



December 7, 2021

VIA ELECTRONIC FILING

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

RE: Docket No. 21-08-06 Annual Review of the Electric Vehicle Charging Program – Year 1, Letter in Lieu of Written Exceptions

Dear Mr. Gaudiosi,

The Sierra Club respectfully submits this Letter in Lieu of Written Exceptions to the Public Utilities Regulatory Authority (PURA) in response to the November 30, 2021 Proposed Final Decision and Notice of Written Exceptions, Briefs and Oral Arguments in Docket No. 21-08-06 Annual Review of the Electric Vehicle Charging Program – Year 1. Sierra Club focuses the following comments on the sections of the Proposed Final Decision addressing the Proposed Managed Charging Program Requirements.

Sierra Club supports the Proposed Final Decision’s focus on implementing a robust managed charging program in Connecticut “to optimize the distribution system and to maximize grid-level benefits of transportation electrification for all customers.”¹ With regard to the Advanced Managed Charging tier, Sierra Club appreciates the Authority’s recognition that “[i]nclusion of a robust Advanced Managed Charging tier offering in Year 2 of the Program is critical”² to achieving this objective. Sierra Club supports the guidance to Electric Distribution Companies (EDCs) to submit revised Managed Charging Program Proposals by May 1, 2022 for implementation of an Advanced Managed Charging tier as soon as possible but no later than January 1, 2023.³

With regard to the Baseline Managed Charging tier, Sierra Club agrees with the Authority in questioning whether “[g]iven the importance of encouraging long-lasting customer behavior shifts to charging their EVs during off-peak times... an all-year program may be more appropriate”⁴ than the Baseline Managed Charging tier as proposed, which is limited to a fourth-month period over the summer. While Sierra Club supports the Authority’s directive to EDCs to reconvene the Managed Charging Working Group to reexamine the proposed program design of the Baseline Managed Charging tier, Sierra Club urges the Authority to provide more guidance on how that tier should be

¹ Public Utilities Regulatory Authority, Docket No. 21-08-06 Annual Review of the Electric Vehicle Charging Program – Year 1, November 30, 2021, p. 7. [Hereinafter, “Proposed Final Decision”].

² Proposed Final Decision, at 7.

³ Proposed Final Decision, at 12.

⁴ Proposed Final Decision, at 9.

adjusted to more fully promote long-lasting shifts in customer behavior. The Authority notes that alternatives to the current proposed model include incentive-based programs that reward participants for consistent off-peak charging and EV-only and whole-house time of use (TOU) rates.⁵ Sierra Club urges the Authority to provide a clearer directive to the EDCs and working group participants that, at a minimum, the Baseline Managed Charging tier should be improved to incorporate year-round events to advance the Authority's goal of promoting long-lasting customer behavior shifts and consistent off-peak charging.

In addition, Sierra Club expresses concern regarding the Authority's recommendation that Eversource transition customers enrolled in the year-round ConnectedSolutions EV pilot to the Residential EV Managed Charging Program.⁶ Without further direction from the Authority to improve the Baseline Managed Charging tier, that program will likely retain a summer-only demand response structure as initially proposed by the EDCs. Sierra Club urges that transitioning customers from the year-round ConnectedSolutions program to a demand response program that only promotes off-peak charging during the summer months would be a step backward for managed charging in Connecticut. Sierra Club understands the Authority's concerns relating to customer confusion and inefficiencies in program administration should Eversource offer two programs concurrently and does not dispute that one streamlined program should be offered. Therefore, Sierra Club reiterates its request that the Authority direct the EDCs to improve the Baseline Managed Charging tier to match the year-round offerings of the ConnectedSolutions program, in order to avoid a step backwards on managed charging in Connecticut.

Sierra Club reiterates its strong support for the Electric Vehicle Charging Program and the implementation of managed charging in Connecticut, and looks forward to continued engagement with PURA and stakeholders. Sierra Club does not request oral argument on the Proposed Final Decision but reserves the right to participate should oral argument be scheduled at the request of another party.

Sincerely,

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cc: Service List

⁵ Proposed Final Decision, at 10.

⁶ See Proposed Final Decision, at 9.

CERTIFICATE OF SERVICE

This is to certify that on this 7th day of December, 2021, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served upon each person designated on the Authority's official service list the applicable proceedings in accordance with R.C.S.A. Section 16-1-15.

/s/ Sarah Krame

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