Save the Sound®
Action for our region's environment.

ANNUAL REVIEW OF THE ELECTRIC VEHICLE CHARGING PROGRAM - YEAR 6	**:**	**DOCKET NO. 26-08-06**
	:	
	:	**OCTOBER 5, 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 (Notice) issued by the Public Utilities Regulatory Authority (the Authority) on September 21, 2026.

The Authority has requested that docket Participants and interested stakeholders provide written comments on several topics, primarily related to the EDCs' Annual Report. Save the Sound presents the following preliminary comments with the recognition that the Authority has allowed for the submission of Supplemental Written Comments following the scheduled October 13th Technical Meeting.[1]

It is unfortunate although not unexpected that the overall participation numbers for the program have declined since passage of Public Act 25-173, which imposed income and other eligibility restrictions on EVSE and wiring rebates. We are encouraged, however, that despite those restrictions the companies continue to receive applications for infrastructure rebates, albeit at a much-reduced level.[2] Given the value that the managed charging program provides to the grid and all ratepayers, we are pleased to see that interest in the program remains strong in UI territory and that there remains a relatively consistent level of enrollment in Eversource territory, notwithstanding the sharp decline in applications in June 2026 in Eversource's territory.

Proposed Program Design Changes Regarding the Residential Managed Charging Program

We support the EDCs' recommendation to maintain the current $100 managed charging enrollment incentive for the residential program. Given the steep decline in overall program participation in the wake of legislative changes to eligibility requirements, the continuation of the incentive will help to avoid further declines in program enrollment.

We further preliminarily support the proposal to discontinue the targeted incentives for the DCFC program category and to shift the resources that would otherwise be used for that program segment to the Level 2 category.[3]

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[1] Ruling to Motion No. 10 (Oct. 5, 2026). While the motion ruling does not expressly extend the opportunity for supplemental comments to participants or stakeholders beyond the DEEP Bureau of Energy and Technology and the Office of Consumer Counsel, we read the ruling in that manner, as is typical Authority practice in ruling on motions for extension of time or other motions that could be applicable to all parties.

[2] Joint Annual Report, at 20, Figures 15, 16, Aug. 3, 2026).

[3] *See* Joint Annual Report at 28-32

Pending further discussion and analysis of the data provided by the EDCs, the recommendation to move resources from DCFC to support additional L2 chargers appears sound.

Incentive Flexibility to help Simply Enrollment Flow (Eversource)

While we do not object in principle to simplifying the enrollment process for customers, we do not support the proposed recommendation. Eversource states that it "seeks flexibility to offer he enrollment incentive ($100) to all customers and adjust the current $1,500 EVSE and wiring rebate to $1,400." We understand that Eversource is proposing this as a "technical" change; essentially removing $100 from the infrastructure rebate and reclassifying it as an "enrollment incentive" to facilitate enrollment through the DERMS. We question the added value that this approach might produce in practice. Are all customers (including those who do not receive equipment rebates) currently routed through the "rebate portal" (as is apparently suggested)? If so, simply moving them to the DERMS portal first would resolve much of the issue (particularly as these customers represent by far the largest segment of participants).

Eversource suggests that their proposed change will "avoid customer delays that may result from building in additional review and a potential waiting period" for customers receiving the infrastructure rebate. However, given that these customers wouldn't have the capacity to participate in the managed charging program until the infrastructure work was completed, are they really subject to an undue delay in enrolling in the managed charging program? Wouldn't these customers still have to utilize the rebate portal for the processing of the infrastructure rebate? It appears that a two-track approach based on what rebates/incentives the customer is receiving makes the most sense. Route the EVSE/wiring rebate customers through the rebate portal first, and then DERMS, and route all other participants directly to the DERMS.

Additionally, we are concerned that reclassifying a portion of the infrastructure rebate as a managed charging enrollment incentive will create confusion among both customers and policymakers regarding the program design and use of program funding. Accordingly, we oppose reclassifying a portion of the EVSE rebate as an enrollment incentive.

EDCs' Commercial Program Recommendations

Restrictions on Sites Receiving Third Party Funding and/or Stacked Funding

We support the EDCs' alternative recommendation regarding the "stacking" of incentives from multiple sources. Without taking a position at this time on whether stacking of incentives should be allowed or prohibited, we support the proposal to require that "total funding from all sources should not exceed total project costs, and applicants should be required to disclose all anticipated and awarded funding sources during the application process."[4]

Incentives for New Construction Stretch Building Codes

Although the EDCS did not directly make a specific recommendation regarding whether buildings subject to new building code EV requirements should be eligible for program incentives, we believe that it makes sense from a program and budget perspective to limit any incentives to infrastructure installed beyond the minimum code requirements. Given the availability of other sources of funding to support the installation of EV infrastructure, we do not feel it would be the

[4] Joint Annual Report at 34.

best use of ratepayer funds to subsidize activity that is legally required and that, accordingly, would occur with or without incentives.

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,

/s/ Charles J. Rothenberger
Charles J. Rothenberger
Director of Government Relations, CT

CERTIFICATION

This is to certify that on this 5th day of October 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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