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May 4, 2023

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

Luly E. Massaro, Commission Clerk  
Rhode Island Division of Public Utilities and Carriers  
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:

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 Mission:Data Coalition’s Motion to Expand Scope of Intervention in the above-referenced matter.<sup>1</sup>

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)  
John Bell, Division  
Leo Wold, Esq.

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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.

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 4th day of May, 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 4/17/2023**

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May 4, 2023

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STATE OF RHODE ISLAND

RHODE ISLAND PUBLIC UTILITIES COMMISSION

In re: The Narragansett Electric Company d/b/a Rhode Island Energy’s Advanced Metering Functionality Business Case	) ) ) ) )	Docket No. 22-49-EL
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**THE NARRAGANSETT ELECTRIC COMPANY D/B/A RHODE ISLAND ENERGY’S  
RESPONSE TO MISSION:DATA COALITION’S  
MOTION TO EXPAND SCOPE OF INTERVENTION**

The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) hereby responds to the Motion to Expand Scope of Intervention filed by Mission:Data Coalition (“Mission:Data” or “MDC”). The topic Mission:Data proposes to address falls within the scope of intervention already established for Mission:Data by the Public Utilities Commission (the “Commission”). Accordingly, MDC’s motion to expand the scope is unnecessary. For this reason, the Company respectfully requests that the Commission deny MDC’s motion to the extent that it seeks to expand upon the scope the Commission originally permitted.

**I. RELEVANT FACTS**

On January 25, 2023, the Commission held an Open Meeting to consider motions to intervene in this 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 the financial and technical aspects of those three discrete topics.

On April 24, 2023, Mission:Data served its Second Set of Data Requests. The Second Set contains six questions relating to the Company's experience with distributed intelligence and the availability and technical specifications of third-party software applications that may interact with the Company's proposed meters. The Company has attached Mission:Data's Second Set of Data Requests as Exhibit A.

Also on April 24, 2023, Mission:Data filed its Motion to Expand the Scope of Intervention. In it, Mission:Data requests that the Commission expand the scope of its intervention to include "investigation into and discussion of the potential utilization of 'Distributed Intelligence' capabilities of advanced meters." Motion at 1. On April 28, 2023, Mission:Data submitted the Direct Testimony and Supporting Exhibits of Michael Murray. That testimony includes discussion of the financial and technical aspects of distributed intelligence as well.

## **II. LEGAL STANDARD**

Commission Rule 1.14(B) provides that "any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission." 810-RICR-00-00-1.14(B) [hereinafter "Commission Rule 1.14(B)"]. The Commission has been "cautious in granting intervener status to ensure that a movant actually meets one of the three criteria established in [Commission Rule 1.14(B)]." *In re*

*Narragansett Elec. Co. d/b/a Nat'l Grid Proposed Standard Offer Serv. Rate Reduction*, No. 3739, 2006 WL 4070740 (Dec. 27, 2006).

In granting Mission:Data limited intervention status, the Commission provided that Mission:Data could seek leave to expand its scope of intervention should circumstances warrant an expansion.

### **III. ARGUMENT**

The Company requests that the Commission deny Mission:Data's motion because its proposed expansion already falls within the scope of its existing intervention. Mission:Data asks the Commission to expand its scope "to include investigation into and discussion of the potential utilization of 'Distributed Intelligence' capabilities of advanced meters." Motion 1. According to Mission:Data, distributed intelligence "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." *Id.* at 2. Further, "Distributed Intelligence directly relates to the potential technological aspect of RI Energy's proposal." *Id.*

This proposed topic falls squarely within Mission:Data's existing scope. Specifically, as described by Mission:Data, questions regarding distributed intelligence relate to the "technological aspects" of "whether and how advanced metering functionality ('AMF') enables a market for third party energy management services." Mission:Data Reply Brief in Supp. Intervention 3. For this reason, the topics explored by Mission:Data's Second Set of Data Requests and the issues addressed in the testimony submitted by Mission:Data do not exceed the scope of its Commission-approved limited intervention. Accordingly, the Company does not object to Mission:Data's issuance of the Second Set of Data Requests, its discussion of distributed intelligence in its testimony solely with respect to scope, or generally to



Mission:Data's participation in this docket to address issues concerning the financial and technical aspects of distributed intelligence.

Accordingly, because Mission:Data's proposed topic of inquiry falls within its existing limited scope of intervention, there is no need to expand the scope of Mission:Data's intervention. The Company notes that its position on this motion preserves its view that the Commission appropriately limited the scope of Mission:Data's intervention. The Company objects to any expansion of Mission:Data's participation and, to the extent that the Motion seeks to expand upon the scope authorized in the Commission's original intervention order, the Company objects to any such expansion.

**IV. CONCLUSION**

For these reasons, the Company respectfully requests that the Commission deny Mission:Data's Motion to Expand the Scope of Intervention, but authorize the specific type of participation in this docket described in the motion related to distributed intelligence as within Mission:Data's originally authorized scope.

Respectfully submitted,

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

By its attorneys,



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Dated: May 4, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 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 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?