CAE-019

The United Illuminating Company **Witness: Logan Taricani**
Brian Morris

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CAE-019 Q:

Program Administrator Order No. 20 Compliance Filing, July 29, 2026, Att. 2, p. 38.

If dual enrollment in the ESS Program and managed charging program is not permitted for EVs, should the make-ready program's 24-month managed charging enrollment requirement be waived for customers who exit the managed charging program solely to enroll in the ESS Program? If not, explain why.

CAE-019 A:

UI does not believe the 24-month enrollment requirement should be waived for customers who exit the Managed Charging program solely to enroll in the Energy Storage Solutions ("ESS") program. As noted on page 16 the Connecticut Electric Vehicle Charging Program Participant Guide[1] ("Participant Guide"), customers who receive an EVSE and/or wiring upgrade rebate must remain enrolled in the Program for at least 24 months, and customers who leave before fulfilling the required participation term may be required to repay a prorated portion of the upfront incentives received. UI notes that in the Authority's Final Decision in Docket 25-08-06, EVSE and/or wiring upgrades were limited only to Low-to-Moderate Income ("LMI") customers to comply with legislative requirements. Additionally, the Authority approved a $100 enrollment incentive for all non-LMI customers. Customers receiving the $100 enrollment incentive are only required to participate in managed charging for a period of 12 months. The Company believes the Authority could apply more latitude to those customers who receive less substantial incentives.

The 24-month participation requirement is intended to ensure that customers who receive substantial upfront incentives, including rebates up to $1,500 for eligible EVSE and wiring upgrades, provide the load flexibility and charging data that support the program objectives of shifting EV charging to off-peak periods, reducing overall system costs and aiding the Connecticut utility companies manage growing EV-related load. Waiving this requirement for customers who voluntarily leave the Managed Charging program to participate in another program would undermine the customer commitment that originally formed the basis for the upfront incentive.

While participation in the ESS Program may provide separate system benefits, they are distinct from the benefits realized through participation in the Managed Charging program. Therefore, UI does not believe voluntary enrollment in the ESS Program should constitute a basis for waiving for the existing 24-month Managed Charging commitment.

[1] Connecticut Electric Vehicle Charging Program