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July 16, 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 No. 25-19-EL - The Narragansett Electric Company d/b/a Rhode Island Energy  
Proposed Green Button Connect, Home Area Network, and Grid Edge Computing  
Responses to Division Data Requests – Set 1**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company"), I have enclosed the Company's responses to the Division of Public Utilities and Carriers' First Set of Data Requests issued in the above-referenced matter.

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", with a long horizontal flourish extending to the right.

Jennifer Brooks Hutchinson

Enclosures

cc: Docket No. 25-19-EL Service List

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 25-19-EL  
In Re: Proposed Green Button Connect, Home Area Network and  
Grid Edge Computing  
Responses to the Division's First Set of Data Requests  
Issued on June 25, 2025

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Division 1-1

Request:

What criteria is RIE creating that third-party vendors must meet in order to be approved? [See GBC Plan, Page 6 of 10].

Response:

The criteria that third-party vendors must meet to be approved to register with the Company's AMF Customer Portal include general and technical fitness.

Rhode Island Energy will review third-party vendors initially to determine their general fitness to receive energy usage data from Rhode Island Energy customers (once a customer consents). This will include a review of the completeness of their application, the service(s) description(s) on their website, and their stated intention with respect to the scope and use of the energy usage data approved to be shared by the customer.

Once general fitness is determined, Rhode Island Energy will screen the vendor for technical fitness. This will include confirming their ability to securely receive the data from the AMF Customer Portal-provided Application Programming Interface (API) in the standard XML-based format. Rhode Island Energy administrators will ensure access security by providing vendors with a unique access token that the third-party vendor will need to use every time it would like to access the approved data.

The Company will inquire back to the third-party vendor with any questions prior to approving or rejecting the application.

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Division 1-2

Request:

What criteria will RIE use to revoke third-party access?

Response:

The Company will review any customer reports related to third-party vendor activity and/or any significant customer disenrollments for a specific third-party vendor. This review will include compiling information and asking questions to both the customer and the third-party vendor to understand the situation and take any necessary actions. The Company can revoke a third-party vendor's access to the AMF Customer Portal at any time and would notify customers who had approved the third-party vendor of such removal.

In addition to the Company's monitoring and revoking of third-party access, customers are also able to revoke access to their data through the AMF Customer Portal at any time if they no longer want to share information with a third-party vendor.

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Division 1-3

Request:

Please explain how customers will know which third-party vendors to sign up for if they must “sign up for Green Button Connect directly from a third-party vendor’s website or application”? [See GBC Plan, Page 7 of 10].

Response:

The Company will include a list of third-party vendors who have been approved by the Company on its website to inform customers with whom it can share its data through the Green Button Connect functionality.

Customers will need to go through the third-party vendor’s website to enroll in Green Button Connect, which will then route the customer to the Company’s AMF Customer Portal through which the customer will be able to approve the scope and timeframe of the data that it will share with the third-party vendor.

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Division 1-4

Request:

With respect to LGE's Green Button Connect (GBC) plan:

- a) When did LGE's GBC plan become operational?
- b) How many residential and commercial customers use the plan?
- c) How many do not?
- d) Provide LGE's assessment of how the plan is working?

Response:

The information provided for this response includes the Company's Kentucky affiliates that were part of the Kentucky AMF deployment, including Louisville Gas & Electric and Kentucky Utilities.

- a) The GBC capabilities became operational June 30, 2023.
- b) 15 customers have used Green Button Connect thus far. The Company has reached out to its vendor to confirm the breakdown of these customers between commercial and residential.
- c) 1,026,907 customers have AMF meters and have not used Green Button Connect.
- d) Green Button Connect functionality was successfully implemented by June 30, 2023 as committed to the Kentucky Public Service Commission. The Company's Kentucky affiliates have promoted the ability to use Green Button in its customer newsletter and on its website, but customer engagement remains minimal.

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Division 1-5

Request:

Do LGE customers participate in a Home Area Network (HAN) Plan? If so, please compare the plan to the plan RIE will be offering in Rhode Island. What has been LGE's customers' experience with the plan?

Response:

LG&E customers can participate in a Home Area Network; however, customers must purchase, register and connect devices that support Zigbee Smart Energy Profile 1.2b to their meters to enable this. Since deployment, approximately 150 customers have registered devices, and LG&E has received no complaints or concerns thus far.

Please note, this will only allow customers to receive near real time data and not load disaggregation insights that Rhode Island Energy customers will have with the Sense application. Rhode Island Energy meters communicate over Wi-Fi, whereas the LG&E meters communicate over Zigbee.

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Division 1-6

Request:

Provide RIE's "communications plan" for RIE's GBC Plan when available.

Response:

The Company's communications plan will include content to educate customers on GBC functionality via different channels such as:

- The Rhode Island Energy Website
- Email Notifications
- Frequently Asked Questions
- Fact Sheets
- Social Media

Please note, the Company will not begin these communications until closer to the Green Button Connect functionality deployment, which is scheduled for the first quarter of 2026. These communications will be shared with stakeholders as they are developed.

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Division 1-7

Request:

Provide RIE's "communications plan" for RIE's HAN Plan when available.

Response:

The Company's communications plan will include content to educate customers on HAN functionality via different channels such as:

- The Rhode Island Energy Website
- Email Notifications
- Frequently Asked Questions
- Fact Sheets
- Social Media

Sense also has a help center on its website that the Company will refer to in its communications that cover a variety of topics and frequently asked questions.

Please note, the Company will not begin these communications until closer to the Sense deployment, which is scheduled for the first quarter of 2026. These communications will be shared with stakeholders as they are developed.



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Division 1-8

Request:

Can RIE's GBC and/or HAN Plans be tailored to provide information for individual customers about: (i) payment assistance, (ii) renewable energy subsidies (iii) demand-side management (iv) demand response, (v) energy efficiency programs (vi) time-varying rates (when implemented)? Please explain.

Response:

The Company's GBC and HAN Plans are aligned with the AMF Business Case and are intended to deliver the functionalities defined by the Green Button Alliance and Sense's current offering.

The data provided by GBC or Sense cannot provide information for individual customers related to items (i) through (vi) in the above request.<sup>1</sup> However, since GBC is a tool that allows customers to share their data with third-party vendors, third-party vendors could provide information related to these topics as part of the services they provide.

In general, the Company's advanced metering and energy efficiency teams meet regularly to discuss the advanced metering project progress, energy efficiency programs and any potential overlaps or benefits. The advanced metering team will provide the energy efficiency team information and communications on GBC and HAN to help customers understand the use and potential benefits of these programs through the energy efficiency team's outreach.

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<sup>1</sup> A proposal for time-varying rates and associated communications to customers will be developed for a future proceeding; revisions to the GBC and HAN Plans proposed within this docket will be appropriately considered at that time.

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Division 1-9

Request:

Will RIE's GBC Plan obtain and maintain Green Button Alliance certification? Please explain.

Response:

The Company received its Green Button Alliance certification Version 3.3 Usage Data and Retail Customer Data on June 27, 2025, after completing all necessary requirements.

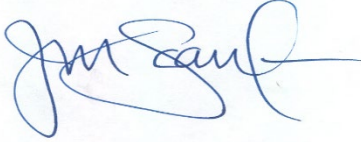
The Company does not need to renew or reapply for this certification unless there are any changes to the product that would affect certification compliance, such as changes to the software, server, standards or ownership.

Please note, while the certification has been received, Green Button Connect will not be available to customers until both (1) the functionality is deployed, which is scheduled for the first quarter of 2026 and (2) an AMF meter has been installed at the customer's premises.

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.



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Joanne M. Scanlon

July 16, 2025  
Date

**The Narragansett Electric Company d/b/a Rhode Island Energy**  
**Docket No. 25-19-EL Proposed Green Button Connect, Home Area Network and Grid**  
**Edge Computing**  
**Service list updated 7/15/2025**

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