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May 12, 2025

VIA ELECTRONIC MAIL AND HAND DELIVERY

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 22-49-EL – The Narragansett Electric Company d/b/a Rhode Island Energy
Advanced Metering Functionality Business Case
Compliance Filing - Open Meeting Motion 13**

Dear Ms. De La Rosa:

Pursuant to the Public Utilities Commission’s (“Commission”) Open Meeting on September 13, 2023, on behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), I have enclosed the Company’s compliance filing, which contains the following plans pursuant to Motion 13 issued by the Commission in the above-referenced docket: Green Button Connect (“GBC”), Home Area Network (“HAN”) and Grid-Edge Computing (“edge-computing”).

Thank you for your attention to this matter. If you have any questions, please contact me at 401-316-7429.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson".

Jennifer Brooks Hutchinson

Enclosures

cc: Docket No. 22-49-EL Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy

Advanced Metering Functionality

Green Button Connect Plan

May 12, 2025

Docket No. 22-49-EL

Submitted to:

Rhode Island Public Utilities Commission

Submitted by:



Rhode Island Energy™

a PPL company

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I. Introduction

On September 27, 2023, the Rhode Island Public Utilities Commission (“Commission”) approved Rhode Island Energy’s¹ Advanced Metering Functionality (“AMF”) Business Case in Docket No. 22-49-EL. As part of Motion 13 of the Commission’s Open Meeting Motions and Votes, the Company is required to file plans related to Green Button Connect (“GBC”), Home Area Network (“HAN”) and Grid-Edge Computing (“edge-computing”) as outlined below:

- *Motion (13): Move that within two months of the start of meter installation, the Company must file plans that address Green Button Connect, Home Area Network, and Grid Edge Computing, as described below. The company may consult with any stakeholder deemed necessary, but the plan must be filed by the company and will be reviewed by the Commission in a contested proceeding.*
 - *Green Button Connect: Within two months of the start of meter installation, the company must file a Green Button Connect plan that addresses the following:*
 - a. *For every customer specific item on the bill, whether that same information should be provided through GBC;*
 - b. *At a minimum, the company should plan to provide the same data fields and historical information as offered or planned to be offered to its customers in Pennsylvania and Kentucky.*
 - c. *For each of the items in (a), whether the underlying customer-specific data (e.g., interval meter reads, voltage) should be provided through GBC;*
 - d. *To the extent historical data is provided for (a) and (b), provide the extent of that data set. Specifically address whether it is appropriate to provide 36 months of electric consumption.*
 - e. *Whether (a), (b), and (c) should be provided for gas.*
 - f. *Whether any additional customer specific data beyond (a) and (b) should be provided through GBC (e.g., disaggregated load data).*
 - g. *Timeline for GBC certification and version of certification.*

¹ The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”). Rhode Island Energy is a wholly owned indirect subsidiary of PPL Corporation (“PPL”).

- *Home Area Network: Within two months of the start of meter installation, the company must file a Home Area Network plan that addresses the following:*
 - h. Version of bring-your-own-device that will be offered to customers, and requirements, if any, on those devices;*
 - i. Access to usage and disaggregation insights;*
 - j. Whether any charges apply to customers or device-makers;*
 - k. Technical standards for local devices;*
 - l. Terms and conditions on direct upload of usage data and disaggregation insights.*
- *Grid Edge Computing: Within two months of the start of meter installation, the company must file a Grid Edge Computing plan that presents a framework or terms and conditions for each issue identified in Mission:data Coalition’s Post-Hearing Statement section 3, parts (a) through (f).*

The Company’s Green Button Connect Plan is outlined within this document. The Home Area Network Plan and the Grid-Edge Reporting Plan are contained in separate respective documents, which are being filed simultaneously with this plan.

II. Green Button Overview

The Green Button initiative is an industry-led effort to provide utility customers with access to their energy usage information in a consumer-friendly format. Green Button is based on the Energy Services Provider Interface (“ESPI”) data standard released by the North American Energy Standards Board (“NAESB”) in 2011.

There are two subsets of the Green Button Initiative:

- 1. Green Button Download My Data** allows customers to download their energy usage data in the Green Button data standard format directly to their own device and, if they choose, to upload their data to a third-party application. This capability is currently available to Rhode Island Energy customers through their online portal and will continue to be provided to customers on a new separate AMF customer portal, which will be available for customers once their AMF meter is installed.

2. **Green Button Connect My Data** is a capability that allows customers to approve the secure transfer of their energy usage data with the Green Button data standard format to authorized third-party vendors. Rhode Island Energy customers will have the ability to approve sharing their electric AMF meter interval data beginning in January 2026 through the new AMF Customer Portal. The Company is currently not offering GBC to gas customers at this time because the current gas meters do not provide interval meter reads and the upgrade of gas meters was not in scope for the AMF project. If the Company decides to implement advanced gas meters, it will consider whether this information should be provided for gas customers. The Company is in the process of completing necessary testing to complete the certification process and obtain GBC certification Version 3.3 Usage Data from the Green Button Alliance. This is expected to be complete in the coming months.

A. **Customer Data Analytics**

The type of energy insights customers receive depends on the authorized third-party vendor selected and the type of data shared. Third-party vendors may use the shared data to provide customers with energy usage insights as well as ways to potentially manage and conserve energy.

Registered, authorized third-party vendors receive customer data through the AMF Customer Portal based on the authorized scope. The Green Button Connect solution facilitates the transfer of customer energy usage information from the AMF Customer Portal to third-party vendors once it is authorized by the customer.

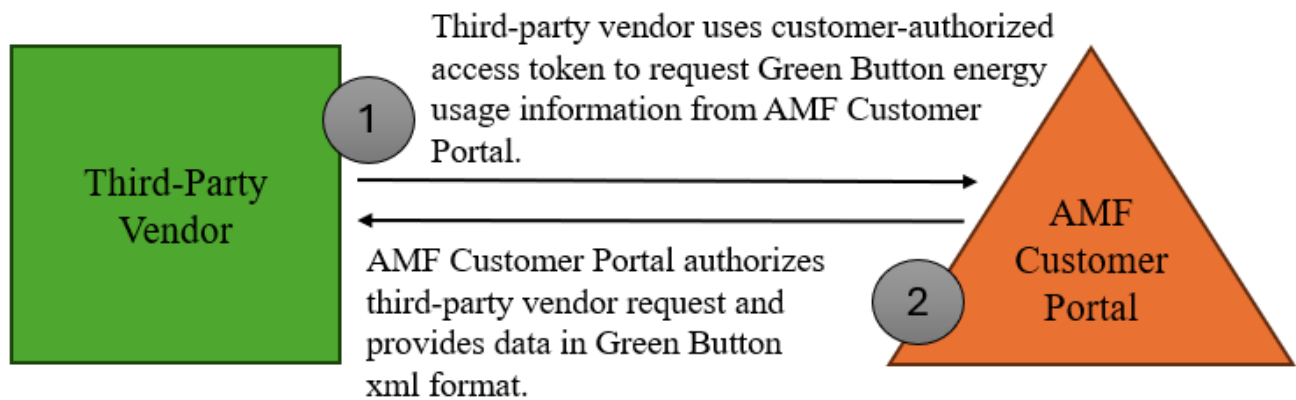


Figure 1. Customer Data Transfer between Third-Party Vendors and AMF Customer Portal

The AMF Customer Portal provides data to the vendor in the Green Button data standard xml format. The data provided to the third-party vendor is dependent on what the customer has authorized.

B. Comparison to Other PPL Operating Companies

Like Rhode Island Energy customers, PPL customers in Pennsylvania currently have access to Green Button Download My Data. Customers can do a one-time download of their own energy consumption data directly to their own computer and, if they choose, upload their data to a third-party vendor. Pennsylvania customers currently do not have access to Green Button Connect.

PPL customers in Kentucky have the option of utilizing Green Button Connect My Data. Once the functionality is deployed, Rhode Island Energy customers with AMF meters² will have the same GBC capabilities, data fields, and historical information that Kentucky electric customers have.

III. Green Button Connect Plan

The Company is implementing GBC to provide customers with the ability to share their energy usage information with third-party vendors. GBC facilitates computer-to-computer communication to allow for a standard protocol by which customers can provide authorized third-parties direct access to energy usage data.

A. Third-Party Vendor Green Button Connect Registration

The GBC solution facilitates the transfer of energy usage information from customers to third-party vendors. To register, third-party vendors must first access the Company’s AMF Customer Portal and submit a third-party registration form, as shown below.

² Green Button Connect functionality is expected to be complete in January 2026. Customers with AMF meters will be able to use Green Button Connect once this is deployed. As customers have AMF meters installed beyond January 2026, they will be able to take advantage of the Green Button Connect functionality.

Green Button Connect Registration ✕

[? View a reference guide to get help with filling out this form.](#)

Software Version	Client Name
<input type="text"/>	<input type="text"/>
Third-Party Name	Contact
<input type="text"/>	<input type="text"/>
Policy URI	Third-Party Application Description
<input type="text"/>	<input type="text"/>
Redirect URI	Third-Party Application Status
<input type="text"/>	<input type="text"/>
Client URI	Token Endpoint Authentication Method
<input type="text"/>	<input type="text"/>
Third-Party Application Type	Scope
<input type="text"/>	<input type="text"/>
Third-Party Application Use	Grant Types
<input type="text"/>	<input type="text"/>
Third-Party Phone	Response Types
<input type="text"/>	<input type="text"/>
Third-Party User Portal Screen URI	Third-Party Notify URI
<input type="text"/>	<input type="text"/>
Logo URI	Software ID
<input type="text"/>	<input type="text"/>
Terms of Service URI	<input type="checkbox"/> Terms and Conditions Text Here
<input type="text"/>	

Figure 2. Green Button Connect Vendor Registration Form

The Company will use the AMF Customer Portal administrative interface to review the request and either approve or deny registration. The Company is creating a set of criteria that the third-party vendors must meet in order to be approved. The Company can revoke third-party access at any time if suspicious activity is detected or reported by customers.

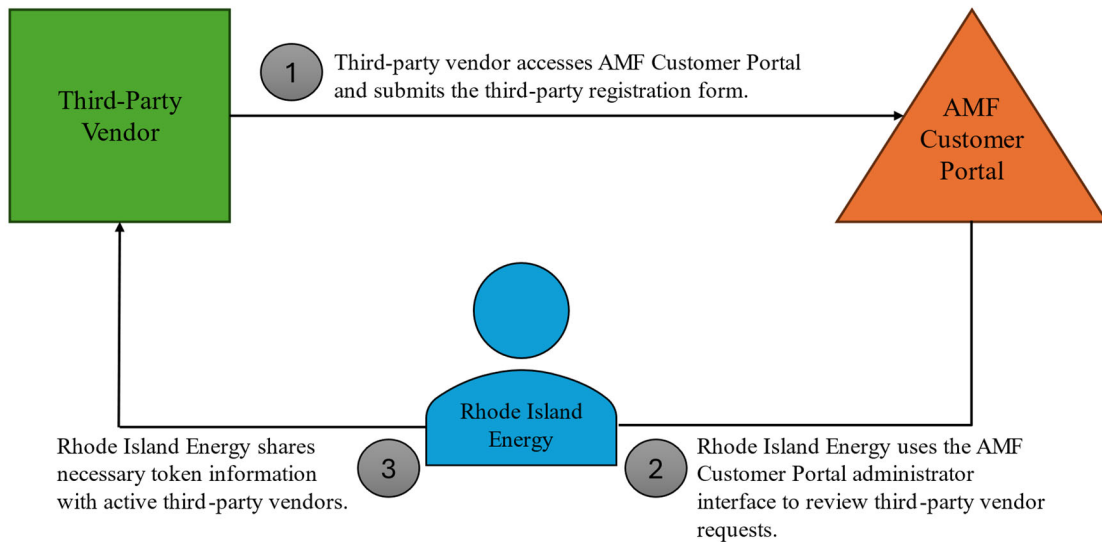


Figure 3. Third-Party Registration Process Diagram

B. Customer Registration for Green Button Connect

Rhode Island Energy electric customers sign up for Green Button Connect directly from a third-party vendor’s website or application. There, customers will select the duration and timeframe of historical data for which they are authorizing access. Once the customer is registered in the third-party vendor’s application, they are redirected to their AMF Customer Portal account where they enter their account credentials for authorization. The third-party vendor must be approved by the Company prior to the customer being able to grant access to their data.

After the AMF Customer Portal validates the customer’s credentials, the customer is presented with a screen where their selected data scope is displayed with the option to accept or decline the request. If the customer accepts, the authorization process is complete. A summary of the customer registration process is provided below:

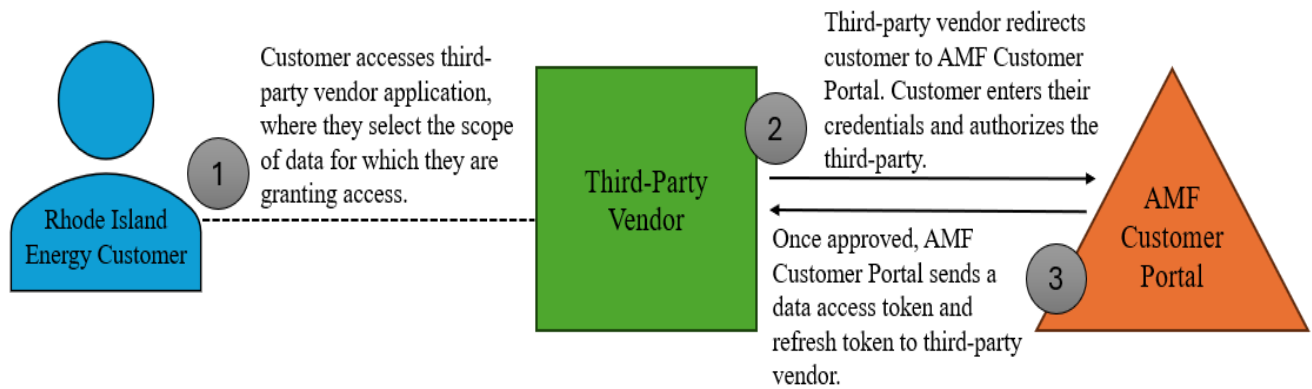


Figure 4. Customer Registration with Third-Party Vendors

At any point, customers may update or revoke data access from the third-party vendor’s application in the AMF Customer Portal. To revoke third-party access, customers can log into the AMF Customer Portal and navigate to the User Profile, where they will see a list of third-party vendors they have authorized. Here, the customer can use the Delete button to revoke the vendor’s access to their data, as shown in the example below:

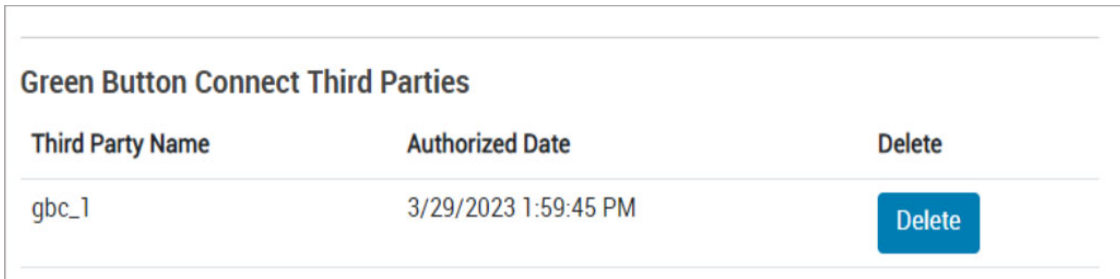


Figure 5. Third-Party Vendor Access Deletion Window

C. Customer Specific Data

Rhode Island Energy electric customers currently receive a monthly bill for their electric use that includes a breakdown of charges but limited insight into their electric use.

A table of all customer-specific information provided on a customer’s electric bill and whether this information can or cannot be provided through Green Button Connect is provided below:

Available in Green Button Connect	Not Available in Green Button Connect
<ul style="list-style-type: none"> • Monthly Electricity Usage (kWh) • Monthly Electricity Usage (kWh) from prior year* • Meter Reading • Meter Number • Reading Dates 	<ul style="list-style-type: none"> • Account Number • Customer Name • Address • Average Monthly Cost Increase or Decrease (%)

• Total Bill	
--------------	--

*This is dependent on how much historical information the customer authorizes to be shared.

The customer usage data that the AMF Customer Portal will have and could be provided to third-party vendors through Green Button Connect, is summarized below:

- **Billed Electric Usage:**
 - Consumption (kWh)
 - Demand (kW)

- **Interval Electric Usage:**
 - 15-minute interval consumption (kWh)
 - Daily meter reads (kWh)
 - Daily consumption (kWh)

Interval data will be available beginning with the installation of a customer’s AMF meter. Customers will have the ability to determine the data timeframe to provide third-party vendors, which is up to 13 months of electric interval data; 36 months of data will not be available in the AMF Customer Portal. Thirteen months of interval data represents the historical interval data stored and available in the AMF Customer Portal and allows a comparison from the same month in the prior year to the current month. The Company determined this was an appropriate amount of data to maintain in its systems based on Company data needs, customer data needs, and data storage costs.

Two years of historical billing data currently is available and will accumulate for up to 10 years. The timeframe selected will be on a rolling basis and will be stopped only if the customer decides to no longer share his or her information with the third party.

Voltage and disaggregated load data will not be available through Green Button Connect. However, disaggregated load data will be available through the Sense mobile application. Please see the Company’s Home Area Network Plan for additional information on the Sense mobile application. The Company has not identified any other customer specific data beyond these two items that are available but not provided.

D. Marketing and Customer Support

As part of the planning for the AMF Customer Portal and Green Button Connect release to customers, Rhode Island Energy is working on a communications plan to

educate customers. This information will be available on the Rhode Island Energy website and sent to customers through both digital and physical channels. Rhode Island Energy Customer Service Representatives will be enabled with training related to the AMF Customer Portal for troubleshooting and frequently asked questions.

IV. Conclusion

AMF provides various benefits; one being increased energy usage insights for customers. Green Button Connect is one of the ways customers can receive these additional insights through sharing their energy usage data with third parties. In this Green Button Connect Plan, the Company has outlined how the AMF Program will enable the Company to offer Green Button Connect, the Company verification, approval, and monitoring of third parties, the customer’s ability to connect with third-party vendors, and how the customer will authorize sharing information. As the Green Button initiative continues to evolve, Rhode Island Energy will continue to explore how Green Button Connect can enhance customer experience.

The Narragansett Electric Company
d/b/a Rhode Island Energy

Advanced Metering Functionality

Home Area Network Plan

May 12, 2025

Docket No. 22-49-EL

Submitted to:
Rhode Island Public Utilities Commission

Submitted by:



Rhode Island Energy™

a PPL company

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I. Introduction

On September 27, 2023, the Rhode Island Public Utilities Commission (“Commission”) approved Rhode Island Energy’s¹ Advanced Metering Functionality (“AMF”) Business Case in Docket No. 22-49-EL. As part of the Motion 13 of the Commission’s Open Meeting Motions and Votes, the Company is required to file plans related to Green Button Connect, Home Area Network and Grid-Edge Computing as outlined below:

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 - k. Technical standards for local devices;*
 - l. Terms and conditions on direct upload of usage data and disaggregation insights.*
- *Grid Edge Computing: Within two months of the start of meter installation, the company must file a Grid Edge Computing plan that presents a framework or terms and conditions for each issue identified in Mission: data Coalition’s Post-Hearing Statement section 3, parts (a) through (f).*

The Company’s Home Area Network Plan is outlined within this document. The Green Button Connect Plan, and the Grid-Edge Plan are contained in separate respective documents, which are being filed simultaneously with this plan.

II. Home Area Network Overview

Rhode Island Energy has partnered with Sense, a leading ClimateTech innovation company based in Cambridge, Massachusetts, to provide Rhode Island Energy residential customers with real time energy usage and load disaggregation information through the Sense application.

As also mentioned in the Grid-Edge Computing Plan, the Landis+Gyr (“L+G”) Revelo AMF meters include an Edge Intelligence Card (“EIC”) that includes the Sense software element SenseCore. This architecture ensures that customers will have full access to the Sense real-time mobile experience, which is done by connecting the AMF meter to their router and downloading the Sense application on their mobile devices. The customer is no longer required to buy an additional device to get an understanding of their home energy usage. There are no technical standards or charges for local devices or device-makers, as there is no need for a customer to bring their own device. Rhode Island Energy customers will not have to pay any enrollment fees for the Sense mobile application, which is available for download on iOS and Android mobile

devices. The Sense mobile application capabilities will be available to Rhode Island Energy customers as part of Release 3, which is scheduled to be completed in January 2026².

A. Customer Access

Customers can register for Sense by downloading the application to their mobile devices and setting up an account. The registration process guides customers to create an account, validate their utility account and home address, pair their meter and then connect it to Wi-Fi.

Once the AMF meter is connected to the customer’s router via Wi-Fi, the SenseCore software running on the EIC within the AMF meter captures load disaggregation data by reading unique powerline signatures of appliances in the customer’s home such as refrigerators, dishwashers, and laundry machines. This data is stored in the Sense Cloud and presented to the customer in the Sense mobile application in a user-friendly and insightful format. The following images depict samples of near real-time energy usage and load disaggregation insights, respectively, that customers can receive in the Sense mobile application.

² Sense application functionality is expected to be complete in January 2026. Customers with AMF meters will be able to use the Sense application once this is deployed. As customers have AMF meters installed beyond January 2026, they will be able to take advantage of the Sense application.

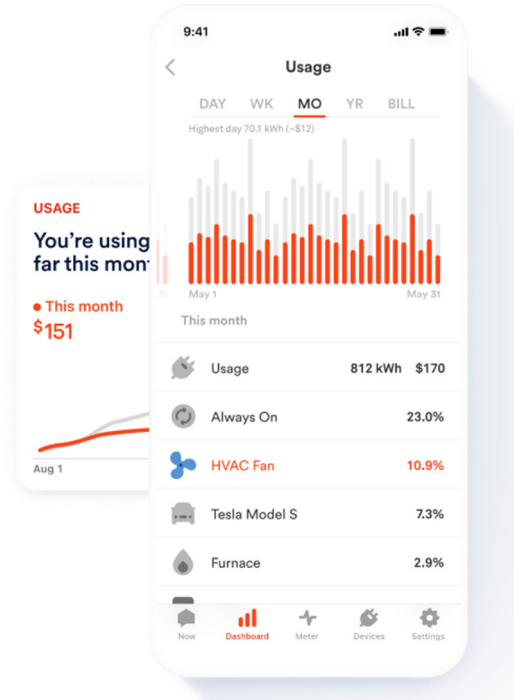


Figure 1. Near Real Time Energy Usage within the Sense Mobile Application

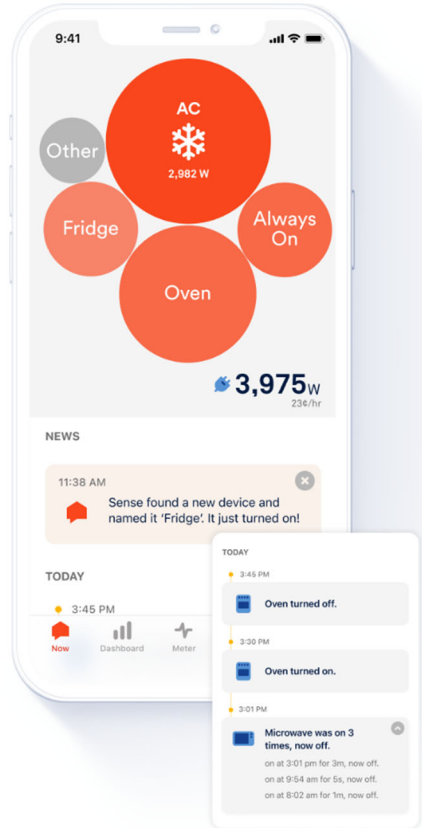


Figure 2. Additional Load Disaggregation Insights Provided within the Sense Mobile Application

Using the Sense mobile application, customers will have the ability to remotely monitor energy usage in real-time, view energy trends, set goals and alerts, and gain detailed insight on individual appliances or devices within their home. The Sense mobile application is designed to feel collaborative and insightful, as shown in the sample Sense interfaces above.

Sense’s terms of service and data privacy policies, which must be agreed to by the customer at the time of registration, outline that customers own their data, including usage data and disaggregation insights, and it will only be shared with third parties with customer consent. Sense will not share any data with unauthorized third parties.

B. Marketing and Customer Support

As part of the planning for the application release to customers, the Rhode Island Energy and Sense teams will work on a communications plan to educate customers on the application and how to register as well as continued engagement once their account is set up. This information will be available on the Rhode Island Energy website and sent to customers through both digital and physical channels.

Rhode Island Energy Customer Service Representatives will be enabled training related to Sense, however all troubleshooting, including account setup, will be deferred to the Sense team. The Sense application also has a Help Center, which includes self-service articles that are frequently reviewed and updated.

III. Conclusion

AMF provides various benefits – one being increased energy usage insights for customers. Sense is one of the ways customers can receive these additional insights, which includes providing real-time energy usage and load-disaggregation data. The Company outlined in this Home Area Network Plan how the AMF Program will offer Sense, the customer’s ability to connect its meter to Wi-Fi and see his or her energy usage information. As the Home Area Network technology continues to evolve in the industry, Rhode Island Energy will continue to explore how Home Area Network functionalities can be expanded and improved.

The Narragansett Electric Company
d/b/a Rhode Island Energy

Advanced Metering Functionality

Grid-Edge Computing Plan

May 12, 2025

Docket No. 22-49-EL

Submitted to:
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I. Introduction

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- Grid Edge Computing: *Within two months of the start of meter installation, the company must file a Grid Edge Computing plan that presents a framework or terms and conditions for each issue identified in Mission:data Coalition’s Post-Hearing Statement section 3, parts (a) through (f).*

The Company’s Grid-Edge Computing (“edge computing”) Plan is outlined within this document. The Home Area Network Plan and the Grid-Edge Reporting Plan are contained in separate respective documents, which are being filed simultaneously with this plan.

II. Grid-Edge Computing Plan

Grid Edge Computing or “edge computing” is a computing platform where data is gathered close to its source and analyzed to both enhance the customer experience and utility operations.

As part of the AMF project, the Company is offering the Sense mobile application to customers. This represents the first customer-facing application using edge computing and will be available to customers with an AMF meter². For more information on Sense and how customers can access and use the application, refer to the Home Area Network (“HAN”) Plan. Because of this, the Company is outlining the framework below as a potential future state. There is currently no established date that the Company anticipates this framework would be put in place.

² Sense application functionality is expected to be complete in January 2026. Customers with AMF meters will be able to use the Sense application once this is deployed. As customers have AMF meters installed beyond January 2026, they will be able to take advantage of the Sense application.

Within this framework, the Company also addresses the issues identified by Mission:data Coalition (“Mission:data”) in its Post-Hearing Statement filed in this docket,³ which include concerns related to commission fees, customer data ownership, customer consent, sharing of data, customer accessibility and Commission oversight of an application store (“App Store”).⁴

A. Grid-Edge Computing Components in AMF Meters

The Rhode Island Energy AMF Plan includes the deployment of Landis+Gyr Revelo AMF meters. The AMF meters include three separate components built into the devices:

- Hardware-isolated metrology;
- Hardware-isolated communications interface; and
- Hardware-isolated edge computing environment

See Figure 1 below. Because these components are separate from one another, it ensures the grid-edge computing platform does not conflict with or interrupt the primary functionalities of the meter.

³ See Mission:data Coalition’s Post-Hearing Statement, sec. 3(a) through (f) at the following link: [2249-MDC-PostHearing-Statement_8-24-23.pdf](#).

⁴ The Company will not own or operate the App Store, rather it will be owned and managed by Landis+Gyr. Therefore, the Public Utilities Commission will not have direct regulation over the App Store but rather through its regulatory authority over the Company.

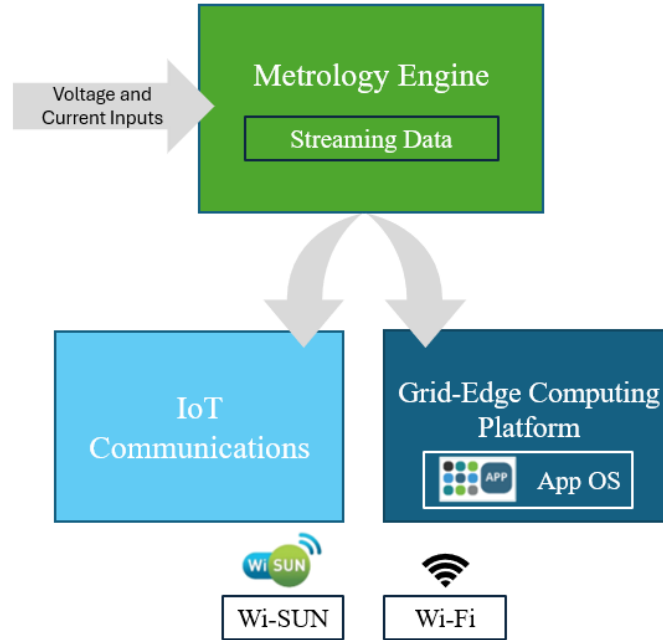


Figure 1. Hardware-Isolated Meter Components

The Metrology Engine is where customer usage data is collected and has firmware to properly measure usage.

The Internet of Things (“IoT”) communication interface obtains the data the Metrology Engine collects and transmits it to the Company’s back-office systems utilizing the Wi-SUN field-area network (“FAN”).

The Grid Edge Computing platform has a Wi-Fi radio for consumer facing applications and a connection to the FAN platform for utility-facing grid applications, which are computed using the Edge Intelligence Card (“EIC”). These capabilities provide the opportunity for the Company to enable the app ecosystem in the future.

B. Customer Data Related to Grid-Edge Computing

Initially, the Company will utilize the Grid-Edge Computing capabilities to provide Rhode Island Energy residential customers with the Sense mobile application, which will provide load disaggregation and real time energy usage information. The EIC component within the Landis+Gyr Revelo AMF meters runs the pre-installed SenseCore software, which provides data for the Sense mobile application. Customers will have the ability to download the Sense mobile application on their smartphones

without additional fees in January 2026 as part of the HAN to monitor electricity usage and gain valuable insights.

The Sense App will be available as a free service to all eligible Rhode Island Energy customers who decide to enroll. Enrolling into this service requires that a customer connect their meter to a home area network (e.g., Wi-Fi). Further, customers will be presented with data privacy and consent terms during this setup process. Customers retain ownership rights to their load disaggregation data including the ability to consent to sharing with third parties and Sense. The Company does not have an agreement in place for Sense to provide load disaggregation data directly to the Company.

C. Grid-Edge Computing Ecosystem

The Grid-Edge Computing Capabilities of the Landis+Gyr Revelo AMF meters can support the Landis+Gyr Gridstream Connect App Ecosystem (“Ecosystem”), designed as an open application development community and marketplace. The Ecosystem supports the following types of users:

- **App Developers:** Any person or entity granted access as a Landis+Gyr App Developer and pays the yearly developer license fee to gain access to the App Studio development environment and shared resources. App Developers can publish reviewed applications to the App Marketplace and make them available for purchase by the Owner/Utility.
- **App Publisher:** Any person or entity who publishes approved applications to the App Marketplace and who has a signed publisher agreement in place with Landis+Gyr that sets forth terms and conditions such as revenue sharing for any purchased applications. Approved applications can be added to the App Marketplace only by an App Publisher, and an App Publisher can be either the App Developer or any entity that hires a third-party App Developer to create its application.
- **Rhode Island Energy:** The Company is responsible for all applications that get installed on its meters via its head-end system and network. App developers will need to meet the Company’s technical requirements and security requirements for an application to be loaded on the meter’s EIC.

The Ecosystem is comprised of four key components, as defined below:

- **App Studio**: The Java-based Application Development Environment component of the App Ecosystem where App Developers can access waveform and load simulations, as well as other shared resources of the Developer Community.
- **App Marketplace**: The component of the App Ecosystem where approved applications are available. Landis+Gyr uses the App Marketplace to manage the app catalog, track versioning and device compatibility, and manage subscription payment methods, reconciliation, and payouts.
- **App Manager**: The component of the App Ecosystem that will be used by Rhode Island Energy to manage the applications lifecycle within a network. It enables the provisioning and registration for all Revelo meter EIC cards and allows the Company to manage the secure import, distribution, installation, or removal of applications, as well as monitor diagnostics.
- **App Lab**: The comprehensive platform in the App Ecosystem used to manage the application review process. It includes App Studio, App Marketplace, and App Manager, and supports a developer community, providing technical resources and community forums. Once apps are created, App Developers must submit their applications to the App Lab for review by Landis+Gyr before they can be added to the App Marketplace. The App Lab review process ensures each application does what it claims to do, does not violate any terms or conditions, and complies with information and cybersecurity requirements. The App Lab review process also ensures that an application does not cause problems for other applications already installed and functioning on a Revelo meter’s EIC card.

D. App Ecosystem Costs

App Developers generally will pay a nominal flat fee per year to Landis + Gyr for their developer license, which includes access to all software necessary to develop an application and the right to submit most applications for review. Extremely large or complex applications may require additional fees for review.

App Publishers generally will agree to share a portion of revenues from purchased applications with Landis+Gyr. The revenue share depends on the application.

The Company understands that some parties have concerns about technological and/or financial restrictions on the ability of third parties to develop applications to be installed on the proposed meters. The Company is willing to commit that it will use commercially reasonable efforts to include terms in its agreements with its meter

vendor that require open and non-discriminatory terms for developing and installing third-party applications on the AMF meters.

If the Company were to procure applications beyond Sense, it would go through its typical Request for Proposal (“RFP”) process to obtain competitive bids and select a vendor to ensure the application meets the Company's and customer needs and fair pricing. The Company would also need to procure the App Manager application to work in conjunction with the Landis+Gyr Command Center Head End System. There are no additional costs for App Studio, App Marketplace, and the Developer Community or to submit an application for review through App Lab. The Company has no plan currently to charge a commission fee on software applications to either ratepayers or software application developers.

E. Governance

Beginning with the rollout of the Sense application during the Rhode Island Energy AMF Program, Rhode Island Energy has the opportunity to implement a digital platform that enables valuable interactions between external producers and consumers. Digital platforms have proven to be highly efficient and productive business models in other industries, and Rhode Island Energy plans to capture these benefits for both customers and the Company through applying this strategy to their utilities operations. Successful digital platforms are durable and improve over time, largely due to a reduction in barriers to entry for vendors, promotion of market-based competition, and availability of assets commonly provided by third parties or end users. With platform capabilities through grid-edge computing taking shape in the advanced metering industry, Rhode Island Energy will work to define an appropriate governance structure based on benchmarking and learnings from early adopters and will be developed in a matter that preserves customer interests and benefits

App developers will all have the same ability to access the developer ecosystem and will be subject to the same requirements during the qualification process in Landis+Gyr’s App Lab. Similarly, all applications will be held to the Company’s cybersecurity and data governance requirements.

F. Cybersecurity and Data Privacy

The Company is committed to addressing data privacy concerns and mitigating cybersecurity risks. Please see Attachment G of the Company’s AMF Business Case for the Company’s Cybersecurity, Data Privacy and Data Governance Plan and Section 10.2 Cyber and Privacy Protections Using Data Governance.

Additionally, the Company’s Privacy Notice outlines the use and disclosure of personal information, which includes law enforcement requests⁵.

In addition, and as mentioned above, the Landis+Gyr Revelo AMF meters utilized in the Company’s AMF Project include three separate hardware-isolated components. Because these components are separated, it ensures the meter’s primary function is not disrupted and ensures cybersecurity susceptibility is not created. Applications complete cybersecurity tests before they are published on the Gridstream Connect App Ecosystem.

III. Conclusion

Rhode Island Energy recognizes that the capabilities of the Landis+Gyr Revelo AMF meters’ grid-edge computing capabilities will drive additional benefits for customers and the grid. This Plan describes those new capabilities and plans to leverage the technology to further drive benefits. The Company looks forward to continued dialogue with interested stakeholders.

⁵ Rhode Island Energy Privacy Notice; <https://www.rienergy.com/site/legal/privacy-notice>

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Adam Ramos

May 12, 2025

The Narragansett Electric Company d/b/a Rhode Island Energy
Docket No. 22-49-EL Advanced Meter Functionality (AMF)
Service list updated 5/14/2025

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