

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: The Narragansett Electric Co.)
d/b/a Rhode Island Energy’s)
Advanced Metering Functionality)
 (“AMF”) Business Case)

Docket No. 22-49-EL

Mission:data Coalition’s Post-Hearing Statement

Intervenor, Mission:data Coalition (“Mission:data”), respectfully requests that the Public Utilities Commission (“Commission”) incorporate the following into a final order in the above-captioned docket:

1. With respect to the Green Button Connect (“GBC”) program, we respectfully request that the Commission order the Company as follows:
 - a. When GBC is functional as part of AMF Group 3, it shall provide, at a minimum, for the exchange of the following data types:
 - i. At least twenty-four (24) months of electric usage data;
 - ii. Ongoing interval electric usage data, delivered to the third-party with a 30- to 45-minute delay, including updated information over time on a timely basis;
 - iii. For applicable commercial or industrial customers, peak demand, kilo-volt-amp-hours, reactive power, power factor, and any other billing determinant generated by the advanced meter for twenty-four (24) months and on an ongoing basis;
 - iv. At least twenty-four (24) months of natural gas usage and billing data;

- v. Customer account and billing information, inclusive of electric and natural gas bill PDFs, all billing line items and rate codes;
 - vi. Sufficient information to determine eligibility for and participation in bill payment assistance, renewable energy subsidies, demand-side management, demand response, load management, and/or energy efficiency programs;
 - vii. If software for disaggregating electric usage is enabled for any customer's advanced meter, the disaggregated electric usage insights at the level generated by the software on the advanced meter; and
 - viii. Any updates or changes to billing, customer programs or previously transmitted information described above.
- b. The Company shall maintain GBC certification with version 3.3, or later versions as becomes certifiable by the Green Button Alliance, including all relevant certification tests that cover the data types described in Section 1(a) above.
2. With respect to the Home Area Network ("HAN") functionality, we respectfully request that the Commission order the Company as follows:
- a. As part of AMF Group 3, the Company shall offer, at no charge to either customers or device makers, "bring your own device" ("BYOD") functionality, defined as giving a customer the ability to purchase any technologically compatible device and connect it to their advanced meter on a non-discriminatory basis to access and use electric usage and disaggregation insights.

- b. The Company, acting by itself or via its vendor(s) in deploying AMF, shall not impose requirements on HAN devices or device manufacturers, including, but not limited to, pre-screening, device testing, financial, or contractual requirements.
 - c. The technical standard for local device HAN communications shall be IEEE2030.5-2018. However, if the Company believes that an alternative communication protocol should be implemented in Rhode Island, the Company shall within three (3) months file an application stating the Company's rationale, the benefits to customers and interoperability of the Company's proposed alternative, and a revised implementation timeframe.
 - d. The Company shall, within six (6) months, file with the Commission an implementation plan for supporting the direct upload of near-real-time electric usage data and disaggregation insights via the customer's Wi-Fi network to a cloud service of the customer's choosing without requiring data to pass through an intermediary entity. This service shall also be at no charge to either customers or customer-authorized third parties.
3. With respect to Grid Edge Computing, also known as Distributed Intelligence, which includes an App Store on advanced meters, we respectfully request that the Commission order the Company as follows:
- a. The Company, acting by itself or via its vendor(s) in deploying AMF, is prohibited from charging a commission fee on software applications to either ratepayers or software developers.
 - b. The Company shall take no action that would limit or otherwise curtail a Customer's ownership rights over the disaggregation insights that are generated

by ratepayer-funded technology or software. Such insights shall be equally available to customers and customer-authorized third parties.

- c. No disaggregation software application on advanced meters will be enabled unless (1) the Commission has granted prior authorization, or (2) the customer has granted his or her consent to the Company.
 - d. The Company shall provide written notification to the Commission each time the Company shares AMF-generated data, including energy usage or disaggregation insights, with a law enforcement agency.
 - e. The Company, acting by itself or via its vendor(s) in deploying AMF, shall provide customer-authorized third parties with access to the App Store and related advanced meter functionality on an open and non-discriminatory basis, allowing customers to choose to at least one software application from a third party to be deployed onto their advanced meter.
 - f. The Company is hereby notified that the Commission's oversight and supervision over the Company's App Store is limited to the terms included herein. The Commission's approval of AMF shall not be construed as approval of any App Store policy, procedure or technology not explicitly addressed herein.
4. With respect to the development of applicable Terms and Conditions for programs described in paragraphs 1-3, we respectfully request that the Commission order the Company as follows:
- a. The Company will propose and file for review with the Commission the terms and conditions as between the Company and customer-authorized third parties regarding GBC, HAN and the Company's App Store. The Company shall not

permit its App Store vendor(s) to circumvent Commission review of terms and conditions with customer-authorized third parties.

- b. Prior to filing with the Commission its terms and conditions for third party access to the Company's App store, the Company shall consult with the Working Group described in paragraph 6.
5. With respect to reporting metrics for the programs described in paragraphs 1-4, we respectfully request that the Commission order the Company as follows:
- a. The Company shall report on GBC metrics continuously on a publicly-available website; HAN metrics on a monthly basis; Edge Computing metrics quarterly; and customer experience metrics annually.
 - b. For reporting metrics for Green Button Connect, the Company shall provide at least the following information:
 - i. Time elapsed for a random sample of customers to complete a data-sharing authorization with a third party;
 - ii. Average and maximum data delivery time, in seconds, following customer authorization;
 - iii. GBC system availability, calculated on a monthly basis as the number of minutes the GBC service is available for use and operating correctly without a severe defect divided by the total number of minutes, excluding scheduled maintenance windows;
 - iv. Number and type of errors generated, if any;

- v. Number and type of issues raised by third parties and customers, including severity, mean and max acknowledgment time, and mean and max resolution time;
 - vi. Number and status of third parties going through administrative onboarding; and
 - vii. Number and status of third parties going through technical onboarding.
- c. For reporting metrics for Home Area Network, the Company shall provide at least the following information:
- i. Number and type of errors experienced in device pairing;
 - ii. The average time it takes for a random sample of customers randomly recruited for assessment purposes to complete a HAN pairing process, with an explanation of obstacles experienced and remediation plans;
 - iii. The number of customer attempts to pair a device and the number of successfully completed attempts;
 - iv. For direct upload functionality, the number and type of errors experienced in the customer authorization process; and
 - v. For direct upload functionality, the number of customer attempts and the number of successfully completed attempts.
- d. For reporting metrics for Edge Computing, the Company shall provide at least the following:
- i. A list of all apps deployed on meters, including:
 - 1. Name of the app;
 - 2. Author, creator, or licensor(s) of the app;

3. Detailed technical description of the app;
 4. The number of meters on which the app is deployed grouped by customer class (residential, small commercial, medium/large commercial, etc.);
 5. Whether the app is utility-facing, customer-facing or both;
 6. If the app is customer-facing, screenshots showing how customers initiate, use and/or benefit from the app;
 7. Cost of the app;
 8. A description of where customer data and resulting insights are transmitted and held; and
 9. Whether and how the app creator or licensor(s) are entitled to access or use customer data or insights for any purpose.
- ii. A list of each app developer that has either deployed an app on the meter or has initiated the process to deploy the app on the meter, including:
 1. Time elapsed for administrative onboarding; and
 2. Time elapsed for technical, security or functional review.
 - iii. Number and description of consumer complaints received that relate to Wi-Fi connectivity.
6. With respect to the Company's proposed Working Group, we respectfully request that the Commission order the following:
 - a. Within six (6) months, the Working Group will file a report with the Commission addressing the possibility and costs of participating in a regional data sharing hub, including, but not limited to, New York and New Hampshire. Individual parties

may address any other GBC implementation issue in the Working Group and in the written report to the Commission.

- b. If the Company wishes to propose an alternative to IEEE2030.5 for local device HAN communications, it shall first propose its alternative to the Working Group and submit the comments and positions provided by Working Group participants along with its proposal to the Commission.
7. With respect to the Company's request for cost recovery for the implementation of these programs, we respectfully request that the Commission prohibit the Company from receiving cost recovery from ratepayers for any App Store costs that may exceed the Company's AMF Cost Cap as determined by the Commission.

Respectfully submitted,

/s/ James Rhodes
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Dated: August 24, 2023

Certificate of Service

I hereby certify that an electronic copy of this document was served via electronic mail to the service list for this docket. An original and nine (9) copies will follow by USPS.

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August 24, 2023

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**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 Mission:data Coalition's post-hearing statement regarding the specific decisions it is requesting the Commission make with respect to the above referenced docket. An original and nine (9) copies of the testimony will follow by USPS.

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

Enclosures

Copy to: Service List

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