September 4, 2026

Commissioner Elizabeth Mahony
Massachusetts Department of Energy Resources
100 Cambridge Street
Boston, Massachusetts 02114
ATTN: Ms. Morgan Bowler, Clean Energy & Sustainability Coordinator

RE: Comments Relative to Proposed Changes to 225 CMR.00 (MOR-EV Regulations)

Dear Commissioner Mahony:

On behalf of the Transportation Association of Massachusetts (TAM), I am writing to provide comments on the Massachusetts Department of Energy Resources' (DOER's) proposed amendments to 225 CMR 26.00 and, specifically, the MOR-EV incentives available for medium- and heavy-duty (MHD) trucks. TAM appreciates the agency's efforts to ensure that limited state resources continue to be available for this program in light of significant federal funding cuts. However, the proposed funding mechanism for purchasing MHD trucks still remains woefully insufficient – particularly considering the cost of electric MHD trucks, their limited capacity and the lack of electric infrastructure necessary to support these vehicles.

As you know, TAM represents companies throughout the Commonwealth that depend upon commercial trucks to move freight, deliver food and medical supplies, provide home heating fuel, support construction, tow disabled vehicles, and perform countless other services necessary to Massachusetts residents and businesses. While TAM shares the Commonwealth's objective of reducing emissions from the transportation sector, we need to embrace a myriad of means and mechanisms for doing so. Whether eliminating the Massachusetts sales and use tax on qualifying rolling stock used in interstate commerce, establishing a meaningful "Dollars for Diesels" truck-replacement program that provides incentives to retire older, higher-emitting diesel trucks; or supporting the expanded use of renewable diesel and other lower-carbon fuels where they can produce immediate emissions reductions using the existing vehicle and fueling infrastructure, there are multiple mechanisms for reducing emissions from the transportation sector.

Put simply, the electrification of MHD trucks is not the only way for reducing emissions. In fact, until the capacity of these vehicles is improved and our electric infrastructure is capable of reliably meeting the demand for electric MHD trucks, there is little reason for a trucking company to purchase an electric MHD truck at this moment. Against that backdrop, however, TAM appreciates DOER's efforts to use the MOR-EV program, one of the aforementioned emissions reductions mechanisms, to make limited Massachusetts funding go farther and sustain the MOR-EV program for as many purchasers as possible.

With that in mind, TAM offers the following comments to the DOER's proposed amendments:-

- 225 CMR 26.07(3)(b). Vehicle Price Caps. The proposed regulations would replace the existing general $2 million price ceiling for medium- and heavy-duty vehicles with class-specific limits. Class 3 vehicles would be subject to a $100,000 sales-price cap, Classes 4 through 6 would be capped at $500,000, and Classes 7 and 8 would retain a $2 million cap. Unfortunately, this change could adversely affect certain companies that rely on certain specialized vocational vehicles that include expensive bodies, equipment, and upfits. Many vocational trucks, often Class 4 through Class 6, exceed the $500,000 threshold. Therefore, a truck could be technologically appropriate for electrification but become ineligible for a rebate because its total purchase price exceeds the applicable cap. This cap will ultimately slow down the adoption of electric MHD trucks by key industries.

- 225 CMR 26.07(3)(e). Class 4 through Class 8 Incentives. Initial rebate amounts for qualifying commercial fleets would still remain tied to vehicle class, beginning at $30,000 for Class 4 vehicles and increasing to $45,000 for Class 5, $60,000 for Class 6, $75,000 for Class 7, and $90,000 for Class 8 vehicles. An electric MHD truck costs substantially more than a new clean diesel truck. The higher acquisition costs associated with electric MHD trucks, as well as the additional costs of charging infrastructure, utility upgrades, and other operational changes make an electric MHD truck economically infeasible. A $90,000 incentive does not eliminate the economic barrier for a Class 8 purchaser. And as the incentive declines through subsequent blocks, the economics become even more difficult. The loss of the former federal commercial clean-vehicle tax credit makes the gap wider still. If Massachusetts genuinely wants fleets to make these investments, the proffered incentive needs to reflect the actual increased costs of purchasing an electric MHD truck.

- 225 CMR 26.07(3)(e). Declining Rebate Blocks. The declining-block incentive structure for Classes 4 through 8 means that incentive values could decline by as much as thirty (30%) percent after each rebate block is exhausted, compared with a lower maximum reduction under the current structure. This creates greater uncertainty for fleets planning vehicle purchases because a company ordering a truck later in the program may receive a substantially smaller rebate than a company purchasing earlier. That uncertainty is particularly problematic for commercial vehicles, which often have lengthy specification, ordering, infrastructure-development, and delivery timelines. Again, TAM appreciates that the DOER is attempting to manage a reduced funding landscape; however, this change continues to reduce the appeal for trucking companies to make the substantial investments necessary to support the purchase of an electric MHD truck.

- 225 CMR 26.07(f). Combining MOR-EV with Other Incentives. The proposed regulations would allow MOR-EV incentives to be combined with other state and federal electric-vehicle rebates or grant programs unless the other program prohibits such stacking. TAM appreciates change for MHD truck end users because the cost of vehicle electrification is sufficiently high that multiple funding sources may be necessary to make a purchase economically feasible. The ban on exceeding the MHD truck's purchase price is reasonable.

- **225 CMR 26.10(5)(e). Program Pause Authority.** The proposed regulations give DOER explicit authority to institute a "Program Pause" for one or more MOR-EV rebate offerings when sufficient funding is unavailable. The DOER generally must provide public notice of at least 30 days. While appreciative that "Rebate Reservation Vouchers" already issued or approved before the announcement of a pause may still be redeemed, the broader authority to pause the program creates additional uncertainty for fleets considering major capital purchases. Once again, TAM appreciates that the DOER is attempting to manage a reduced funding landscape; however, this change continues to reduce the appeal for trucking companies to make the substantial investments necessary to support the purchase of an electric MHD truck.

Vehicle incentives cannot succeed without a parallel commitment to infrastructure. Respectfully, the Commonwealth cannot treat the truck and the infrastructure needed to operate that truck as separate issues.

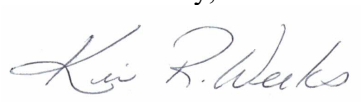
MHD electric trucks require substantially more electrical capacity than passenger vehicles. High-power truck charging can require megawatt-scale connections, major utility upgrades and lengthy interconnection processes. National fleet demonstrations have shown that energizing commercial electric-truck depots can take many months — and in some cases several years.

TAM urges the DOER to work with the MHD truck end user community to develop a range of reasonable emissions strategies that we can implement in the short term while we all work towards a holistic approach to zero emissions in the future. Whether through the changing of laws impacting the application of the sales and use tax on rolling stock used in interstate commerce; the creation of a "dollars for diesels" program which will get older trucks off the road, or the near-term embrace of renewable diesel fuel, there are additional mechanisms for reducing emissions from the transportation sector today while we further develop the means for zero emissions in the future.

~~The MOR-EV program will become a more valuable and effective program as the Commonwealth's infrastructure and electric MHD capacity and cost improves. We urge the agency to work with MHD truck end users to find reasonable solutions for reducing emissions through other means in the meantime.~~

TAM remains encouraged by the Commonwealth's commitment to reducing emissions from the transportation sector and stands ready to work with policymakers toward that shared goal. We are concerned, however, by the considerable time, attention and resources being devoted to programs that, given today's technology, infrastructure and economics, remain impractical for much of the trucking industry, while other achievable strategies capable of producing meaningful emissions reductions today receive comparatively little attention. We urge the Commonwealth to work directly with the trucking industry to pursue practical, measurable solutions that can begin reducing emissions now, while continuing to build toward the technologies and infrastructure necessary to achieve our longer-term zero-emission goals.

Sincerely,



Kevin Weeks
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