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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 this letter in lieu of brief in regard to the above-referenced docket. OCC respectfully directs the Authority's attention to OCC's Supplemental Written Comments, filed on October 20, 2026,[1] but takes this opportunity to discuss two issues that OCC believes warrant additional discussion.

First, on the issue of the program budget, CAE-003 clarifies that the $59.1 million figure is an "illustrative example" and represents a hypothetical estimate of cost(s) to meet the existing deployment targets using historical per-port incentive levels. However, OCC still remains unclear as to what portion of the actual and projected total program expenditures are attributable to costs that are inclusive of the budget cap established by PA 25-173 section 3(b).[2] Without this data, OCC is unable to adequately analyze the impact of the EDCs' proposal to adjust incentives and port deployment targets. OCC further highlights that an identical issue occurred during last year's annual program review, where the Authority stated that "[t]here is unclear and limited record evidence regarding Program budgets, actual Program Year spending, projected 2026 Program budgets, and budget expense eligibility under Public Act No. 25-173."[3] As such, OCC respectfully requests the Authority to order the EDCs to include a breakdown of this cost category within their annual reports.

Second, after reviewing the EDCs' responses to CAE-002 and CAE-004, OCC believes that the elimination of DCFC deployment at this point in time would be premature. According to

[1] Docket No. 26-08-06, OCC Supplemental Written Comments, (Oct. 20, 2026) available at 26-08-06 10.20.26 Supp. Comments.pdf.
[2] The Authority has held that the "Statutory Expense Cap in section 3(b) of Public Act No. 25-173 is limited to the physical EVSE and customer wiring upgrade/make-ready costs. Therefore, the Authority determines that the Statutory Expense Cap does not include EV Charging Program marketing and administration expenses." Docket No. 25-08-06, Final Decision, 7 (December 17, 2025).
[3] Docket No. 25-08-06, Final Decision, 16 (December 17, 2025).

CAE-003, the known pipeline of DCFC projects has already fallen from 413 ports at nearly 80 locations to 352 ports at 69 locations, and a number of those projects either have unknown completion dates or are not expected online until 2027–2029. Further, CAE-004 confirms that eliminating future DCFC deployment would not immediately reduce education and outreach, EM&V, IT, vendor, or labor costs because those costs support the broader program and existing DCFC obligations. Thus, the existence of a pipeline of projects in queue is alone insufficient to show that the remaining geographic gaps will be filled within the estimated timeline. As such, OCC recommends that the Authority maintain the program's DCFC incentives but suggests that the Authority may want to reconsider the issue once there is more clarity regarding the program's actual and projected costs.

OCC thanks the Authority and stakeholders for their work on this docket.

Respectfully submitted,

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