oneida Nation land about 20 miles east of Syracuse. New York has a limited number of Tesla stores, but this came about via a negotiation with the dealerships. The franchise laws there are still in place. This limited exception arrangement applies only to Tesla (i.e. not Rivian or Lucid) and caps the store count. Tesla has been chafing at this limit for a long time. Every Tesla store or gallery in NY is in New York City, Westchester County, or Long Island. The entire upstate region has been unserved.

The new Tesla facility, to be located at a former Victoria's Secret outlet at the Mohegan Sun Casino, will sell and deliver vehicles. Test drives will be available. Renovation of the space is set to commence imminently and should be finished at some point this fall. Deliveries will begin before the facility is completed, and we will publish an update when that information is finalized. It is not a service-center.

Mohegan Sun is located about 44 miles from Hartford, 54 miles from New Haven, and 93 miles from Stamford. Stamford is the heart of Fairfield County, which is Tesla Central. And that is

the limitation of opening on tribal land – it is not near the big population centers. Nonetheless, it will make a material difference for residents of the eastern part of the state. It is our expectation that Mount Kisco will remain a delivery option for customers in western CT. We are also waiting to hear the word on whether deliveries to CT customers will be enabled at the forthcoming Chicopee, MA location (10 miles over the state line off I-91. It will be a while before that large facility is built.)

A sales and delivery facility on tribal land does not mean that the company will stop its efforts to win the right to open stores in CT (a.k.a. direct sales). This could be viewed as planting a flag by Tesla, as the legislature has not acted in the interests of its constituents, over 80% of whom support allowing direct sales. On the other hand, the facility will open and the dealers will see that the world isn't coming to an end. (A lengthier discussion of direct sales, following the Transportation Committee's failure to raise the direct sales bill in the 2023 legislative session, can be found [here](#).)

The obvious follow-on question is whether Rivian and Lucid will do the same thing. A lot of people come to these tribal casinos. It is good business for both parties.

According to the Mohegan Sun press release, Tesla will work with Mohegan to incorporate Tribal members and Mohegan Sun Team Members into its workforce development program.

We look forward to a future post about the new sales center when they have the grand opening in the fall.

Photo credit: Paul Braren

Teslas for Police: A Better Deal Than Ever

Post by Barry Kresch

Tesla Patrol Car Purchase Price Now Lower Than Ford Explorer ICE Police Vehicle

In 2019, when the Westport Police purchased a Model 3 for use as a patrol car for \$52,000 vs. \$37,000 for the incumbent gasoline-powered Ford Explorer, it was a good deal. But it had to be proven, as some were skeptical that the savings would be significant enough to overcome the \$15,000 purchase premium. In our analysis, we found that when factoring in savings in fuel, maintenance, customization, and expected vehicle life, the Model 3 is projected to save over \$50,000 over a 4-year period. The purchase price differential was recouped in the first year. That detailed analysis is [here](#). Fast forward a few years, however, and things have really changed.

The law-enforcement version of the Ford Explorer, which comes with a few augmentations, such as a heavy-duty alternator, to be able to support the customization needs of the police, is now \$47,000. The Westport Police expect delivery next month of their third Tesla and second Model Y, purchased this year, for which they paid \$53,000. This new Tesla is eligible for Inflation Reduction Act incentives of \$7500, making the acquisition price lower than the Ford.

The IRS code section 45W, clean vehicles for fleet incentives, applies to this vehicle. In 2023, obtaining the credit is a little cumbersome because an entity that does not pay taxes must file for “direct pay” to get the funds from the Treasury. This will become easier in January when the transfer provision

goes into effect. The buyer transfers the tax credit to the seller and the seller gives the incentive as a rebate, deducted off the invoice price. This [article](#) describes the process for non-taxable entities.

The department buys the same Tesla vehicles that consumers buy. The Model Y that the police bought is the lowest-priced trim level – dual motor (AWD), standard range (279 miles). With continuing price-cutting by Tesla, that model, if bought today, goes for \$47,740. At that price, it would also be eligible for a CHEAPR rebate of \$2250. (CHEAPR rebates for fleet purchases are expected to be implemented within the next couple of months of this writing on 6/27/23.) The net purchase price for a Model Y will be \$37,990, or \$9000 less than the Explorer.

The Model Y now seems to be the EV of choice for the Westport Police, rather than the Model 3 due to the extra space. At the time the Model 3 was purchased, the Model Y did not yet exist. (The only other police department in the state with an electric patrol car is Wethersfield, which has a Ford Mach-E. The Westport PD also has other EVs for non-patrol duty uses, including these [new additions](#).) A video walk through of a fully customized Model Y and the Mach-E can be found on the Club's [YouTube](#) channel.

Increased Expectations for Vehicle Service Life

When we did the financial analysis in 2021, after the Model 3 had been in service for a year, we built an amortization schedule based on a projected 6-year service life for the Tesla compared to the historical 4 years for the Explorers. (After 4 years, the maintenance costs for the Explorers make it not cost-effective to continue using them as patrol cars.) Three years into the use of the Model 3, the police feel it is quite possible that the 6-year projection may be too

conservative. The vehicle is holding up well. Maintenance costs are as low as forecast. The battery is in good shape (and they are monitoring it with Tesla-Fi). They intend to run with it as long as they can. Let's say, and this may also be conservative, that the 6 years turns into 8 years. *That means the capital cost of acquiring patrol cars gets cut in half.*

How Is This Not a No-Brainer?

- Lower acquisition cost
- Lower fuel costs
- Lower maintenance costs
- Double the service life
- Better performance

TOWN OF WESTPORT, CT



1835
VEHICLES DISPLAYED COURTESY OF
CHIEF FOTI KOSKINAS

VEHICLES BUILT BY



Fleet Auto Supply
(800)-WE-FLASH

BUILT WITH PRODUCTS FROM

HAVIS

SETINA

WHELEN

All Manner of EVs for Westport Police

Westport Police Add Electric Utility Vehicle and Electric Motorcycle to Fleet

Both vehicles were on display at the Westport Sunrise Rotary Duck Race fund raiser on June 24th as the department display the ongoing results of its efforts to reduce carbon emissions, as well as benefit from lower EV operating costs.

The photo at the top is the all-terrain utility vehicle. It looks rather like a golf cart, though designed for heavier-duty applications, including the winch on the seen on the front. This vehicle has the life we would all like to have, spending its days at Compo Beach, where it can be used on the sand if needed.

The vehicle is powered by 6 12-volt batteries. These are not lithium-ion. A charge lasts between 8-12 hours.



Vehicle interior.



Zero Electric Motorcycle

Photo is Westport Police Chief Foti Koskinas sporting the new Zero Electric Motorcycle (before he had a chance to change into his uniform). The Zero is a recent arrival and still has to be outfitted with decals and police lights. It will be used for parking and traffic enforcement. It replaces a Harley that was retired.

This stealthy bike has a 17.3 kWh battery, rated for a range of 183 miles city and 85 miles highway. Chief Foti states that those numbers are so far achieved in real world experience.

Besides these two new vehicles, the department has 2 Tesla patrol cars with a third on order, 2 Toyota Prius Prime Plug-in Hybrid, Honda Clarity PHEV, and a BMW i3 Battery Electric Vehicle – seven plug-in vehicles in all plus a Ford Interceptor conventional hybrid patrol car.



Legal Battle Over Proposed Shelton Rivian Service Center Continues

Court Rules in Favor of Rivian's Motion to Dismiss; Plaintiffs File Motion to Reargue

Note: For those following this case, the docket number is AAN CV 22-6049137 in Superior Court, J/D of Ansonia, Milford. This is the [link](#).

Update: Hearing scheduled for June 20 regarding plaintiffs motion.

June 20 Update: Court denies plaintiff motion for re-argument and sustains Rivian's objection to plaintiff's motion.

Rivian needs a license from DMV. Should they get that, and if there are no further appeals, they should then be in a position to begin renovating the site. The plaintiff has 20 days from June 20 to file an appeal if they so choose.

=====
=====

Rivian seeks to open a service center in Shelton, though they also want to deliver new vehicles at the location. There would be no showroom and no sales activity. Shelton granted an approval for a facility to be located at 2 Mountain View Drive. Mario D'Addario Buick, along with TD Properties, the

owner of the D'Addario property, filed a lawsuit to force the Town to rescind the approval.

On May 16, the court ruled in favor of a motion filed by Rivian to have the lawsuit dismissed. The court ruled that the plaintiffs lacked standing due to their arguments not being a zoning issue but rather a licensing issue, which is the province of the Department of Motor Vehicles. Zoning regulations are meant to protect the public interest and are not intended to address business competition. Furthermore, Rivian acknowledged that it cannot carry out any activities that may require a license until it obtains such a license.

On June 5, the plaintiffs filed a Motion for Reconsideration and Reargument. They contend that since D'Addario has a new car dealer license and Rivian does not, they are a protected class of business in this licentiate, and this amounts to illegal competition.

This is not a legal blog and we don't know whether DMV will get involved or where this will go. This is an earlier [post](#) from when the initial lawsuit was filed. Our opinion, in general, is that the dealerships are trying to make it as difficult as possible for direct sales companies to open servicing facilities. We have seen this with Tesla in East Hartford and South Windsor, and now this episode with Rivian.

Goodbye, Mt. Kisco, Sort Of

Tesla Leasing Customers Can Now

Pick Up Their Vehicles in Milford

A shout out to Rich from the Tesla Owners Club for announcing this update. **Customers who lease a new Tesla will be picking up their vehicle at Milford.** To be clear, this does not apply to customers purchasing a vehicle.

This is franchise law related. The franchise laws that are being used by dealers to prevent Tesla and other direct sales manufacturers from selling directly were written so long ago that they don't apply to leases. Way back when, leasing was not a thing, and the law does not address it.

Tesla has been doing leasing paperwork at Milford for several years now, but hasn't delivered vehicles there. It sounds like there were some logistical hurdles, which have now been worked out with the Department of Motor Vehicles. No more temporary plates! Permanent plates will be on the new car.

20 Level 2 Chargers Installed at Department of Transportation HQ

Photos by Paul Braren

20 EVSE L2 Chargers at DOT

An EV charger installation at DOT headquarters in Newington is now open. The location is 2800 Berlin Turnpike. The 20 level 2 chargers are from EVSE, LLC, an Enfield, CT based manufacturer. The chargers have J-1772 connectors. They are

40-amp units and there is a 4-hour parking limit. That amount of time should get most vehicles ~140 miles of charge.

These chargers are currently open to the public and the price is right (free)! We do not know how long either of these conditions will last. The chargers are at the DOT building, not in a downtown parking lot, so not the most convenient for someone who does not have business at DOT or the immediate area. But we'll take more chargers anywhere we can. This location is noted in PlugShare with a number of happy check-ins over the free juice.

One of the features of these chargers is auto-coil. When the cord is disconnected from the vehicle, there is a mechanism to automatically retract the cord into the housing of the charger, which is clearly seen in the photo of charger number 20 below. This is a valuable feature. Many older chargers have cords that need to be manually wrapped, which is a nuisance that people frequently don't bother doing. The cord ends up flopping on the ground, subject to damage from becoming overly entangled with itself, snow or ice, or cars driving over it. That is the best way to get out-of-service chargers. Whether it is auto-coil or other systems that do a similar thing, this is a best-practice with EV chargers.

The Rivian R1T in the photos has a camper package. This is a third-party package that fits the Rivian. Rivian camper packages have seen lengthy delays.



What The Consumer Needs To Know About The New Battery Rules

Photo above: Ford expects its Mustang Mach-E to qualify for half the incentive; Chevy expects the same for its Bolt.

Battery Rules Issued

January 1 came and went. The new federal incentives in the Inflation Reduction Act became law but the implementing agency, the IRS, had not completed rule-making for several portions of it, most particularly how manufacturers can be in compliance with the new rules for sourcing and refining of critical minerals and battery assembly. The IRS said it needed until March. True to its word, the rules were issued on March 31 and take effect April 18th. This interim period allows manufacturers to determine which vehicles will be eligible and whether the certification will be for the full \$7500 credit or only half.

Consumers have gotten a benefit from this delay as more vehicles were temporarily eligible. Many vehicles are expected to lose incentives due the rules. If you have cash burning a hole in your pocket and are in the market, you can still move fast and pick up an EV with the full incentive applied (assuming the other criteria are met). But you have to take possession of it before April 18th. The incentives are applied, in IRS speak, at the "date placed in service."

What Rules Apply

The rule-making itself is highly technical in nature. The law requires that 40% of the sourcing and refining of critical

battery minerals occur either domestically or with a free-trade partner and that 50% of battery assembly takes place in North America during 2023. Going forward, these levels escalate. So, how do you define 40%/50%? The IRS has determined that it is to be based on value. So how does one define value? What is the legal definition of a free-trade partner? (The ink is still wet on some frantic dealmaking that happened so that some friendly nations, e.g. Japan and South Korea, could officially become free trade partners.)

We'll know on April 17th what vehicles are eligible for how much of the incentive, but it will be a continually evolving list as manufacturers wrangle supply chain logistics and as the requirements escalate. It is possible that a vehicle eligible in one year loses eligibility in a subsequent year if the supply chain has not maintained pace with the requirements. And it has to be done in an environment of (presumably) a rapid ramping up of production volume. This article from [Reuters](#) includes statements by some manufacturers regarding which vehicles stand to lose incentives. This is the [Department of Energy](#) page that lists qualifying vehicles. It will be updated on April 17th.

Making Sure the Vehicle is Incentive-Eligible

It certainly helps if a manufacturer certifies that a given vehicle is incentive-eligible. But the IRS is officially determining eligibility based on the VIN. This is a new world we're about to enter, and with all that is being written in the press about how these incentives work, there hasn't been much discussion of this potential for a consumer to be left in the lurch.

It is possible that two of the same make/model/model year vehicles have different incentive statuses, based on when and where the manufacturing and delivery take place. When filing

for the tax credit, the VIN is required and Treasury matches it to its records. It is advisable to check the VIN before buying the vehicle. That can be a hassle, as for a made to order vehicle, the VIN isn't available until late in the game.

The EV Club, in partnership with the Electric Vehicle Association, recommended that the IRS use make/model/model year and deal with it at the manufacturer level. Our take is that asking consumers to be in the VIN checking business is a clunky way to go. It could cause an unpleasant surprise. It definitely fosters confusion.

For readers of this blog, if you buy an EV after the new rules are in effect, we are interested in hearing about the process and if you felt protected if you were promised an incentive.

Leasing

For those who lease, none of the rules apply, not even North American final assembly. The full incentive applies. Just remember, the finance company gets the incentive. It is up to the consumer to verify it is being passed along, which is not legally required. It is called a subvented lease.

Other Rule-making

Yes, there's more, particularly the foreign entities of concern rule and the transfer.

Foreign Entities of Concern

The foreign entities of concern rule, which will phase in during 2024 and 2025, will likely include several countries, but is really all about China, which currently dominates the battery mineral supply-chain and has a lot of battery IP. What about Chinese investments in this country? Ford recently announced a joint venture with the big Chinese battery

company, CATL, to build a plant in Michigan to manufacture LFP (Lithium Iron Phosphate) batteries. Does this comport with the law? In this case, Ford is banking on the fact that it is only the IP that comes from CATL and that the plant is owned by Ford. This is an article in [Politico](#) that discusses it in some detail but stops short of making a definitive statement. Stay tuned.

Transfer Provision

The transfer provision kicks in as of Jan 1, 2024. This year, the incentive is a tax credit. There are two drawbacks to tax credits. The first is that you have to wait until you file your taxes to get the incentive. The other is that you need to have the tax liability to burn it off. The transfer provision allows the consumer to transfer the incentive to the dealer or manufacturer and take the credit as a “cash on the hood” rebate. Unlike with a lease, the law requires the dealer to transfer the full amount of the credit to the consumer. That solves the timing problem. But what about if the consumer doesn't have \$7500 of tax liability? Could there be a claw-back? That seems unlikely. The intent of the transfer provision is, in part, to be an equity measure, so people without tax liability could take advantage of the incentive.

It's Magic

Tesla Debuts Combo Port to Accommodate CCS Charging

The photo above, taken by Paul Braren at the Tesla

Superchargers in Brewster, NY, displays the new Tesla “Magic Dock.” That is the hunk of plastic at the upper left of the connector. The Tesla connector is plugged into a Combined Charging Standard (CCS) adapter.

Federal NEVI Funding Moves Tesla to Accommodate Open Standard

The background is the National Electric Vehicle Infrastructure (NEVI) part of what is referred to as the bipartisan Federal Infrastructure Bill that predated the Inflation Reduction Act (IRA). There’s money in the air, [\\$5 billion](#) from this legislation, as well as additional funds in the IRA, but proprietary technology will not qualify for federal grants. The CCS standard is used for DC fast charging for every non-Tesla EV. The Tesla charging network is already the most robust. This will enable them to tap federal funds to further accelerate their expansion. The Tesla network has very strong uptime and performance metrics and its entry into the CCS charging space promises to be a major boon for non-Tesla drivers.

7,500 combo chargers by the end of 2024.

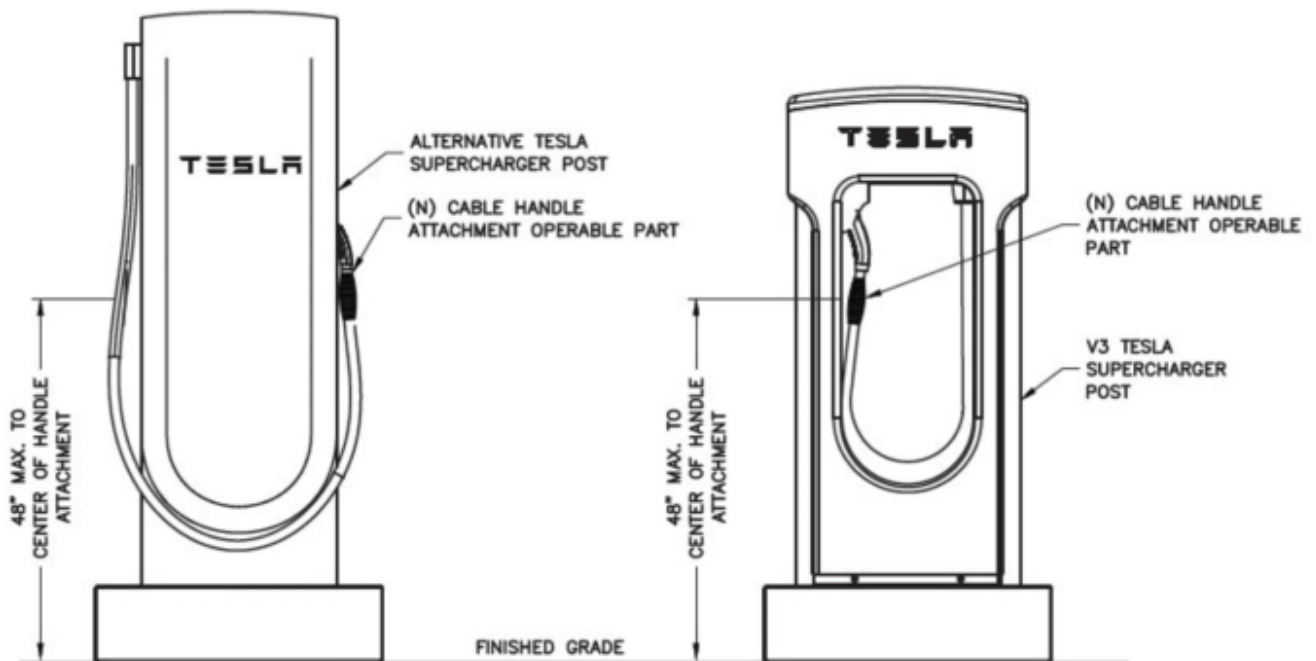
As included in a White House [press release](#), “Tesla, for the first time, will open a portion of its U.S. Supercharger and Destination Charger network to non-Tesla EVs, making at least 7,500 chargers available for all EVs by the end of 2024.” That number includes destination chargers, which are level 2 chargers, and it did not specify a breakdown of destination vs Superchargers.

Using the Magic Dock

When a driver uses this combo connector, the smartphone app will tell the charger what kind of car it is. At present, the app is a Tesla app, which can be downloaded by owners of non-Tesla EVs. We'll see if that creates a problem with the Feds if they demand a more open system. If the app recognizes a Tesla, the charger will unlock only the Tesla connector. For other vehicles, it will unlock the connector with the CCS adapter attached. In the latter case, the CCS adapter will be locked to the Tesla connector so that someone doesn't make off with it. At present, there are only a small number of these combo chargers installed. According to the Tesla charging network maps, none are in CT; they are only in New York and California.

There is one other issue. This photo is a V3 charger. At Tesla chargers, vehicles back in and the charging port is at the driver's side-rear of the car, similar to where a gas tank is usually located. The length of charger cord needed to reach the port is pretty short. Different manufacturers locate charging ports in different places on the car. There have been reports of vehicles parking at an angle or horizontally, and taking up multiple spaces, in order to be able to plug in. It is not a simple matter to switch out these cords for longer ones. They are liquid cooled and would experience power loss. Tesla has removed the bollards from at least some of the superchargers, which would provide a tad more wiggle room. Hopefully, nobody crunches into something they shouldn't!

The solution is a new design, which is what Tesla has previewed here:



The V3 is on the right and the new V4 is on the left. Note the different style of connector with a considerably longer cord, external mounting, and much taller unit in general. That seems to be a good answer. Now we await word on the timing of the planned rollout, which may well be contingent on the timing of the grant funds.

Big Charger Installation Underway in Westport

Update: 4/27/23

The installation of 12 chargers is complete, including Eversource installing transformers and the town wiring them to the charging units. They have not yet been turned on. We await word from the Town when that will be and if there will be a fee to use them.

Baldwin Parking Lot to Host EV Chargers

The photo shows several JuiceBar Level 2 chargers being installed in the Town owned Baldwin Lot in downtown Westport. According to CT-based manufacturer, JuiceBar, they have been commissioned to install 12 of these units. The Town of Westport advises that they have also installed all the necessary conduits, circuitry, etc. to accommodate an additional 12 units, the timing for which is to be determined. The Town also advises that all going forward planning for parking now includes EV charging.

From the Town's perspective, the installation is complete. What remains is for Eversource to do its part – pulling in the primary service cables, setting the new transformer, and wiring it to their side of the electric meter so the distribution panels will become energized. Eversource has not given a specific date. The Town estimates 4-6 weeks.

These are 80 amp units, which is as powerful as it gets for a 240 volt, Level 2 charger. Most level 2 public chargers are 30 or 40 amps. Where that matters is charging speed for vehicles that can take advantage of it. A vehicle's onboard charger converts the AC current to DC and controls the flow of energy. It takes an onboard charger of 19.5 kW to fully utilize this level of power, which will deliver over 80 miles of range per hour of charge. If your vehicle's onboard charger is lower than 19.5 kW, and most are, it simply means the rate of charge will be slower. It will not damage the battery. It is forward-looking that a unit with this amount of power is being installed. The capacity of onboard chargers is steadily increasing as battery technology improves.

To be clear, these are not Level 3 DC fast chargers. These chargers are located in a lot where vehicles are typically parked for an hour or two as there are numerous stores and

restaurants in the immediate area. But now that hour or two can bring with it a substantial amount of charge, as opposed to the relatively token amount of mileage on many of the low-powered units that are out there.

These units have J1772 connectors.

The charging may be free when the units are first fired up. The town has provided free charging at its other EV chargers (library, Town Hall, both Metro-North depots, Staples). That will change. When and how much has not yet been decided.

Utility Incentive Program Updates

Restructured Residential Managed Charging Incentives

For the first year of the program, there was one incentive program. This was a so-called demand-response (DR) program, where the EDCs would declare demand events during peak load periods on hot days. These occurred during 3-9 PM on weekdays from June through September. They don't happen all the time, just when demand is very high due to heavy air-conditioning use.

The new plan revises this DR incentive and adds a second level of incentive known as Advanced Managed Charging, or Advanced Tier.

Before getting into the details, let's zoom out a bit.

As noted, current peak demand periods occur during hot summer afternoons. In a fully decarbonized, meaning electrified world, demand patterns will significantly change. If heat pumps become the primary means of climate control, they will be working hardest on the coldest nights where gas and oil do the heavy lifting now. The summertime demand will be reduced since heat pumps are more efficient than AC compressors. So the Public Utilities Regulatory Authority (PURA) wants to inculcate in consumers the habit of thinking about peak and off-peak utilization as a year round thing, while still responding to the near-term load-shedding needs that occur over the summer.

The Authority directs the EDCs to implement an annual passive managed charging program for the residential Baseline Tier, with the on-peak period of 3:00 P.M. to 9:00 P.M. weekdays

participants shall be eligible for a maximum monthly incentive of \$10, so long as the customer charges the EV at least 80% of the time during off-peak hours for the given month

EDCs will stagger start times to prevent “timer peak.”

These new programs are anticipated to be effective as of April 1, 2023.

Baseline Tier

The Baseline Tier is structured in 2 parts with separate payouts.

The first is a Passive Managed Charging tier where participants charge 80% or more of the time during the off-peak period and would be entitled to a \$10/mo award. Peak times are 3 PM – 9 PM weekdays for this monthly incentive.

Additionally, the Demand Response Events remain during June to September where participants are encouraged to not opt-out of optional DR Events. There can be up to 15 such events,

occurring between the hours of 3 PM – 9 PM per month. Participating (i.e. not opting) out in all events in a given month would entitle a Participant to an additional \$20/mo for the four DR months.

In total, customers could earn \$120 (\$10/mo for 12 months) and \$80 (\$20/mo for 4 DR months) for a total of \$200 in Baseline Tier. The total amount of the incentive remains unchanged; only the structure is different.

Advanced Tier

This tier is referred to as Active Managed Charging, where participants work with their utility to set a daily charging schedule that avoids on-peak charging. Customer inputs the State of Charge (SOC) that they need and a Time Charge is Needed (TCIN) and the utility does the rest. Participant can set these as default, for example, “every day, I need 100% charge at 7am” and the utility does the rest. They can also adjust these inputs as needed. Participant is responsible for not overriding the schedule where that act of overriding causes them to charge on-peak. Participants are able to opt out in such a way twice in a given month and still retain their incentive – any more and they forfeit the incentive in that month. There must be a minimum of two at-home charging sessions during the month. The incentive is \$25 per month or \$300 per year.

Peak time is the same 3 PM – 9 PM as in the Baseline Tier.

Of the comments noted in the docket, the most interesting was from DEEP, which “opined that rather than limiting charging under this tier to solely off-peak hours, the Advanced Tier should instead allow charging during all hours and provide dynamic managed charging to real-time grid conditions.” That would be an optimal approach as, for example, it would take into account weather and distributed energy resource contributions, rather than the current flat approach of set

time periods. Ultimately, that is the way we need to go.

Note: Purchase, installation, telematics enrollment incentives are unchanged. In the original docket there was an enrollment option involving a device that would be placed on a dumb charger. There is no sign that one has been approved. There was no mention of anything about it in the participation data.

Additional Funds

Eversource and United Illuminating, the electricity distribution companies or EDCs, have reported high rates of participation for the DCFC (level 3) part of the program, as well as for the installation of level 2 chargers at Multiple Unit Dwellings (MUD). The MUD incentives apply to buildings with more than 5 units and are governed by the rules for commercial incentives. The Public Utilities Regulatory Authority (PURA) has authorized making more funds available in the near term (by accelerating funds designated for other years). Eversource and UI have compiled waitlists for applications received subsequent to funds depletion which will now be able to be included.

Leasing Program for Level 2 Chargers at MUDs

MUD = Multiple Unit Dwelling.

For these dwellings, defined as having 5 or more units, PURA has directed the EDCs to implement a leasing program for EVSE (chargers) as of February 2023. It is felt that some buildings may find it challenging to foot the upfront cost for multiple chargers/ports, even with the incentives and that leasing could ease overcome that. Furthermore, it allows the homeowner associations or building owners to gain experience with charging and tenant interaction.

The leases will be offered for 5 years, followed by an option to renew for another 5 years (at a lower price to reflect depreciation). At the conclusion of the second lease period, the dwelling will have the option of buying the chargers or allowing the EDC to repossess them.

During the lease period, the EDCs are obligated to engage a third party to maintain the equipment.

These are the prices listed in the December docket for the first 5-year term and are **not final**. Note that they are reflective of the distance between the EVSE and electric service.

Table 16²³
EDCs' Proposed Tariffs for MUD Level 2 EVSE Lease Program

Distance from Electric Service or First Charger	Eversource		UI	
	Baseline	Underserved	Baseline	Underserved
Two Charging Ports				
Within 25' of Charger	\$91.23	\$91.23	\$113.10	\$113.10
Within 50' of Charger	\$91.23	\$91.23	\$113.10	\$113.10
Within 75' of Charger	\$103.39	\$91.23	\$124.40	\$113.10
Additional Two Charging Ports²⁴				
Within 10' of Charger	\$93.42	\$91.23	\$115.13	\$113.10
Within 20' of Charger	\$140.12	\$91.23	\$175.42	\$113.10
Within 30' of Charger	\$170.31	\$91.23	\$209.27	\$113.10

Managed Charging for MUDs

How to charge for the power and offer incentives for load-shedding are complicated in an MUD setting, given that incentives are not always aligned between landlords and tenants, and there could be competition between tenants for

less expensive charging slots. The EDCs have been directed to propose a voluntary opt-in managed charging program for MUDs for review by May 1 and implementation by July 1, 2023.