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

Re: Docket No. 26-08-06, Annual EV Charging Program Review

October 5, 2026

Dear Secretary Gaudiosi and PURA Staff,

I am Deputy Director at Clean Transportation Communities of Southern Connecticut (CTC), a nonprofit organization designated by the federal Department of Energy to help facilitate the adoption of clean transportation technologies in New Haven, Middlesex and New London Counties. CTC submitted written comments and presented at last year's Technical Meeting on docket 25-08-06 about the gaps we observed in the EV Charging Program make-ready incentives related to small multi-unit dwellings (MUDs with 2-4 units) and low-power charging solutions (i.e. smart outlets). We were also grateful for the opportunity to be a participant in the PURA-directed working group on these topics this year. Overall, CTC was pleased with the amendments to the Program that the EDCs proposed (as summarized in attachments 12 and 16 to the EDCs' Annual Report) as a result of this working group, and very much appreciate the time and consideration they took to make this proposal.

However, as we detail in our written comments that accompanied the EDCs' proposal (attachment 19 to the EDCs' Annual Report), there are several further amendments we propose. We won't reiterate all of these comments now (they are here for reference), but just wanted to emphasize a couple points and provide a pertinent update.

We want to highlight again that make-ready costs can often go well beyond the $1500/port incentive structure the EDCs propose, both for small MUDs and for smart outlets in large MUDs. One of the working group participants, a local EVSE provider called Matcha Electric, pointed out that small MUDs in particular are often old townhouses that would need new electrical service in order to accommodate an EV charging installation. And even if using smart outlets were to avert the need for a new service, trenching and/or long conduit runs can drive up make-ready costs significantly in many situations.

Relatedly, we thought that one of the most compelling presentations given to the working group was from Peninsula Clean Energy, a community choice aggregator in CA that offers incentives for smart outlets. We noticed at one point after the working group's meetings had ended that Peninsula Clean Energy (now rebranded as WestLight Energy) had since increased its smart outlet incentive levels from $2000/port ($2500/port for affordable housing) to $2500/port ($3000/port for affordable housing), in addition to offering $5000 towards a main panel upgrade for installations with four or more ports. We think this is a notable update to bring to PURA's

attention; we believe that the CT EV Charging Program should incentivize smart outlets at similar levels.

Lastly, we support the other working group participants who have submitted comments calling for measures to ensure managed charging is utilized as much as possible in small MUDs and with smart outlets. We understand that shared spaces can pose a challenge, but we believe managed charging should be required in situations with individually-assigned spaces, and vehicle telematics can provide an alternate way to track individual charging sessions.

Many thanks for your consideration,

Geremy Schulick
Deputy Director, Clean Transportation Communities of Southern Connecticut

schulick@cleantransportationct.org
347-756-0093
87 Olive St unit T
New Haven, CT 06511

Also signed by:

Barry Kresch, President of EV Club of CT – evclubct@gmail.com

Rebecca Cramer, Chair of Whalley/Edgewood/Beaver Hill Community Management Team, New Haven and a small MUD landlord — rebecca.k.cramer@gmail.com