November 6, 2026

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

Re: *Docket No. 26-08-06-Annual EV Charging Program Review – Year 6 - DEEP Letter in Lieu of Brief*

Dear Mr. Gaudiosi:

The Bureau of Energy and Technology Policy of the Department of Energy and Environmental Protection ("DEEP" or "Department") respectfully submits this letter in lieu of briefs to the Public Utilities Regulatory Authority's (the "Authority" or "PURA").

DEEP reaffirms the comments previously submitted by the Department on this proceeding[1]. DEEP also appreciates the comments submitted by docket participants, especially the comments submitted by the Office of Consumer Council ("OCC)" on October 20, 2026[2]. Regarding the latter, DEEP agrees with OCC's position that it is necessary to have a Connecticut-specific avoided-cost framework that captures the broader value of Electric-Vehicle (EV) managed charging and with the recommendation for PURA to require that "EDCs develop and test approaches to quantify location-specific distribution value as participation and data availability improve, while clearly distinguishing directly demonstrated load reductions from modeled or monetized avoided-cost benefits".

Regarding OCC's recommendation that the EDCs use the updated 2024 AESC study avoided-cost values, where appropriate, rather than continuing to rely solely on the 2021 AESC study. DEEP agrees that, if using AESC numbers, the most updated study should be used instead of the 2021 (2027 AESC is expected to be released soon). However, DEEP strongly recommends against the use of AESC avoided-cost values uniformly across energy efficiency and demand response programs. First, the AESC study estimates specific categories of avoided costs based on defined methodologies, assumptions, and analytical parameters that may not accurately reflect the costs of the particular investments being deferred or avoided, nor fully capture the benefits associated with measures such as EV managed charging. Using the AESC might be overestimating active demand response projects that require customer behavior changes. If projects miss the

[1] CT DEEP, Docket No. 26-08-06, Written Comments (March 2, 2026) available at: 03022026_DEEP's Written Comments Dkt. No. 26-08-06.pdf and Written Comments (October 20, 2026) available at: 10202026_DEEP's Written Comments Dkt. No. 26-08-06.pdf.

[2] The Office of Consumer Council, Docket No. 26-08-06, Written Comments (March 20,2026) available at: 26-08-06 10.20.26 Supp. Comments.pdf

annual and needle point peaks, a very large share of the benefits is missed. This is very different than instillation of energy efficiency programs which are broad-based and have a fairly consistent profile where the avoided costs can be assumed with a reasonable degree of confidence. There is far less confidence for these benefits in an active demand response program. Second, AESC is a regional New England study. Although it provides state-specific estimates for certain cost components, its assumptions and resulting estimates may not adequately reflect Connecticut-specific distribution system conditions, locational constraints, or marginal infrastructure costs. Finally, the assumptions underlying the AESC study may not be appropriate for all resource types, investment decisions, or planning horizons.

DEEP thanks the Authority for the opportunity to provide this brief and appreciates the Authority's consideration. Furthermore, DEEP looks forward to ongoing opportunities for engagement in this proceeding.

Sincerely,
DEPARTMENT OF ENERGY AND
ENVIRONMENTAL PROTECTION,
Bureau of Energy & Technology Policy

By:/s/ Victoria Hackett
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to the service list in compliance with Conn. Agencies Regs. § 16-1-15.

By:/s/ *Obinna E. Anugweje, Esq*.
Obinna E. Anugweje, Esq.
Commissioner of the Superior Court