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

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

Dear Commissioners:

The Office of Consumer Counsel ("OCC") submits these written comments in response to the Authority's Notice of Request for Written Comments, as issued in the above-captioned docket on February 9th, 2026. OCC offers the following comments for the Authority's consideration.

Through prompt one, the Authority requests comments on the EDCs' proposal to align with the National Electric Vehicle Incentive (NEVI) 97% uptime requirement for DCFC stations. To allow for adequate time for adjustments and implementation, OCC does not oppose the EDCs' proposal to impose uptime requirements for DCFC stations awarded after January 1, 2027. However, we emphasize that this data is integral to future program reviews and potential full-scale program adoption and urge that their inclusion should not be delayed any further.

Through prompt two, the Authority request comments on the EDCs' proposal regarding the Authority's Office of Education, Outreach & Enforcement ("EOE") being responsible for the enforcement of DCFC uptime requirements through monetary penalties. As discussed in our June 17, 2025 written comments in Docket No. 25-08-06, OCC recognizes the administrative costs associated with the NEVI uptime requirement, and would not oppose an increase to the withholding amount to incentivize compliance with the upkeep requirement, and we also would not oppose the inclusion of uniformity in reporting, calculations, and payout dates to reduce administrative complexities. However, if the Authority deems this approach to be inadequate to successfully support uptime requirements, OCC does not oppose the inclusion of monetary penalties as an enforcement mechanism. OCC also does not oppose the EDCs' proposal for EOE to be responsible for the enforcement of these monetary penalties.

Respectfully submitted,

STATE OF CONNECTICUT OFFICE
OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Prabisha Bhandari
Prabisha Bhandari
Staff Attorney

cc: Service List