ANNUAL REVIEW OF THE ELECTRIC :

VEHICLE CHARGING PROGRAM - : DOCKET NO. 26-08-06

YEAR 6 :

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VIA ELECTRONIC FILING

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ev.energy Comments on Notice of Request for Written Comments: Annual Review of the Electric Vehicle Charging Program - Year 6

I. Introduction

ev.energy submits these comments as an independent distributed energy resource ("DER") aggregator with 8+ years of experience orchestrating 300,000+ DERs across utility, Community Choice Aggregation, and retail energy provider partnerships in the U.S. and internationally, including in Connecticut, where we proudly support Eversource Energy's (Eversource's) and The United Illuminating Company (UI's) EV Managed Charging Programs.

We appreciate the opportunity to comment on the Annual EV Charging Program Review — Year 5 report, and the Public Utilities Regulatory Authority's (PURA's or the Authority's) continued leadership in advancing the zero-emission vehicle marketplace in the state, region, and country. We generally support the electric distribution companies' (EDCs') recommendations for the Residential Single-Family Level 2 Managed Charging Program[1] and Multi-Unit Dwelling Managed Charging Pilot Program[2]. Our comments focus on how:

[1] Joint EDC Annual Report, EV Charging Program Cycle Year 5 (2026). Eversource and United Illuminating. Connecticut Public Public Utilities Regulatory Authority Docket No. 26-08-06.

[2] Joint Compliance with Order 6, MUD Managed Charging Pilot Results. Eversource and United Illuminating. Connecticut Public Public Utilities Regulatory Authority Docket No. 26-08-06. August 31, 2026.

- The managed charging programs can evolve as the market adoption of EVs increases in Connecticut;
- Approving the EDCs' proposed residential managed charging program recommendations, including the Fast Track proposal, can help in this program evolution, including the piloting of more advanced load management strategies;
- Extending the Multi-Unit Dwelling Pilot and approving the EDCs' proposed recommendations will increase program participation and support the program's goal of reducing EV charging during peak system periods.

We appreciate the opportunity to comment and advance the grid benefits of managed charging to all ratepayers in Connecticut.

II. Comments

1. Feedback on the Annual Report, including:

A. implementation metrics

ev.energy supports the current set of 30 implementation metrics as defined in the annual report.[3]

Pending PURA's decision on the EDCs' proposed recommendations, additional implementation metrics may be worth tracking. For example, if PURA approves the EDCs' Fast Track proposal, which we support, and explores managed charging as part of a strategy on distribution system-level optimization, implementation metrics such as peak and average load reduction by feeder may be appropriate.

We look forward to working with PURA, the EDCs, and other stakeholders to define the next set of "advanced" implementation metrics as the managed charging programs evolve.

B. Program Activities since the last annual review

No comment, but we reserve the right to comment in the future.

C. Proposed program design changes regarding the Residential Managed Charging Program recommendations and EDC Commercial Program recommendations

In general, we support the EDCs' residential managed charging program recommendations described in the annual report and are encouraged by the EDCs' forward-looking approach to Connecticut's maturing EV market. As EV adoption continues to grow in Connecticut and the state nears 100,000 EVs on its roads, the residential managing charging program has the opportunity to enroll additional EVs in the program and explore how additional charging behaviors and

[3] Joint EDC Annual Report – Program Cycle Year 5 (2026). Page: 9 -10.

functionality can provide value beyond the program's current goal of shifting away from system peak.[4]

Studies and program evaluation reports from across the United States and the United Kingdom have identified different service-territory-wide and feeder-specific EV market adoption tipping points where managed EV charging optimized for local capacity has been shown to reduce grid impacts. While these estimated market adoption tipping points range from 5% to 10%, Connecticut is now near ~3% market adoption, so the time for understanding how and where these additional charging behaviors and functionality can provide grid value is approaching.[5] As such, we strongly support the EDCs' proposal to utilize the proposed Fast Track process to rapidly develop, deploy, and evaluate additional managed charging functionality to address targeted system constraints, including but not limited to:

- circuit-level demand response,
- substation-level demand response,
- circuit-level defined off-peak periods,
- substation-level defined off-peak periods, and
- generation-based charging periods.

These advanced charging behaviors and functionalities can be layered into existing programs with minimal customer communication, without impacting a participant's time requirements for achieving a desired state of charge (one of the most important elements of program participation), and in a way that increases value to the grid.[6]

In our comments below, we provide additional lessons learned on implementing these "value stacking" strategies, and the EDCs' other recommendations for the residential managed charging program.

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[4] As of December 31, 2025, Connecticut has 72,747 EVs registered. Atlas Public Policy Evaluate CT Dashboard. See: https://atlaspolicy.com/evaluatect/

[5] "Getting ahead of the EV tipping point: Proactive EV management strategies for an efficient and flexible grid." AES and Camus. October 2024. finding a residential EV adoption tipping point at 5% systemwide for AES Indiana, with roughly 1-in-5 feeders exceeding 10% local adoption driving 70% of the benefit in the tipping-point year). See: https://www.camus.energy/ev-tipping-point

[6] A recent research study completed by E Source for Xcel Colorado found that ensuring their EV is ready for the next trip was the most important factor amongst nine factors in deciding when and how to charge across non-program participants. Across program participants it was the second most important factor. The nine factors included were: making sure my EV is ready for the next trip, cost of electricity at the time of charging, simplicity (not having to think about or manage charging), convenience of charging location, protecting or extending the battery life, having flexibility to charge when I want, speed of charging, environmental impact of charging, and helping reduce strain on the electric grid. July 1, 2026. 26A-0263EG Public Service Company - Customer Programs 2027-2030. Hearing Exhibit 104, Attachment 4, 2026 US EV Experience Home Charging Study.pdf. See: https://www.dora.state.co.us/pls/efi/EFI.Show_Filing?p_fil=G_835402&p_session_id=

D. EDC education and outreach activities and program costs

We support the EDC education and outreach activities that have occurred and reference our previous comments on the importance of leveraging multiple marketing channels, as well as assigning appropriate costs to the training and education needed to deploy certain channels.[7] Based on our experience, no single channel can successfully reach all potential participants in every market, from new EV purchasers to longtime EV drivers. A variety of engagement strategies are necessary to increase enrollment and target drivers in geographically constrained areas.

E. Program costs

No comment, but we reserve the right to comment in the future.

2. Annual Report, Att. 9. The EDCs' report summarizing the EDCs' tracking of Program participation rates, application trends, and any other relevant market impact resulting from the Statutory Expense Cap throughout the 2026 Program Year, and study on the impact of potential incentive allocation reductions on the business case for contractors and site hosts, and the Connecticut EVSE market as a whole.

No comment, but we reserve the right to comment in the future.

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

We support continued investment in EV charging infrastructure. We observe that the current program incentives focus on charging type versus locational need. The projected need for EV charging in specific areas may be driven largely by EV adoption. It may be useful to compare with other sources of charging installation (such as public and private sector funding) and request utility funding based on filling in gaps in other programs. Utilities may be best positioned to support multifamily and some workplace charging that's not already covered by federal or private funds. The suggested program changes for the multi-unit dwelling pilot will also support deployment in locations convenient to multifamily housing residents.

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.

We support the retention of the enrollment incentive to support continued program growth. Industry research and evaluation reports of other managed charging programs have consistently found that enrollment incentives encourage program participation. What remains unclear is how

[7] ev.energy comments on Expanding Program Marketing and Outreach Efforts. July 30, 2026. CT PURA Docket 26-08-06. See: https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/4623b76c349d2af585258e45004580f2?OpenDocument

different dollar values affect program enrollment rates, and how those different values interact across marketing channels.

To help answer this question, ev.energy has partnered with a higher education institution to study the impact of different incentive rates on enrollment rates. Initial results from this study should be available in early 2027 and could help inform future enrollment incentive decisions.

As such, we encourage PURA to approve the EDCs' recommendation to maintain the $100 enrollment incentive and allow the EDCs to experiment with reduced or increased enrollment incentive rates within the Fast Track pilot framework.

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

As noted above, we support the EDCs' efforts to explore the "value stack" of managed EV charging through additional charging behaviors and functionalities via the proposed Fast Track process. The charging behaviors and functionalities are all technically feasible today, but implementation will require additional costs and program design modifications. These realities make the Fast Track process an appropriate mechanism to pilot them before incorporating them into the broader program.

We look forward to supporting the EDCs in developing and implementing these pilots and offer the following comments to help ensure their success.

Customer Targeting

Unlike the existing residential managed charging approach, "value stacking" requires enrolling specific customers connected to a specific circuit or distribution substation. As shown in the Annual Report's Table 15: Count of UI Managed Charging Participants on Circuits by Highest Phase Loading, on some circuits there may be program participant counts high enough to relieve constraints (i.e. circuit number 2) but not enough or zero program participants to relieve constraints (i.e. circuit number 8). This reality will hold across all programs focused on a single technology and should be viewed not as a reason to pursue targeted load management, but instead as an opportunity to demonstrate additional strategies for identifying and enrolling the appropriate customers. These strategies may include but are not limited to:

- **AMI Disaggregation.** As noted in the most recent report and discussed in previous program-year dockets, AMI disaggregation can be a helpful tool for identifying customers with an EV not currently enrolled in the program. We look forward to seeing the results of UI's Connecticut IES Project with Gridsight that is currently being conducted and are optimistic that the technology will provide both EDCs and the managed charging program with a cost-effective mechanism for identifying "high-grid" value EV and other DER program participants.
- **Targeted Marketing.** As noted earlier, we strongly believe in leveraging multiple marketing channels to drive program participation. The need for multiple channels increases as more eligible customers sign up, requiring new ways to reach the existing eligible population.

Finally, more advanced managed charging capabilities depend on the vehicle being plugged in. Different programmatic frameworks including (but not limited to) modified enrollment and participation incentives may be required to encourage drivers to adopt the behavior of plugging their EV in when available so charging can be optimized to meet grid constraints while also ensuring sufficient charge by a desired time.

Customers should always be able to opt out of a managed charging state using the "boost" button, but this happens rarely. Less than 2% of ev.energy global users have ever "boosted" themselves out of an active managed charging state, suggesting very little disruption to their operational needs.

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

Multifamily program enhancements

Level 1 charging (adding approximately 4 miles per hour of charging, or 48 miles in a 12-hour period) is much slower than Level 2 charging (adding approximately 25 miles per hour of charging, or 300 miles in 12 hours). As such, relying on Level 1 charging is feasible but would likely require residents to plug in and charge nearly every night to accommodate the average daily driving range of 31 miles per day found in a survey conducted by AAA.[8] As a result, multifamily buildings that choose to focus on Level 1 charging may need to plan to provide closer to a 1:1 ratio of Level 1 chargers to residents who have or plan to get an EV. Alternatively, multifamily buildings could provide fewer Level 2 chargers for residents to share, with a ratio below 1:1.

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.

Our comments on this topic are incorporated into our response to number 8.

8. Motion No. 9; The results of the MUD pilot offering and the EDCs' proposed final program design.

We agree with the EDCs' contention that technical feasibility was demonstrated for the programs and "the underlying technology and program administration necessary to support a MUD managed charging offering are viable."[9] We also note that the multifamily managed charging program is working as intended: "participants are consistently limiting their on-peak charging to less than 20%."[10]

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[8] AAA Foundation for Traffic Safety's annual American Driving Survey 2024. Published December 2025. See https://aaafoundation.org/research/american-driving-survey-2024/

[9] Joint Motion For Review And Approval Of Order No. 6. State Of Connecticut Public Utilities Regulatory Authority Annual EV Charging Program Review – Year 6, Docket No. 26-08-06. August 31, 2026.

[10] M*otion No. 9; Annual Report, pp. 15-19, 44–45.*

However, we also support the need to scale this program and reach more drivers by expanding to more locations, which involves collaboration with additional parties well suited to work with potential charging site hosts. Partnerships with NSPs such as AmpUp provide an effective way to better connect with existing or potential locations for EV charging. ev.energy is actively collaborating with AmpUp and other NSPs, and is open to working with other identified NSPs to expand the number of charging locations that can reach multifamily residents.

9. Tesla's request to revise connector technical requirements to accept North American Charging Standard (NACS) as a standard connector.

Given that the majority of automakers have committed to develop new EVs with the NACS connector[11], we support Tesla's request to accept the NACS connector as a standard connector eligible for incentives without requiring co-deployment with other connectors.

Prior to Tesla opening up the NACS standard in 2022[12], non-Tesla EV models featured non-NACS connectors, including the SAE J1772 connector for Level 1 and Level 2 charging, and the SAE Combined Charging System (CCS) or CHAdeMO for DC fast charging. Given that there is a large pool of existing EVs with non-NACS connectors and drivers who rely on non-NACS chargers, it is appropriate to continue providing a level of coverage for these EVs in the market.

10. Any additional topics and/or recommendations regarding the Program, EDCs' filings, or other relevant items.

The aforementioned advanced managed charging capabilities extend to vehicle-to-grid (V2G) export, enabling EVs to send power back to the grid. We support layering export with the existing managed charging program, rather than requiring EV owners to choose between participating in managed charging or V2G export. Our research[13] on the value stack of managed charging reflects the opportunity to grow the grid value of electric vehicles substantially with V2G. There is currently a proposal underway to allow bidirectional-capable EVs to export to the grid as part of the Energy Storage Solutions (ESS) program in Connecticut. As reflected in our previous comments in that proceeding[14], we support allowing bidirectional export in an expedient fashion to support the grid and complement, rather than replace, managed charging program participation.

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[11] Bierenkoven, Chase. "Nearly Every Major Automaker Has Finally Switched to Tesla's Charger." Edmunds. January 9, 2024. See https://www.edmunds.com/car-news/every-ev-you-can-charge-at-a-supercharger.html

[12] "Opening the North American Charging System." The Tesla Team, November 11, 2022. See https://www.tesla.com/blog/opening-north-american-charging-system

[13] "Turning EV grid risk into a $30 billion opportunity." ev.energy and The Brattle Group. September 2025. See https://platform.ev.energy/resources/value-of-managed-charging

[14] ev.energy Comments on Notice of Request for Written Comments: Docket No. 26-08-05, Annual Energy Storage Solutions Program Review —Year 6. August 28, 2026. See https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/ba94d3b63a1c854885258e6100737fdb?OpenDocument

Finally, including EVs and other DERs in virtual power plants (VPPs) offers another avenue for additional grid value. The Clean Energy States Alliance estimates that there are 82 battery-based VPP programs in 30 states.[15] Many states are now extending these VPPs to include other devices, such as thermostats, EVs, and more. Many states have introduced VPP proceedings, including Hawaii,[16] , Maryland,[17] and New Jersey.[18] Connecticut's ESS program provides a strong foundation for coordinating batteries and EVs to benefit the grid. It is worth considering how EVs, storage, and other DERs will integrate to deliver optimal grid benefits, which could require opening a docket on the need for distributed energy resource management systems (DERMS) to support such efforts.

III. Conclusion

ev.energy appreciates the opportunity to comment on this proceeding and will continue working to grow the grid benefits of advanced managed charging and DERs to all ratepayers in Connecticut.

Respectfully submitted,

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[15] Virtual Power Plant Programs Summary Table. Clean Energy States Alliance, August 2026. See https://www.cesa.org/projects/energy-storage-policy-for-states/virtual-power-plant-programs-summary-table/

[16] "Instituting A Proceeding To Design And Implement A Virtual Power Plant Grid-Services Program." Hawaii Public Utilities Commission. April 21, 2026. https://hpuc.my.site.com/cdms/s/puc-case/a2Gcs0000053VvdEAE/pc209736?tabset-a3299=3

[17] "Order On Drive Act Implementation Proposals." Maryland Public Service Commission. October 21, 2025. https://psc.maryland.gov/wp-content/uploads/Order-91917_ML-323522-9761-1.pdf

[18] NJ Proposes "Virtual Power Plant" Plan to Save Ratepayers Millions Annually. New Jersey Board of Public Utilities. July 27, 2026. See https://www.nj.gov/bpu/newsroom/2026/approved/20260727.html