

# KEOUGH + SWEENEY, LTD.

ATTORNEYS AND COUNSELORS AT LAW  
41 MENDON AVENUE  
PAWTUCKET, RHODE ISLAND 02861  
**TELEPHONE** (401) 724-3600  
**FACSIMILE** (401) 724-9909  
www.keoughsweeney.com

RAYNHAM OFFICE:  
90 NEW STATE HIGHWAY  
RAYNHAM, MA 02109  
TEL. (508) 822-2813  
FAX (508) 822-2832

**JOSEPH A. KEOUGH JR.\***  
**JEROME V. SWEENEY III\***

**SEAN P. KEOUGH\***

**JEROME V. SWEENEY II**  
**OF COUNSEL**

\*ADMITTED TO PRACTICE IN  
RHODE ISLAND & MASSACHUSETTS

BOSTON OFFICE:  
171 MILK STREET  
SUITE 30  
BOSTON, MA 02109  
TEL. (617) 574-0054  
FAX (617) 451-1914

August 8, 2025

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

***RE: Docket 25-19-EL – In re: The Narragansett Electric Company d/b/a Rhode Island Energy’s Proposed Green Button Connect, Home Area Network, and Grid Edge Computing Plans***

Dear Ms. De La Rosa:

Enclosed please find an original and nine copies of the following:

1. Mission:data Coalition’s Motion To Intervene.

Please note that an electronic copy of this filing has been provided to the service list. Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosures

cc: Service List (via electronic mail)

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**In re: The Narragansett Electric Company  
d/b/a Rhode Island Energy’s Proposed  
Green Button Connect, Home Area  
Network, and Grid Edge Computing Plans**

**Docket No. 25-19-EL**

**MISSION:DATA COALITION’S MOTION TO INTERVENE**

Mission:data Coalition (“Mission:data”) hereby respectfully requests that the State of Rhode Island Public Utilities Commission (“Commission”) grant Mission:data intervener status in the above-referenced Docket pursuant to 810-RICR-00-00-1.14. The reasons for intervention are set forth below.

**I. BACKGROUND – MISSION:DATA**

1. Mission:data is a not-for-profit organization organized as a social welfare organization under section 501(c)(4) of the Internal Revenue Code that is focused on advancing policies that improve customers’ access to, and utilization of, their own energy-related data.
2. Mission:data has members and supporters that work in the field of energy management or distributed energy resources (“DERs”) more broadly.
3. Mission:data member companies provide energy-related products and services to residential, commercial and industrial customers, including demand response, bill management, virtual energy audits, virtual power plants, environment/social/governance reporting, electricity demand forecasting, rooftop solar, advanced measurement and verification, and many others.
4. Mission:data is also funded by charitable donations from individuals and foundations.

5. Although Mission:data’s corporate supporters aid its research and advocacy work in various ways, Mission:data is an independent legal entity with an independent board of directors.<sup>1</sup>
6. As such, Mission:data does not claim to represent its supporters or their direct interests; instead, Mission:data relies on their expertise and input to inform its own positions and strategic decisions as to when and where to engage in addressing critical questions regarding energy management across the country.
7. In support of these public-interest purposes, Mission:data’s activities across the country include conducting research, publishing reports, learning from practitioners as to best practices in the field of “data portability,” and advocating at the state level for policies that help achieve these objectives.
8. To date, Mission:data has intervened in 14 states and the District of Columbia, and data portability policies governing over 41 million electric meters nationwide have been established by its productive engagement with state regulatory commissions and interested stakeholders.
9. This includes Mission:data’s participation as an intervener in Commission Docket No. 22-49-EL as addressed herein below.

## **II. PROCEDURAL HISTORY – DOCKET 22-49-EL**

10. On November 18, 2022, The Narragansett Electric Company d/b/a Rhode Island Energy (“RI Energy” or “Company”) filed with the Commission an Advanced Metering Functionality (“AMF”) Business Case to support its proposed investment plan to replace the current automated metering reading (“AMR”) system and an accompanying new cost recovery mechanism.

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<sup>1</sup> For a list of corporate supporters, please see Mission:data’s website at [www.missiondata.io](http://www.missiondata.io)

11. In its filing, RI Energy explained that:

“AMF refers to the functionality provided by advanced meters, also referred to as smart meters, while AMR refers to the presently used metering systems solution in Rhode Island to collect billing information with a “drive-by” technology. AMF is a broader concept than Advanced Metering Infrastructure (AMI); AMI commonly refers only to the smart meters themselves. AMF refers to the functionality that comes from the broader deployment of hardware and software solutions needed to utilize the smart meter data in a timely and efficient manner.”<sup>2</sup>

12. In Docket 22-49-EL, Mission:data was granted intervener status to address “...the financial and technological aspects of the AMF proposal which relate to Green Button Connect, the Home Area Network, and whether and how the proposed advanced metering functionality affects the market for third party energy management services.” (See Report And Order No. 25353, p. 24)

13. On September 27, 2023, the Commission approved RI Energy’s AMF Business Case as memorialized in its Docket 22-49-EL Report And Order.

14. In its Report and Order, the Commission noted that:

“The second area [of post AMF implementation accountability metrics] focuses on planning and transparency related to customer-facing technologies, specifically addressing functionalities provided by Green Button Connect, Home Area Networks, and Grid Edge Computing, which are intended to enhance customer access to energy data and facilitate integration with third-party technologies. The Company’s proposals, consistent with Ordering paragraph 16, shall be filed within two months of the start of meter installation and will be considered in a contested case. It will be important to understand the technical issues around data governance and customer access to data. Some parties advocated for a formal stakeholder proceeding to define these items but the Commission, while encouraging stakeholder outreach, declines to order the creation of a formalized group, instead preferring an initial filing and responsive filings to ensure full transparency that can get lost in a settlement.” (See Report And Order No. 25353, p. 22)

15. As such, the Commission ordered that:

“16. Within two months of the start of meter installation, The Narragansett Electric Company d/b/a Rhode Island Energy must file plans that address Green Button Connect, Home Area Network, and Grid Edge Computing, as described below. The company may consult with

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<sup>2</sup> RI Energy Filing, Book 2, at Bates page 1, n.2.

any stakeholder deemed necessary, but the plan must be filed by the company and will be reviewed by the Commission in a contested proceeding.” (See Report And Order No. 25353, p. 27)

16. Pursuant to this Order, RI Energy submitted its Green Button Connect, Home Area Network, and Grid Edge Computing plans to the Commission on May 12, 2025 in the above captioned Docket (25-19-EL).

### **III. LEGAL STANDARD**

17. Intervention in Commission proceedings is governed by 810-RICR-00-00-1.14, which 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).
18. The Commission may grant the motion to intervene when (1) the right of intervention is conferred by statute, (2) a movant may be bound the Commission’s action in the proceeding and its interests are not adequately represented by existing parties, or (3) the movant’s intervention is in the public interest. See 810-RICR-00-00-1.14(B)(1) through (3).

### **IV. ARGUMENT**

19. Mission:data’s intervention in this Docket is appropriate, as its interests in this Docket are not adequately represented by existing parties.
20. Furthermore, Mission:data’s intervention is in the public interest. Ensuring that customers are able to choose from a wide range of energy management services available on the market fairly, helps ratepayers and the State of Rhode Island achieve their energy affordability and carbon mitigation goals.
21. As the Commission’s Docket 22-49-EL Report And Order noted “...Rhode Island is in the minority of states that have not yet switched over to AMI.” (See Order No. 25353, p. 3)

22. Many of Mission:data’s members are active in Rhode Island and have customers in Rhode Island. The ability of these members to serve customers in Rhode Island both now and in the future depends upon the policies and methods for accessing customer data with customer permission that are at issue in the present docket.
23. As noted above, Mission:data was granted intervener status in Docket 22-49-EL to address “...the financial and technological aspects of the AMF proposal which relate to Green Button Connect, the Home Area Network, and whether and how the proposed advanced metering functionality affects the market for third party energy management services.”
24. In this Docket (25-19-EL), RI Energy’s specific Green Button Connect, Home Area Network and Grid Edge Computing plans will be examined by the Commission.
25. As the Commission noted in Docket 22-49-EL, “It will be important to understand the technical issues around data governance and customer access to data.” (*See Report And Order No. 25353, p. 22*)
26. Further, as noted in the Docket 22-49-EL Report And Order, RI Energy’s witness acknowledged:
- “The new processes will not be instantaneous. Mr. Freitas explained that actually learning how to efficiently use the vast amounts of expected data can be challenging. He stated that “high volume data is always a challenge. You have to really design the human interface with the ADMS so it's optimal for the folks that operate the system.” He advised that the Company would rely on vendors, peer review, and visits with other utilities to learn how they are integrating and using the new data to operate their system.” (*See Report And Order No. 25353, p. 8, internal footnotes omitted*)
27. Mission:data’s purpose is to support a class that is often under-represented in state regulatory proceedings such as this one: energy management organizations and technologies that wish to serve Rhode Island ratepayers through the permission-based analysis of customer energy data.

28. Mission:data’s advocacy in this area has been consistent since its founding in 2013, when it adopted two key principles: (1) consumers should have easy control over their energy information, including the ability to have such information shared electronically with the energy management service provider of their choice; and (2) energy usage and pricing information should be available according to nationally recognized standards and best practices.
29. These interests are not adequately represented by other parties in this Docket, and it is in the public interest that such interests are represented.
30. In this Docket, the Commission will examine numerous technical and policy matters. These include Green Button Connect, which is a technical standard for consumers to share their energy-related data with third parties of their choice; data governance and cybersecurity; the latency of meter readings being available to consumers and the Customer Portal, both of which affect how effectively consumers and their devices can respond to price or consumption signals; the sufficiency of the energy data provided by RI Energy for demand response aggregators to participate in wholesale markets operated by ISO New England; and the Home Area Network (“HAN”), which provides real-time usage data to certain types of eligible devices.
31. Mission:data member companies provide services that receive customer data via Green Button Connect and HAN. Mission:data member companies could also provide software applications to run on the Grid Edge Computing capabilities on advanced meters. For these reasons, Mission:data members will be directly impacted by the outcomes of this proceeding.
32. Mission:data has been deeply involved in the development of “data portability” proceedings at other state commissions across the country.

33. As noted above, Mission:data has intervened in 14 states and the District of Columbia, and data portability policies governing over 41 million electric meters nationwide have been influenced by its productive engagement with state regulatory commissions and interested stakeholders.
34. Through formal participation in this proceeding, Mission:data can assist in developing a robust record and incorporating lessons learned from other jurisdictions with regard to data portability, privacy, fair competition, and access to energy management services.

### **V. CONCLUSION**

For the foregoing reasons, Mission:data Coalition hereby requests that the State of Rhode Island Public Utilities Commission grant its motion to intervene as a full party in this Docket.

Mission:data Coalition  
By its Attorney,



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Joseph A. Keough, Jr., Esquire (#4925)  
KEOUGH & SWEENEY, LTD.  
41 Mendon Avenue  
Pawtucket, RI 02861  
(401) 724-3600  
Fax (401) 724-9909  
E-Mail: [jkeoughjr@keoughsweeney.com](mailto:jkeoughjr@keoughsweeney.com)

Dated: August 8, 2025

## CERTIFICATION

I hereby certify that on August 8, 2025, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Stephanie De La Rosa, Commission Clerk, by electronic mail and hand delivery.

Name/Address	E-mail Distribution List	Phone
<b>The Narragansett Electric Company d/b/a Rhode Island Energy</b>  Jennifer Hutchinson, Esq. 280 Melrose Street Providence, RI 02907	<a href="mailto:JHutchinson@pplweb.com">JHutchinson@pplweb.com</a> ;	401-316-7429
	<a href="mailto:JScanlon@pplweb.com">JScanlon@pplweb.com</a> ;	
	<a href="mailto:COBrien@pplweb.com">COBrien@pplweb.com</a> ;	
	<a href="mailto:SBriggs@pplweb.com">SBriggs@pplweb.com</a> ;	
	<a href="mailto:PDCapwell@RIEnergy.com">PDCapwell@RIEnergy.com</a> ;	
	<a href="mailto:CAGill@RIEnergy.com">CAGill@RIEnergy.com</a> ;	
	<a href="mailto:NABegnal@RIEnergy.com">NABegnal@RIEnergy.com</a> ;	
	<a href="mailto:WJHennegan@pplweb.com">WJHennegan@pplweb.com</a> ;	
	<a href="mailto:EMcCord@RIEnergy.com">EMcCord@RIEnergy.com</a> ;	
	<a href="mailto:JOliveira@pplweb.com">JOliveira@pplweb.com</a> ;	
	<a href="mailto:BESchuster@RIEnergy.com">BESchuster@RIEnergy.com</a> ;	
<a href="mailto:PJWalnock@pplweb.com">PJWalnock@pplweb.com</a> ;		
<b>Hinckley Allen</b> Adam Ramos, Esq. 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	<a href="mailto:aramos@hinckleyallen.com">aramos@hinckleyallen.com</a> ;	401-457-5164
	<a href="mailto:AGiron@hinckleyallen.com">AGiron@hinckleyallen.com</a> ;	
	<a href="mailto:cdieter@hinckleyallen.com">cdieter@hinckleyallen.com</a> ;	
	<a href="mailto:ssuh@hinckleyallen.com">ssuh@hinckleyallen.com</a> ;	
<b>Division of Public Utilities (Division)</b> Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov</a> ;	401-780-2177
	<a href="mailto:Christy.Hetherington@dpuc.ri.gov">Christy.Hetherington@dpuc.ri.gov</a> ;	
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ;	
	<a href="mailto:Joel.munoz@dpuc.ri.gov">Joel.munoz@dpuc.ri.gov</a> ;	
	<a href="mailto:Linda.George@dpuc.ri.gov">Linda.George@dpuc.ri.gov</a> ;	
	<a href="mailto:Ellen.golde@dpuc.ri.gov">Ellen.golde@dpuc.ri.gov</a> ;	
	<a href="mailto:Machaela.Seaton@dpuc.ri.gov">Machaela.Seaton@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov</a> ;	
	<a href="mailto:Leo.Wold@dpuc.ri.gov">Leo.Wold@dpuc.ri.gov</a> ;	
	<a href="mailto:mark.a.simpkins@dpuc.ri.gov">mark.a.simpkins@dpuc.ri.gov</a> ;	
	<a href="mailto:kyle.j.lynch@dpuc.ri.gov">kyle.j.lynch@dpuc.ri.gov</a> ;	
	<a href="mailto:gregory.schultz@dpuc.ri.gov">gregory.schultz@dpuc.ri.gov</a> ;	
	<a href="mailto:Thomas.kogut@dpuc.ri.gov">Thomas.kogut@dpuc.ri.gov</a> ;	
<a href="mailto:john.r.harrington@dpuc.ri.gov">john.r.harrington@dpuc.ri.gov</a> ;		

	<a href="mailto:Nicole.M.Corbin@dpuc.ri.gov">Nicole.M.Corbin@dpuc.ri.gov</a> ;	
Mike Brennan	<a href="mailto:mikebrennan099@gmail.com">mikebrennan099@gmail.com</a> ;	
Robin Blanton	<a href="mailto:robin.blanton@ieee.org">robin.blanton@ieee.org</a> ;	
William Watson	<a href="mailto:wfwatson924@gmail.com">wfwatson924@gmail.com</a> ;	
David Littell	<a href="mailto:dlittell@bernsteinshur.com">dlittell@bernsteinshur.com</a> ;	
Gregory L. Booth, PLLC 14460 Falls of Neuse Rd. Suite 149-110 Raleigh, NC 27614	<a href="mailto:gboothpe@gmail.com">gboothpe@gmail.com</a> ;	
Linda Kushner L. Kushner Consulting, LLC 514 Daniels St. #254 Raleigh, NC 27605	<a href="mailto:lkushner33@gmail.com">lkushner33@gmail.com</a> ;	
<b>Office of Attorney General</b> Nick Vaz, Esq. 150 South Main St. Providence, RI 02903	<a href="mailto:nvaz@riag.ri.gov">nvaz@riag.ri.gov</a> ; <a href="mailto:mbedell@riag.ri.gov">mbedell@riag.ri.gov</a> ;	401-274-4400 x 2297
<b>Office of Energy Resources (OER)</b> Adam Fague, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 <sup>th</sup> Floor Providence, RI 02908  Chris Kearns, OER	<a href="mailto:adam.fague@doa.ri.gov">adam.fague@doa.ri.gov</a> ; <a href="mailto:nancy.russolino@doa.ri.gov">nancy.russolino@doa.ri.gov</a> ; <a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ; <a href="mailto:Shauna.Beland@energy.ri.gov">Shauna.Beland@energy.ri.gov</a> ; <a href="mailto:Steven.Chybowski@energy.ri.gov">Steven.Chybowski@energy.ri.gov</a> ; <a href="mailto:Nathan.Cleveland@energy.ri.gov">Nathan.Cleveland@energy.ri.gov</a> ; <a href="mailto:William.Owen@energy.ri.gov">William.Owen@energy.ri.gov</a> ;	401-222-8880
<b>George Wiley Center</b> Jennifer L. Wood, Executive Director R.I. Center for Justice 1 Empire Plaza, Suite 410 Providence, RI 02903	<a href="mailto:jwood@centerforjustice.org">jwood@centerforjustice.org</a> ; <a href="mailto:georgewileycenterri@gmail.com">georgewileycenterri@gmail.com</a> ; <a href="mailto:camiloviveiros@gmail.com">camiloviveiros@gmail.com</a> ;	
<b>NRG Retail Companies</b> Craig Waksler, Esq. Eckert Seamans Cherin & Mellott, LLC Two International Place, 16 <sup>th</sup> Floor Boston, MA 02110	<a href="mailto:CWaksler@eckertseamans.com">CWaksler@eckertseamans.com</a> ; <a href="mailto:sstoner@eckertseamans.com">sstoner@eckertseamans.com</a> ;	617-342-6890  717-237-6000
<b>Conservation Law Foundation (CLF)</b> James Crowley, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	<a href="mailto:jcrowley@clf.org">jcrowley@clf.org</a> ; <a href="mailto:jrhodes@clf.org">jrhodes@clf.org</a> ;	401-228-1905
<b>Original &amp; 9 copies file w/ PUC:</b> Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd.	<a href="mailto:Stephanie.DeLaRosa@puc.ri.gov">Stephanie.DeLaRosa@puc.ri.gov</a> ; <a href="mailto:jordan.sasa@puc.ri.gov">jordan.sasa@puc.ri.gov</a> ; <a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	401-780-2107

Warwick, RI 02888	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:Christopher.Caramello@puc.ri.gov">Christopher.Caramello@puc.ri.gov</a> ;	
	<a href="mailto:kristen.l.masse@puc.ri.gov">kristen.l.masse@puc.ri.gov</a> ;	
<b>Interested Parties:</b>		
Victoria Scott (GOV)	<a href="mailto:Victoria.Scott@governor.ri.gov">Victoria.Scott@governor.ri.gov</a> ;	
Seth Handy, Esq.	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	
Mary McMahon	<a href="mailto:mmcmahon@seadvantage.com">mmcmahon@seadvantage.com</a> ;	
Jim Kennerly	<a href="mailto:jgifford@seadvantage.com">jgifford@seadvantage.com</a> ;	
Amy Boyd, RI Director, Acadia Center	<a href="mailto:aboyd@acadiacenter.org">aboyd@acadiacenter.org</a> ;	401-276-0600
Amanda Barker	<a href="mailto:amanda@greenenergyconsumers.org">amanda@greenenergyconsumers.org</a> ;	
Larry Chretien	<a href="mailto:larry@greenenergyconsumers.org">larry@greenenergyconsumers.org</a> ;	
Nancy Lavin	<a href="mailto:nlavin@rhodeislandcurrent.com">nlavin@rhodeislandcurrent.com</a> ;	
Kelly Crandall	<a href="mailto:kelly@utilityapi.com">kelly@utilityapi.com</a>	

---

Joseph A. Keough, Jr., Esquire (#4925)  
KEOUGH & SWEENEY, LTD.  
41 Mendon Avenue  
Pawtucket, RI 02861  
(401) 724-3600  
Fax (401) 724-9909  
E-Mail: [jkeoughjr@keoughsweeney.com](mailto:jkeoughjr@keoughsweeney.com)