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February 10, 2023

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

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

**Re: The Narragansett Electric Company d/b/a Rhode Island Energy**  
**In Re: Advanced Meter Functionality Business Case – Docket No. 22-49-EL**

Dear Ms. Massaro:

Enclosed please find an original and nine copies of The Narragansett Electric Company d/b/a Rhode Island Energy's (the "Company") 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.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Adam M. Ramos".

Adam M. Ramos

AMR:cw  
Enclosures

cc: Service List 22-49-EL (via e-mail only)

**The Narragansett Electric Company d/b/a Rhode Island Energy**  
**Docket No. 22-49-EL Advanced Meter Functionality (AMF)**  
**Service list updated 2/6/2023**

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STATE OF RHODE ISLAND

RHODE ISLAND PUBLIC UTILITIES COMMISSION

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In re: The Narragansett Electric Company )  
d/b/a Rhode Island Energy’s Advanced ) Docket No. 22-49-EL  
Metering Functionality Business Case )  
\_\_\_\_\_ )

**THE NARRAGANSETT ELECTRIC COMPANY D/B/A RHODE ISLAND ENERGY’S  
MOTION TO OBJECT TO DATA REQUESTS BY  
MISSION:DATA COALITION 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 REQUESTS 1-5(a) and 1-7**

Pursuant to Rule 1.19(C)(3) of the Rhode Island Public Utilities Commission (the “Commission”) Rules of Practice and Procedure, 810-RICR-00-00-1.1 *et seq.* (the “Commission Rules”), The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) hereby moves to object to the following data requests issued by Mission:Data Coalition (“Mission:Data” or “MDC”) as part of its First Set of Data Requests issued on January 31, 2023: Data Request MDC 1-3, Data Request MDC 1-5(a), Data Request MDC 1-6, Data Request MDC 1-7(c)-(g), Data Requests MDC 1-8, Data Request MDC 1-9, and Data Request MDC 1-10(a)-(c) (collectively, the Objectionable Data Requests). Additionally, the Company hereby moves for a protective order with respect to the following data requests: Data Request MDC 1-5(a), and Data Request MDC 1-7. For the reasons set forth in this motion, the Objectionable Data Requests are unreasonable or improper, seek information beyond the scope of Mission:Data’s permitted intervention in this docket, and ask for competitively sensitive and confidential Company information and contracts. Therefore, the Company respectfully requests

that the Commission grant this motion, sustain the Company’s objections, and enter an order directing that the Company need not respond to the Objectionable Data Requests.

**I. RELEVANT FACTS**

On January 25, 2023, the Commission held an Open Meeting to consider motions to intervene in the above docket. Although the Commission granted Mission:Data’s motion to intervene, the Commission noted that Mission:Data had a “very narrow interest” in the proceeding as articulated on page 3 of its reply brief in support of its motion to intervene. There, Mission:Data identified its interest as “the financial and technological aspects” of three specific aspects of the Company’s Advanced Metering Functionality (“AMF”) Business Case: “(1) Green Button Connect My Data (‘GBC’), (2) Home Area Network (‘HAN’), and (3) whether and how advanced metering functionality (‘AMF’) enables a market for third party energy management services.” Mission:Data Reply Brief 3. The Commission limited Mission:Data’s participation to these three discrete topics.

On January 31, 2023, Mission:Data served its First Set of Data Requests. The Objectionable Data Requests seek data and information that extend far beyond the narrow defined interests for which the Commission granted Mission:Data’s intervention. The Objectionable Data Requests call for (1) answers to hypothetical legal questions unrelated to this docket and Mission:Data’s permitted scope of intervention; (2) confidential and competitively sensitive Company information, including contracts and testing protocols, that Mission:Data’s members could use to its competitive advantage; (3) information related to Solar PV adoption; and (4) the AMF procurement process. Specifically, the Company objects to the following:

- MDC 1-3: This Data Request asks in subpart (a) for the Company to “identify which entity – Rhode Island Energy employees, proposed AMF contractors, etc. – would charge the amounts provided [for modifying the recording interval from 15 minutes to 5 minutes].” Subpart (b) asks whether the Company would “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.”

- MDC 1-5(a): This Data Request asks the Company to “provide copies of all contracts, testing protocols, and the like” relating to “requirements” the Company may impose on Home Area Network (HAN) devices to connect with customers’ meters.
- MDC 1-6: This Data Request references the Company’s testimony regarding solar PV adoption and asks the Company (a) to “provide all designs and written descriptions of the ‘integrated marketplace’ showing its functions, both to ratepayers and Rhode Island Energy”; (b) to “provide all documents regarding the ‘integrated marketplace’”; and (c) “[w]hat specific ‘customer research’ or data from customers [ ] Rhode Island Energy expects to obtain as a result of the proposed CP that cannot be obtained from rooftop solar interconnection applications.”
- MDC 1-7(b)-(g): This Data Request in subpart (b) requests “the mathematical equations, technical documentation and communication with actual or potential vendors” relating to aggregate data and normalized usage. Subpart (c) requests “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.” Subpart (d) requests information relating to “production” or “occupancy” data. Subpart (e) requests “copies of any agreements between Rhode Island Energy and regulated or unregulated affiliates that pertain to the exchange of customer data.” Subpart (f) asks whether the Company has “shared customer energy usage, billing, or other customer-specific information with any unregulated affiliate.” Subsection (g) requests “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.”
- MDC 1-8: This Data Request asks whether the Company “believe[s] that ‘home analytics where the details into energy usage by appliance could be provided to empower customers’ is a natural monopoly.”
- MDC 1-9: This Data Request asks whether “Rhode Island Energy [is] 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.”
- MDC 1-10(a)-(c): This Data Request asks in subpart (a) whether the Company has “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.” Subparts (b) and (c) request additional detail depending on the answer to subpart (a).

The Company has attached Mission:Data’s First Set of Data Requests as Exhibit A. The Objectionable Data Requests seek information beyond the scope of Mission:Data’s permitted participation, that is not relevant to this proceeding, and that is not a proper topic for discovery.

## **II. LEGAL STANDARD**

A party to a Commission proceeding “may request such data, studies, workpapers, reports, and information as are reasonably relevant to the proceeding and are permitted by [the Commission] rules or by statute.” Commission Rule 1.19(C)(1). If a party to whom a data request is made considers a request to be “unreasonable” or to seek “material [that] is not relevant or not permitted or required by law,” then the party may file a motion asserting an objection to the data request on those grounds. Commission Rule 1.19(C)(3). The presiding officer must determine the validity of the request “under the standards established for such determinations under Rule 26 of the Superior Court Rules of Procedure.” *Id.* Under Superior Court Rule 26, “[p]arties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action[.]” Super. Ct. R. Civ. P. 26(b)(1). The Commission has ruled that a party need not respond to data requests that are irrelevant to a proceeding. *See In re: A&R Marine Corp., d/b/a Prudence & Bay Islands Transport Initial Rate Filing*, Docket No. 4586, Order No. 22814, 2017 WL 2438762, at \*3 n.15 (RIPUC June 2, 2017) (noting that the Chairperson ruled that certain data requests were “irrelevant to the proceeding”).

Under Commission Rule 1.19(E), the presiding officer “may make an order when justice requires” to protect the responding party from “unreasonable annoyance, embarrassment, oppression, burden or expense, or from disclosure of confidential business and financial information.” Commission Rule 1.19(E).



### **III. ARGUMENT**

The Objectionable Data Requests seek information that is beyond the scope of Mission:Data's permitted participation in this docket and that attempts to ferret out the Company's confidential business and financial information that could be used for the competitive benefit of Mission:Data's member organizations. Many of the requests also are unclear, overly broad, or seek irrelevant hypothetical information. Accordingly, the Company requests that the Commission sustain the Company's objection to the Objectionable Data Requests and issue a protective order with respect to Data Requests MDC 1-5(a), and MDC 1-7. An analysis of each of the Objectionable Data Requests makes this apparent.

#### **A. Data Request MDC 1-3**

The Company objects to this request on several grounds. With respect to subpart (a), the particular entity that would charge any amounts required to adjust the time interval recording of electric usage is irrelevant to this proceeding. It is also speculative and hypothetical at this juncture. The Company has not yet received approval for advanced metering functionality ("AMF") at all, nor has ISO-New England issued a requirement with respect to a required time interval to participate in its demand response programs. Further, the identity of the entity that would charge any applicable amounts in the event of a hypothetical change to the data recording interval is beyond the scope of Mission:Data's participation, which is limited to questions of the "financial and technical aspects" of HAN, GBC, and third-party market enablement.

With respect to subpart (b), attempting to commit the Company to certain negotiating positions for future hypothetical contracts is not a proper use of discovery. The Company should not be required to preemptively justify a position it may or may not take for a future situation that may or may not occur. Subpart (b) seeks wholly speculative information that is not relevant

to this proceeding. For these reasons, Data Request MDC 1-3 does not fall within the proper scope of discovery under Superior Court Rule 26.

**B. Data Requests MDC 1-5(a)**

The Company objects to providing “copies of all contracts, testing protocols, and the like” relating to any requirements for HAN devices that may be necessary to connect with customers’ meters and seeks a protective order from providing this information. The contracts and testing protocols themselves are outside the scope of Mission:Data’s permitted participation. Rather, requesting these documents is a way for Mission:Data to obtain market intelligence that could benefit its members. The term “and the like” is impermissibly vague and overly broad. This makes the request irrelevant under Superior Court Rule 26 and unduly burdensome. *See In re: A&R Marine Corp.*, 2017 WL 2438762, at \*3 n.15 (noting that the Chairperson ruled that certain data requests were “unduly burdensome”).

Further, any contracts relating to HAN would contain confidential pricing information resulting from the Company’s negotiations with third parties. Any testing protocols may contain sensitive information relating to the maintenance of cyber security. Mission:Data has no need for these documents. The Company does not object to answering the portion of the question that asks “[w]hat requirements [ ] Rhode Island Energy [will] impose on [HAN] devices (or the manufacturers of such devices) in order to connect with customers’ meters.” This information will allow Mission:Data to assess the “financial and technical aspects” of HAN without confidential contracts and testing protocols. The Company therefore seeks a protective order from providing this information.

**C. Data Request MDC 1-6**

This request seeks information relating to the “integrated marketplace for customer research of solar PV adoption.” On its face, this request does not relate to the “financial and technical aspects” of HAN, GBC, or third-party market enablement. Although it references the customer portal, the request seeks information about the “integrated marketplace” and what the Company intends to do with the data it gathers. This does not relate to the “enablement” of third-party services.

Additionally, this request is exceedingly broad. It requests “all designs and written descriptions” and “all documents regarding the ‘integrated marketplace.’” The breadth of this request far exceeds the scope of Mission:Data’s intervention and suggests an effort to obtain information about market opportunities for its members. This is not a proper purpose of discovery and places the request well outside the permitted scope of Superior Court Rule 26.

**D. Data Request 1-7(b)-(g)**

The Company objects to these requests on two grounds. First, the information sought exceeds the scope of Mission:Data’s participation. The requests relate to the Company’s practices of sharing information it receives, not to the “financial and technical aspects” of HAN or GBC, or to the enablement of third-party services. For example, subpart (c) requests a “detailed list of all entities” that “will have custody of, or come into contact with,” certain customer data, and subpart (d) asks about the Company’s use of this data. This does not fall within the scope of Mission:Data’s participation. Nor does information about how the Company has historically shared customer information with unregulated affiliates, as requested in subpart (f). The information is irrelevant to this proceeding as defined by Superior Court Rule 26.

Second, the request seeks confidential and proprietary Company information relating to existing contracts, ongoing negotiations, and internal formulae. For example, subpart (b) requests “mathematical equations, technical documentation and communications with actual or potential vendors.” Subpart (e) requests “any agreements between Rhode Island Energy and regulated or unregulated affiliates that pertain to the exchange of customer data.” Subpart (g) requests “consent form(s)” or “contractual language” with customers. In addition to exceeding the scope of Mission:Data’s permitted participation in this docket, these subparts seek confidential documents that the Company does not typically share with third parties. The Company therefore seeks a protective order from providing this information.

Finally, the Company filed its proposed Cybersecurity, Data Privacy and Data Governance Plan as Attachment G to the AMF Business Case filed in this docket, and Section 10.2 of the AMF Business Case provides a description of the Cyber and Privacy Protections Using Data Governance. Accordingly, the Company already has provided information about how data will be protected and shared as part of the AMF Business Case. This request is improper because (a) it does not identify anything specific about which it is seeking clarity from the information already provided, and (b) to the extent it seeks specific additional information about how and with whom data will be shared, such information is beyond the scope of the permitted intervention of Mission:Data. For these reasons, the request is irrelevant and unduly burdensome under Superior Court Rule 26.

**E. Data Request MDC 1-8**

This request poses a legal question unrelated to the current docket. The question of whether a hypothetical future state constitutes a natural monopoly is purely speculative. Additionally, the Company’s legal opinion on the question is irrelevant to the issues before the

Commission and well beyond the scope of Mission:Data’s limited participation in this docket, which relates to the “technical and financial aspects” of HAN and GBC and the enablement of third-party markets. This request does not fall within Superior Court Rule 26’s requirement that discovery be “relevant to the subject matter involved in the pending action.” Super. Ct. R. Civ. P. 26(b)(1).

**F. Data Request MDC 1-9**

The Company objects to this request as outside the scope of Mission:Data’s participation in this docket. The question of whether the Company intends to “commence a competitive procurement process for AMF” does not relate to the “technical and financial aspects” of HAN or GBC or the enablement of third-party markets. This request therefore falls outside the relevant requirement of Superior Court Rule 26.

**G. Data Request MDC 1-10(a)-(c)**

The Company objects to subparts (a)-(c) of this request as outside the scope of Mission:Data’s participation in this docket. The question of whether the Company has any internal measures of success of market animation does not relate to the enablement of a third-party market. The question of enablement of third-party market animation deals with what the Company’s proposal is technically capable of providing and whether the associated financial burdens will be reasonable, such that customers and third parties are able to participate in the market for third-party services. Whether the Company has internal measures for assessing the success of market animation and, if the Company has such measures, the nature of such measures, is purely an internal governance matter that is not a proper subject for discovery for the purposes for which Mission:Data has been permitted to intervene in this docket. The

Company therefore objects to this request as outside the relevant scope of the proceeding under Superior Court Rule 26.

**IV. CONCLUSION**

For these reasons, the Company respectfully requests that the Commission grant this motion and order that the Company need not respond to Data Request MDC 1-3, Data Request MDC 1-5(a), Data Request MDC 1-6, Data Request MDC 1-7(c)-(g), Data Requests MDC 1-8, Data Request MDC 1-9, and Data Request MDC 1-10(a)-(c). The Company further requests that the Commission issue a protective order with respect to Data Request MDC 1-5(a), and Data Request MDC 1-7.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a RHODE ISLAND ENERGY**

By its attorneys,



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Dated: February 10, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on February 10, 2023, I sent a copy of the foregoing to the service list by electronic mail.

/s/ Adam M. Ramos

# **EXHIBIT A**





**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**In re: Rhode Island Energy Advanced Metering Functionality Business Case and Cost Recovery Proposal** : : **DOCKET NO. 22-49-EL**

**MISSION:DATA COALITION FIRST SET OF DATA REQUESTS  
DIRECTED TO RHODE ISLAND ENERGY**

Issued January 31, 2023

MDC 1-1 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.

MDC 1-2 MDC 1-2 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.

MDC 1-3 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.

MDC 1-4 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>

MDC 1-5 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.

MDC 1-6 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?

MDC 1-7 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.

- MDC 1-8 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.
- MDC 1-9 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.
- MDC 1-10 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.
- MDC 1-11 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?
- MDC 1-12 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 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.