

DEPARTMENT OF THE ARMY OFFICE OF THE ASSISTANT SECRETARY OF THE ARMY INSTALLATIONS, ENERGY AND ENVIRONMENT 110 ARMY PENTAGON WASHINGTON DC 20310-0110

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MEMORANDUM FOR DISTRIBUTION

SUBJECT: Department of the Army Policy Guidance on Electric Vehicle (EV) Charging Infrastructure and Equipment in Army Privatized Housing

1. References.

- a. DoDI 4165.14 Real Property Inventory and Reporting, September 2023
- b. DoDI 4165.03 DoD Real Property Categorization, January 2023
- c. DoDI 4165.06 Real Property, July 2022
- d. AR 735-5 Property Accountability Policies, November 2016
- e. Electric Non-Tactical Vehicle (NTV) Acquisition/Charging Memo, November 2023
- f. 2021 International Existing Building Code (IEBC), December 2020
- 2. Purpose. The purpose of this policy guidance is to ensure Department of the Army privatized housing providers offer sufficient access to electric vehicle charging infrastructure for their residents, establish standard practices for proper financial responsibility, and ensure electric vehicle charging is safe.
- 3. Applicability. The following policy guidance applies to all providers of non-transient privatized housing located on Army Installations or on land leased from the Army.
- 4. Effective Dates. This policy guidance is effective immediately.

5. Definitions.

- a. Electric Vehicle (EV): A vehicle that is powered by an electric motor drawing current from rechargeable storage batteries or other portable electric energy storage devices. It includes a battery electric vehicle, a plug-in hybrid electric vehicle, etc.
- b. EV Charging Infrastructure: Also called electric vehicle supply equipment, electric vehicle chargers, or electric vehicle charging facilities. This includes the equipment necessary to safely charge an EV.

SAIE-IHP

SUBJECT: Department of the Army Policy Guidance on Electric Vehicle (EV) Charging Infrastructure and Equipment in Army Privatized Housing

c. Charging as a Service (CaaS): A subscription-based contracting model that generally includes installation, maintenance, and access for electric vehicle charging stations.

6. Objectives.

- a. All new construction and major renovations of privatized housing to which this policy guidance applies shall include the necessary in-home electric infrastructure to support all future connection of either Level 2 or Level 3 EV chargers. For the purpose of this policy guidance, a major renovation is a Level 3 alteration, as defined in Reference (f).
- b. Privatized housing providers shall be responsible for facilitating installation, maintenance, and access to EV charging infrastructure for residents of Army privatized housing to the extent practical when charging access is requested by residents.
- c. Community EV charging infrastructure within a Military Housing Privatization Initiative (MHPI) lease, which includes those at community centers and other common areas used for vehicle parking within the leased footprint (i.e., charging stations not located near a resident's home), shall meet the applicable minimum capabilities requirements outlined in Reference (e), and shall be coordinated with Army Housing Offices (AHOs).

7. Implementing Guidance.

- a. Privatized Housing Providers' plans for EV charging infrastructure shall be reviewed with garrisons prior to implementation as detailed in Reference (e) to ensure the installation has sufficient electric infrastructure to accommodate the EV charging requirements referenced herein. EV charging infrastructure electricity usage will be metered separately from the home's normal electric usage. All work associated with in-home EV charging infrastructure installation or electrical upgrades will be completed by a vendor approved by the MHPI Project Company or by the installation based on the demarcation line for the electric utility listed in the applicable Municipal Services Agreement (MSA). When the resident moves out of the MHPI home, any EV charging infrastructure installed will remain with the home. The resident shall be permitted to remove and maintain any auxiliary charger components purchased by the resident that are specific to their vehicle/charger.
- b. Residents may be responsible for costs associated with the installation, maintenance, and administration of EV chargers and meters if these costs are bundled into CaaS contracts. The resident will be required to sign a lease addendum regarding EV charging that has been approved by the Assistant Secretary of the Army for Installations, Energy and Environment or designee. EV

SAIE-IHP

SUBJECT: Department of the Army Policy Guidance on Electric Vehicle (EV) Charging Infrastructure and Equipment in Army Privatized Housing

chargers may be metered internally or externally to the charging system and will be separately billed to the resident in addition to the rental rate paid by the resident. EV energy consumption will not be covered by Basic Allowance for Housing or any utility allowance. For General Officer (GO) homes, any costs borne by the project or by the Army will be included in the GO cost report.

- c. If the privatized housing providers has entered a CaaS contract with a third-party provider for EV charging infrastructure in the home, residents desiring to charge an EV will be required to enroll in that EV charging program if they wish to charge their EV at the home.
- d. If a third-party EV charger is installed within a home and the resident moves out of the home, reasonable efforts should be made by the Project Owner to ensure the home is leased to another owner of an EV. Home offers and assignments, however, will not violate the Unit Occupancy Plan and associated waitlist management procedures.
- e. If the MHPI project is participating in a Resident Energy Conservation Program (RECP), the EV charging infrastructure metered usage will not be included in RECP baseline averages for like-type groups.
- f. Upon implementation of this policy guidance, residents are required to utilize MHPI Project Owner approved EV charging infrastructure in homes and may not charge EVs from any other household electrical outlets. Resident EV charging guidelines will be included in the EV charging lease addendum. MHPI Project Owners will monitor utility consumption and perform home energy audits to the extent necessary to identify resident violations of this policy guidance. AHOs will engage with residents owning EVs to ensure residents are informed regarding their responsibilities under this policy guidance and the EV lease addendum.
- g. In accordance with References (a), (b), & (c), all real property on military installations must be accounted for by the Real Property Accountable Officer (RPAO), including privately owned and operated assets (e.g., privatized housing and utilities). Permanently installed chargers which meet the definition of real property should be capitalized under facility code 8124 (Electric Vehicle Charge Facility). MHPI Project Companies must work with the installation RPAO to ensure all real property eligible EV chargers are capitalized on the real property and provide required supporting documentation as outlined in Reference (d).
- h. MHPI projects that receive electrical power through the Army installation should anticipate future demand for EV charging infrastructure and require adequate capability of electrical distribution systems and avoidance of increased demand or time-based electricity charges for the installation. MHPI projects receiving electrical power through the Army installation will coordinate their plans with the

SAIE-IHP

SUBJECT: Department of the Army Policy Guidance on Electric Vehicle (EV) Charging Infrastructure and Equipment in Army Privatized Housing

installation Directorate of Public Works via AHOs prior to installation of EV charging infrastructure.

8. Considerations.

- a. Wherever possible, privatized housing provider should prioritize the use of CaaS contracts to mitigate upfront installation costs on residents requesting EV charging infrastructure access. Where CaaS isn't feasible, privatized housing providers should develop pricing strategies that ensure costs associated with home charging are equally distributed between residents benefitting from charging access and use over the lifetime of the ground lease.
- b. The privatized housing providers may choose, but are not required, to partner with Army and Air Force Exchange Services (AAFES) to support the installation of community EV charging infrastructure within an MHPI lease.
- 9. The point of contact for this effort is the Deputy Assistant Secretary of the Army for Installations, Housing and Partnership at (703-697-8161).

CARLA K. COULSON

Deputy Assistant Secretary of the Army (Installations, Housing and Partnerships)

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Chief, Army Reserve Commander, U.S. Army Materiel Command Deputy Chief of Staff, G-9 (DAIN-OD)