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June 11, 2026

Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, CT 06051

RE: Docket No. 26-08-06, Annual EV Charging Program Review – Year 6

Dear Commissioners,

Tesla, Inc. respectfully submits these written comments for consideration in the Annual EV Charging Program Review by the Public Utilities Regulatory Authority (PURA). We greatly appreciate your consideration to ensure that an important program modification is approved no later than the start of the 2027 (Year 7) program year.

Connecticut's EV charging programs should accept NACS as a standard connector.
Over the last several years, automotive manufacturers, EVSE manufacturers, and charging networks have increasingly aligned behind the North American Charging Standard (NACS) as the industry standard connector for light duty electric vehicles. Industry adoption of NACS is a major milestone to improve interoperability and simplify the charging experience for EV drivers in the US.

To reflect these shifts in the market, Tesla respectfully requests that the Year 6 Annual EV Charging Program Review include a program modification to revise connector technical requirements. The make-ready infrastructure programs should accept NACS (also known as SAE J3400) as a non-proprietary connector that is fully eligible for incentives, without the need for co-deployment of the CCS1 or J1772 connector type.

NACS has completed standardization and is widely recognized as the EV charging standard by automakers, EV charging manufacturers, and EV charging networks.
NACS, widely associated with Tesla and now formally standardized as SAE J3400, has been adopted by every major North American auto manufacturer, including General Motors, Ford, Rivian, Nissan, Toyota, and Hyundai.[1] This means new EV models will increasingly be sold with native J3400 inlets, and several Model Year 2025 and 2026 EVs are already on the road with them.[2] EVSE manufacturers have also developed and are selling equipment with J3400 standard connectors. This industry-wide commitment reflects broad consensus that J3400 is a reliable, high-performance connector capable of supporting both AC and DC charging across a wide range of vehicle platforms and power levels.

SAE International published the initial Technical Information Report in December 2023 and advanced the document to Recommended Practice status in September 2024. These

[1] For a full list of automakers that have gained access to the Tesla Supercharger network for existing vehicles and committed to NACS/J3400 for new vehicles, see https://www.tesla.com/NACS.
[2] In addition to all Tesla models, vehicles with native NACS inlets include the 2025+ Hyundai Ioniq 5 and Ioniq 9, 2025+ Kia EV6 and EV9, and 2026+ Rivian R1T, R1S, and R2. A full list if available at https://evchargingstations.com/chargingnews/all-evs-with-a-nacs-sae-j3400-charging-port/

publications establish J3400 as a mature standard with clear technical requirements that any manufacturer or charging provider can utilize without restriction.

Accepting NACS-only EV charger deployments will advance the state of Connecticut's goals for an interoperable and accessible EV charging network.
Given this widespread adoption and completed standardization, Connecticut's EV charging programs would benefit from updating their requirements to permit J3400 connectors on a standalone basis. Allowing stations to be deployed with J3400 without mandatory co-deployment of CCS1/J1772 would reduce unnecessary hardware costs, simplify program administration, and align program rules with current market realities and consumer expectations. Such a modification would accelerate the build-out of future-proofed equipment while maintaining full compatibility with the growing fleet of J3400-equipped vehicles.

Because industry transition is ongoing, equipment with J1772, CCS1, or J3400 should be eligible for incentives in any combination, that is, without prescribed ratios for each type. This modification would defer the selection of connector types to the incentive recipient, ensure adequate flexibility for the market, and prevent the need for additional modification in the final years of the EV Charging Programs.

Outline of Recommended Changes
In the revised 2026 EV Manual submitted as a joint motion by Eversource and United Illuminating (UI) in PURA Docket# 26-08-06, on March 3, 2026, the terms Electric Vehicle Supply Equipment (EVSE), Port, and Direct Current Fast Charger (DCFC) are defined throughout the manual with reference to specific connector standards. Tesla recommends these definitions are amended to clarify that J3400 is an allowable port type, with suggested language in underline.

> **Electric Vehicle Supply Equipment (EVSE)**[3]
> Level 2 or DCFC charger. Level 2 requires 208/240-Volt input with J1772 or J3400 connection. DCFC requires 208 or 480-volt, 3-phase input, with CCS and/or CHAdeMO and/or J3400 connections. EVSE includes the charger, EV charge cords and plugs, and charge stands
>
> **Port** [4]
> A J1772, CCS, J3400, or CHAdeMO connector that can provide power to charge a connected EV regardless of whether other ports at the same site are simultaneously in use.
>
> **Direct Current Fast Chargers**[5]
> DCFC charging stations can include both SAE J1772 Combined Connector System (CCS), SAE J3400 North American Charging Standard (NACS), and IEEE 2030.1.1

[3] Docket No. 26-08-06, Joint Review and Approval of Order No 5, Connecticut Electric Vehicle Charging Program, Revised March 2, 2026, Pg. 50.
[4] Id., Pg. 51
[5] Id., Pg. 54

(CHAdeMO) charging ports. Having both port types is not a requirement. Simultaneous charging on both ports is not a requirement. However, a station capable of simultaneous charging on each port may qualify as two ports if each port can charge at 50kW or greater.

Direct Current Fast Charger (DCFC)[6]:
DCFC chargers, sometimes referred to as a Level 3 DC charger, are a step up in power from L2 chargers. DCFC chargers use a 3phase 480-volt AC electric circuit but deliver direct current (DC) to the vehicle. DCFC equipment can charge a BEV to 80% in just 20 minutes to one hour. For this Program, DCFC charging stations must have SAE J1772 Combined Connector System (CCS), SAE J3400 North American Charging Standard (NACS), or IEEE 2030.1.1 (CHAdeMO) in any combination. ~~be dual port with both SAE J1772 Combined Connector System (CCS) and IEEE 2030.1.1 (CHAdeMO) charging ports~~. For equipment with several connector types, s~~S~~upport of simultaneous charging on both ports is not a requirement; however, to qualify as a two-plug charging site, DCFC stations must support simultaneous charging of at least 50 kW

Conclusion
Tesla respectfully request that PURA modify the EV Charging Programs to allow standalone J3400 deployment for chargers that receive incentive funds. We greatly appreciate the opportunity to comment and look forward to accelerating charging infrastructure deployment in Connecticut.

Sincerely,

Mal Skowron
Sr. Policy Analyst, Charging
Tesla, Inc.

[6] Id., Pg. 85