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April 24, 2023

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888
Luly.massaro@puc.ri.gov

**In Re: The Narragansett Electric Co. d/b/a Rhode Island Energy's Advanced
Metering Functionality Business Case - Docket No. 22-49-EL**

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of Mission:data Coalition's motion to expand the scope of its intervention along with data requests that are being filed concurrently with the motion.

Thank you for your attention to this matter, and please do not hesitate to contact me with any questions.

Sincerely,



James Rhodes
Attorney for Mission:data Coalition
james@jrhodeslegal.com

Enclosures

Copy to: Service List

**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 MOTION TO EXPAND SCOPE OF INTERVENTION

Now comes Intervenor, Mission:data Coalition, respectfully requesting that the Public Utilities Commission approve an expansion in the scope of its intervention in above-referenced docket to include investigation into and discussion of the potential utilization of “Distributed Intelligence” capabilities of advanced meters.

I. Background information

Generally, Distributed Intelligence-capable (“DI”) advanced meters have internal computing capacity in order to effectively analyze high-frequency energy, voltage, and current information. This is a new and emerging technology that is beginning to be deployed by utilities across the country. There are only a handful of deployments underway at this time, and Mission:data Coalition believes that any initial plans to deploy this technology warrants discussion for both purposes of its intervention into this docket as well as for the benefit of the wider public interest.

RI Energy’s Business Case does not explicitly use the term Distributed Intelligence to describe envisioned functionality of the smart meters. However, descriptions of the functionality leads to a reasonable inference that it may be, or has been, considered by Company.¹ If this is a reference to this type of technology platform to be incorporated into the meters in Rhode Island, it is critical to explore the potential value to ratepayers and the system along with anti-

¹ RIE AMF Plan, Book 2. Schedule PJW/WR-1. Page 35 of 100. Description includes the following statement, “The broad deployment of AMF supports maximum functionality and adaptability of the intelligent computer platform residing within each metering device...”

competitive risks and the negative impacts it may have on the ability of third-party applications to access and utilize the data being generated by a customer's meter.

II. Standard

The Commission granted Mission:data Coalition a limited intervention in this docket based on its primary interest in “the financial and technological aspects” of RI Energy’s Advanced Metering Functionality (AMF) Business Case, with a specific focus on the Green Button Connect and Home Area Network functionality in conjunction with how AMF enables a market for third-part energy management services. Commission Open Meeting of January 25, 2023. Additionally, the Commission indicated that Mission:data Coalition may seek leave to address other issues as they are identified as the docket proceeds. Id. This motion is intended to satisfy that obligation to seek leave to expand the scope of topics on which Mission:data Coalition is permitted to explore in both discovery and direct testimony.

III. Discussion

Distributed Intelligence is a novel and rapidly developing smart meter technology. The utilization of miniature computers within advanced meters has the potential to greatly enhance the ability of customers and customer-authorized third-party services to access and utilize customer data associated with their utilization of the grid and related services. This specific technology was not referenced in Mission:data Coalition’s motion to intervene or in its response to RI Energy’s opposition to that intervention.

Mission:data Coalition’s primary interest as recognized by the Commission is in “the financial and technological” aspects of RI Energy’s proposal. Distributed Intelligence directly relates to the potential technological aspect of RI Energy’s proposal. It was not immediately apparent whether RI Energy is considering such technology, therefore Mission:data Coalition


believes it to be appropriate to use discovery to determine if there is such an intention and to ask questions regarding that potential scope of deployment.

At this time, Mission:data Coalition is requesting leave to issue a series of data requests, which have been filed concurrently with this motion, addressing the degree to which RI Energy has considered utilization of this technology and their intentions on how it may, or may not, facilitate the integration of third-party applications that customers may seek to deploy. Mission:data Coalition recognizes that responses may not be available prior to the deadline to submit testimony. For that reason, Mission:data intends to provide initial testimony regarding the use of this technology and reserves the right to supplement this testimony either in subsequent paper filings or during the hearing based upon responses to either data requests or direct testimony.

IV. Conclusion

Therefore, Mission:data Coalition respectfully request that the Commission grant this expansion in its intervention in the above referenced docket and direct RI Energy to respond to Mission:data Coalition's Second Set of Data Requests, which have been filed concurrently with this motion.

Respectfully submitted,



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Dated: April 24, 2023

Certificate of Service

I hereby certify that an electronic copy of the Motion was served via electronic mail to the service list for the above captioned docket on April 24, 2023. Paper copies to the Commission shall follow via USPS.

A handwritten signature in black ink, appearing to read "James Rhodes", is written above a horizontal line.

James Rhodes

**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 SECOND SET OF DATA REQUESTS
DIRECTED TO RHODE ISLAND ENERGY**

Issued April 24, 2023

- MDC 2-1 Does RI Energy or its affiliates have any experience deploying Distributed Intelligence (DI) capable advanced meters? If so, please provide:
- a. Description of hardware and software vendors were used.
 - b. Identification as to how many software applications ("apps") it deployed onto each meter.
 - c. Documentation concerning material software or deployment errors or malfunctions that resulted in additional, unplanned costs to remedy.
 - d. What fees, if any, the DI platform provider charged to third-party software developers to test or deploy apps.
- MDC 2-2 Please provide the technical specifications by which a meter-based software app can query data from the meter. What information is accessible to apps (voltage, current, power, waveform details, etc.) and with what frequency (once per second, a thousand times per second, ten thousand times per second, etc.)?
- MDC 2-3
- a. What restrictions, if any, will third-party software applications have regarding the use of the meter's WIFI system? For example, will RI Energy-developed DI software applications have full WIFI access whereas third party-developed DI software applications will have limited or no WIFI access?
 - b. Will RI Energy limit or prohibit DI software applications from communicating over the customer's WIFI network to a remote server not controlled by RI Energy? Why or why not?
- MDC 2-4 Will a customer be able to select a particular app s/he wishes to have downloaded and installed onto their advanced meter? Why or why not?
- MDC 2-5 What conflict of interest provisions guide RI Energy's actions if it sought to purchase DI software apps made by the Company's regulated or unregulated affiliates and sought to recover those costs in rates?
- MDC 2-6 In what cases would RI Energy seek to obtain the customer's permission prior to downloading a DI software app to the customer's meter?