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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 written comments in response to the Authority's Notice of Request for Written Comments, as issued in the above-referenced docket on July 9th, 2026. OCC offers the following comments for the Authority's consideration.

To the first prompt, OCC generally supports the uptime requirement and appreciates the need to balance incentives for operators to comply with the requirement while not withholding a significant amount of upfront funding. OCC acknowledges the careful consideration the Authority has given to that appropriate balancing and supports the proposal as outlined. The withholding percentage both meets the goal of the program by encouraging compliance with the uptime requirements, without placing too great of the burden of upfront costs on the operator. OCC further supports quarterly uptime reporting and requiring applicants to demonstrate the ability to provide the specified uptime data as a condition of receiving Program incentives.

To the second prompt, OCC agrees with and supports the EDCs' proposal to more closely align the Program and CT DOT's deployment of NEVI. To effectively and equitably deploy chargers among municipalities, officially committed NEVI sites should be taken into account by the Program for proper scoring. This approach seeks to ensure accurate counting of existing chargers and sites where NEVI chargers will be deployed. OCC would encourage the EDCs to continue to deploy chargers within lower scoring municipalities, even at fewer numbers, to further equitable distribution of these chargers through the state. OCC also recommends that the EDCs monitor and report how the revised scoring methodology affects the number of municipalities served and the geographic distribution of ports, including whether municipalities with a small but nonzero number of existing chargers are disproportionately deprioritized.

To the third prompt, OCC agrees that expanding adoption of EVs must be accompanied by appropriate outreach. OCC appreciates the proactive effort the EDCs are making to engage customers at the most opportune time, however there were no associated costs listed along with

the proposed outreach efforts. Additionally, any proposals that necessitate sharing customer data must include applicable plans for data security. OCC recommends that the EDCs track the costs, referrals, completed enrollments, conversion rates, and cost per enrollment associated with each outreach channel. Any customer-level data sharing should also be limited to the information necessary for outreach and based on applicable terms or affirmative customer consent. Without details either to cost or potential cybersecurity concerns, however, OCC cannot provide more detailed recommendations at this juncture.

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/ Alison McHorney
Alison McHorney
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cc: Service List