STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

TEN FRANKLIN SQUARE
NEW BRITAIN, CONNECTICUT 06051

TELEPHONE
(860) 827-2900
VOICE AND TDD
WWW.CT.GOV/OCC

Prabisha Bhandari
Direct Dial: (860) 827-2902
Email: prabisha.bhandari@ct.gov

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Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, Connecticut 06051

Re: **Docket No. 26-08-06, Annual EV Charging Program Review – Year 6**

Dear Commissioners:

The Office of Consumer Counsel ("OCC") submits these supplemental comments in response to the Authority's Notice of Request for Written Comments, as issued in the above-referenced docket on September 21st, 2026.

Through prompt 1, the Authority requests comments on various sections of the Annual Report, including proposed program design changes, implementation metrics, and program costs. OCC does not oppose the EDCs' proposal to move from a per site incentive to a per port incentive, but OCC has identified certain concerns that warrant additional analysis. These concerns are addressed in further detail within OCC's response to prompt 3. OCC also does not oppose the EDCs' proposal to discontinue the targeted incentives for the DCFC category and to shift the resources that would otherwise be used for that segment to the Level 2 category. However, OCC shares the Authority's concern about locational gaps in DCFC access[1], and believe the category should not be discontinued until that concern is addressed. Similarly, OCC shares the Authority's confusion regarding the EDCs' program expenditures and budget[2] and looks forward to reviewing further cost data once available.

Through prompt 2, the Authority requests stakeholder input on the EDCs' market tracking report and study on incentive allocation, as discussed in Attachment 9 of the Annual Report. Overall, Attachment 9 supports the general conclusion that the current incentive structure is at the threshold necessary to promote customer participation and that lower incentives could therefore reduce charger deployment. However, it bears emphasizing that the interview evidence is limited, as only 12 interviews were conducted, and the EDCs received only 6 additional survey responses out of 668 invitations. As such, the results should be viewed as directional rather than conclusive. OCC suggests that further research can be done to tie the analysis more directly to

[1] CAE-2.
[2] CAE-3.

the actual incentive structure being proposed, rather than relying mainly on hypothetical percentage reductions to the current program. In addition, OCC recommends continued tracking of participation, out-of-pocket costs, and actual deployment as incentive levels change, including results by program area and underserved status.

Through prompt 3, the Authority requests comments on the EDCs' proposal regarding program incentives and deployment targets. OCC does not oppose the EDCs' proposal to switch from a per-site incentive to a per-port incentive and to implement a maximum incentive cap of 10 ports per parcel. Port incentives may provide more granular data and improve budget predictability. In addition, the per-parcel cap should act as a guardrail to prevent large projects from absorbing a disproportionate share of the annual budget. OCC emphasizes that such caps and situational variances must be a part of the application review process to avoid geographic infrastructure gaps.

In addition, OCC remains unsure about the basis for the 40% cap on enhanced underserved incentives, particularly because historically, more than 40% of ports in several categories have received enhanced incentives. Similarly, OCC would appreciate further information to justify the EDCs' proposal to implement identical Level 2 incentive amounts for MUD, Destination, and Workplace projects, particularly given that historical per-port costs have differed across those categories. Overall, OCC cautions against assuming Scenario 2's deployment targets will actually be achieved simply because the budget mathematically supports that number of ports at the lower rebate. Attachment 9 suggests uptake may fall materially as incentives decline. Such targets require monitoring and true-up based on actual participation and program data.

Through prompt 4, the Authority requests stakeholder input on the EDCs' recommendation to maintain the $100 managed charging enrollment incentive. OCC supports the EDCs' recommendation to maintain the $100 managed charging enrollment incentive. Given the substantial changes to program eligibility implemented just last year in response to Public Act 25-173, coupled with the decline in program participation, incentive level modifications may be premature. Additional time is warranted to allow further customer engagement and market maturity.

Through prompt 5, the Authority requests comments on the EDCs' report regarding the "Value Stack" and Load Optimization. OCC generally agrees with the EDCs' conclusion that the strongest near-term evidence supports peak-load reduction, system capacity value, and avoided energy costs, while more localized benefits such as distribution upgrade deferral remain more dependent on modeling, granular system data, and sufficient participation in constrained areas. This is generally consistent with OCC's prior comments advocating for a Connecticut-specific avoided-cost framework that captures the broader value of managed charging. OCC recommends that PURA require the EDCs to develop and test approaches to quantify location-specific distribution value as participation and data availability improve, while clearly distinguishing

directly demonstrated load reductions from modeled or monetized avoided-cost benefits. OCC also recommends using the updated AESC 2024 avoided-cost values, where appropriate, rather than continuing to rely solely on the 2021 AESC study.

Through prompt 6, the Authority requests comments on the EDCs' report concerning small-sized MUF and Level 1 working group and proposal recommending a solution(s). OCC does not oppose the inclusion of the $1,500 per port/receptacle incentive, not to exceed 100% of total cost and capped at $6,000 per site, for both Baseline and Underserved small MUD customers. Such an incentive would align with the incentive allocated in the residential single-family pathway and could encourage greater program participation from MUD customers. Additionally, while OCC believes that incentive expenditures should ultimately be tied to demonstrable grid benefits, we recognize that the small MUD pathway remains in the early stages of development and that including a managed charging requirement at this juncture may be premature. As such, OCC does not oppose the EDCs' recommendation to not require managed charging at this time.

Through prompts 7 and 8, the Authority requests stakeholder input on the results of the MUD pilot offering and EDCs' recommendations for scaled deployment of AmpUp's Innovative Energy Solutions Cycle 1 Project within the MUD managed charging final program design. OCC views the results of the MUD managed charging pilot as promising for peak and load reduction. However, the sample size remains too small at this point to make any conclusions as to the charging patterns of the participants and the overall impact of the MUD managed charging. In terms of next steps, OCC supports continued testing of AmpUp's proposed incentive structure but recommends that the EDCs more systematically evaluate how customer response varies across the proposed $1–$3 per-session range. Existing research suggests that the effectiveness of charging incentives depends not only on the dollar amount offered, but also on the amount of inconvenience, delay, or flexibility being requested from participants. Daziano (2022)[3] found that EV drivers placed a measurable value on allowing utilities additional control over charging timing, while Fabianek, Atasoy, and Madlener (2025)[4] found that drivers generally required meaningful price reductions to change when, where, or how long they charged. Research examining gasoline purchasing[5] similarly found that consumers were only willing to incur additional travel for lower fuel prices when the savings were sufficient to offset the added inconvenience.

While these studies examine different programs and should not be used to directly prescribe an appropriate Connecticut incentive, collectively they support empirically testing how incentive size affects behavior rather than assuming that a particular dollar amount will produce the desired response. OCC therefore recommends that the EDCs use the proposed $1–$3 range as an opportunity to test customer response at different incentive levels and compare the resulting participation, incremental kWh shifted, peak kW reduction, and cost per unit of load

[3] https://www.sciencedirect.com/science/article/abs/pii/S0739885921001487?fr=RR-2&ref=pdf_download&rr=a4a87ef7fffb9002
[4] https://www.fcn.eonerc.rwth-aachen.de/global/show_document.asp?id=aaaaaaaadadzkwn
[5] https://journals.sagepub.com/doi/pdf/10.1177/10949968231179148

reduction. The evaluation should also distinguish between customers who actually change their charging behavior in response to the incentive and customers who would have charged outside the 3–9 p.m. peak period regardless. This would provide the Authority with a stronger basis for determining whether higher incentive levels produce proportionately greater grid benefits and which incentive level is most cost-effective for ratepayers.

Through prompt 9, the Authority requests stakeholder input on Tesla's June 11, 2026 Correspondence.

OCC supports recognizing J3400/NACS as an eligible connector given the formal standardization and growing market adoption. However, OCC suggests that program should distinguish J3400 eligibility from allowing J3400-only deployments at all ratepayer-funded charging sites. Consideration should be given to whether some interoperability/accessibility requirement should remain during the transition period, especially for existing vehicles using J1772 or CCS1. For example, Tesla proposes eliminating the prescribed connector-mix requirements entirely. OCC does not oppose the general concept of eliminating the requirement but ultimately cannot formulate a position without further information about the impact of the modification. More specifically, OCC would appreciate information regarding:

1. How J3400-only sites would affect access for the existing non-NACS vehicle fleet.
2. Whether adapters are expected to address compatibility and how practical and reliable that solution is.
3. Whether any minimum interoperability standard should remain for publicly subsidized charging sites.

OCC thanks the Authority for consideration of these comments.

Respectfully submitted,

STATE OF CONNECTICUT OFFICE
OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Prabisha Bhandari
Prabisha Bhandari
Staff Attorney

Anubhav Kumaria
Research Analyst

cc: Service List