Executive Secretary Jeffrey R. Gaudiosi, Esq.
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-08-06, Annual EV Charging Program Review

November 6, 2026

Dear Secretary Gaudiosi and PURA Staff,

We appreciated the opportunity to present at the Technical Meeting on 10/13/26 to the PURA Chairman, Commissioners, and staff about the CT Small MUD and Low-Power Solutions Working Group, both for ourselves and on behalf of our partners and stakeholders. We maintain our positions on the various provisions proposed by the EDCs that resulted from this working group, as stated in our presentation slides and our Written Comments, and note the additional signatories below. There are a few other issues that came up from the EDCs' joint Annual Report filing and at the Technical Meeting that we would like to comment on.

The EDCs are proposing to eliminate make-ready incentives for EV charging infrastructure that is installed in new constructions in order to be in compliance with the 10% EV readiness state requirement from PA 22-25. We believe that state-mandated EV readiness should still be eligible for incentives. If not, it would essentially be rendered an unfunded mandate, leaving developers and building owners to bear the costs, which would then likely be passed down to residents—something that could especially be burdensome in underserved communities. Furthermore, code doesn't cover the utility-side part of make-ready, nor does it completely address future-proofing. The state should support mandates like this with the appropriate funding to ensure its success.

We also wanted to comment on the EDCs' position that there is already enough DCFC installed and in the pipeline to provide CT drivers with sufficient coverage. We noticed from the EDC interrogatory response regarding estimated completion dates for DCFC projects that many of them have unknown completion dates, which leaves one unsure if they will in fact be installed. Furthermore, a number of the DCFC projects in the pipeline are through the NEVI and CFI programs, which have been notoriously riddled with delays, so it would seem prudent to not count on those being completed soon either.

The topic of the low utilization of the MUD managed charging program also came up at the Technical Meeting. One relatively straightforward measure that may help this is raising the upfront enrollment incentive. There may be some users who are well-positioned to join this program, with their own deeded/reserved parking spots, who still have not signed up simply because the upfront $50 incentive isn't enough to make it worthwhile for them, given the process involved. Furthermore, the residential single family home managed charging program

offers a $100 upfront incentive; why not offer the same incentive for MUD residents, especially given these issues with utilization?

While raising the incentive may help, managed charging for MUD residents can be a more complex environment due to some situations that involve sharing of a limited number of chargers. We recommend there to be a deeper exploration of how the residents of these buildings view participation in this program, as well as an evaluation of the impacts of the anticipated changes that would expand charging options, before anything resembling a final course of action is determined.

Many thanks for your consideration,

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Also signed by:

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