STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL REVIEW OF THE ELECTRIC VEHICLE CHARGING PROGRAM - YEAR 6	:	DOCKET NO. 26-08-06
	:	MARCH 2, 2026

WRITTEN COMMENTS

Save the Sound respectfully submits the following written comments as part of the Annual Review of the Electric Vehicle Charging Program – Year 6 in response to the Notice of Request for Written Comments issued by the Public Utilities Regulatory Authority (the Authority) on February 9, 2026.

The Authority has requested that docket Participants and interested stakeholders file written comments on the following:

1. Provide comments on the EDCs' proposal to align with the National Electric Vehicle Incentive (NEVI) 97% uptime requirement for DCFC stations, including but not limited to, the following:

   a. The EDCs' proposed pre-requisite that DCFC projects be able to report specific uptime data fields to the EDCs in order to be eligible to apply for and participate in the Program;
   b. The EDCs' proposed required uptime reporting fields included in Attachment Appendix A - Uptime Field Requirements; and
   c. The EDCs' proposal that these requirements begin with DCFC stations awarded after January 1, 2027.

2. Provide comments on the EDCs' proposal regarding the Authority's Office of Education, Outreach & Enforcement being responsible for the enforcement of DCFC uptime requirements through monetary penalties.

1.a. The EDCs' proposed pre-requisite that DCFC projects be able to report specific uptime data fields to the EDCs in order to be eligible to apply for and participate in the Program;

Save the Sound supports this as *a pre-requisite for program eligibility*, as we recommended in previous comments.[1] While we recognize that it may be too late to implement this requirement for the current round of project applications (see comments on 1c, below), we recommend that, for the current application round, the ability of projects to comply with future uptime reporting

[1] Docket No. 25-08-06, Written Comments of Save the Sound at 2-3 (June 17, 2025).

requirements be evaluated and that a preference potentially be provided to projects deemed capable of complying with the uptime reporting requirements when they are formally adopted.

1.b. The EDCs' proposed required uptime reporting fields included in Attachment Appendix A - Uptime Field Requirements.

To the extent that they align with the reporting required under the NEVI program, Save the Sound takes no exception to the proposed uptime reporting fields provided by the EDCS.

We raise one question, however, with respect to the proposed frequency of the data reporting. In their latest submission, the EDCs propose that Uptime Data be reported every six [6] months "for alignment with the NEVI requirements."[2] However, it is our understanding that the NEVI program requires *quarterly* reporting of such data.[3] Specifically, the NEVI regulations provide that:

> States and other direct recipients must ensure the following data are submitted on a quarterly basis in a manner prescribed by the FHWA. Any quarterly data made public will be aggregated and anonymized to protect confidential business information.
> (1) Charging station identifier that the following data can be associated with. This must be the same charging station name or identifier used to identify the charging station in data made available to third-parties in § 680.116(c)(1);
> (2) Charging port identifier. This must be the same charging port identifier used to identify the charging port in data made available to third-parties in § 680.116(c)(8)(ii);
> (3) Charging session start time, end time, and any error codes associated with an unsuccessful charging session by port;
> (4) Energy (kWh) dispensed to EVs per charging session by port;
> (5) Peak session power (kW) by port;
> (6) Payment method associated with each charging session;
> (7) Charging station port uptime, T_outage, and T_excluded calculated in accordance with the equation in § 680.116(b) for each of the previous 3 months;
> (8) Duration (minutes) of each outage.[4]

Indeed, in an earlier filing, the EDCs acknowledged that this data was required to be reported quarterly pursuant to NEVI.[5]

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[2] Docket No. 26-08-06, Joint Motion for Review and Approval of Order No. 14 [Motion No. 1] at 2-3 (Feb. 2, 2026).
[3] *See*, 23 CFR §680.112, https://www.ecfr.gov/current/title-23/section-680.112.
[4] *Id*.
[5] Docket No. 24-08-06, Compliance Filing Order No. 14, Joint EDC Annual Report – Program Cycle Year 3, at 24 (Aug. 1, 2024); https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/bb5e186a4054508d85258b6c00676d28/$FILE/Attachment%201%202024%20Annual%20Report.pdf.

Given that the Connecticut commercial EVSE program currently requires quarterly reporting of EVSE Utilization Data and EVSE Financial Data,[6] we recommend that the reporting timelines be made consistent such that Uptime Data for the CT program be reported quarterly, rather than every six months.

1.c The EDCs' proposal that these requirements begin with DCFC stations awarded after January 1, 2027.

While Save the Sound urges the adoption of uptime reporting requirements and compliance mechanisms at the earliest practical time, we understand that the application period for the current 2026 DCFC proposals is scheduled to begin this month. Given the timing of the current program application process and the likely time needed to finalize uptime reporting requirements and associated compliance mechanisms, we recognize that a January 1, 2027, implementation date may be reasonable.

However, we would encourage the EDCs, for the current application round, to evaluate, through the applications and follow-up conversations with the appropriate vendors, the ability of proposed projects to comply with anticipated uptime reporting requirements in order to ensure the availability of such data in the future. We suggest that projects that are deemed compatible with future uptime reporting requirements be given a preference over projects deemed unable to comply with future requirements.

2. The EDCs' proposal regarding the Authority's Office of Education, Outreach & Enforcement being responsible for the enforcement of DCFC uptime requirements through monetary penalties.

As we previously noted, Save the Sounds supports the imposition of penalties on EVSE operators for non-operable DCFC chargers to ensure that the public has reasonable access to working chargers.[7] Save the Sound takes no position as to which entity is best positioned to enforce compliance with minimum uptime requirements. That being said, we have no objection should the Authority's Office of Education, Outreach and Enforcement be designated as the responsible entity, as recommended by the EDCS.

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[6] Connecticut Electric Vehicle (EV) Charging Program 2025 Comprehensive Program Manual, Appendix A EVSE Utilization Data And EVSE Financial Data Sharing Requirements, at 98, 107 (Nov. 5, 2025); https://www.uinet.com/documents/d/uinet/ct-ev-program-manual-eversource-ui-final-ev.

[7] Docket No. 25-08-06, Written Comments of Save the Sound at 4 (June 17, 2025).

Conclusion

Thank you for the opportunity to submit these comments. We look forward to continuing our engagement with the Authority, the EDCs and all of the stakeholders to ensure the continued success of the CT EV Charging Program.

Respectfully submitted,

Charles J. Rothenberger
Director of Government Relations, CT
Save the Sound

CERTIFICATION

This is to certify that on this 2nd day of March 2026, a copy of the foregoing document was 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: */s/* Charles J. Rothenberger

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