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 OF ORDER NO. 6

The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") and The United Illuminating Company ("UI," and collectively the "Companies" or "EDCs") hereby submit the following filing, for review and approval, in compliance with Order No. 6 of the December 17, 2025, Decision (the "Decision") issued by the Public Utilities Regulatory Authority (the "Authority") in Docket No. 25-08-06. More specifically, Order No. 6 provides:

> *No later than August 1, [2026], the EDCs shall jointly submit to the Authority for review and approval the results of the MUD Managed Charging Pilot offering and a final program design, as directed in Section IV.F.3 of the Year 2 Decision, and Section IV.C.3.c [of the Year 3 Decision].*[1]

In compliance with Order No. 6, the Companies provide the following results and proposal for the Authority's review and approval.

I. Final Program Design Recommendation

The EDCs acknowledge the Authority's objective of developing a scalable managed charging offering for residents of multi-unit dwellings ("MUDs"). Through implementation of the MUD Managed Charging Pilot ("MUD Pilot"), the EDCs have successfully demonstrated the technical feasibility of managed charging in the multifamily sector and have gained valuable insight into the operational and market conditions that will inform future decisions on program scalability and design.

[1] The deadline to submit compliance with Order No. 6 was extended to August 31, 2026, pursuant to the Authority's July 28, 2026, ruling on Motion No. 12 in the above-captioned proceeding.

The MUD Pilot has established the capability to integrate shared charging infrastructure into a managed charging platform, collect and validate charging session data, associate charging activity with participating drivers, support multiple enrollment pathways, and develop active charging management functionality. These achievements demonstrate that the underlying technology and program administration necessary to support a MUD managed charging offering are viable.

Just as importantly, the MUD Pilot has identified key market findings associated with scaling managed charging within the MUD sector including site acquisition, customer awareness, and participant enrollment. Throughout the MUD Pilot, expansion opportunities remained constrained by the availability of participating sites and the challenges associated with recruiting and engaging MUD property owners, charging providers, and tenants.

Since initiation of the MUD Pilot, the Authority has separately evaluated alternative approaches to MUD managed charging through the AmpUp Innovative Energy Solutions ("IES") Pilot and has directed the EDCs to scale elements of that model[2]. The EDCs believe the Authority's direction is responsive to many of the barriers identified during implementation of the MUD Pilot, particularly those associated with site acquisition, customer engagement, and enrollment friction.

The EDCs have provided a proposal for scaling elements of the AmpUp pilot by making a number of updates to the MUD Managed Charging pilot. However, because these approaches have not yet been deployed and evaluated within the MUD Pilot framework, the EDCs conclude that the current record does not yet support establishment of a long-term statewide MUD managed charging program design. Instead, implementation and evaluation of these

[2] Order 1 in Final Decision in Docket No. 22-08-07.

enhancements represent the next logical phase of pilot development and will provide the Authority with a more complete evidentiary record upon which to base future programmatic decisions.

Accordingly, the EDCs recommend continuation of the MUD Pilot through December 2028, and approval of the targeted enhancements described below.

II. MUD Pilot Results and Key Findings

a. Technical Feasibility Was Successfully Demonstrated

The MUD Pilot successfully demonstrated the ability to support managed charging functionality in a multifamily environment. Through implementation of the MUD Pilot, the EDCs demonstrated the ability to:

- Integrate charging infrastructure from participating network service providers ("NSPs");
- Collect and validate charging session data;
- Associate charging activity with individual participating drivers;
- Support both telematics-based and charger-based enrollment pathways; and
- Develop managed charging functionality capable of supporting future load management objectives.

Collectively, these accomplishments establish a strong technical foundation for future MUD managed charging offerings.

b. Site Acquisition and Enrollment Represent Scalability Challenges

While technical implementation was successful, the MUD Pilot demonstrated that future program scalability depends on the ability to recruit participating charging locations and efficiently enroll customers. Despite outreach efforts, site host incentives and direct engagement activities, expansion opportunities remained constrained by the limited number of participating locations and the challenge of engaging site hosts and tenants.

These findings suggest that future program success will depend less on development of additional technical capabilities and more on adoption of enrollment and customer acquisition models that leverage existing relationships between charging providers, property owners, and EV drivers.

c. Additional Experience & Data Is Needed to Evaluate Enhanced Program Approaches

The Authority's direction in the AmpUp proceeding introduces several program enhancements specifically intended to address barriers identified during implementation of the MUD Pilot. These enhancements include expanded enrollment pathways, greater NSP involvement, reduced customer enrollment friction, and broader site acquisition opportunities.

Because these modifications have not yet been implemented and evaluated, the EDCs believe additional pilot operation and data collection is warranted to assess customer adoption, enrollment effectiveness, site acquisition performance, load-shifting results, and overall program scalability under the enhanced framework.

III. Recommendations

a. Continue to Enhance MUD Pilot through December 2028

The EDCs recommend continuation of the MUD Pilot through December 2028. The requested extension is not intended to continue the Pilot unchanged. Rather, it will support implementation and evaluation of enhanced program approaches informed by both the MUD Pilot and the Authority's direction regarding the AmpUp model. Extension of the Pilot would allow the EDCs to:

- Implement Authority-directed program enhancements;
- Expand charging network participation opportunities;

- Evaluate NSP-facilitated enrollment pathways;
- Increase site acquisition opportunities;
- Assess customer response to revised incentive structures;
- Evaluate load-shifting performance under the enhanced model;
- Evaluate scalability and aggregate load reductions across statewide MUD sites; and
- Develop a more robust evidentiary record to support future regulatory decisions.

b. *Expand NSP Participation and Enrollment* Pathways

The EDCs recommend maintaining existing telematics and site-host participation pathways while introducing an additional NSP-facilitated participation model.
Under this approach, participating NSPs would be permitted to enroll eligible customers directly through their existing charging platforms and applications. This enhancement would reduce enrollment friction, simplify customer participation, and expand eligibility to drivers who may not otherwise participate through vehicle telematics or traditional enrollment mechanisms.

The EDCs would continue to maintain oversight of program administration, reporting, and performance verification while leveraging existing NSP customer relationships and marketing channels to increase participation opportunities. The EDCs have filed a joint plan for scaling the AmpUp pilot scaling as required by PURA3, with key changes summarized in Sections (c) and (d) below.

c. Evaluate Enhanced Participant Incentive Structures

The EDCs recommend a session-based performance incentive for all drivers participating in the MUD Pilot. Under this approach, incentives would continue to be tied to off-peak charging behavior but would be evaluated at the individual charging-session level rather than on a

[3] Joint Motion for Review and Approval of Order No. 1. Docket 26-08-05, filed August 31, 2026

monthly basis. The EDCs believe this approach may improve customer experience by providing a clearer and more immediate connection between participant behavior and incentive eligibility. The EDCs propose an incentive structure that allows participants to earn $1-3 per charging session. This range of incentives would allow the EDCs the flexibility necessary to provide incentives to participants based on observed load shifting, potential seasonal incentive offerings, and flexibility with various NSPs that may be added to the pilot at a later date who propose alternative incentive levels. Incentives would be offered under the following conditions:

- A charging session duration must be 80% or more during the off-peak period;
- On-peak is defined as 3 to 9pm on non-holiday weekdays;
- A charging session must consist of 10 kWh[4] or more in energy delivered to the vehicle;
- One opportunity per day to earn an incentive, capped at $10 per month; and
- Customers may bank their incentives for direct monthly payments or choose to credit their NSP charging account.

The EDCs propose maintaining existing enrollment and site-recruitment incentives while evaluating the effectiveness of the session-based approach during the extended pilot period.

d. Expand NSP Support for Site Acquisition

Consistent with pilot findings, the EDCs recommend expanding the role of participating NSPs in site recruitment activities.

The MUD Pilot demonstrated that the primary obstacle to program growth is not technical integration, but rather identifying and enrolling participating charging locations. Unlike the EDCs, NSPs maintain direct and ongoing relationships with many multifamily charging site hosts as part of their normal business operations. NSPs frequently support charger deployment,

[4] The criteria of 10 kWh minimum energy delivery is intended to ensure a valid charging is established.

network services, account management, maintenance, and customer communications, providing regular access to both property owners and charging customers.

The EDCs therefore propose leveraging NSPs as site acquisition partners by allowing them to identify prospective locations, conduct initial site host engagement, facilitate customer enrollment, and support ongoing participant communications. The EDCs believe this approach aligns responsibility for site recruitment with organizations that already maintain direct relationships with the relevant stakeholders and may improve the scalability of future managed charging offerings.

Where appropriate, the EDCs also propose allowing the existing $250 site-recruitment incentives to support NSP-facilitated site recruitment activities that result in successful enrollment of qualifying MUD charging locations.

e. Implement Authority-Directed Integration with the AmpUp Model

Consistent with the Authority's direction in the AmpUp proceeding, the EDCs propose implementation of integrations between the managed charging platform and AmpUp, along with the incorporation of related enrollment and participation strategies within the MUD Pilot framework. The EDCs believe this collaborative framework has the potential to:

- Increase access to eligible charging locations;
- Improve customer awareness and participation;
- Reduce enrollment friction;
- Leverage existing site-host and customer relationships;
- Inform scalability; and
- Generate a more robust dataset upon which future program decisions can be based

IV. Conclusion

The MUD Pilot has successfully demonstrated that managed charging can be implemented within a multifamily environment and has provided valuable insights regarding the operational and market conditions that will influence future program success. The Pilot has further demonstrated that the principal barriers to scale are associated with site acquisition, customer engagement, and participant enrollment rather than underlying managed charging technology.

The Authority's direction in the IES proceeding creates the opportunity to test enhancements that could help address these barriers. The EDCs support implementation of those enhancements and believe they should be evaluated before a decision on a potential statewide MUD managed charging program design is made.

Accordingly, the EDCs respectfully request that the Authority:

1. Continue the MUD Managed Charging Pilot through December 2028;
2. Approve implementation of the enhanced enrollment, participation, and site acquisition approaches described herein;
3. Authorize incorporation of the Authority-directed AmpUp model within the MUD Pilot framework; and
4. Direct the EDCs to submit updated results and recommendations following evaluation of the enhanced pilot design and load shifting

This approach will allow any future permanent program design to be informed by the performance of the enhanced framework directed by the Authority and supported by a more complete evidentiary record regarding customer adoption, site acquisition, scalability, and load-shifting performance.

RESPECTFULLY SUBMITTED,

THE CONNECTICUT LIGHT AND POWER 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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