

Jennifer Brooks Hutchinson  
Senior Counsel  
PPL Services Corporation  
JHutchinson@pplweb.com

280 Melrose Street  
Providence, RI 02907  
Phone 401-784-7288



February 21, 2023

**VIA ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket No. 22-49-EL-The Narragansett Electric Company d/b/a Rhode Island Energy  
Advanced Metering Functionality Business Case  
Responses to MDC Data Requests – MDC Set 1**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), attached is the electronic version of Rhode Island Energy’s response to MDC Set 1 from the Mission:Data Coalitions’s First Set of Data Requests in the above-referenced matter.<sup>1</sup>

On February 10, 2023, the Company filed a Motion to Object to Data Requests by Mission:Data Coalition Nos. 1-3, 1-5(a), 1-6, 1-7(c)-(g), 1-8, 1-9, and 1-10(a)-(c) and Motion for a Protective Order With Respect to Mission:Data Coalition Data Request Nos. 1-5(a) and 1-7, in which it asserted an objection to these data requests. That motion remains pending, and pursuant to the direction provided in Public Utilities Commission (“Commission”) counsel’s February 16, 2023 email, the Company is not providing responses to these data requests at this time. To the extent required after the Commission rules on the Company’s objection, the Company will provide responses as and when directed.

Thank you for your time and attention to this matter. If you have any questions, please contact Jennifer Brooks Hutchinson at 401-316-7429.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson", with a long horizontal flourish extending to the right.

Jennifer Brooks Hutchinson

Enclosures

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<sup>1</sup> Per communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by hard copies filed with the Clerk within 24 hours of the electronic filing.

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 Docket No. 22-49-EL – AMF Business Case  
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cc: Docket No. 22-49-EL Service List  
 John Bell, Division  
 Leo Wold, Esq.

**CERTIFICATE OF SERVICE**

I certify that a copy of the within documents was forwarded by e-mail to the Service List in the above docket on the 21st day of February, 2023.

  
 Adam M. Ramos, Esq.

**The Narragansett Electric Company d/b/a Rhode Island Energy**  
**Docket No. 22-49-EL Advanced Meter Functionality (AMF)**  
**Service list updated 2/9/2023**

Name/Address	E-mail Distribution List	Phone
<b>The Narragansett Electric Company d/b/a Rhode Island Energy</b>  Jennifer Hutchinson, Esq. 280 Melrose Street Providence, RI 02907	<a href="mailto:JHutchinson@pplweb.com">JHutchinson@pplweb.com</a> ; <a href="mailto:JScanlon@pplweb.com">JScanlon@pplweb.com</a> ; <a href="mailto:COBrien@pplweb.com">COBrien@pplweb.com</a> ; <a href="mailto:CAGill@RIEnergy.com">CAGill@RIEnergy.com</a> ; <a href="mailto:JOliveira@pplweb.com">JOliveira@pplweb.com</a> ; <a href="mailto:BLJohnson@pplweb.com">BLJohnson@pplweb.com</a> ; <a href="mailto:SBriggs@pplweb.com">SBriggs@pplweb.com</a> ; <a href="mailto:KGrant@RIEnergy.com">KGrant@RIEnergy.com</a> ; <a href="mailto:wanda.reder@gridxpartners.com">wanda.reder@gridxpartners.com</a> ; <a href="mailto:PJWalnock@pplweb.com">PJWalnock@pplweb.com</a> ;	401-784-7288
<b>Hinckley Allen</b> Adam Ramos, Esq. 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	<a href="mailto:aramos@hinckleyallen.com">aramos@hinckleyallen.com</a> ; <a href="mailto:cdieter@hinckleyallen.com">cdieter@hinckleyallen.com</a> ;  <a href="mailto:cwhaley@hinckleyallen.com">cwhaley@hinckleyallen.com</a> ;  <a href="mailto:ssuh@hinckleyallen.com">ssuh@hinckleyallen.com</a> ;	401-457-5164
<b>Division of Public Utilities (Division)</b> Leo Wold, Esq. Christy Hetherington, Esq. Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Leo.Wold@dpuc.ri.gov">Leo.Wold@dpuc.ri.gov</a> ; <a href="mailto:Christy.Hetherington@dpuc.ri.gov">Christy.Hetherington@dpuc.ri.gov</a> ; <a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov</a> ; <a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ; <a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ; <a href="mailto:Joel.munoz@dpuc.ri.gov">Joel.munoz@dpuc.ri.gov</a> ;	401-780-2177

	<a href="mailto:Linda.George@dpuc.ri.gov">Linda.George@dpuc.ri.gov</a> ;	
	<a href="mailto:Ellen.golde@dpuc.ri.gov">Ellen.golde@dpuc.ri.gov</a> ;	
	<a href="mailto:Machaela.Seaton@dpuc.ri.gov">Machaela.Seaton@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov</a> ;	
	<a href="mailto:Paul.Roberti@dpuc.ri.gov">Paul.Roberti@dpuc.ri.gov</a> ;	
	<a href="mailto:Thomas.kogut@dpuc.ri.gov">Thomas.kogut@dpuc.ri.gov</a> ;	
	<a href="mailto:John.spirito@dpuc.ri.gov">John.spirito@dpuc.ri.gov</a> ;	
Mike Brennan	<a href="mailto:mikebrennan099@gmail.com">mikebrennan099@gmail.com</a> ;	
Robin Blanton	<a href="mailto:rblanton@utilityengineering.com">rblanton@utilityengineering.com</a> ;	
William Watson	<a href="mailto:wfwatson924@gmail.com">wfwatson924@gmail.com</a> ;	
David Littell	<a href="mailto:dlittell@bernsteinshur.com">dlittell@bernsteinshur.com</a> ;	
Gregory L. Booth, PLLC 14460 Falls of Neuse Rd. Suite 149-110 Raleigh, NC 27614	<a href="mailto:gboothpe@gmail.com">gboothpe@gmail.com</a> ;	
Linda Kushner L. Kushner Consulting, LLC 514 Daniels St. #254 Raleigh, NC 27605	<a href="mailto:lkushner33@gmail.com">lkushner33@gmail.com</a> ;	
<b>Office of Attorney General</b> Nick Vaz, Esq. 150 South Main St. Providence, RI 02903	<a href="mailto:nvaz@riag.ri.gov">nvaz@riag.ri.gov</a> ;	401-274-4400 x 2297
	<a href="mailto:egolde@riag.ri.gov">egolde@riag.ri.gov</a> ;	
<b>Office of Energy Resources (OER)</b> Albert Vitali, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 <sup>th</sup> Floor Providence, RI 02908	<a href="mailto:Albert.Vitali@doa.ri.gov">Albert.Vitali@doa.ri.gov</a> ;	401-222-8880
	<a href="mailto:nancy.russolino@doa.ri.gov">nancy.russolino@doa.ri.gov</a> ;	
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
	<a href="mailto:Shauna.Beland@energy.ri.gov">Shauna.Beland@energy.ri.gov</a> ;	
	<a href="mailto:Matthew.Moretta.CTR@energy.ri.gov">Matthew.Moretta.CTR@energy.ri.gov</a> ;	
	<a href="mailto:Anika.Kreckel@energy.ri.gov">Anika.Kreckel@energy.ri.gov</a> ;	
Chris Kearns, OER	<a href="mailto:Steven.Chybowski@energy.ri.gov">Steven.Chybowski@energy.ri.gov</a> ;	
	<a href="mailto:Nathan.Cleveland@energy.ri.gov">Nathan.Cleveland@energy.ri.gov</a> ;	
	<a href="mailto:William.Owen@energy.ri.gov">William.Owen@energy.ri.gov</a> ;	
<b>Acadia Center</b> Hank Webster, Esq. Acadia Center 31 Milk St., Suite 501 Boston MA 02109-5128	<a href="mailto:HWebster@acadiacenter.org">HWebster@acadiacenter.org</a> ;	401-276-0600 x 402

<b>Mission:data Coalition</b> James G. Rhodes, Esq. Rhode Consulting LL 160 Woonsocket Hill Rd. North Smithfield, RI 20896	<a href="mailto:james@jrhodeslegal.com">james@jrhodeslegal.com</a> ;	401-225-3441
<b>George Wiley Center</b> Jennifer L. Wood, Executive Director R.I. Center for Justice 1 Empire Plaza, Suite 410 Providence, RI 02903	<a href="mailto:jwood@centerforjustice.org">jwood@centerforjustice.org</a> ;	
	<a href="mailto:georgewileycenterri@gmail.com">georgewileycenterri@gmail.com</a> ;	
	<a href="mailto:camiloviveiros@gmail.com">camiloviveiros@gmail.com</a> ;	
<b>NGR Retail Companies</b> Craig Waksler, Esq. Eckert Seamans Cherin & Mellott, LLC Two International Place, 16 <sup>th</sup> Floor Boston, MA 02110	<a href="mailto:CWaksler@eckertseamans.com">CWaksler@eckertseamans.com</a> ;	617-342-6890
	<a href="mailto:Kmoury@eckertseamans.com">Kmoury@eckertseamans.com</a> ;	717-237-6000
	<a href="mailto:sstoner@eckertseamans.com">sstoner@eckertseamans.com</a> ;	
<b>Conservation Law Foundation (CLF)</b> James Crowley, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	<a href="mailto:jcrowley@clf.org">jcrowley@clf.org</a> ;	401-228-1905
	<a href="mailto:mcurran@clf.org">mcurran@clf.org</a> ;	
<b>Original &amp; 9 copies file w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:Emma.Rodvien@puc.ri.gov">Emma.Rodvien@puc.ri.gov</a> ;	
	<a href="mailto:Christopher.Caramello@puc.ri.gov">Christopher.Caramello@puc.ri.gov</a> ;	
Victoria Scott (GOV)	<a href="mailto:Victoria.Scott@governor.ri.gov">Victoria.Scott@governor.ri.gov</a> ;	
Seth Handy, Esq.	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	
Stephan Wollenburg	<a href="mailto:swollenburg@seadvantage.com">swollenburg@seadvantage.com</a> ;	
Mary McMahan	<a href="mailto:mmcmahan@seadvantage.com">mmcmahan@seadvantage.com</a> ;	
Jim Kennerly	<a href="mailto:jgifford@seadvantage.com">jgifford@seadvantage.com</a> ;	
Amy Moses	<a href="mailto:amoses@utilidata.com">amoses@utilidata.com</a> ;	

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MDC 1-1

Request:

In the testimony of Mr. Walnock and Ms. Reder, AMF Book 1 at 29:1-3, indicate "PPL also has developed and implemented portals that provide customers and non-regulated power producers ("NPPs") with the ability to view their usage data."

- (a) Please provide detailed descriptions of these portals with the following: the utilities and states involved; screenshots of each portion of such portals showing their functionality; a detailed list of the types of customer data that are accessible; technical documentation; and current utilization statistics of each portal including the number of registered NPPs and the number of customers whose data has been transmitted via such portal.
- (b) In the instances referenced above, what does PPL require of NPPs in order to access customer usage data with customer permission (such as contractual commitments, payment of fees, etc.)? Please list all requirements in detail and provide copies of all agreements that PPL requires NPPs to execute.

Response:

- (a) The AMF Business Case includes two portals:
  1. The Customer Portal is intended to provide customers with access to energy consumption data, energy insights, and service offerings. See Bates page 64 of Book 2 of the AMF Business Case for more details on the Customer Portal.
  2. Non-Regulated Power Producers ("NPPs") are intended to use the Supplier Portal, which will provide NPPs the ability to request access to their customers' metering and billing data.

PPL Corporation ("PPL") currently offers Customer Portals in both Pennsylvania (for PPL Electric Utilities Corporation ("PPL Electric")) and Kentucky (for Louisville Gas & Electric and Kentucky Utilities (LGE/KU)). PPL currently offers a Supplier Portal in Pennsylvania for PPL Electric. The current utilization of each portal including the number of registered NPPs and the number of customers whose data has been transmitted via such portal is as follows:

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Portal	Customer Data	NPP’s
PPL Electric Customer Portal	835K	N/A
LGE & KU Electric Customer Portal	18K **	N/A
PPL Electric Supplier Portal	550K	180

\*\* Note, AMI Mass deployment only recently kicked off in LGE/KU territories.

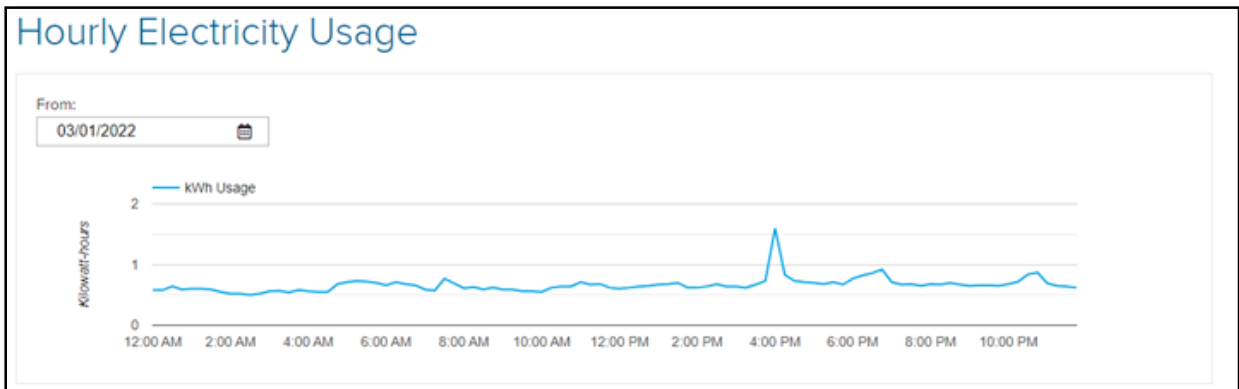
Start date = 11/2022

### Customer Portal

The Customer Portals available in Pennsylvania and Kentucky provide similar types of customer data and functionality across both markets; The breakouts of types of data shown below:

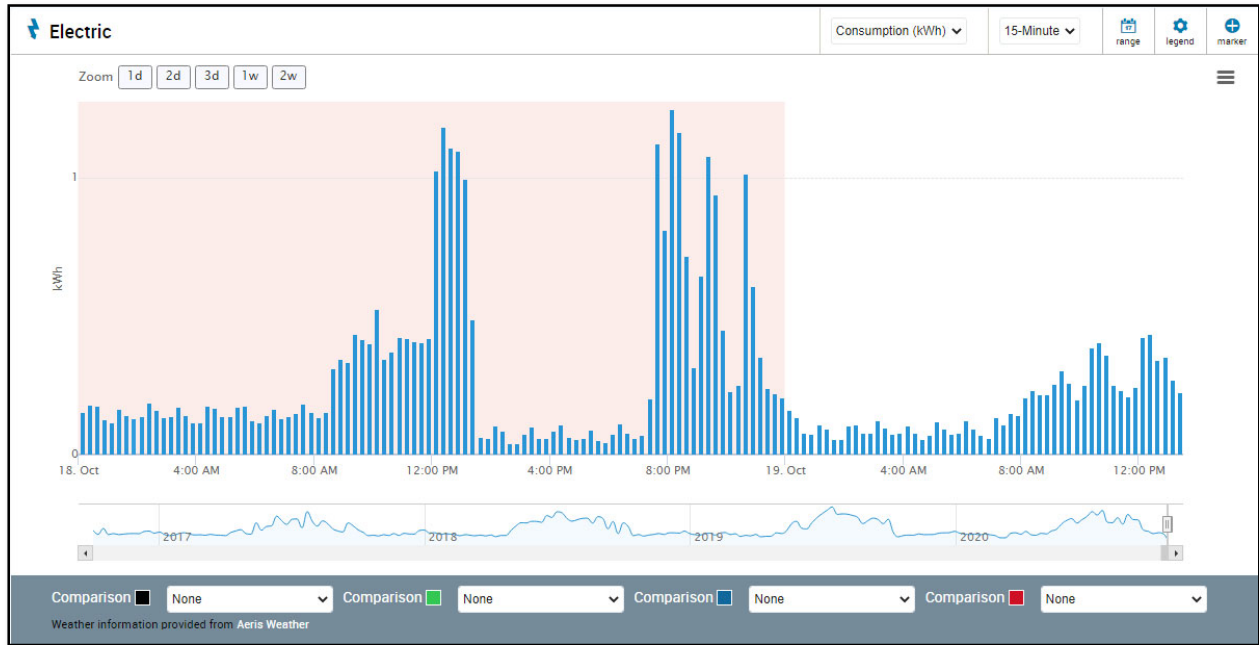
#### A) Energy Data Insights

- **Hourly Usage with Intervals (down to 15 minutes)**
  - PPL Electric:



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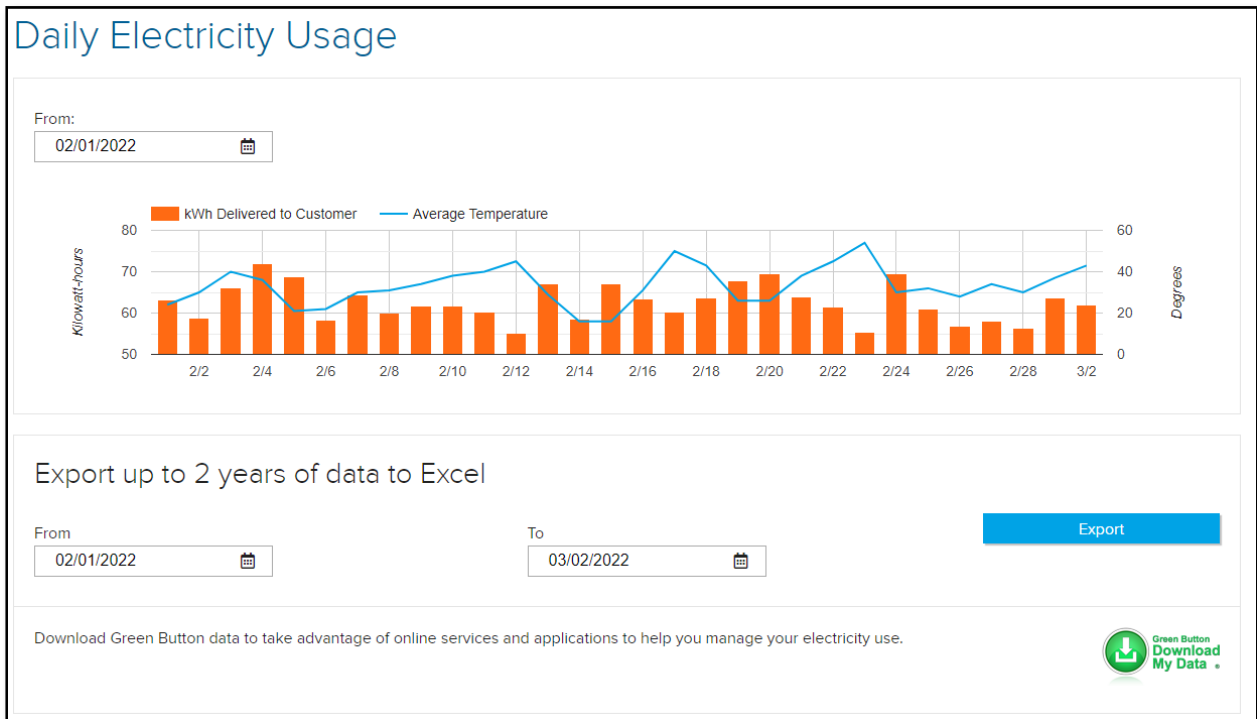
o LGE/KU:



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- **Consumption data with Temperature overlay**

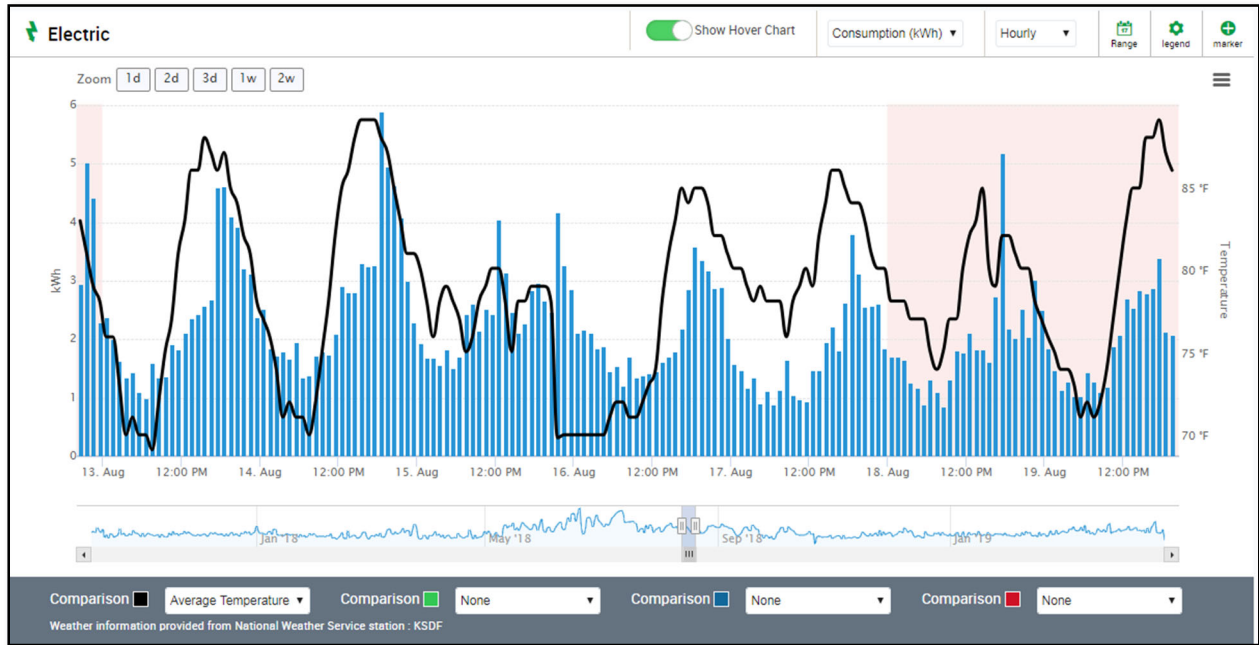
- PPL Electric:





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LGE/KU:



- **Billing Data Comparisons**

- PPL Electric – Bill to Date Estimations:

<b>Bill-to-Date Estimate*</b>	<b>\$46.98</b>	<a href="#">View Ways to Save &gt;</a>
6 days into 32-day billing cycle ending Mar 28		
<b>Usage-to-Date</b>	<b>354 kWh</b>	
<b>Average Daily Cost</b>	<b>\$7.83</b>	
<small>*Your bill-to-date estimate is based on PPL Electric Utilities' price for generation and transmission as of the previous day.</small>		

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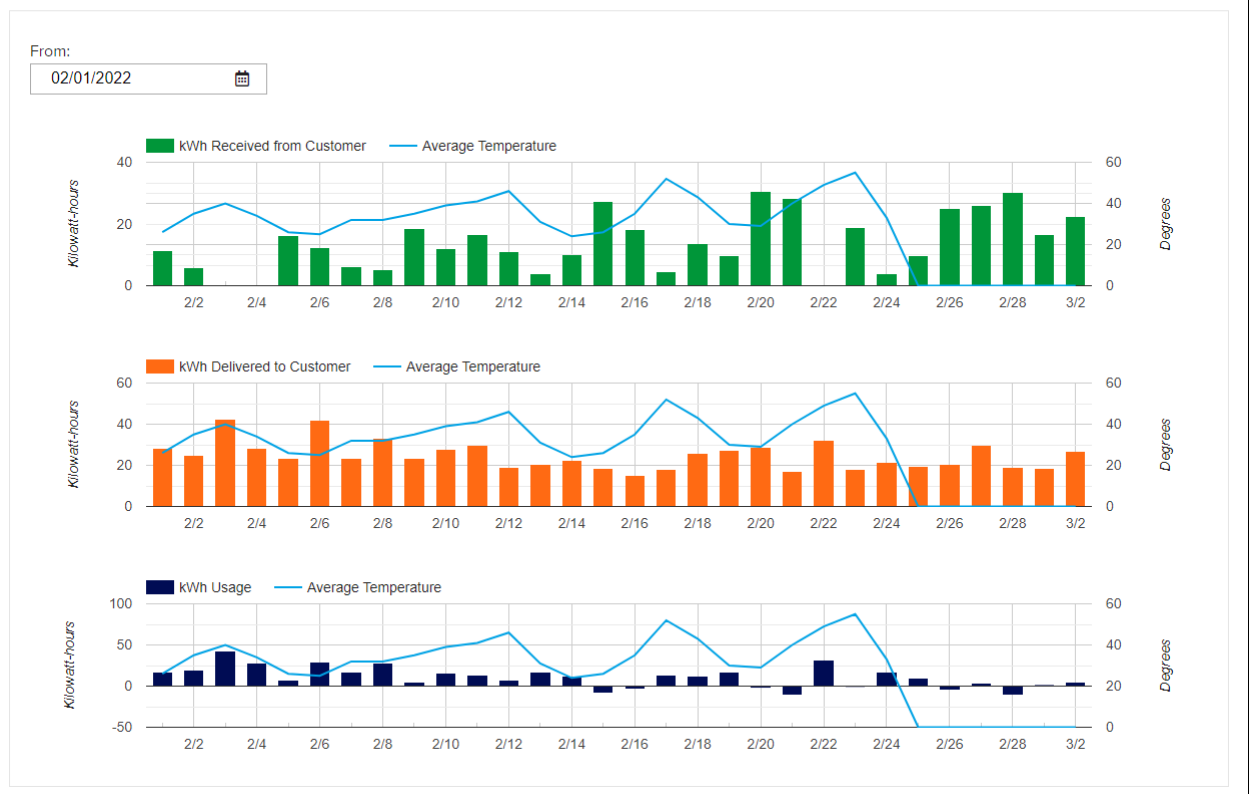
- LGE/KU Customer Portal – Compare Energy or Billing Data to Prior Periods:



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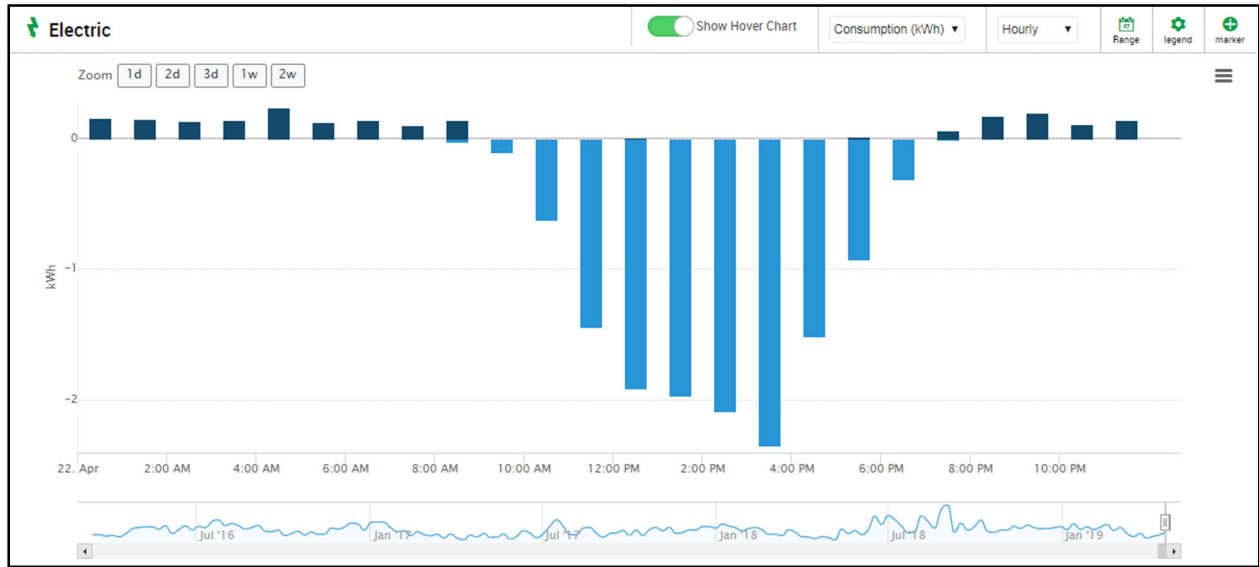
- Net Metering Data
  - PPL Electric – See Appendix A7

### Daily Electricity Usage



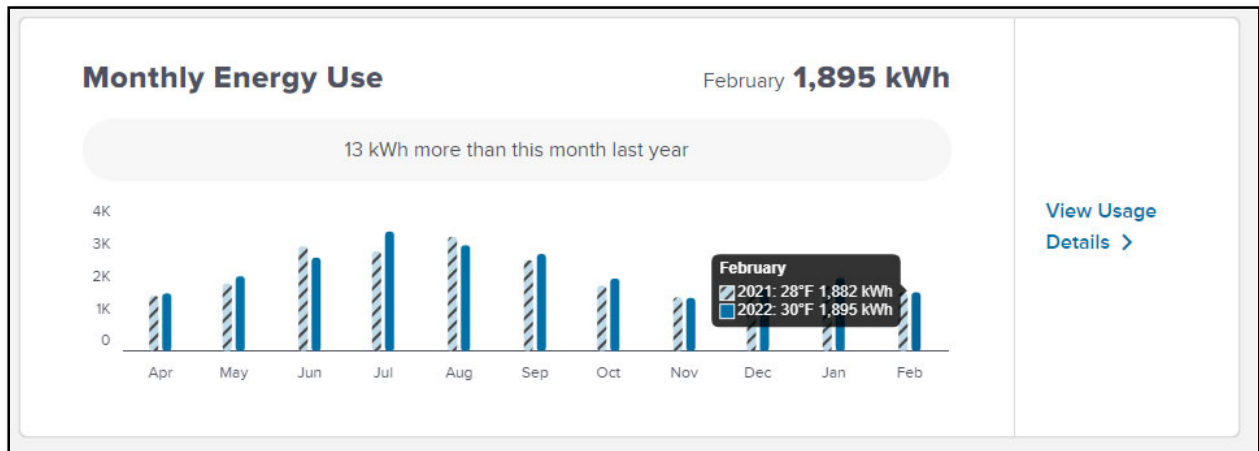
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o LGE/KU:



**B) Customer Tools & Actions:** The capability for customers to take advantage of configurable tools that alert customers to usage thresholds

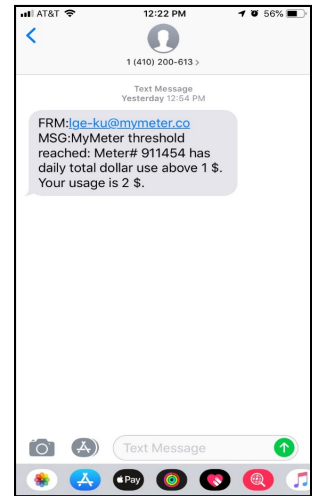
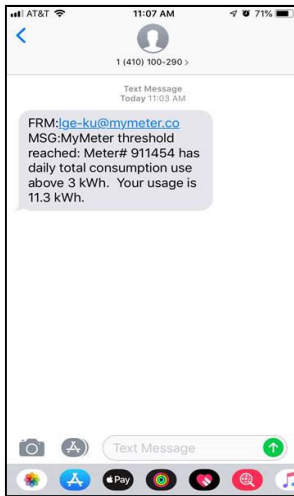
- PPL Electric – Compare Year-Over-Year Consumption:



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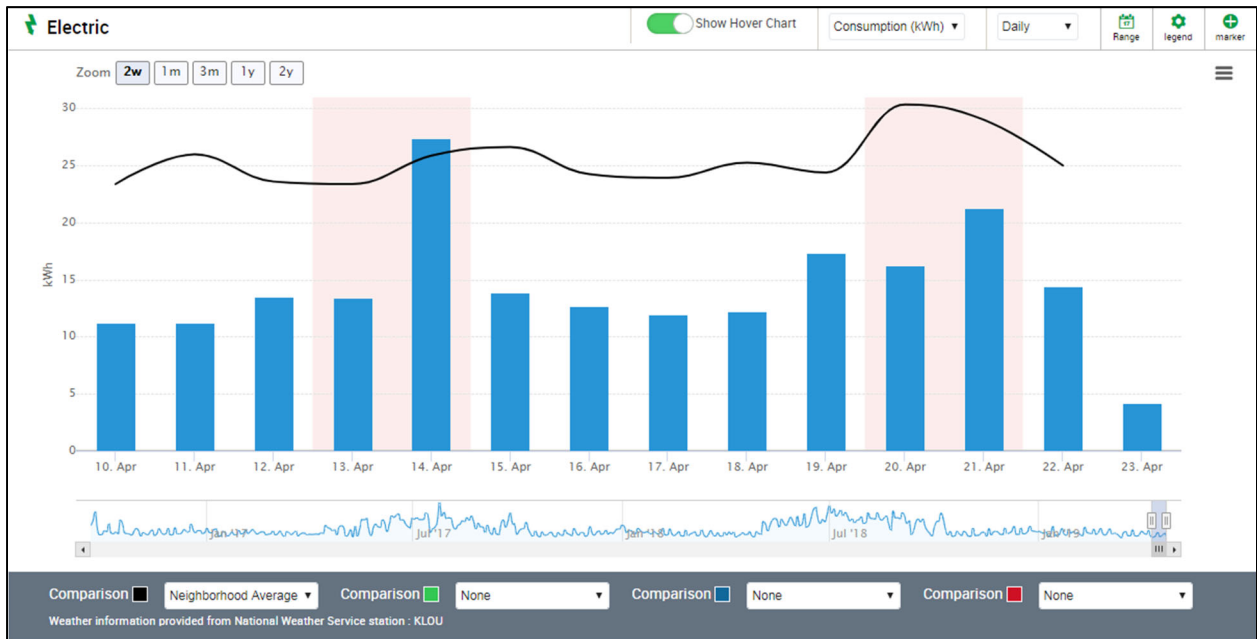
- LGE/KU – Configure Usage or Billing Threshold Notifications:

The screenshot shows a web form titled "Add Threshold Notifications". It is divided into several sections: "Notification Details" with dropdowns for Location (Home), Service Type (Electric), and Meter (Meter #911454 (Residential Electric Service)); "Threshold Details" with a "Notify me when" dropdown set to "Daily", a "usage is" dropdown set to "Over", a numerical input field set to "0", and a unit dropdown set to "kWh"; "Recipient Details" with a "Contact Method" dropdown set to "SMS Text", a "Carrier" dropdown set to "AT&T", and a "Number" input field; and a "Delivery Method" section set to "Enabled". A "Save Changes" button is at the bottom right.



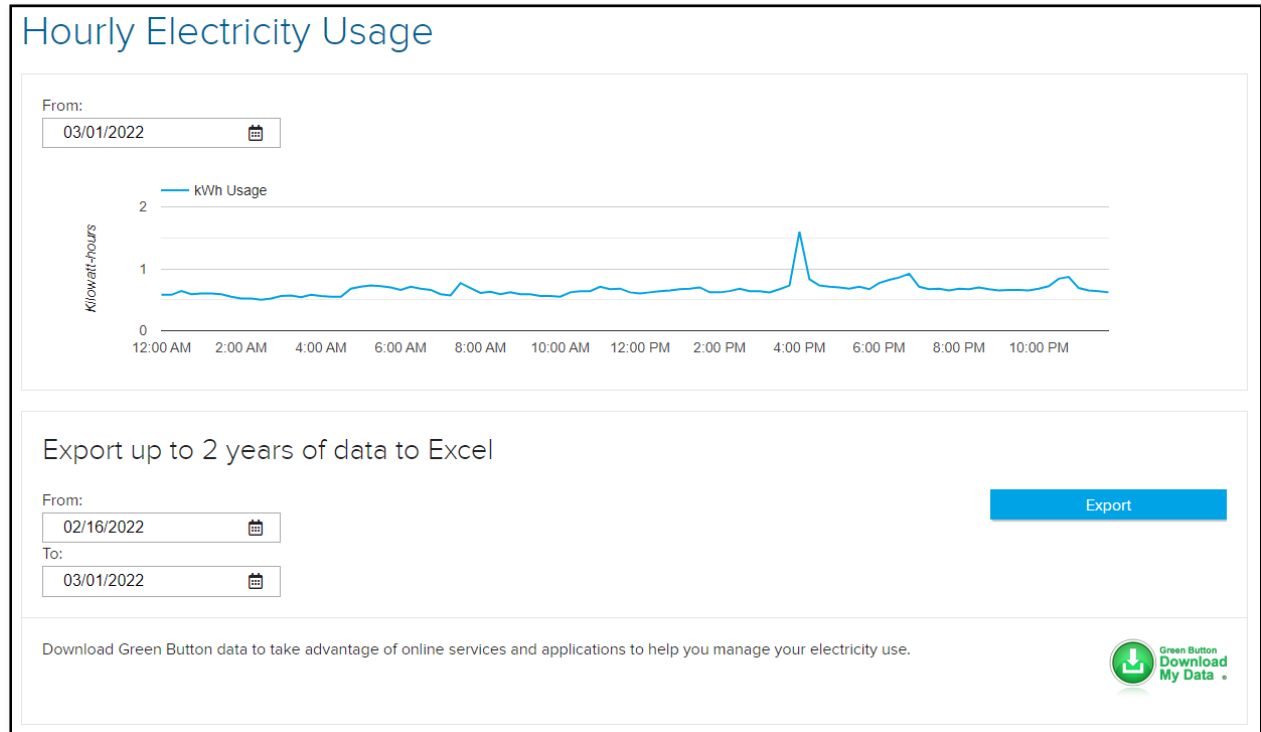
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- LGE/KU – Compare Usage Against Zip Codes



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- PPL Electric – Green Button Download My Data:



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- LGE/KU - Green Button Download My Data –

### Download Usage Data

Format:

Service Type:

Meters:  #911454 (Residential Electric Service)

Interval:

Start Date:

End Date:

#### Choose Columns

- Read Date
- Account Number
- Name
- Meter
- Location
- Address
- kWh
- \$

#### Row Sort Order

- ↑
- ↑
- ↑

#### Choose Columns

Select the columns you want in your download from this list by checking the box.

To arrange the columns in a specific order, click and hold on the  and drag and drop it to the location you want it to appear in your download results.

#### Row Sort Order

When you select the columns from the 'Choose Columns' section, they will appear in this section.

The data will be sorted in the order you specify.

Drag and drop the order of your sorting by clicking and holding on the  and moving it to the location you want.

Click the  to select ascending or descending order for each column if you have a preference.



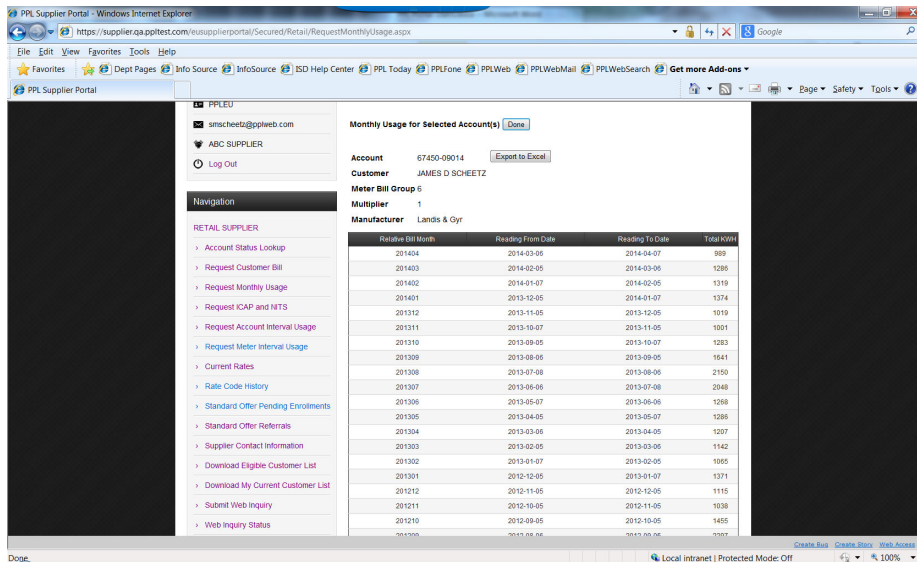
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## Supplier Portal

The Supplier Portal was developed in Pennsylvania as part of the Electronic Data Exchange Working Group’s web portal that provides Energy Generation Suppliers (“EGS”) (the Pennsylvania equivalent of NPPs) and Conservation Service Providers (“CSPs”) with access to customer data. The Supplier Portal provides access to summary and interval usage data to market participants (EGS and CSPs), as well as account and billing information to the customer’s Supplier of record. A Supplier can view a bill image for their customer. If the customer receives paper bills, the Supplier can view up to the last two bill images if they were the “provider of record” during the bill month.

## Monthly & Interval Data Lookups

### Monthly Usage Example:



The screenshot shows the PPL Supplier Portal interface. The main content area displays 'Monthly Usage for Selected Account(s)' for account 67450-09014, customer JAMES D SCHEETZ. The table below shows usage data for various months from 2013 to 2014.

Relative Bill Month	Reading From Date	Reading To Date	Total kWh
201404	2014-03-05	2014-04-07	889
201403	2014-02-05	2014-03-05	1285
201402	2014-01-07	2014-02-05	1319
201401	2013-12-05	2014-01-07	1374
201312	2013-11-05	2013-12-05	1019
201311	2013-10-07	2013-11-05	1001
201310	2013-09-05	2013-10-07	1283
201309	2013-08-05	2013-09-05	1647
201308	2013-07-08	2013-08-05	2103
201307	2013-06-06	2013-07-08	2045
201306	2013-05-07	2013-06-06	1258
201305	2013-04-05	2013-05-07	1285
201304	2013-03-06	2013-04-05	1207
201303	2013-02-05	2013-03-06	1142
201302	2013-01-07	2013-02-05	1055
201301	2012-12-05	2013-01-07	1371
201212	2012-11-05	2012-12-05	1115
201211	2012-10-05	2012-11-05	1038
201210	2012-09-05	2012-10-05	1455
201209	2012-08-06	2012-09-05	1007

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**Interval Usage Example:**

**Request Account Interval Usage**

Interval Usage for Selected Account(s) Done

Note: Only the last 75 days of IU is displayed. Clicking 'Export to Excel' will provide IU for the last 365 days.

Account: 67450-09014 Export to Excel

Customer: JAMES D SCHEETZ

Data Element: Interval Usage (approved)

Multiplier: 1

Manufacturer: Lands & Oyr

Date	12:00 AM	1:00 AM	2:00 AM	3:00 AM	4:00 AM	5:00 AM	6:00 AM	7:00 AM	8:00 AM
2014-02-21	1.2096	1.2672	1.2096	3.0528	1.6128	1.728	1.6704	1.6704	1.5552
2014-02-22	1.2096	1.2672	3.0528	1.6704	1.8432	1.6704	1.728	1.6704	1.8432
2014-02-23	0.4032	0.6336	2.1312	0.9792	1.0368	0.9792	0.9792	1.0368	1.152
2014-02-24	1.2672	1.2672	1.3248	1.728	3.1104	1.6704	1.7856	2.2464	2.1888
2014-02-25	2.9952	1.3248	1.2672	1.7856	2.9952	2.1312	1.7856	2.1888	2.1312
2014-02-26	1.2672	1.2672	2.304	2.5344	1.8432	1.6704	1.8432	2.3616	2.1312
2014-02-27	2.016	1.2672	1.2672	3.3408	1.7856	1.728	2.0736	2.5344	1.7856
2014-02-28	1.3624	1.3248	3.2256	1.7856	1.7856	1.7856	3.168	2.1312	2.1312
2014-03-01	1.5562	1.4876	2.304	2.7144	1.7856	1.8432	1.7856	2.2464	2.7072
2014-03-02	1.3624	1.2096	2.88	1.728	1.728	1.728	1.8432	2.9952	1.2672
2014-03-03	1.8432	1.2672	2.2464	2.3616	1.6704	1.7856	3.2256	2.2464	2.016
2014-03-04	1.2672	1.3248	3.1104	1.7856	1.728	2.4192	2.5344	2.592	2.016
2014-03-05	1.3248	0.6336	0.576	2.5344	1.0944	1.0944	1.0944	1.4876	1.2096

**Account & Billing Information**

**Account Status Lookup:**

**Supplier Portal**

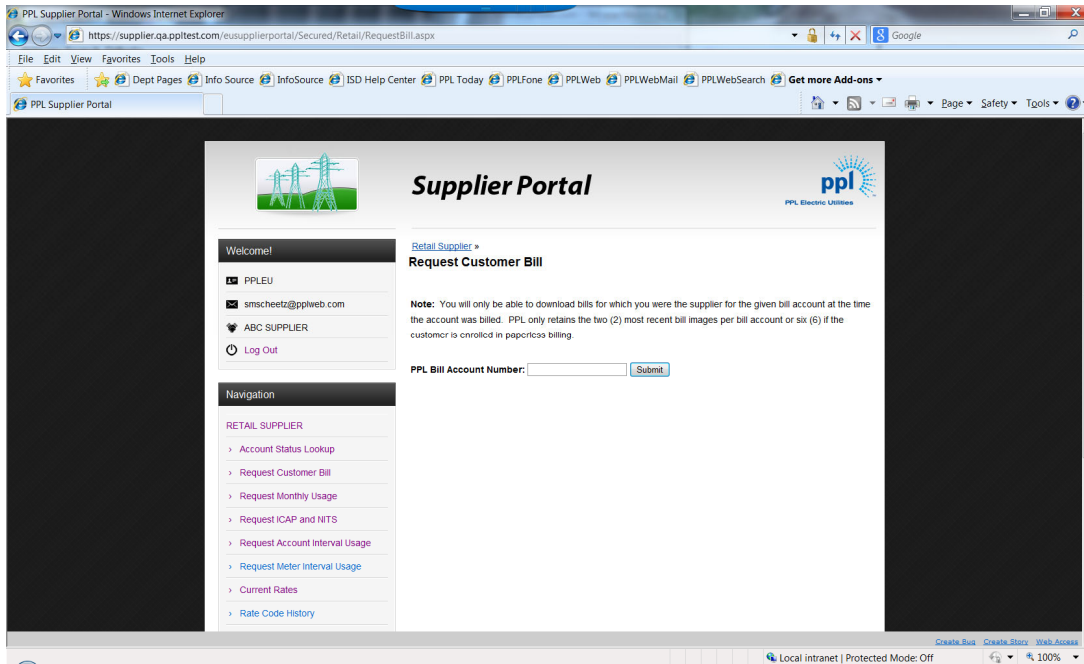
Account Status Lookup

Status for Selected Account(s)

Bill Account	Status	Date	Meter	Summary	Area	Tariff	Tariff Description
67450-09014	Active	09/11/1999	N	N	N	052	(RSO) Gen Residential 1999 - Dist

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**Customer Bill Request:**



- (b) To access customer usage data with customer permission, PPL Electric requires that a supplier must be: 1) licensed through the Pennsylvania Public Utility Commission as an EGS, and 2) PPL Electronic Data Interchange tested and certified. Both are needed prior to PPL granting third parties access to the Supplier Portal. EGS's that have been granted access can view energy data as well as account and billing data for the EGS customers of record. More detail can be found on the web site at this URL:  
<https://www.pplelectric.com/site/Other-Parties/Electricity-Suppliers>.

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MDC 1-2

Request:

In the same testimony, Mr. Walnock and Ms. Reder state that a "Supplier Portal" will be available to NPPs.

- (a) Who will be eligible to use the Supplier Portal? Will the Supplier Portal in Rhode Island only be accessible to licensed competitive suppliers? Please explain the Company's position and rationale.
- (b) How will the Supplier Portal for Rhode Island Energy be different in any way from the portals in other PPL jurisdictions mentioned in Book 1 at 29:1-3? Please provide a detailed explanation of each difference.

Response:

- (a) The Company has not yet determined specific access eligibility for the Rhode Island Energy Supplier Portal. The PPL Electric Utilities Corporation ("PPL Electric") Supplier Portal in Pennsylvania is available to licensed competitive suppliers, and it will serve as a template for the development for the Rhode Island Energy Supplier Portal. The Company will determine specific access eligibility as part of the detailed design phase for AMF implementation.
- (b) The Company has not yet determined all the details for the design of the Supplier Portal, however it plans to leverage the PPL Electric Supplier Portal code and internal business processes used in Pennsylvania. Today, accessibility and eligibility for the PPL Electric Supplier Portal is managed by the process referenced in the Company's response to MDC 1-1 (b).

PPL Electric has had a Supplier Portal since 2013. PPL Electric developed that Supplier Portal based on input from the supplier stakeholders, and it has gone through several phases of added functionality and improvements since. The PPL Electric Supplier Portal will serve as the starting point for the design of the Rhode Island Energy Supplier Portal, with Rhode Island Energy specifics to be determined during the detailed design phase. From a preliminary view, functionality that currently exists in the PPL Electric Supplier Portal that is expected to be part of the Rhode Island Energy Supplier Portal includes:

- Request customer bill image
- Request monthly usage – summary

The Narragansett Electric Company

d/b/a Rhode Island Energy

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- Request ICAP & NITS
- Load Profile
- Meter Constant
- Request customer historical interval usage
- Supplier contact information
- Download Eligible Customer List

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MDC 1-3

Request:

Rhode Island Energy proposes that its advanced meters will collect electric usage data at 15-minute intervals.

- (a) If the time interval needs to be modified to, say, 5 minutes in order to participate in ISO-New England demand response programs, what will be the cost to change the recording interval from 15 minutes to 5 minutes? Please provide all documents relevant to this question. Also identify which entity – Rhode Island Energy employees, proposed AMF contractors, etc. – would charge the amounts provided.
- (b) Would Rhode Island Energy be willing to commit to negotiate its contracts with AMF vendors such that the cost to reprogram a meter from 15 minutes to 5 minutes (or any other interval as required by ISO-New England) is zero? Why or why not? Please explain in detail.

Response:

On February 10, 2023, the Company filed a Motion to Object to Data Requests by Mission:Data Coalition Nos. 1-3, 1-5(a), 1-6, 1-7(c)-(g), 1-8, 1-9, and 1-10(a)-(c) and Motion for a Protective Order With Respect to Mission:Data Coalition Data Request Nos. 1-5(a) and 1-7, in which it asserted an objection to this data request. That motion remains pending, and pursuant to the direction provided in Public Utilities Commission ("Commission") counsel's February 16, 2023 email, the Company is not providing a response to this data request at this time. To the extent required after the Commission rules on the Company's objection, the Company will provide a response as and when directed.

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MDC 1-4

Request:

In AMF Book 1 at 36:19-20, Mr. Walnock and Ms. Reder describe Green Button Connect ("GBC").

- (a) Please complete the spreadsheet attached to indicate what data fields and historical information will be provided through GBC.
- (b) Will Rhode Island Energy attain independent certification of adherence to the GBC standard?
- (c) If the answer to (b) is no, please explain in detail why not, and provide all documents related to its decision not to seek independent certification.
- (d) If the answer to (b) is yes, please explain whether certification will be achieved once, or whether Rhode Island Energy will attain certification on an ongoing basis. Please explain in detail the Company's response.
- (e) Will Rhode Island Energy provide natural gas usage data via GBC?
- (f) If the answer to (e) is no, please explain in detail why not.
- (g) Please provide a list of all Function Blocks from the GBC standard that Rhode Island Energy proposes to implement. For reference, a helpful list of all Function Blocks is provided by one vendor here:  
<https://utilityapi.com/docs/greenbutton/scope#fb-reference-table>

Response:

- (a) The Company has not yet determined all the details required to complete the attached spreadsheet for the design of Green Button Connect ("GBC"). The Company plans to leverage Green Button code and internal business processes used by other PPL Corporation ("PPL") affiliates in Pennsylvania and Kentucky as the foundation when it commences the detailed design phase. PPL affiliates currently have Green Button functionality for customers in Pennsylvania and GBC enhancements are planned to be implemented for customers in Kentucky later this year. These implementations will serve as the starting point for the GBC solution for advanced metering functionality ("AMF") meters in Rhode Island.

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- (b) The Company has not yet determined all the details for the design of GBC. The Company plans to review all options available with respect to certification.
- (c) See (b) above.
- (d) See (b) above.
- (e) At this time, there are no plans to include natural gas usage data via GBC. The Company has not included AMF functionality for natural gas meters in the AMF Business Case.
- (f) See the Company's response to part (e), above.
- (g) See the Company's response to part (a), above. It is too early in the process for Rhode Island Energy to have determined the Function Blocks that it will implement.



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MDC 1-5

Request:

In AMF Book 1 at 49:13, Mr. Walnock and Ms. Reder mention "in-home device support through the newly created CP."

- (a) What requirements will Rhode Island Energy impose on Home Area Network ("HAN") devices (or the manufacturers of such devices) in order to connect with customers' meters? Please explain and provide copies of all contracts, testing protocols, and the like.
- (b) Will Rhode Island Energy commit to a policy of "bring your own device" ("BYOD") with regard to Home Area Network ("HAN") devices, meaning that Rhode Island Energy will honor any customer's attempt to connect a device of the customer's choosing to the customer's meter without pre-clearance or advance certification by Rhode Island Energy?
- (c) If the answer to (b) is anything other than an unqualified yes, then please explain in detail the rationale for the Company's response. Provide all documents related to the Company's decision-making regarding HAN device compatibility.
- (d) Will HAN capability be available to customers at the "AMF Deploy Ready" phase – in other words, immediately after an advanced meter is installed? Why or why not? If not, please explain in detail when HAN capability will be available for customers.

Response:

- a) On February 10, 2023, the Company filed a Motion to Object to Data Requests by Mission:Data Coalition Nos. 1-3, 1-5(a), 1-6, 1-7(c)-(g), 1-8, 1-9, and 1-10(a)-(c) and Motion for a Protective Order With Respect to Mission:Data Coalition Data Request Nos. 1-5(a) and 1-7, in which it asserted an objection to this data request. That motion remains pending, and pursuant to the direction provided in Public Utilities Commission ("Commission") counsel's February 16, 2023 email, the Company is not providing a response to this part of this data request at this time. To the extent required after the Commission rules on the Company's objection, the Company will provide a response as and when directed.
- b) The details around the types of devices to be included have not been determined yet. The Company's affiliates have in-home device support capabilities in both

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- Pennsylvania and Kentucky using ZigBee as the wireless technology for connecting a device to the meter. The Company's Pennsylvania and Kentucky affiliate have adopted a "bring your own device" approach. The meters being deployed in Rhode Island will use Wi-Fi as opposed to ZigBee. The Company needs to conduct an analysis of the impacts of connecting a device by Wi-Fi, as well as the types of devices in the market, before it can specify the types of devices to include.
- c) To guide Home Area Network ("HAN") device compatibility, the Company will follow its Cybersecurity, Data Privacy and Data Governance Plan, included in the AMF Business Case as Attachment G, which provides provisions to making data accessible while keeping it secure and maintaining customers' privacy.
  - d) No. The Customer Portal in-home Device Support is scheduled in Group 3 of the AMF Functionality Roadmap which is in the Phase "AMF Enhancements from Meter Deployment Start." The capability to provide HAN device compatibility is considered an "AMF Enhancement During Meter Deployment", which is scheduled to occur six months after meter deployment starts to provide time for development of systems, enrollment requirements and customer communications. See Figure 6.1 in the AMF Business Case, Bates page 70 for additional detail regarding the timing of the functionalities.

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MDC 1-6

Request:

In AMF Book 1 at 49:14-15, Mr. Walnock and Ms. Reder state, "Also, the CP will provide an integrated marketplace for customer research of solar PV adoption..."

- (a) Please provide all designs and written descriptions of the "integrated marketplace" showing its functions, both to ratepayers and Rhode Island Energy.
- (b) Please provide all documents regarding the "integrated marketplace."
- (c) What specific "customer research" or data from customers does Rhode Island Energy expect to obtain as a result of the proposed CP that cannot be obtained from rooftop solar interconnection applications?

Response:

On February 10, 2023, the Company filed a Motion to Object to Data Requests by Mission:Data Coalition Nos. 1-3, 1-5(a), 1-6, 1-7(c)-(g), 1-8, 1-9, and 1-10(a)-(c) and Motion for a Protective Order With Respect to Mission:Data Coalition Data Request Nos. 1-5(a) and 1-7, in which it asserted an objection to this data request. That motion remains pending, and pursuant to the direction provided in Public Utilities Commission ("Commission") counsel's February 16, 2023 email, the Company is not providing a response to this data request at this time. To the extent required after the Commission rules on the Company's objection, the Company will provide a response as and when directed.

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MDC 1-7

Request:

In AMF Book 1 at 49:14-18, Mr. Walnock and Ms. Reder continue, "Also, the CP will provide...the ability for C&I and multi-family customers to have a portfolio view of C&I facilities and multifamily units, aggregate data, and normalized usage based on variables, such as production, occupancy, or weather."

- (a) Will Rhode Island Energy support automated benchmarking with EnergyStar Portfolio Manager? Please explain in detail.
- (b) If not, please explain in detail how the CP will "normalize" energy usage based on the variables cited. Please provide the mathematical equations, technical documentation and communication with actual or potential vendors relating to this question.
- (c) If customers provide "production" or "occupancy" data to Rhode Island Energy, please provide a detailed list of all entities – including, but not limited to, contractors/vendors, regulated affiliates, unregulated affiliates, etc. – that will have custody of, or come into contact with, such customer-provided data.
- (d) If customers provide "production" or "occupancy" data to Rhode Island Energy, will Rhode Island Energy commit to not share such data with its unregulated affiliates unless the customer consents? Why or why not? Please explain in detail.
- (e) Please provide copies of any agreements between Rhode Island Energy and regulated or unregulated affiliates that pertain to the exchange of customer data including, but not limited to, energy usage data, billing data, or customer program participation information.
- (f) In the past 3 years, has Rhode Island Energy shared customer energy usage, billing, or other customer-specific information with any unregulated affiliate? If yes, please provide a detailed explanation, including, but not limited to, the circumstances, the types of customer data shared, the reason(s) for the unregulated affiliate to seek such customer data, etc.
- (g) Please provide a copy of any consent form(s), screenshots of web-based consent forms, or contractual language with customers of any kind that Rhode Island Energy plans to use for customer-provided data such as "production" and "occupancy" that are not necessary for regulated electric utility service.

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Response:

- (a) The Company has not determined the specific features of automated benchmarking because the Customer Portal solution detailed design has not yet occurred.
- (b) The identification of the specific features of the C&I and Multifamily Portfolio has not yet occurred and will be part of detailed design. The functionality will provide residential and commercial customers who manage multiple customer accounts with the ability to group those accounts together into a single view in the Customer Portal. This will allow these customers the ability to make better decisions about their energy usage across all of their accounts as they can see all of the information in one place for their entire portfolio of accounts.
- (c)-(g) On February 10, 2023, the Company filed a Motion to Object to Data Requests by Mission:Data Coalition Nos. 1-3, 1-5(a), 1-6, 1-7(c)-(g), 1-8, 1-9, and 1-10(a)-(c) and Motion for a Protective Order With Respect to Mission:Data Coalition Data Request Nos. 1-5(a) and 1-7, in which it asserted an objection to these subparts of this data request. That motion remains pending, and pursuant to the direction provided in Public Utilities Commission ("Commission") counsel's February 16, 2023 email, the Company is not providing a response to these subparts of this data request at this time. To the extent required after the Commission rules on the Company's objection, the Company will provide a response as and when directed.

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MDC 1-8

Request:

In AMF Book 1 at 50:8-51:6, Mr. Walnock and Ms. Reder discuss the "Future" phase of AMF.

- (a) Does Rhode Island Energy believe that "home analytics where the details into energy usage by appliance could be provided to empower customers" is a natural monopoly? Why or why not? Please explain in detail.

Response:

On February 10, 2023, the Company filed a Motion to Object to Data Requests by Mission:Data Coalition Nos. 1-3, 1-5(a), 1-6, 1-7(c)-(g), 1-8, 1-9, and 1-10(a)-(c) and Motion for a Protective Order With Respect to Mission:Data Coalition Data Request Nos. 1-5(a) and 1-7, in which it asserted an objection to this data request. That motion remains pending, and pursuant to the direction provided in Public Utilities Commission ("Commission") counsel's February 16, 2023 email, the Company is not providing a response to this data request at this time. To the extent required after the Commission rules on the Company's objection, the Company will provide a response as and when directed.

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d/b/a Rhode Island Energy  
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MDC 1-9

Request:

See AMF Book 1 at 54:18-55:5. Is Rhode Island Energy saying that it will not commence a competitive procurement process for AMF because it intends to merely “leverage existing strategic partnerships” with PPL’s already-chosen vendors? Please explain in detail.

Response:

On February 10, 2023, the Company filed a Motion to Object to Data Requests by Mission:Data Coalition Nos. 1-3, 1-5(a), 1-6, 1-7(c)-(g), 1-8, 1-9, and 1-10(a)-(c) and Motion for a Protective Order With Respect to Mission:Data Coalition Data Request Nos. 1-5(a) and 1-7, in which it asserted an objection to this data request. That motion remains pending, and pursuant to the direction provided in Public Utilities Commission (“Commission”) counsel’s February 16, 2023 email, the Company is not providing a response to this data request at this time. To the extent required after the Commission rules on the Company’s objection, the Company will provide a response as and when directed.

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MDC 1-10

Request:

See AMF Book 1 at 55:8-9 where Mr. Walnock and Ms. Reder indicate, "AMF will animate the market for third-party products and services by enabling customers to share energy usage information with authorized entities."

- (a) Does Rhode Island Energy have any quantitative targets (in terms of number of third parties, number of customers using third party enabled services, or any other metric) by which it will evaluate the success or failure of market animation?
- (b) If yes, please provide those targets and a detailed explanation for each.
- (c) If no, please explain in detail why no quantitative targets were developed.
- (d) Has Rhode Island Energy conducted any interviews, research or surveys of third parties that have in any way informed the Company's proposed functionality?
- (e) If yes, please provide copies of documentation (including meeting summaries).
- (f) If yes, please explain in detail, and provide specific examples of, how the Company's proposal has been modified by such interviews, research or surveys in order to animate the market for third parties.
- (g) If no, please explain in detail why no interviews, research or surveys of third parties were conducted.

Response:

- (a)-(c) On February 10, 2023, the Company filed a Motion to Object to Data Requests by Mission:Data Coalition Nos. 1-3, 1-5(a), 1-6, 1-7(c)-(g), 1-8, 1-9, and 1-10(a)-(c) and Motion for a Protective Order With Respect to Mission:Data Coalition Data Request Nos. 1-5(a) and 1-7, in which it asserted an objection to this data request. That motion remains pending, and pursuant to the direction provided in Public Utilities Commission ("Commission") counsel's February 16, 2023 email, the Company is not providing a response to this data request at this time. To the extent required after the Commission rules on the Company's objection, the Company will provide a response as and when directed.
- (d) No, Rhode Island Energy has not conducted any formal interviews, research or surveys of third parties to inform proposed functionality; however, through the



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Power Sector Transformation (“PST”) Advisory Group process, the Company engaged in multiple meetings and sessions over several years that informed the content for the AMF Business Case. Enabling third party products and services was one of the topics of discussion with the AMF/GMP Sub-Committee of the PST Advisory Group. These stakeholder members represent a broad spectrum of interests ranging from environmental and clean-energy groups to low-income, community, and business interests, as well as non-regulated power producers (“NPPs”). See Figure 1.3: PST AMF and GMP Sub-Committee Meeting Schedule of the AMF Business Case, Bates Page 18. Through this stakeholder process, the Company incorporated feedback from the Sub-Committee members regarding the timing of Green Button Connect functionality through the Customer Portal in the AMF Functionality Roadmap (Figure 6.1 of the AMF Business Case). For example, based on the input from the AMF/GMP Subcommittee, the Company advanced Green Button Connect into Group 3 (i.e., planned within six months after deployment starts).

- (e) Please see Attachment MDC 1-10 for a copy of the AMF Data Governance and Data Security slide deck presented to the AMF/GMP Subcommittee at the August 16, 2022 PST Advisory Group meeting. There are no additional meeting summaries to share.
- (f) See the response to subpart (d), above.
- (g) Rhode Island Energy did not conduct interviews, research or surveys of third parties because it was able to rely upon and leverage the prior experience of PPL Corporation's affiliates in Kentucky and Pennsylvania. In addition, the robust stakeholder process through of the PST Advisory Group provided multiple perspectives regarding the enablement of third party services and products, among other issues that is reflected in the content of AMF Business Case. See also the response to subpart (d), above.



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## **AMF Data Governance and Data Security**



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## People, Process, Technology, and Purpose are Key

- **People** – The requirement for greater security and faster delivery cycles requires changes in team make up and requires regular training. Security is integrated through the business for security/compliance requirements.

*Company maintains a cybersecurity organization comprised of individuals who are trained, certified and experienced in information and cybersecurity. Investment in, and ongoing assessment of our cyber skills is vital to the success of our cybersecurity function.*

- **Processes** – Software and components need to be tracked as they change and as well as the vulnerabilities affecting them. A systematic process is needed since manual processes for tracking vulnerabilities as they are disclosed are unreliable.

*Company has a Data Governance Council that is made up of a cross-functional body of departments to ensure the governance initiatives are coordinated in the most functional manner with ongoing efforts across PPL. Company leverages internal security policies derived from best practices designed to look for novel and effective ways to protect the company's assets from current and emerging threats.*

- **Technology** – Signature-based solutions providing ground truth based on output and continuous monitoring of newly disclosed vulnerabilities and compromises mapped to production software and associated systems

*AMF system will be evaluated for compliance with cybersecurity requirements derived from the Company's Enterprise Security Standards and appropriate industry security standards and frameworks. This evaluation process will continue throughout the development lifecycle*

- **Purpose** – Evaluate the risk and possible repercussions

*Company considers not only the potential impact to the flow of power to customers, but also the intended flow of data through the company's System(s).*



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## PPL Data Governance Plan

- Defines pertinent policies addressing data privacy, data governance, information classification, and Cybersecurity and enterprise security standards
- Supports critical infrastructure and vital business functions including AMF
- Framework includes a comprehensive set of principles and standards:
  - ✓ Data Governance Policy
  - ✓ PPL Standards of Integrity
  - ✓ PPL Responsible Behavior Program
  - ✓ Information Security
  - ✓ Information Classification and Handling
  - ✓ Electronic Information Security
  - ✓ Records Management
  - ✓ PPL Cybersecurity Policy
  - ✓ PPL FERC Standards of Conduct
  - ✓ PPL Enterprise Information Security Policy
  - ✓ Data Security Standard
- Designed to ensure the data generated by the Company and through its AMF:
  - Collected, managed, stored, transferred, and protected in a way that preserves customer privacy
  - Practices are consistent with cybersecurity requirements
  - Facilitates access to further operational requirements
  - Enables grid modernization and clean energy objectives



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## PPL Data Governance Policy

### **Data Governance Policy (Governance Team/Roles & Responsibilities)**

- Define the roles and responsibilities for different data creation and usage types, and clear lines of accountability.
- Develop best practices for effective data management and protection.
- Protects data against internal and external threats
- Ensure that data consumers complies with applicable laws, regulations, exchange, and standards
- Ensure that a data trail is effectively documented

### **AMF Data Privacy Review (Framework to communicate with customers and third parties)**

- Data Access Principles
  - Utilizes widely recognized data privacy frameworks for AMF
  - Supported by NIST as long-established and best practices that are readily available and straightforward concepts to consistently utilize when building privacy controls into processes
- Data Privacy Review
  - Compares the NIST Guidelines to the Company's existing privacy policies, procedures and the AMF implementation plan to identify where best practice is in place or further alignment is needed



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## AMF Data Privacy Review

- AMF Data Privacy
  - Evolving AMF technologies brings new types of information that can involve privacy
  - Need to review existing policies to confirm adequate coverage
  - Standard practices are required to safeguard information
  - Consumers need notification of privacy exposures
- Using NIST Interagency Report 7628 volume 2 on Privacy and the Smart Grid as a basis for a review
- Applies to AMF and to GMP

### DRAFT - Data Privacy Review Categories

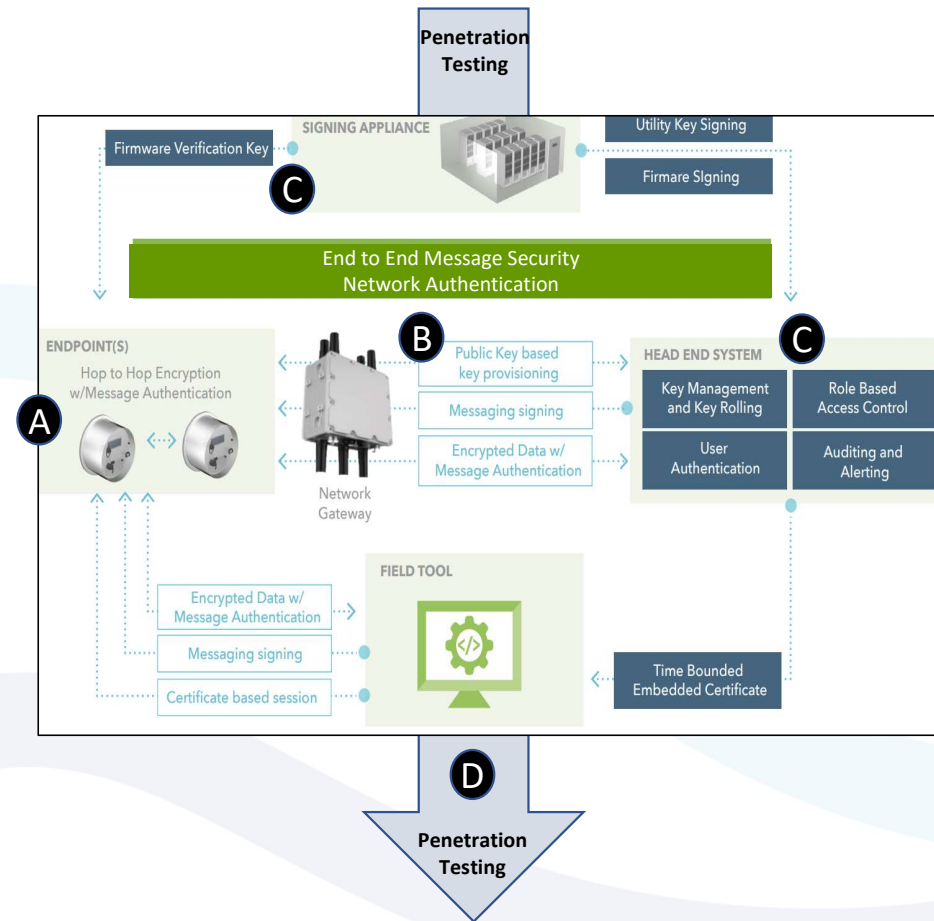
- 1 Management and Accountability
- 2 Notice and Purpose
- 3 Choice and Consent
- 4 Collection and Scope
- 5 Use and Retention
- 6 Individual Access
- 7 Disclosure and Limiting Use
- 8 Safety and Safeguards
- 9 Accuracy and Quality
- 10 Openness, Monitoring, and Challenging Compliance
- 11 Personal Information in the Smart Grid
- 12 Wireless Access to Smart Meters and Secondary Devices
- 13 Commissioning, Registration, and Enrollment for Smart Devices
- 14 Smart Grid Data Access by Third Parties
- 15 Plug-in Electric Vehicles Privacy Concerns
- 16 Awareness and Training
- 17 Mitigating Privacy Concerns within the Smart Grid
- 18 Emerging Smart Grid Privacy Risks



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## Cyber Security: Technology and Process

- A. Data encryption capability for transit at the networking layers on the devices
  - Uses advanced encryption protocol standard to protect the transfer of data online
- B. RF network provides a uniquely keyed application layer messaging encryption to ensure privacy between an endpoint and the associated head end system
  - Uses 3-layered approach provides best in class cryptography and privacy controls
- C. Resistance and local security tamper resistance protects devices from being modified and allows for monitoring
- D. Penetration testing will also be required by a third-party focusing on the network and software layers
- E. Ongoing testing coupled with design characteristics, which includes A+B+C+D, ensures the entire system is secure



## Green Button for Customers, Third Parties/NPPs



- RIE can generate Green Button data from AMF meters
- Green Button Connect will be available through the Customer Portal designed to provide customers with secure access to energy usage in a consumer-friendly and computer-friendly format.
- Provides customers with the ability to take advantage of a growing array of services to help manage energy use and save on their bills.
- Enables and incentivizes entrepreneurs to build innovative applications, products and services which will help consumers manage energy use
- Benefits utilities that receive numerous requests for information
- Customers can authorize the sharing of their data with third-parties.







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## Performance Metrics and Reporting

- Suite of metrics designed to provide a transparent assessment progress of AMF implementation in key areas
- Focus is on providing metrics for three key areas:
  - Implementation
  - Customer
  - Operations
- AMF Program Report to be provided at the end of the year with mid-year project status update meeting

### DRAFT Performance Metrics

Benefit Category	Benefit Metric
Program Implementation	<b>Major Project Release progress</b> Progress of AMF Program Functionality Releases
	<b>Meter Pre-Sweep Completions</b> Counts of Completed Pre-Sweeps
	<b>Network Deployment</b> Counts of Completed Device Installs
	<b>Meter Deployment</b> Counts of Completed Exchanges
	<b>Meter Base Repairs</b> Counts of Meter Bases requiring repairs prior to meter exchange
	<b>Sector Completion</b> Sector Acceptance Status
	<b>Program Spend</b> Costs Breakdown Summary for key categories of the AMF Program
Customer	<b>Customer Interactions</b> Counts and reasons for customer contacts to the AMF Program
	<b>Customer Portal Enrollments</b> Counts of customers signing up for Customer Portal access
	<b>Customer Surveys / Customer Satisfaction</b> Breakdown of Customer Satisfaction survey results of AMF communication, access to information & FAQs, and issue resolution
	<b>Customers Accessing Green Button Connect Data</b> Counts of customers who have exported their Green Button Connect data
	<b>Customers who Opt out of AMF meter</b> Count of customers who have elected to Opt Out from receiving an AMF meter
Operations	<b>Billing Read Rate</b> Register meter reads expected vs. delivered
	<b>Interval Read Rate</b> Interval meter reads expected vs. delivered
	<b>MDMS estimates sent to Billing</b> Percentage of meters requiring estimates for billing
	<b>Remote Switch Performance</b> Percentage success rates of remote switches
	<b>Last Gasp Alerting</b> Percentage of Last Gasp alerts successfully delivered to the OMS (Outage Management System)
	<b>VVO metric</b> Number of feeders with AMF deployed that have implemented Volt Var Optimization

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MDC 1-11

Request:

See AMF Book 1 at 81:1-2 where Mr. Walnock and Ms. Reder state, "NPP's can access the data of customers who enroll in their services in two different ways: 1) Electronic Data Exchange; 2) Supplier Portal."

- (a) Please explain in detail what is meant by "Electronic Data Exchange."
- (b) If Rhode Island Energy is referring to "Electronic Data Interchange (EDI)," please explain in detail how the Company will ensure that NPPs will only be permitted to access the energy data of accounts to which the NPP has authorization. What steps ensure that customer consent has been received by the Company prior to the release of customer data?

Response:

- a) Electronic Data Exchange is the process in which Electronic Data Interchange ("EDI") is shared between the Company and nonregulated power producers ("NPPs").
- b) As a deregulated utility, Rhode Island Energy provides a customer choice program in which customers can select their preferred energy supplier. In order for a customer to participate in the customer choice program, the NPP will obtain an authorization form from the customer that acknowledges the customer's intent to receive services from the energy supplier. Upon customer authorization, the supplier will send an EDI 814 enrollment request transaction to the utility that includes the customer's account number and first four characters of the account name. This will be deemed by the Company as confirmation that the customer has consented to the enrollment or switch. The utility will then provide an EDI 814 enrollment response to the supplier indicating whether the request was accepted or rejected. If the customer enrollment was accepted, a start date will be provided that signals when the customer will begin billing under the supplier's program and when the supplier will begin receiving the customer's consumption and billing data.

Rhode Island Energy will process the enrollment request; upon successful enrollment the Customer Information System system will tag the customer as being served by that NPP and will share EDI data with only that supplier.

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MDC 1-12

Request:

See Schedule PJW/WR-1 at 58, citing Wi-Fi capabilities on advanced meters.

- (a) Will the Company support IEEE2030.5 over Wi-Fi as the communication standard for transmitting kWh data to Home Area Network ("HAN") devices?
- (b) If no, what communications standard(s) will be used? Please explain in detail.
- (c) If IEEE2030.5 will be used, which "function sets" of the IEEE2030.5 standard will the Company implement? Please explain in detail.
- (d) If IEEE2030.5 will be used, please describe in detail all data that will be provided to authorized HAN devices and on what frequency.
- (e) Given that Wi-Fi is on the meters, will customers be able to direct the Company to send their meter data to any URL the customer wishes on a periodic interval, say every 5 seconds, without needing to have a dedicated device such as an IEEE2030.5 client running on a gateway device inside the home? Why or why not? Please explain in detail.
- (f) Will all customer types (including commercial and industrial) have Wi-Fi HAN access, or will HAN be limited to residential customers? Please explain in detail.
- (g) Does Rhode Island Energy intend to offer its own mobile phone application to connect to the HAN over Wi-Fi?
  - i. If yes, please provide all designs, diagrams, screenshots, mockups and the like showing the functionality.
  - ii. If yes, will the mobile app be a separate app from the Company's traditional bill payment app that exists today? Why or why not? Please explain in detail.
  - iii. If yes, what is the estimated cost for the development of the Company's HAN mobile app?
- (h) If ratepayers ultimately pay for load disaggregation functionality on meters, does Rhode Island Energy believe customers should be able to have their

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disaggregation insights transmitted over Wi-Fi to any device or service of the customer's choice? Why or why not? Please explain the Company's rationale in detail.

- (i) If ratepayers ultimately pay for load disaggregation functionality on meters, does Rhode Island Energy believe that it owns such insights, or do customers? Please explain the Company's views in detail.

Response:

- (a) Yes, the Company is committed to enabling Wi-Fi from the meter to the Home Area Network ("HAN") devices, however the specific communication standard for transmitting kWh data has not been determined.
- (b) See MDC 1-12 (a) above.
- (c) See MDC 1-12 (a) above.
- (d) See MDC 1-12 (a) above.
- (e) AMF Business Case Attachment G, (Bates 296) the Cybersecurity, Data Privacy and Data Governance Plan will guide provisions, process and requirements pertaining to data that is shared from the meter via Wi-Fi that is yet to be developed.
- (f) All customer types that receive an AMF meter will have Wi-Fi HAN access.
- (g) A decision has not yet been made on the details of connecting a mobile device to the HAN over Wi-Fi. Rhode Island Energy will consider offering a mobile application for this purpose as one of the potential options.
- (h) AMF Business Case Attachment G, (Bates 296) the Cybersecurity, Data Privacy and Data Governance Plan will guide provisions, process and requirements pertaining to data management stemming from load disaggregation functionality on meters.
- (i) The Company's Cybersecurity, Data Privacy and Data Governance Plan govern how AMF data and insights from it will be used such that (1) the data generated by the Company and through its AMF is collected, managed, stored, transferred, and protected in a way that preserves customer privacy; (2) practices are

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consistent with cybersecurity requirements and facilitate access to further operational requirements; and (3) grid modernization objectives and Climate Mandates can be met. The Company is committed to protecting the confidentiality, integrity, and availability of all data and information, data and information assets, and data and information resources to a level that is commensurate with their value.