STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

Annual EV Charging Program Review - Year 6	**:**	**DOCKET NO. 26-08-06**
	:	
	:	**AUGUST 31, 2026**

JOINT MOTION FOR REVIEW AND APPROVAL PURSUANT TO ORDER NO. 1

The Connecticut Light and Power Company d/b/a Eversource ("Eversource"), The United Illuminating Company ("UI", together with Eversource, the "EDCs"), and AmpUp (collectively, with the EDCs, the "Companies") hereby submit the following motion, for the Public Utilities Regulatory Authority's ("PURA" or the "Authority") review and approval, in compliance with Order No. 1 of the July 1, 2026, Final Decision from DN 22-08-07 (Innovative Energy Solutions Program Cycle 01). Specifically, Order No. 1 states:

1. *No later than August 1, 2026, AmpUp, UI, and Eversource shall jointly submit, for review and approval in Docket No. 26-08-06, information regarding AmpUp's project and recommendations for its scaled deployment within the MUD managed charging final program design, including:*
    a. *a discussion of the advantages and disadvantages of direct-to-driver and network-to-driver managed charging;*
    b. *options and recommendations for incorporating the NSP aggregator approach into a final MUD managed charging program design;*
    c. *considerations for including additional types of public Level 2 chargers in the scaling implementation design, in addition to MUD chargers;*
    d. *recommended site host incentives; and*
    e. *estimated costs and timelines for scaled implementation.*

On July 16, 2026, Eversource and UI (collectively the "EDCs") filed a Joint Motion for Extension of Time of Order No. 1 requesting that the Authority grant an approximately 30-day

extension to submit their compliance.[1] PURA subsequently granted this Motion on July 30, 2026, thereby extending the deadline to August 31, 2026.

In compliance with Order No. 1, the Companies provide the following for the Authority's review and approval.

I. Background

In Innovative Energy Solutions ("IES") program cycle 1, the captioned docket, the Authority selected AmpUp to test an electric vehicle ("EV") managed charging offering for public Level 2 charging stations aimed at reducing system peak ("AmpUp Pilot"). The AmpUp Pilot included 214 sites and tested customer response to an "Adapt and Earn" offering from April 1 through June 30, 2025.

Additionally, in Order No. 22 of the final decision in the Year 3 Annual EV Charging Program Review docket, the Authority directed the EDCs to implement a Multi-Unit Dwelling ("MUD") Managed Charging Pilot ("Pilot") no later than January 1, 2025.[2] Pursuant to this Order, the EDCs began offering the MUD Pilot for customers located in MUD buildings in January 2025.

The recommendations presented herein are the result of extensive collaboration between the Companies. Drawing on operational experience, the MUD Pilot and AmpUp Pilot results, and stakeholder discussions, the Companies worked jointly to develop a proposal that balances innovation, customer experience, program oversight, and the need for additional evidence before establishing a longer-term managed charging program design.

In addition to this Motion, on August 31, 2026, the EDCs jointly submitted a motion for review and approval pursuant to Order No. 6 in the December 17, 2025 Final Decision in Docket

[1] Docket No. 22-08-07, Joint Motion for Extension of Time (filed July 16, 2026).

[2] Docket No. 23-08-06, Annual EV Charging Program Review - Year 3, Final Decision (Nov. 29, 2023) Order No. 22.

No. 25-08-06, *Annual EV Charging Program Review – Year 5* ("EV Program Year 5 Final Decision"), ("EDCs' EV Joint Motion").[3]

II. Recommendations for Scaled Deployment of AmpUp's Project

a) A discussion of the advantages and disadvantages of direct-to-driver and network-to-driver managed charging

For purposes of this discussion, the terms "direct-to-driver" and "network-to-driver" are conceptual categories developed by the EDCs to distinguish program delivery approaches evaluated through recent pilots. These are not formal industry classifications, nor are they mutually exclusive approaches. There are different strategies for ultimately reaching drivers to cause a shift or reduction of charging load at MUD charging sites, during the peak periods for the grid. A *direct-to-driver approach* allows the EDCs to engage and share peak time information with, and receive data from, enrolled EV drivers through a mobile app and/or web portal provided by a single EDC partner; this is facilitated through either the driver's EV telematics data connection or through EV Chargers enrolled with the Distributed Energy Resource Management System ("DERMS") platform. In contrast, with a *network-to-driver approach,* an EDC works directly with the DERMS and/or a Network Service Provider ("NSP"), who in turn offers drivers the opportunity to opt-in to a program and/or event.

i. Direct-to-Driver Approach

The direct-to-driver approach allows the EDCs to communicate directly with participating drivers through a managed charging platform. This approach provides a customer experience that is similar to the EDCs' existing residential managed charging offering and enables direct engagement with drivers regarding charging behavior and peak reduction opportunities.

[3] EV Program Year 5 Final Decision, Order No. 6.

Advantages

- Provides a familiar enrollment pathway through vehicle telematics or networked smart chargers that is consistent with the EDCs' existing residential managed charging program.
- Enables direct communication and education of EV drivers regarding charging behavior and opportunities to reduce grid impacts during peak periods.
- Creates implementation efficiencies through a single DERMS provider that can integrate with multiple NSPs and charging technologies.

Disadvantages

- Vehicle telematics participation rewards individual charging behavior but may not always translate into equivalent reductions in aggregate site load if other vehicles charge during the same period.
- Experience from the MUD Pilot suggests that recruiting and enrolling site hosts can be challenging, even when incentives are available and administrative requirements are minimized. Site hosts may have concerns regarding ongoing participation obligations, granting system access permissions, impacts on charger utilization, and whether the value proposition justifies long-term participation.

ii. Network-to-Driver Approach

Under a network-to-driver approach, the EDC works through a network service provider that offers managed charging participation opportunities directly to drivers using its charging platform and customer relationships.

Advantages

- May facilitate site enrollment because NSPs typically maintain existing relationships and contractual arrangements with charging site owners.

- Leverages established customer relationships between the NSP and charging network users, potentially simplifying participation for drivers.
- The IES AmpUp Pilot demonstrated that at least one NSP can successfully implement load-shifting functionality and engage drivers through its existing platform.

Disadvantages

- The IES Pilot evaluated load-shifting periods of up to four hours; therefore, additional testing is needed to determine customer response to the EDCs' full 3 p.m. to 9 p.m. off-peak management period.
- Broader NSP participation remains uncertain. As of July 2026, only a limited number of NSPs had integrated with the MUD Pilot, and additional integration, program development, and customer engagement efforts may not be attractive to all providers.
- Active managed charging based on customer-defined state of charge and ready-by times is not currently feasible through this model.
- Maintaining a single EDC-managed aggregation of EV load with consistent oversight may be more complex when the customer relationship resides primarily with the NSP.

The approach proposed in this filing is hybrid of both the direct-to-driver and network-to-driver models discussed above. Accordingly, the advantages and disadvantages identified for those approaches should not be viewed as inherent characteristics of the proposed solution.

b) Options and recommendations for incorporating the NSP aggregator approach into a final MUD managed charging program design

In the EDCs' EVs Joint Motion, the EDCs have recommended several updates to improve the MUD Pilot, based on lessons learned from the AmpUp Pilot. The EDCs aim to implement these changes with AmpUp using the approach outlined below. These changes, if approved, would

expand the EDC MUD Pilot to include a network service provider ("NSP") option, and support deployment with AmpUp MUD chargers.

As provided in the EDCs' EVs Joint Motion, the EDCs recommend updates to the MUD Pilot that incorporate elements of the AmpUp Pilot. Neither the EDCs' EVs Joint Motion nor this response represent a final program design, as the scaling of the AmpUp Pilot for inclusion in the MUD Pilot and related enhancements proposed by the EDCs represent the next logical phase of MUD Pilot development. Additionally, sufficient evidence has not been collected in the MUD Pilot to date to support a final design. The EDCs intend to modify the MUD Pilot, as described herein and in the EDCs' EVs Joint Motion, with the objective of increasing participation and generating additional data to inform a long-term program design. Pursuant to Order No. 1 in the captioned docket, the EDCs describe below the proposed design changes and collaboration with AmpUp that would support implementation of this pilot design.

Fundamental to this design is participation through AmpUp's Charging Management System ("CMS"), which is compatible with any electric vehicle and leverages charging data from existing charging infrastructure that AmpUp already operates at participating properties. This approach minimizes customer burden by requiring no additional action from drivers beyond the information they have already provided through the normal enrollment process.

i. Program Implementation

The EDCs and AmpUp will pursue the following implementation approach that is consistent with the EDCs' EVs Joint Motion. The EDCs will continue to work directly with ev.energy as their managed charging technology provider, with AmpUp functioning as a delivery partner of ev.energy. In this framework, AmpUp's CMS platform will connect to ev.energy via Application Programming Interface ("API") integration. Open Charge Point Protocol ("OCPP")

charging session data is collected and shared as required for program tracking and settlement to ev.energy's data platforms already in use for the MUD Pilot. ev.energy will be responsible for all data collection, participant tracking, and settlement. All parties will work closely to ensure that all eligibility criteria are met before a charging session is qualified for incentives. Under the proposed design, any EV that charges at an AmpUp-enrolled site within the Eversource or UI service territory will be eligible to participate, regardless of whether the driver is an EDC customer or a resident of the site.

ii. Scope and technical basis for the Pilot with AmpUp sites

The anticipated scope expansion and technical basis for the MUD Pilot is as follows:

- Approximately 60 MUD locations in Connecticut, including 200+ ports, 800+ drivers on the platform, of whom 300+ currently charge during the Managed Charging program's peak window of 3–9pm. [4]
- All sites are already registered with verified ZIP codes and latitude/longitude coordinates for every charger.
- Charging session data is drawn from OCPP, requiring no vehicle telematics, no manufacturer account, and no qualified-vehicle list.

iii. Incentive structure for participants

To align with the AmpUp Pilot approach that rewards drivers per session deferred, the ongoing driver incentive has been modified to $2 per qualifying session with a request to modify

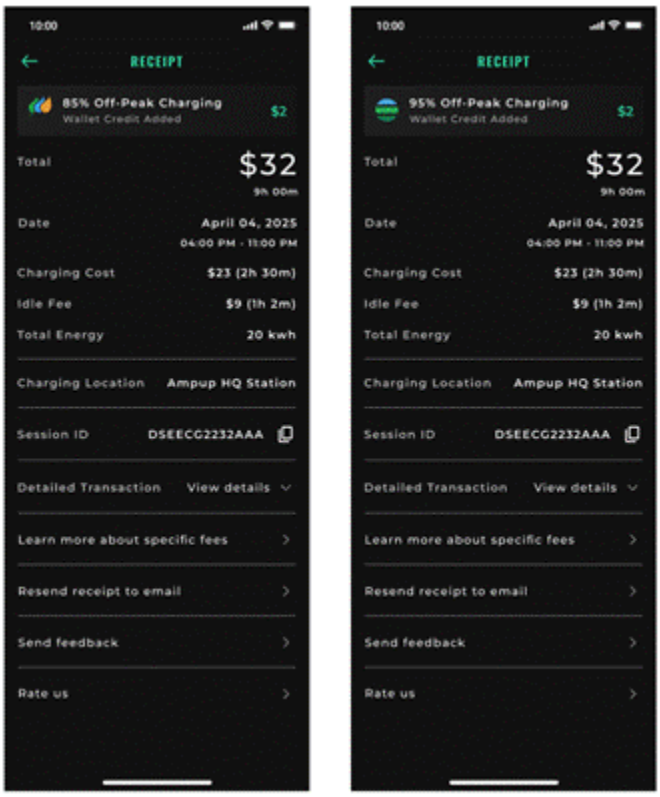
[4] *Note: Thes are estimates based on recent data. Actual locations that qualify to participate and actually participate under AmpUp might vary.*

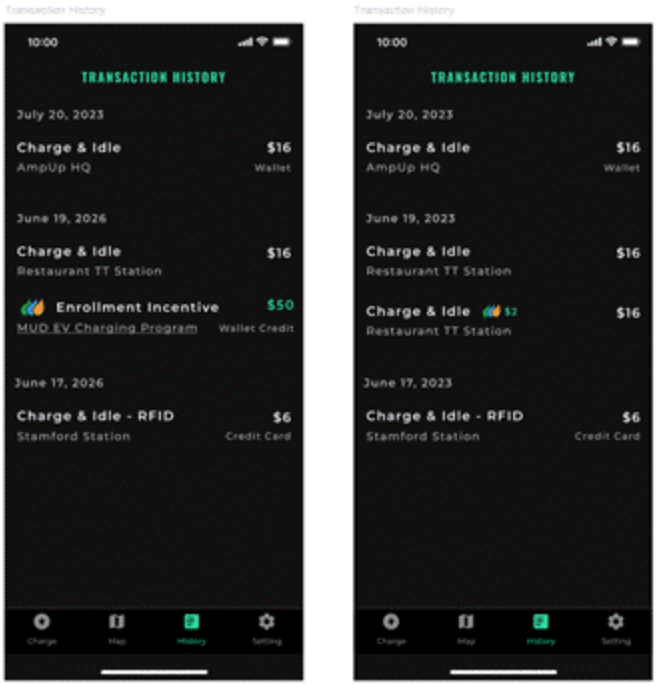
this during the MUD Pilot period from $1 to $3 to further test customer receptivity and response to alternative incentive levels.

	Driver Incentive Structure & Eligibility
Driver enrollment	$50 one-time paid to the driver
Ongoing driver incentive	$2, with flexibility to vary this from $1-3 credit or incentive per qualifying session paid to the driver
Qualifying condition	80%+ off-peak per session (not monthly) and more than 10 kWh charged, only one opportunity to earn an award per day — up to $10 per month. On-Peak defined as 3 – 9 PM, non-holiday weekdays.

iv. Potential Participant Incentive App Screens

Examples of the types of screens participants would see within the incentive app are provided below, for illustrative purposes only:

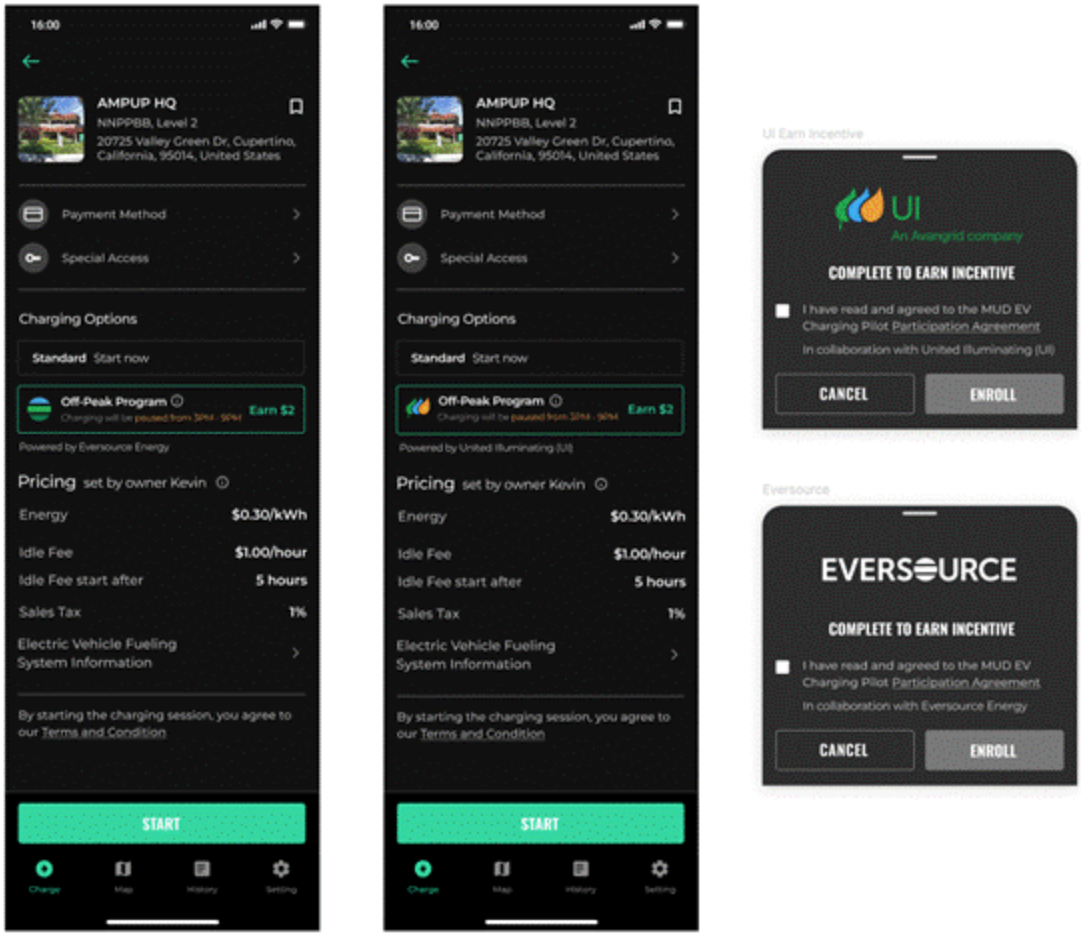




As noted above, these visuals are illustrative only; actual implementation may vary.

v. Potential Participant Enrollment App Screens

AmpUp's application collects a participant's first name, last name and email address at account creation, consistent with the information collected through ev.energy's enrollment process. Once the participant acknowledges the program agreement within the AmpUp app, no further information or action is required, and enrollment is completed entirely within the existing CMS application without any additional steps outside the platform.



As Noted above, these visuals are illustrative only; actual implementation may vary.

vi. Driver flow

A driver charging at a participating site is presented with the Program Participation Agreement alongside AmpUp's privacy policy and terms, aligned to program requirements for CMS based participation. Upon acceptance, the driver is immediately enrolled and begins earning program incentives, with no lookup gate, waiting period, or redirection to another application. Drivers opt in through the AmpUp platform itself, and ev.energy begins receiving session data for enrolled drivers through the API.

vii. Site host enrollment

Site hosts are enrolled automatically with the ability to opt out, consistent with the model validated through the Adapt and Earn program, in which every site host enrolled and none opted out. Before program launch, AmpUp will notify all participating site hosts of their enrollment and provide a straightforward mechanism for opting out.

viii. Data flow and program integrity

AmpUp sends charging session data to ev.energy through an API. ev.energy remains the system of record, responsible for confirming eligibility, checking for duplicate participation, and settling incentives.

	Data Responsibilities
AmpUp sends	Driver first name, last name and email — the same identifiers ev.energy uses today. Site, charger, and port identifiers with address and coordinates. Session start and end times. Interval data for energy delivered. Incentive amount claimed.
ev.energy returns	Confirmation of new drivers enrolled, driver credit awarded, and other program related metrics required for program administration in each reporting period.

ix. Preventing double payment

Every session carries a "fingerprint" made up of the driver's email, the site, and the session start and end times. If a driver has also enrolled through the telematics path — including under a different email address — the fingerprint identifies the overlap, and the driver earns an incentive through only one pathway.

As a result, a driver receiving credit at an AmpUp charger is not credited again through ev.energy's existing pathway. Because verification happens at the session level, load shifting

reported to the Authority is counted only once, regardless of the participation pathway through which the incentive is paid.

x. NSP compensation for incentive management

The EDCs would provide AmpUp, and other NSPs that can support the proposed incentive deployment, with a performance-linked fee equal to 10% of the incentives delivered (i.e., $2 credit to a customer, plus a $0.20 management fee to an NSP, for a total of $2.20). Additionally, NSPs or Site hosts would be eligible to earn a Site Recruitment Incentive, as described in Section d below.

AmpUp Incentive Component	Rate
NSP incentive management fee	10% of per-session driver incentives paid

c) Considerations for including additional types of public Level 2 chargers in the scaling implementation design, in addition to MUD chargers

The updated MUD Pilot design and any integration with AmpUp may help inform any future evaluation or consideration of public level 2 managed charging. However, the EDCs recommend addressing this as a separate matter within the EV docket. In providing this information as directed by Order No. 1 in the Final Decision, the EDCs are focused on augmenting their MUD Pilot to further test relevant load shifting capabilities of an NSP. While there may be similarities, a rigorous and productive discussion on this topic is merited because several obstacles must be addressed.

Particularly, most public Level 2 charging sites are not well-suited to managed charging using the same methods as residential (whether single-family or MUD) due to short dwell times and customers' desire for immediate charging. Furthermore, workplace charging may not be a suitable

candidate for the current regime of simple off-peak charging due to a misalignment of ISO-NE system peak times (early evening) with typical workplace charging load profiles.

d) Recommended site host incentives

The EDCs recommend maintaining, but updating, the upfront incentives available to site hosts. NSP feedback is that site host incentives are helpful in providing sites with some compensation to help assuage concerns about lost revenue associated with charging deferment and idle time.

To support NSP involvement and recognize their role in developing and establishing site participation, the EDCs recommend that the current site host incentive be revised to be a "Site Recruitment Incentive." The incentive would be available to either Site Hosts who enroll directly or to NSPs, who then could share a portion of this incentive with individual sites they enroll. The NSP would be compensated for a driver or a site once that driver or site has delivered two qualifying sessions - not upon sign-up alone. They would not be paid for enrollment that produces no load flexibility.

AmpUp Incentive Component	Rate
Site Recruitment Incentive	$250 per Site; $50 per enrolled driver

e) Estimated costs and timelines for scaled implementation

The EDCs' MUD Pilot implementor, ev.energy, completed an agreement with AmpUp in August 2026. The final technical integration will be completed based upon the updated MUD Pilot design pending approval by PURA in Docket No. 25-08-06. The EDCs anticipate implementation commencing in early 2027.

The EDCs do not have estimates for final implementation costs, which will depend upon contractual updates (change orders) which in turn depend upon PURA's decision regarding the MUD Pilot. The EDCs have provided their best projections based upon the pilot changes recommended in this Motion pursuant to Order No. 1.

Based on information available at this time, the EDCs estimate costs of approximately $150,000 in 2027. This estimate should be considered directional and subject to revision as implementation planning progresses, contractual arrangements are finalized, system integration requirements are refined, and actual site and driver participation becomes known. This estimate includes one- time costs associated with modifying the EDCs existing technology platform to support the design changes proposed, along with the ongoing Site Recruitment Incentives and NSP incentive management fees associated with AmpUp's forecasted CT MUD charger and driver adoption.

Following a decision to implement the proposed structure of the MUD Pilot Program, the EDCs anticipate that they will be able to stand up the updated pilot within four months, barring unforeseen circumstances.

III. AmpUp's Decision on Whether to Scale

AmpUp seeks to scale a solution with the EDCs that incorporate elements of the Adapt and Earn program that performed well -- instant per-session wallet credits, automatic site host enrollment, and no additional enrollment burden on drivers -- within the EDCs' long-term MUD managed charging program design. AmpUp is prepared to proceed with the CMS-based, NSP approach described in this filing at its current scale in Connecticut (approximately 60 sites and 200+ ports) and to grow that footprint as additional MUD sites come online, provided the incentive

structure, compensation mechanics, and data-sharing terms described above are adopted substantially as proposed.

IV. Conclusion

The Companies respectfully request that the Authority approve the program design, incentive structure, and cost estimates described in this response, and permit the Companies to proceed toward the early-2027 implementation timeline referenced above. If approved, the EDCs will begin to develop these MUD Pilot modifications and once completed, enroll AmpUp sites and drivers into the MUD Pilot. These drivers and sites will contribute to new learnings in the multi-family use case and will build capabilities that may aid EV load management in other use cases, as this technology develops. Further, the modifications to the program design using lessons learned during AmpUp's Pilot enable the EDCs to offer a more compelling end customer experience. The Companies look forward to testing the NSP-facilitated approach to build the evidentiary record needed to test MUD managed charging and inform the Authority's future decisions on a MUD managed charging program design.

RESPECTFULLY SUBMITTED,

THE CONNECTICUT LIGHT AND POWER COMPANY

THE UNITED ILLUMINATING COMPANY

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CERTIFICATION

This is to certify that, on this 31st day of August 2026, the foregoing document was filed with the Authority, and copies of the foregoing document were served upon each person designated on the Authority's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

By: *Alex E. Soter*

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