July 24, 2026

Connecticut Public Utilities Regulatory Authority (PURA)
10 Franklin Square,
New Britain, CT 06051

Subject: Comment Submission (Docket No. 26-08-06)

Secretary Gaudiosi,

Electrify America submits these written comments in response to Connecticut PURA's ("Authority") request for comment on Motions No. 1 and No. 6, issued February 2, 2026, which propose: 1) adopting the National Electric Vehicle Infrastructure (NEVI) Program's 97% uptime requirement for direct current fast chargers (DCFCs) financed by utilities and 2) coordinating the utilities' deployment of DCFC infrastructure with ConnDOT's NEVI deployment.

Since the launch of the NEVI program, the 97% uptime requirement and reporting regimen has been widely referenced by electric vehicle industry stakeholders as *the* benchmark for reliability and transparency. Electrify America has committed to meeting NEVI requirements and has implemented standardized reporting protocols to ensure compliance. Divergent regulatory frameworks across authorities, utilities, and jurisdictions can cause unnecessary complexity and administrative burden. Electrify America therefore strongly supports Connecticut PURA's motion to align uptime and reporting requirements with the NEVI program. Finally, Electrify America encourages utilities to commit to implementing these standards to foster consistency and efficiency across jurisdictions.

Electrify America appreciates the Authority's continued efforts to convene utilities and public and private stakeholders together to advance Connecticut's transportation electrification goals. This coordinated approach creates a clear pathway for the state and industry to meet shared EV adoption and infrastructure deployment objectives. We thank the Authority for remaining open to industry feedback and look forward to reviewing the proposed uptime framework in the 2026 Annual Report filing and collaborating on solutions that enhance charging network reliability across Connecticut.

Electrify America is one of the largest providers of publicly accessible fast charging for electric vehicles in North America. To date, Electrify America has built a coast-to-coast network of Direct Current ("DC") Fast Charging ("DCFC") stations across 1000+ locations and with over 5,000 individual DC fast chargers in total, including 11 locations with 76 ports in Connecticut.

Sincerely,

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