Save the Sound®
Action for our region's environment.

ANNUAL REVIEW OF THE ELECTRIC VEHICLE CHARGING PROGRAM - YEAR 6	**:**	**DOCKET NO. 26-08-06**
	:	
	:	**NOVEMBER 6, 2026**

LETTER IN LIEU OF BRIEF

Save the Sound respectfully submits this letter in lieu of brief as part of the Annual Review of the Electric Vehicle Charging Program – Year 6 in response to the calendar schedule as updated by the Public Utilities Regulatory Authority (the Authority) on October 20, 2026.

For the most part, Save the Sound rest on its prior written comments submitted into the docket. We would, however, like to take an opportunity to highlight one issue regarding the EDCs' recommendation to shift DCFC resources to other program areas.

While we preliminarily supported the proposal to discontinue the targeted incentives for the DCFC program category and to shift the resources that would otherwise be used for that program segment to the Level 2 category,[1] we did so pending further discussion and analysis of the data provided by the EDCs to support this recommendation.[2]

In this regard, we note the updated data that Eversource and UI provided in response to Interrogatory CAE-002 on October 16, 2026. In that response, the EDCS reported that the pipeline of publicly funded DCFC projects in the development queue shrunk from 413 DCFC ports across 80 locations to 352 ports across 69 locations.[3] If such a pattern planned DCFC installations failing to materialize continues, it could result in the program failing to meet the number of installations necessary to support EV deployment goals. According to the data provided by the EDCS, there are currently 747 DCFC ports installed statewide. Taking into account the revised figures presented in the EDCs' interrogatory response for planned projects brings the projected total of existing and planned installations to 1,099. While this is only three below the statewide need projected by the EVI Pro-Lite tool, we are concerned that the geographic coverage of the state is far from uniform.

While coverage along Connecticut's major highways (I-95, I-91, I-84, and 395) appears strong, coverage outside these corridors, particularly in the northwest and eastern areas of the state, is sparse.[4] In addition to the overall number of DCFC ports, the geographic distribution of charging capacity matters as well. Given that there are areas of the state significantly under-represented and that, apparently, are not attracting private investment in DCFC, we would encourage

[1] *See* EDC Joint Annual Report at 28-32 (Aug. 3, 2026).
[2] Written Comments of Save the Sound at 2 (Oct. 20, 2026).
[3] CL&P dba Eversource Energy and UI, CAE-002 (Oct. 16, 2026).
[4] CL&P dba Eversource Energy, CAE-002, Attachment 1 (Oct. 16, 2026).

the Authority to explore whether redirecting DCFC program support to these underserved areas of the state, rather than eliminating program support for DCFC deployment, would better serve the goals of the EV managed charging program. Ensuring adequate fast-charging capacity in these areas of the state is particularly important given their predominantly rural character (ironically, this rural quality is likely also the reason for a lack of private investment). It may be that limiting program support for DCFC to provide "fill-in" coverage for currently underserved areas would still allow for some resources to be directed to expanded L2 deployment. But that is an empirical question that rests first on determining how many DCFC chargers would be needed to provide sufficient reliable coverage in those underserved areas of the state.

Conclusion

Save the Sound appreciates the opportunity to submit these additional comments. We look forward to continuing our engagement with the Authority, the EDCs and all of the stakeholders to ensure the continued success of the CT EV Charging Program.

Respectfully submitted,

/s/ Charles J. Rothenberger
Charles J. Rothenberger
Director of Government Relations, CT

CERTIFICATION

This is to certify that on this 6th day of November 2026, a copy of the foregoing document was served upon each person designated on the Authority's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

By: */s/* Charles J. Rothenberger