January 15, 2026

Mr. Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-08-06, *Annual Review of the Electric Vehicle Charging Program –Year 6*, Compliance with Order No. 13 of the Final Decision in Docket No. 25-08-06

Dear Mr. Gaudiosi,

The United Illuminating Company ("UI or the "Company") hereby submits this filing to the Public Utilities Regulatory Authority ("PURA" or the "Authority") in compliance with Order No. 13 of the Final Decision on Docket No. 25-08-06 ("Decision"), issued on December 17, 2025.

Specifically, Order No. 13 states,

> *No later than January 15, 2026, the EDCs shall file as compliance in the 2026 Annual Review Docket, a detailed description of 2022 – 2026 Program Year budgets and incurred expenses for each Program Year that include, but not be limited to: (1) a description of all costs included in each line item; (2) a narrative explanation for why a Program Year's actual expenses did not match the budgeted expenses; and (3) the specific costs that are eligible under the Statutory Expense Cap.31 See, supra Section IV.A.2, Program Incentive and Budget Modifications..*

In compliance with Order No. 13, the Company submits the following response:

(1) Please refer to Order 13 UI Attachment 1, page one for a definition of all costs included in each line of the Program Year budgets. UI notes that PURA requested these definitions and provided a detailed list of the Program Year budget lines to define and report on in its issuance of CAE-020 in Docket No. 17-12-03RE04[1]. Since that time, UI modified all future budget reporting to align with the detailed Program Year line items identified by PURA including the 2024 and 2025 Annual Reports in the respective Program Review proceedings.

(2) Herein, UI provides a narrative explanation for why a Program Year's actual expenses did not match budgeted expenses beginning with a general discussion of Program Year budgets and budget setting process.

[1] See, 17-12-03RE04 Set 2 Interrogatories dated May 17, 2024

Other than 2022, the Program Launch Year, UI has been closely aligned with its budget estimates. The table below shows a summary of each Program Year's percent of actual expense to budget estimate.

Program Year	2022	2023	2024	2025
% of Actual to Program Budget	44%	85%	102%	102%

UI provided its initial 3-year Program Year budget estimates for Program Years 2022, 2023, and 2024 to PURA in response to Order 6 of Docket No. 17-12-03RE04[2]. UI subsequently refiled a revised budget in accordance with Order 7 in Docket No. 21-08-06[3]. Notably, the revised budget filed in January 2022 was not modified again for the remainder of Program Cycle 1 (2022 – 2024). UI suggests that other than 2022, the Program Launch Year, the Company's budget estimates have been largely accurate given the nascency of the CT EV Charging Program and lack of historical data. The table above shows how the Program ramped during Program Cycle 1.

Budget Estimates and Preparation

Preparing budgets for programs like the commercial Make-Ready program presents unique challenges due to the dependency on third parties, in this case, site hosts and/or their contractors. Each Make-Ready project is, in fact, a construction project with its own timeline and potential project delays. Here, UI can rely only on the estimates for completion provided by participants and, to a lesser degree, historical project completions, as historical project completions are not necessarily accurate predictors of future project completion. This can be seen in the actual budget variances by Program Area (DCFC, and MUD, Destination, and Workplace L2). In contrast, historical data can provide insight into enrollments for the residential managed charging programs. UI uses historical enrollment data combined with expected increases in enrollment due to education and outreach efforts and continued customer acceptance of the technology and adoption of EVs.

Budget Explanations from UI's Annual Reports

<u>Program Year 2 Annual Report[4]:</u>

The Company provides the current Program budget, with costs allocated across the three-year Program Cycle and compared to the initial thee-year Program Budget as Attachment 3. This budget was developed by the Company in advance of the program's commencement and was based on the best available estimates at the time. The Company expects that future budgets will be informed by the experience of administering this

[2] See, 2021-10-18 UI Motion for Approval - Attachment 1 Order 6e from DN 17-12-03RE04 #21-08-06.
[3] See, 2022-01-07 Order 7 UI Attachment #21-08-06
[4] See, 2023-08-01 Order 14 UI (from #17-12-03RE04) Attachment 1 #23-08-06, page 28

program over the past two years. Overall, the filed Program budget was $10,173,382 for Program Year 1 (calendar year 2022) and Program Year 2 (calendar year 2023), with 44.89% of the 2-year budget allocated to Year 1, and 55.11% allocated to Year 2. Actual capital and expenses have been lower than budgeted, with 44% of the Year 1 budget spent and 31% of the year-to-date budget for Year 2 spent.

Savings came across all cost categories and program areas. The only cost elements over the initial three-year Program Budget were Annual Device Integration Costs, and IT costs in Year 1, and the MUD L2 program in Year 2. IT costs were not included as a budget line item in the initial three-year Program Budget and are related to costs associated with the implementation of the temporary EV Rate-Rider and the MUD L2 Lease Tariff. Annual Device Integration costs were higher than originally estimated when the initial-three-year Program Budget was filed with the Authority. Year 2 overages in the MUD L2 program were a direct result of the high level of interest in this Program Area. None of these overages were so extensive that they caused overages in their overall cost category (Public Program and Residential Programs)

Program Year 3 Annual Report[5]:

The budgets for Program Year 2 and 3 are $5,606,435 and $6,839,530, respectively. UI's total Program spend to date is $9,251,127, of which $4,785,126 (85% of Program Year 2 budget) was spent in 2023 and $2,466,486 (36% of Program Year 3 budget) was spent between January 1, 2024 and June 30, 2024 (first half of Program Year 3). As with Eversource, total Program spend to date is higher than budgeted for Program activities for the MUD ($2,004,505 spent and $1,640,250 budgeted) and Destination ($1,569,071 spent and $1,264,000 budgeted) Program Areas. The difference in spend is a result of port subscriptions exceeding initial expectations. The overall Public program costs remain under budget despite these overages.

Program Year 4 Clean and Renewable Energy Update[6]:

Program budgets for Program Year 2 and 3 are $5,606,435 and $6,839,530, respectively. The Program budget for Program Year 4 is $12,014,943.

UI total Program spend to date is $23,246,080, of which $4,785,126 (85% of PY2 budget) was spent in 2023 and $6,943,841 (102% of PY3 budget) was spent in 2024. For Program Year 4 UI has spent $9,517,598 (79% of PY4 budget) between January 1, 2025, and September 30, 2025 (first half of Program Year 4).

Total Program spending to date is higher than budgeted for Program activities for the MUD ($10,422,951 spent and $5,393,378 budgeted) Program Area. This area has

[5] See, Attachment 1 2024 Annual Report, Docket No. 24-08-06, page 53
[6] See, 2025-11-17 UI Cross-Posted Compliance - CT EV Charging Program Annual Report #25-08-06 #25-08-01, Docket No. 25-08-01, page 131

experienced high demand, and is where port subscription has consistently exceeded expectations, explaining why costs are higher. The overall Public Program Costs for Program Year 3 slightly exceeded the overall expected budget, driven by high port subscription in MUD, Destination, and DCFC Program Areas. As of September 30, 2025, the EV Program overall spending is under the overall EV program budget ($23,246,080 spent and $29,027,855 budgeted).

(3) Column B of Attachment 1, pages 2 – 6, is labeled, "Eligible Under the Statutory Expense Cap". The budget line items that meet this criterion include a check mark in this column. These budget line items represent the infrastructure incentives associated with respective Program Area.

I hereby certify service of this filing upon all parties or interveners of record in this proceeding.

Sincerely,

James Nitz

James Nitz
Manager, Regulatory Services
UIL Holdings Corporation
As Agent for The United Illuminating Company