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September 17, 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 CLF Data Requests – Set 1 (Complete Set)**

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 complete set of responses to the Conservation Law Foundation’s First Set of Data Requests (“CLF Set 1”) for posting to the Commission’s website in the above-referenced matter.

This transmittal contains the Company’s responses to the remaining data requests in CLF Set 1: CLF 1-8, CLF 1-11, CLF 1-12, and CLF 1-16.

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

CLF 1-1
Green Button Connect

Request:

See the Company's filing at 3: "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."

- a. What did the Company do to assess the cost to include natural gas usage in GBC? Please provide specifics.
- b. Please provide an estimated cost and implementation timeframe to include natural gas usage in GBC.
- c. Please provide a reference to the Green Button standard or any other technical documents used by the Company to conclude that GBC requires interval meter reads in order to include electric or gas usage information.
- d. Was the Company aware that the Green Button standard supports gas meter readings of *any* time interval because it is measured in seconds, i.e., 86,400 seconds = 1 day, 2,592,000 seconds = 30 days?

Response:

- a. Since natural gas was not in the scope for the AMF project, the Company did not assess the costs to include natural gas usage in GBC.

As an additional note, Green Button Download is currently available for gas customers and will remain available. Gas customers can download and send to third-party vendors their usage data in both XML and CSV format.

- b. The Company does not have an estimated cost nor an implementation timeframe to include natural gas usage in GBC since this is not part of the AMF project scope.
- c. This question contains an inaccurate assumption. The Company did not conclude that GBC requires interval meter reads. Monthly usage reads can be provided through Green Button Connect. However, as mentioned in part (a), natural gas was not in scope for the AMF project. Green Button Download is currently available for gas customers and will remain available. Gas customers can download their usage data in both XML and CSV format and send to third-party vendors.

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- d. Yes, the Company is aware that monthly gas usage data could be provided through Green Button Connect. However, as mentioned in part (a), Green Button Download is currently available for gas customers and will remain available. Gas customers can download their usage data in both XML and CSV format and send to third-party vendors if needed.

CLF 1-2
Green Button Connect

Request:

See the Company's filing at 4, footnote 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." Suppose in July 2026 a customer attempts to share their data via GBC. The customer has only had an advanced meter for one month, but the customer has held an active electric account at the same location for several years. Will the Company provide monthly usage readings via GBC for the period *before* an advanced meter was installed on the customer's premises? If not, why not?

Response:

Yes, a customer's monthly usage readings can be provided through Green Button Connect when full interval data is unavailable for the requested period. Customers will have approximately three years of historical monthly usage data available to share via Green Button Connect when the functionality becomes available and will be able to share up to 10 years of monthly usage data once that amount is collected.

CLF 1-3
Green Button Connect

Request:

See the Company's filing at 6: "The Company is creating a set of criteria that the third-party vendors must meet in order to be approved." Additionally, in response to Data Request Division 1-1, RI Energy indicates that it intends to apply criteria to evaluate a third-party vendor's "general fitness" and "technical fitness."

- a. Does the company have a draft or other preliminary set of criteria that it is considering using in evaluating customer-authorized third-party vendors? If so, please provide it.
- b. What is the RI Energy's reason for evaluating "general fitness"? How does the Company propose to do such an evaluation objectively?
- c. For what purpose does RI Energy need to evaluate a customer-authorized vendor's scope of energy usage data requested?
- d. For what purpose does RI Energy need to evaluate a customer-authorized vendor's intended use of the customer's energy usage data?
- e. Would the Company support the idea of a Commission-approved tariff governing the criteria that third party vendors must meet?

Subsections (e)(i) through (iii), (f) and (g) of this request were withdrawn.

Response:

- a. The Company is working on a draft preliminary set of criteria that it will use to evaluate third-party vendors. The primary goal of creating the criteria is to ensure that the third-party vendors have (1) the technical capability to receive the data and (2) a completed application with all necessary information.
- b. As described the Company's response to Division 1-1 and in part (a), above, general fitness is to confirm that the third-party vendor has both the technical capability and a completed application on file to ensure that a third-party vendor can receive the customer data and provide the analysis and insights to customers that it says it can. This will include a review of the completeness of their application, the service(s)

CLF 1-3, page 2

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.

- c. As described in part (b), during the application process the Company will assess the third-party vendor's technical capability to receive customer data and deliver the analysis and insights that it says it will. As part of the application process, the application also will require the third-party vendor to provide both the information (function blocks) and intervals of data it would like to receive when filling out the scope of energy usage data fields. The Company needs this information to ensure the correct data is shared with the third-party vendor. Following review and approval of the third-party vendor's application, the third-party vendor will have access to GBC. No third-party vendor can be "customer-authorized" until after review and approval of the application by the Company. Once the Company has confirmed the third-party vendor's technical capability to receive the customer data, the customer will have sole authority for determining the scope of data actually provided to the third-party vendor.
- d. Please see the Company's responses to parts (b) and (c). Additionally, the Company will discuss with the third-party vendor if the Company does not believe the data will provide the insights that the third-party vendor intends to share with the customer.
- e. As described in parts (a)-(d) above, the Company's review of the third-party vendors is intended to ensure that the vendors have the technical requirements in place to receive customer data and can deliver the intended insights. Additionally, when the Company reviews third-party vendor applications, it will ensure alignment with the corporate policies found in the AMF Data Governance Plan in Docket 22-49-EL Attachment G, Section B, which the Company provided as part of the AMF Business case. Given the technical nature of these requirements and the review of GBC in both the AMF Business case and this docket, the Company does not consider a specific tariff governing these criteria to be necessary.

CLF 1-4
Green Button Connect

Request:

See the Company's filing at 6: "The Company can revoke third-party access at any time if suspicious activity is detected or reported by customers."

- a. Please provide details on what constitutes "suspicious activity."
- b. What elements of due process will the Company commit to in order to ensure that a third-party vendor's access is not revoked in error, e.g., unsubstantiated accusations, human error, computer error, etc.? Please be specific.
- c. Would the Company's unilateral revocation of third-party access affect only the data for the particular customer who made a complaint, or would it result in shutting off third-party access to all customers who had granted their authorization? Please explain.
- d. If the Company revokes access and then reinstates it, will the third party need to seek re-authorization from all of their customers in order to receive data via GBC?
- e. Will the Company provide notice to the Commission or Division when a third-party's access has been revoked?
- f. List all communications the Company will have with customers when a third-party's access is revoked and provide a sample of each communication. For example, please provide the communication that the third party will receive when a third-party's access has been revoked, and the communication that the customer will receive when a third-party's access has been reinstated after a suspension.
- g. Regarding the Company's operation of Green Button Connect, can you confirm that the Company is responsible for sharing customer data only when the account holder has granted their authorization.

Response:

- a. Please see the Company's response to data request PUC 1-15.

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- b. Please see the Company's response to data request Division 1-2 regarding the Company's process for revoking third-party access. The Company's Green Button Connect administrator will not revoke a third party's access until he or she has reviewed and found that any reports or instances are valid, completed a peer check and notified his or her manager.

In addition to the above steps, the Company's Green Button Connect administrator will communicate with the customer who reported the complaint and the third party about the review to attempt to understand the issues.

- c. Please see the Company's response to data request Division 1-2 and subpart (b) above regarding the Company's process for revoking third-party access. If upon completion of the investigation described, the Company revoked a third-party vendor's access to the AMF Customer Portal, that revocation would halt data-sharing for all customers who had enrolled with that third-party vendor.
- d. If the Company revokes and then reinstates access to a third-party vendor for Green Button Connect, all customers who had previously shared access to their data with the third-party vendor would be automatically reenrolled.
- e. The Company does not intend to notify the Commission or Division when a third-party's access has been revoked. The Company will follow the process described in response to data request Division 1-2 and subpart (b) above, which will include notifying the third-party vendor of the revocation.
- f. The Company would handle each situation on a case-by-case basis following the process described in response to data request Division 1-2 and subpart (b) above and does not have any sample communications currently available. The Company will have a designated Green Button Connect administrator who will handle communications with third-party vendors if a review of their activity is warranted and access is revoked and will also handle communications with customers if access has been reinstated after a suspension.
- g. Yes. Customers must proactively enroll on a third-party vendor's website which then routes them to the AMF Customer Portal to consent to their data being shared.

CLF 1-5
Green Button Connect

Request:

See the Company's filing at 8-9 regarding specific customer data available via GBC.

- a. ISO-NE requires demand response resources to provide the account number, premise address, a copy of the utility bill from the last six months, and the customer's load zone and demand response aggregation zone (see, e.g., ISO-NE's Customer and Asset Management System (CAMS), available at https://www.iso-ne.com/static-assets/documents/support/user_guides/cams_da_dr_maint_ug.pdf). Why is the Company not proposing to include this information in Green Button Connect?
- b. Has the Company evaluated the costs of including the information in (a) above in GBC? If so, please provide the costs. If not, please explain why not.
- c. Will the usage data (whether monthly or interval) in GBC be billing-quality? If not, please explain why not.
- d. How can multi-site commercial customers make use of GBC if the Company is not providing account numbers or premise addresses? How are third party vendors supposed to know which metered usage applies to which location? Please explain.

Response:

- a. The Green Button Connect functionality only allows certain data fields to be transferred via token to the third-party vendor. These data fields, otherwise known as "function blocks" are specifically determined by the Green Button Alliance. As part of the AMF project, the Company is implementing function blocks that are part of the Energy Usage Information schema.

Account number, premise address, a copy of the utility bill from the last six months, and the customer's load zone and demand response aggregation zone are not function blocks within the Energy Usage Information schema; therefore, this information is not able to be transmitted via Green Button Connect.

Please note, a customer could still provide this information as part of the enrollment process on the third-party vendor's website.

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- b. The Company did not evaluate the costs of including the information in (a) since this is not part of the AMF project scope, which aligns with the scope that the Company's Kentucky affiliates have implemented for Green Button Connect. In addition, the Company's Green Button Connect vendor currently only has the capability to share information that is part of the Energy Usage Information schema, which does not include the items listed above.
- c. Yes, the usage data provided in Green Button Connect will be billing-quality, except for the data that is shared the same day it is used. This data is validated overnight and would then be billing quality the subsequent day.
- d. When multi-site commercial customers enroll in Green Button Connect, information for all their premises under their account will be shared with the third-party vendor. The third-party vendor will be able to differentiate the premises by the different meter numbers.

CLF 1-6
Green Button Connect

Request:

See the Company's filing at 9: "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. Thirteen months of interval data represents the historical interval data stored and available in the AMF Customer Portal..."

- a. Did the Company develop a cost estimate for storing 24 or 36 months of electric interval data? If so, please provide it. If not, please explain why not.
- b. Is the interval usage data provided in the AMF Customer Portal identical to the interval usage data provided via GBC? If there are any discrepancies between the two, please explain the frequency and magnitude of the discrepancies.

Response:

- a. The Company did not develop a cost estimate for storing 24 or 36 months of electric interval data. The Company included a cost estimate for storing 13 months of interval data in the AMF Business Case, which allows a customer to compare their usage from the same month a year prior.

Additionally, a customer will have the option to download and save interval data to accumulate a longer time period of interval data.

- b. Yes. The interval usage data provided in the AMF Customer Portal is identical to the interval usage data provided via Green Button Connect.

CLF 1-7
Green Button Connect

Request:

See the Company's filing at 9: "The Company has not identified any other customer specific data beyond these two items that are available but not provided."

- a. What about billing line items?
- b. What about the supplier's name or supply costs?
- c. What about the applicable rate or rate code?
- d. What about the customer's participation in a bill repayment program?

Response:

The Green Button Connect functionality only allows certain data fields to be transferred via token to the third-party vendor. These data fields, otherwise known as function blocks, are specifically determined by the Green Button Alliance.

As part of the AMF project, the Company is implementing function blocks that are part of the Energy Usage Information schema. For all the items listed in (a), (b), (c), and (d), these are not function blocks within the Energy Usage Information schema; therefore, this information is not able to be transmitted via Green Button Connect.

CLF 1-8
Green Button Connect

Request:

Regarding billing-quality usage data:

- a. For customers using an alternative supplier, will the Company provide customer- specific interval data to ISO-NE for settlement?
- b. If not, please explain why not, and please explain when and by whom the decision was made.

Revised Request:

With respect to the quality of data available through GBC, will the Company be providing customers and authorized third parties with an indicator of the quality of data for each 15-minute interval? As the data goes through the validation, editing and estimation process, is the data being provided through GBC being updated, including a notation so that end recipients are aware of the quality?

Response:

Please see the Company's response to Data Request CLF 1-5 (c) that outlines the timing and quality of the data that will be shared via Green Button Connect. The data within Green Button Connect will not specifically indicate the quality of each 15-minute interval or include a notation indicating that the data has gone through the validation, editing and estimation process.

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CLF 1-9
Green Button Connect

In response to Rhode Island Energy's objection on August 18, 2025 to certain data requests contained in the Conservation Law Foundation's First Set of Data Requests in this docket, CLF agreed to withdraw Data Request CLF 1-9.

CLF 1-10
Green Button Connect

Request:

Regarding the communication plan:

- a. What is the company's communication plan for customer support requests that are not addressed in pre-written documents?
- b. Will the communication content include a single point of contact for customers and third parties in need of assistance? Who will be the point of contact?
- c. Does the company have a budget to update the communication documents as there are program or technical process changes?

Response:

- a. The Company's contact center will be equipped with frequently asked questions related to Green Button Connect. If a customer's question needs to be escalated, the Company's designated Green Button Connect Administrator will be responsible for answering any additional customer support requests.

The Company will also review any documents it creates for customers related to Green Button Connect and update them for any changes or areas where more questions are being asked.

- b. As mentioned in part (a), the Company's contact center will be equipped with frequently asked questions related to Green Button Connect. If a customer's question needs to be escalated, the Company's designated Green Button Connect Administrator will be responsible for answering any additional customer support requests.
- c. Any updates to communications documents during the AMF deployment are part of the O&M project budget. Business as usual costs after the project would be captured and recovered as typical O&M costs.

CLF 1-11
Green Button Connect

Request:

Regarding customer program opportunities:

- a. Are there any customer billing plans or programs that, if a customer is enrolled, would disqualify the customer from joining a demand response program? If there are, please list all plans, programs or scenarios that are disqualifying.

Revised Request:

Will GBC export include whether the customer is participating in a billing plan or payment program? The GBC Plan, pages 8-9, does not put this information into either category.

Response:

The Green Button Connect functionality only allows certain data fields to be transferred via token to the third-party vendor. These data fields, otherwise known as "function blocks," are specifically determined by the Green Button Alliance. As part of the AMF project, the Company is implementing function blocks that are part of the Energy Usage Information schema.

Billing plan or payment program participation are not function blocks within the Energy Usage Information schema; therefore, this information is not able to be transmitted via Green Button Connect.

Please note, a customer could still provide this information as part of the enrollment process on the third-party vendor's website.

CLF 1-12
Home Area Network / Wi-Fi

Revised Request:

See the Company's HAN filing at 2: "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."

- a. Please confirm that the Company's proposal is that Sense is the *exclusive* technology provider and that no other vendor will be able to use the Wi-Fi capabilities of advanced meters. If the Company's answer is anything other than unqualified confirmation, please explain.
- b. Please provide Sense's terms and conditions to which customers must agree.
- c. Will the terms and conditions in the Sense mobile application be approved by the Commission? Why or why not?
- d. What prevents Sense from unilaterally modifying their terms and conditions on Rhode Island customers at some point in the future?
- e. Please provide technical documentation on the communication protocols and application programming interfaces by which the Sense app receives real-time usage data from the meter over Wi-Fi.
- f. Will the Company commit to support the connection of other, non-Sense devices to advanced meters over Wi-Fi so that customers can make use of their real-time usage data? Why or why not?

Subsections g. and h. have been withdrawn.

Response:

- a. While the Company has decided to deploy Sense as part of its AMF project, this does not mean it is the exclusive technology provider and that no other vendor will be able to use the Wi-Fi capabilities of advanced meters.

In the future, the Company could provide other applications for customers to use which would allow the vendor to use the Wi-Fi capabilities of advanced meters.

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- b. Sense's terms and conditions can be found on its website <https://sense.com/legal/>.
- c. No, the terms and conditions in the Sense mobile application will not be approved by the Public Utilities Commission ("Commission"). The Commission does not have direct regulation over Sense and its terms and conditions but rather through its regulatory authority over the Company.
- d. Sense could modify its terms and conditions in the future and is obligated contractually to notify the Company of any changes. Sense's current policy is also to notify customers when its terms and conditions change.
- e. The Company does not have the requested documentation. To clarify, Sense does not receive real-time usage data from the meter over Wi-Fi. Sense runs as a native application on the meter and usage data is processed on the meter itself. Sense run-time analysis, real-time disaggregation, and event detection is performed locally on the device, not by transmitting usage data from the meter to a cloud environment. When a customer connects their meter to Wi-Fi and opts in to using Sense, the application is then able to present the customer's processed usage data in the Sense mobile experience in real-time.
- f. The Company will determine whether to put additional applications on the meters on a case-by-case basis. At this point, the Company is only offering the Sense application; however, the Company could review and assess other applications that will be available to customers in the future. Before customers can download an application and use it, the Company must first approve and install the applications onto the meter.

CLF 1-13
Home Area Network / Wi-Fi

Request:

See the Company's HAN filing at 6: "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."

- a. If a customer wants their real-time usage and/or disaggregation information shared from the Sense Cloud to another provider, does Sense or the Company provide a way to do that? Please provide screenshots, documentation, and a description of the process and requirements for doing so.
- b. If a customer wants their real-time usage and/or disaggregation information shared from the Sense Cloud to another provider, what contractual mechanisms does the Company have to ensure that Sense's functionality, costs, or terms applicable to customers and third parties will be fair, reasonable, and subject to review by the Commission?
- c. Will the Company agree that there should be no charges, whether charged by the Company or Sense, to customers or to customer-authorized third parties to receive customer data via the Sense Cloud with customer authorization? Why or why not?

Response:

- a. Sense will assist customers with sharing their real-time usage and/or disaggregation data with other providers. The customer will have to make a specific request to Sense for this to be completed.

Since this is not part of the scope of the Sense deployment within the AMF project, the Company does not have any screenshots, documentation, or a description of the process and requirements for doing so.

- b. As described in part (a), any such request will be completed by Sense on an ad hoc basis between the customer and Sense, without the Company's involvement.
- c. As part of the AMF project, the Company is providing both Sense and Green Button Connect to customers at no additional cost. The Sense application will provide customers with both real time data and load disaggregation insights. The Green Button Connect

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functionality allows customers to share their usage data with third-party vendors, once those vendors have completed an application with the Company.

If customers would like to share their usage data with third parties, the Company recommends using the Green Button Connect functionality, and the customers will incur no additional cost to do so. As described in parts (a) and (b), Sense can help customers share their data with other providers, but this would be coordinated directly between Sense and the customer, without any involvement of the Company.

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CLF 1-14
Home Area Network / Wi-Fi

In response to Rhode Island Energy's objection on August 18, 2025 to certain data requests contained in the Conservation Law Foundation's First Set of Data Requests in this docket, CLF agreed to withdraw Data Request CLF 1-14.

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CLF 1-15
Grid Edge Computing

Data Request CLF 1-15 was mis-numbered in Conservation Law Foundation's First Set of Data Requests in this docket.

CLF 1-16
Grid Edge Computing

Request:

See the Company's Grid Edge Computing filing at 5: "Any person or entity granted access as a Landis + Gyr App Developer and pays the yearly developer license fee..."

- a. Please provide the fee.
- b. Please provide the terms and conditions associated with the developer license.
- c. What control, if any, does the Company have over Landis + Gyr's fees or terms or conditions for app developers? If the Company's contract with Landis + Gyr sets the fees or terms, please provide the contract.
- d. What safeguards, if any, prevent Landis+Gyr from imposing unique fees for each app developer?

Revised Request:

Has the Company executed or have pending an agreement with Landis + Gyr or other vendor, either as part of the purchase of L + G meters or through subsequent negotiations, that sets and/or limits the rights or obligations of customers or authorized third parties to access any portion of the Grid-Edge Computing Ecosystem that is described in Section C of the Grid-Edge Computing Plan? If so, please describe it and indicate in which agreement it is contained.

Response:

No, the Company has not executed, nor has a pending agreement with Landis + Gyr or any other vendor that sets and/or limits the rights or obligations of customers or authorized third parties to access any portion of the Grid Edge Computing Ecosystem.

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CLF 1-17
Grid Edge Computing

In response to Rhode Island Energy's objection on August 18, 2025 to certain data requests contained in the Conservation Law Foundation's First Set of Data Requests in this docket, CLF agreed to withdraw Data Request CLF 1-17.

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CLF 1-18
Grid Edge Computing

In response to Rhode Island Energy's objection on August 18, 2025 to certain data requests contained in the Conservation Law Foundation's First Set of Data Requests in this docket, CLF agreed to withdraw Data Request CLF 1-18.

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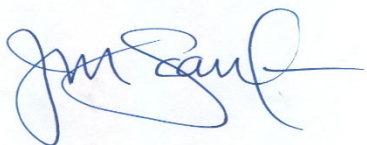
CLF 1-19
Grid Edge Computing

In response to Rhode Island Energy's objection on August 18, 2025 to certain data requests contained in the Conservation Law Foundation's First Set of Data Requests in this docket, CLF agreed to withdraw Data Request CLF 1-19.

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.



Joanne M. Scanlon

September 17, 2025
Date

The Narragansett Electric Company d/b/a Rhode Island Energy
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Service list updated 8/5/2025

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