STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL EV CHARGING PROGRAM REVIEW – YEAR 6	:	Docket No. 26-08-06
	:	
	:	
	:	
	:	October 20, 2026

WRITTEN COMMENTS OF
THE BUREAU OF ENERGY AND TECHNOLOGY POLICY OF
THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION

The Department of Energy and Environmental Protection's (DEEP) Bureau of Energy and Technology Policy (BETP) appreciates the opportunity of submitting supplemental comments in response to the Notice of Request for Written Comments (Notice) issued by the Public Utilities Regulatory Authority (PURA or the Authority) on September 21, 2026 in the above-referenced docket, as permitted by the Authority's Motion 10 ruling.[1] DEEP respectfully submits these supplemental written comments related to selected questions that were set forth in the Notice of Request for Written Comments.

I. WRITTEN COMMENTS

1. The Annual Report, including but not limited to, discussion of the following:

c. proposed program design changes regarding Residential Managed Charging Program recommendations, and EDC Commercial Program recommendations (see Annual Report, pp. 45–55)

5. Annual Report, Att. 11. The EDC's report regarding the "Value Stack" and Load Optimization.

[1] Motion No. 10 Ruling, Docket No. 26-08-06 (Oct. 5, 2026), *available at* 26-08-06 Motion No. 10 Ruling.pdf.

DEEP appreciates the EDCs efforts to review the literature on and explore the options for value stack and load optimization. DEEP agrees that technologies, customer behaviors and grid needs are evolving rapidly. Managed Charging Programs that incorporate innovation and allow for adaptation at an accelerated pace are potentially more likely to maximize the benefits of these developments. Under this rationale, DEEP generally agrees with the EDC's concept of a faster regulatory process for discrete pilots and tests that could potentially further extract benefits to the grid from managed charging.

However, DEEP understands that the Proposed Fast-Track Regulatory Process will in practice create a permanent EV-Grid Value Stack sub-program within the EV Managed Charging Program. Therefore, DEEP suggests that the proposal be assessed as if it was a proposal for the creation of a new PURA Program, which has impacts over ratepayers not only by providing potential benefits but also imposing costs. As such, DEEP recommends PURA request the EDCs to provide a more detailed proposal, which would include a proposed budget, evaluation criteria, potential timeframes for pilots and tests, and clarification on how the EDCs would engage with technology developers and select which technologies or solutions they would propose to test or pilot. DEEP also suggests the Authority consider whether a specific technology readiness level should be required.

The above program framework elements are especially necessary to ensure the costs associated with potential future pilots and tests are managed in a prudent manner, even if ultimately the test or pilot fails. Although this information is not present in the EDC's proposal in the Annual Report, when presenting the Fast-Track proposal at the Technical Meeting held on October 13, 2026, the EDCs mentioned they would seek recovery of the costs related to approved Fast-Track pilots and tests in their respective Annual Review of the Rate Adjustment Mechanisms proceedings.[2] DEEP wants to ensure that

[2] Technical Meeting, Annual EV Charging Program Review, Year 6, Docket No. 26-08-06 (Oct. 13, 2026), *available at* https://www.youtube.com/watch?v=kTxh08os_yE.

approval of pilots and tests under the Proposed Fast-Track Process does not constitute an automatic authorization for cost recovery.

DEEP welcomes and encourages the EDCs to further explore ways of increasing the avoided cost and operational benefits that EVs and smart managed charging can provide to the grid. Nevertheless, DEEP recommends PURA to request the aforementioned additional information to the EDCs and request that a more detailed Fast-Track proposal is submitted as a standalone motion.

3. Annual Report, Att. 10a. The EDCs' proposal regarding Program incentives and deployment targets.

Maintain Incentive Levels, Adjust Port Deployment Targets, and Site Incentive Cap

DEEP agrees with the EDCs recommended adjustments of transitioning from a per-site to a per-port incentive cap while reducing the port deployment targets to align with the Statutory Expense Cap consistent with Scenario 1 of the EDCs analysis in Attachment 14a understanding that this incentive structure will allow for the EDCs to reduce budget uncertainty and more "precisely forecast, track and ensure the successful achievement of port deployment targets within the $20 million annual Program budget ('Statutory Expense Cap')." [3] However, implementation of the per-site should also include the maximum port cap of 10 for each parcel as described in the EDCs proposal to help ensure distribution of incentive funds across sites.

Institute Budget Cap for Enhanced Incentive

DEEP agrees that the Underserved Community enhanced incentive be limited to 40% of the ports funded for each project type, after which all customers (regardless of location) will receive the Baseline

[3] *CT EV Annual Review Y5 Annual Report, Joint EDC Annual Report – Program Cycle Year 5 (2026),* Docket No. 26-08-06, p. 35 (Aug. 3, 2026), *available at* 2026-08-03 CT EV Annual Review Y5 Annual Report #26-08-06.pdf.

incentive which aligns with "the Authority's Equity & Underserved Targeting under the Justice40 Initiative."[4]

Discontinue Program Area 3 (Public DCFC)

DEEP agrees with the EDCs recommendation to discontinue funding for Program Area 3 (Public DCFC) and agrees with the EDCs perspectives that "the market is successfully deploying DCFC ports, independent of program support, at levels above what is needed to support the forecasted and goal levels of EV adoption in CT."[5]

4. Annual Report, pp. 29–33. The EDCs recommendation to maintain the $100 managed charging enrollment incentive (in response to Order No. 18.c. of the Year 5 EV Decision) to help support program growth in 2027.

DEEP recognizes the important potential of managed charging programs for achieving the state's system efficiency goals as stated in Public Act 25-173[1], therefore DEEPs recommendation aligns with the EDCs that, "the $100 managed charging enrollment incentive help support program growth in 2027 but recommends revisiting this incentive when the Program Term report is completed in 2027."[6]

6. Annual Report, Att. 12. The EDC's report concerning the small-size MUD and Level 1 working group and proposal recommending a solution(s).

Given the complexity of administering managed charging enrollment at small MUD and MUD 5+ unit sites, CT DEEP recommends that managed charging enrollment for these categories remain optional per the EDC proposal. However, given the potential benefits of managed charging for achieving

[4] *Id.* at 40.
[5] *Id.*
[6] *Id. at* 33.

the state's system efficiency goals,[7] DEEP recommends that small MUD and MUD 5+ sites which receive program incentives should be required to receive educational materials about available managed charging options to both tenants and landlords. An additional enrollment incentive should be considered for small MUD and MUD 5+ unit sites which opt for managed charging at their site.

Regarding the commercial 5+ unit proposal, DEEP recommends that eligibility be modified to the following wording: "Expand eligibility to allow deeded spaces to qualify for proposed receptacle incentives if a minimum of five deeded spaces or at least twenty percent of the total deeded spaces, whichever is greater, have connected Level 1 or Level 2 receptacles installed."

7. Motion No. 8. The EDCs' recommendations for scaled deployment of AmpUp's Innovative Energy Solutions Cycle 1 Project within the MUD managed charging final program design.

DEEP agrees with the EDCs recommendation of scaling selected elements of AmpUp's MUD managed-charging model within an extended MUD Pilot[8], rather than adopting AmpUp as a fully formed permanent program. The scaled approach would leverage AmpUp's site-acquisition and customer-engagement strategies, including lower-friction enrollment, greater use of existing network service providers (NSPs) and MUD site-host relationships, and a simple customer interface for charging deferral and load shifting. The EDCs would also expand NSPs participation so that charging providers can recruit sites and customers through their existing relationships and platforms. The enhanced model would then be tested through December 2028 to determine whether these approaches can overcome the MUD Pilot's participation barriers and produce sufficient evidence of scalable load shifting to support a future long-term, statewide program. Given the potential benefits of managed charging for meeting the state's system

[7] Connecticut Public Act No. 25-173, §56(b).
[8] Motion N. 8, Docket No. 26-08-06, pp. 5-6, *available at* 2026-08-31 EDC Joint Motion for Review & Approval of Compliance with Order No. 1 #26-08-06.pdf.

efficiency goals,[9] DEEP expresses support that if AmpUp's MUD Pilot demonstrates further evidence of scalable load shifting, that this model be considered for future implementation of broader statewide EV managed charging programs.

8. Motion No. 9; Annual Report, pp. 15-19, 44–45. The results of the MUD pilot offering and the EDCs' proposed final program design.

The MUD pilot results show that the participants are consistently limiting their on-peak charging to less than 20% and most of the charging is occurring during the overnight hours. These initial behavioral results are quite positive. However, only a small amount of data is available for analysis due to the very limited number of participants (five enrolled in Eversource's pilot and two enrolled at UI's). The EDCs emphasize the data cannot establish a causal evaluation as participants' behavior could have been the same absent the incentive and program information provided.[10] Hence, the results do not demonstrate yet that the pilot can be scaled to a large MUD population yet.

Based on that, DEEP agrees with the EDCs' following recommendations regarding the program design:

1. Continue and enhance the MUD Managed Charging Pilot through December 2028 instead of transitioning immediately to a long-term, statewide program. The extension would be used to develop a stronger evidentiary record that would be used to implement and evaluate enhanced approaches informed by the MUD Pilot and PURA's direction regarding the AmpUp solution. The enhanced pilot should therefore be treated as the next phase of program development, with evaluation focused on customer adoption, enrollment effectiveness, site acquisition, load shifting, and overall scalability. As such, the enhanced pilot should be large

[9] Connecticut Public Act No. 25-173, §56(b).
[10] *Supra* note 3, at 17.

enough in terms of participants to provide statistical valid results to inform program design decisions and a potential long-term, statewide program deployment.

2. Expand enrollment pathways beyond the existing vehicle-telematics and site-host enrollment pathways by increasing the role of charging network service providers (NSPs). Participating NSPs would be able to enroll eligible customers directly through their existing charging platforms and applications. DEEP agrees this could reduce enrollment friction and reach EV drivers who may not participate through telematics or traditional enrollment mechanisms.

3. Use NSPs more extensively to recruit MUD charging sites, as the EDCs identified site acquisition as the principal obstacle to scaling the program. NSPs could identify prospective MUD locations, engage site hosts, facilitate enrollment, and support ongoing communications. Existing site-recruitment incentives could also be used to support successful NSP-facilitated recruitment.

4. Integrate the AmpUp approach into the MUD Pilot, including integration between the managed-charging platform and AmpUp, and adoption of relevant enrollment and participation strategies. DEEP agrees this can expand access to eligible charging sites, improve customer awareness, reduce enrollment friction, leverage existing site-host and customer relationships, and generate additional data on scalability.

The EDCs also recommend replacing the current monthly performance incentive with a session-based incentive. The EDCs propose testing a more immediate incentive structure under which participating drivers could earn $1–$3 per qualifying charging session (subject to several requirements), rather than having eligibility determined on monthly basis.[11] The proposed structure is

[11] Motion 8, Joint Motion for Review and Approval Pursuant to Order n. 1, Docket No. 26-08-06, pp. 7-8, (Aug. 31, 2026) *available at* 2026-08-31 EDC Joint Motion for Review & Approval of Compliance with Order No. 1 #26-08-06.pdf.

interesting and could potentially attract more participants to the MUD managed charging program. However, there are important cost-benefit elements required to inform such a program design decision that are not available. First, the EDCs have not provided information on whether the program administrative costs would increase and, if so, by how much, with a more complex eligibility structure. Second, there is no initial evidence that the proposed per-session incentive framework would increase program enrollment. It would be helpful to see a comparison between the number of participants who currently meet the existing incentives eligibility requirement on a monthly basis and the number of participants who would have met the requirements had the proposed structure been in place. The comparison does not answer the question whether the proposed incentive eligibility structure would attract new customers, but it sheds light on whether the proposed framework is easier for existing participants to comply with or even provides them with additional incentives. Also, the EDCs have not mentioned whether a similar structure is present in managed charging programs in other states.

II. CONCLUSION

DEEP thanks the Authority for the opportunity to provide these supplemental written comments and appreciates the Authority's consideration. Furthermore, DEEP looks forward to ongoing opportunities for engagement in this proceeding.

SIGNATURE PAGE FOLLOWS

Respectfully submitted,
DEPARTMENT OF ENERGY &
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to the service list in compliance with Conn. Agencies Regs. § 16-1-15.

By: */s/ Obinna E. Anugweje*
Obinna E. Anugweje
Commissioner of the Superior Court