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August 29, 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 PUC Data Requests – Set 2

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 Public Utilities Commission’s Second 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".

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
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Issued on August 8, 2025

PUC 2-1
App Studio

Request:

Please provide a link or other form of access to the App Studio, and any terms and conditions for App Developers. Please provide electronic and searchable copies if they are written documents.

Response:

There is no link or other form of access to the App Studio. The Landis + Gyr App Studio is not a browser-based product that can be accessed through a URL, it is a software developer kit that includes the tools and guides needed to develop applications on a local machine.

App Studio access is offered upon inquiry by any App Developer, subject to Non-Disclosure Agreement and Developer Agreement terms and conditions between the App Developer and Landis + Gyr. The Company does not have access to these documents.

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PUC 2-2
App Studio

Request:

Please provide a list of licensed App Developers with App Studio access.

Response:

The public-facing App Marketplace site <https://appmarketplace.landisgyr.com> shows App Developers with App Studio access who have published applications. This site is updated as additional apps are published.

The Company does not have the list of licensed App Developers who do not have a published application on the App Marketplace. Until they have published an application, the identity of App Developers is confidential. As noted in response to PUC 2-1, an App Developer and Landis + Gyr enter into a Non-Disclosure Agreement and Developer Agreement that gives access to App Studio to the App Developer. The Company is not a party to these agreements, nor does it have access to the information contained within them, including the identity of the App Developers.

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PUC 2-3
App Studio

Request:

Please explain how App Developers request and obtain access to the App Studio.

Response:

App Developers send an email request to Landis + Gyr. A non-disclosure agreement and contract agreement are then signed between both parties. At that point, an App Developer is provided with access to the App Studio.

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PUC 2-4
App Studio

Request:

Are there different levels of access for App Developers? If so, please explain those levels.

Response:

No, there are no different levels of access for App Developers.

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PUC 2-5
App Studio

Request:

Are access/change logs maintained for the App Studio?

Response:

Yes. Access/change logs are maintained for the App Studio.

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PUC 2-6
App Studio

Request:

What is the cost for an App Developer to access the App Studio?

Response:

The current agreement between Landis + Gyr and an App Developer includes an annual subscription fee to access App Studio of \$1,000 USD.

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PUC 2-7
App Studio

Request:

If the Company develops its own apps or requires App Studio access, who bears the cost?

Response:

If the Company develops its own apps or requires App Studio access, the Company would incur the costs like any other app developer. The Company's ability to recover those costs from customers will be subject to Commission review at that time.

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PUC 2-8
App Studio

Request:

Does an App Developer gain access to the App Lab by having access to the App Studio, or is a separate license required?

Response:

An App Developer receives access and a license to the App Studio and does not receive access to the App Lab. There is no license available for App Lab. The App Lab is a Landis + Gyr organization that supports the App Developer community with technical resources and application reviews before applications are published to the App Marketplace. The App Lab also oversees access to application toolkits, terms and conditions, and cybersecurity to ensure applications are within compliance.

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PUC 2-9
App Lab

Request:

Please provide a link or other form of access to the App Lab.

Response:

There is no link or other form of access available for the App Lab. The App Lab is a Landis + Gyr organization that supports the App Developer community with technical resources and application reviews before apps are published to the App Marketplace. The App Lab also oversees access to application toolkits, terms and conditions, and cybersecurity to ensure applications are within compliance.

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PUC 2-10
App Lab

Request:

Please explain how an App Developer submits an application to the App Lab for review.

Response:

In order to submit an application to the App Lab for review, an App Developer must complete and submit a list of requirements to Landis + Gyr. This list includes a high level business case, technical specifications, test reports along with completing licensing and other legal agreements.

Please see Attachment DIV 2-10 for the Vendor App Submission Checklist.

Vendor App Submission Checklist

This checklist must be completed and submitted to Landis+Gyr for each individual app, including any upgrades to those apps.

High-Level Business Case

- App Business Case** – With volumes / market analysis

Documentation Requirements

- App Description** – Provide a detailed description of the app functionality and features.
- User Documentation** – Include any end-user documentation (e.g., installation, configuration, usage, troubleshooting).
- Technical Documentation** – Provide technical specifications of the app including architecture, support platforms, integration points (e.g., How the app integrates with the meter, distribution network, and the App Marketplace – communication data flow/path diagrams – Wi-Fi, Cellular, Mesh), and other relevant details.
 - Anticipated bandwidth usage (anticipated volume of data and periodicity)
 - Wi-Fi
 - Cellular
 - Mesh
 - Expected app resource utilization (normal and high loading)
 - Wi-Fi
 - RAM
 - Flash
 - Port access – Provide details on what ports your app is opening and listening on
- Reporting and Randomization Strategy** – For app data over the network.
- Variables that Support Dynamic Configuration**
- Commands Transmitted to App**
- Release Notes** – For any new versions or updates, release notes explaining the changes or new features.
- Open-Source Libraries Usage** – All the Open-Source libraries used must be patched to the latest version and must be approved by Landis+Gyr from the security and the licensing perspective.
- Icon for the App** – PNG and SVG formats

Test Reports

- Dynamic Security Test Report** – Include results from dynamic security testing
- Static Security Test Report** – Provide the results of static analysis to ensure code quality, security, and performance.
- Scalability Reports** – Information on the app's ability to scale if needed, particularly in a large-scale deployment.
- Penetration Test Reports** – Define requirements to be submitted to Landis+Gyr malware, etc.
- App Testing Documentation** – Submit proof of testing like logs / demo / screenshots / etc.

App Compatibility

- Submit a Report** – Provide externally facing release notes including the app description, key benefits, the minimum required version of AppOS, App Manager, EIC FW, etc. required, and a summary of changes for each subsequent version.

Legal and Licensing

- App Studio Licensing Agreement**
- App Publisher Licensing Agreement**
- Confidentiality and Non-Disclosure Agreement (NDA)**

Miscellaneous

- Vendor Point of Contact** – Contact information for the vendor's support or development team in case of questions or follow-up.

Questions?

If you have any questions regarding app submission or need more information, contact Landis+Gyr support.

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PUC 2-11
App Lab

Request:

What testing environments or resources are provided in the App Lab?

Response:

There are no resources provided directly in the App Lab. The App Lab is a Landis + Gyr organization that supports the App Developer community with technical resources before applications are published to the App Marketplace. These resources include documents to help with application development as well as personnel who can provide support to developers with the testing, validation and publishing of applications. The App Lab also oversees access to application toolkits, terms and conditions, and cybersecurity to ensure applications are within compliance.

There are also no testing environments in the App Lab. An End-to-End test environment can be made available to App Developers at an additional cost. This would be outlined in the agreement between the App Developer and Landis + Gyr.

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PUC 2-12
App Lab

Request:

Can applications developed outside of the App Studio be submitted to the App Lab for review?
If not, please explain why not.

Response:

No, applications cannot be developed outside of the App Studio and be submitted to the App Lab for review. Applications need to be created in the App Studio to ensure compatibility with the Revelo meter and security compliance.

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PUC 2-13
App Lab

Request:

Are access/change logs maintained for the App Lab?

Response:

Yes, access/change logs are maintained for the App Lab by Landis + Gyr.

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PUC 2-14
App Lab

Request:

Please explain why on Page 7 of the Grid-Edge Computing Plan, the Company states that there are no additional costs to submit an application for review through the App Lab, but on Page 6, it states that “[e]xtremely large or complex applications may require additional fees for review.” Who would make the determination that additional fees are required, and who would pay those additional fees?

Response:

Whether an additional fee applied to large, complex applications will be determined based upon the App Developer's application submission, taking into consideration the additional resources that may be necessary to complete the review. Landis + Gyr and the App Developer would discuss and agree upon the additional App Lab fees to be paid by the App Developer.

If, in the future, the Company decides to go through its typical Request for Proposal (“RFP”) process to develop an application, the Company will negotiate with the App Developer to determine who would pay any additional review fees.

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PUC 2-15
App Lab

Request:

Does the Company participate in App Lab review? What control or input does the Company have during the App Lab review process?

Response:

No, the Company does not participate in Landis + Gyr's App Lab review process, nor does any App Developer. Therefore, the Company has no control or input during this process.

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PUC 2-16
App Lab

Request:

Please elaborate on the terms and cybersecurity requirements referenced in the App Lab review process. Please provide electronic and searchable copies if they are written documents.

Response:

The App Lab review process, completed by Landis + Gyr, includes requirements for App Developers to share a Dynamic Security Test Report as well as a Static Security Test Report. It also includes requirements for App Developers to complete licensing agreements as well as a Non-Disclosure Agreement.

Please see Attachment PUC 2-10 for the full checklist of requirements that App Developers must complete for each individual application for review by Landis + Gyr.

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PUC 2-17
App Lab

Request:

How long does the App Lab review process take for a compliant application?

Response:

The App Lab review process typically takes 3-4 weeks if there are no changes needed. Any changes would be subject to App Developer time to address the issue and resubmit for review.

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PUC 2-18
App Lab

Request:

Please explain what happens after a compliant application passes review.

Response:

After a submitted application is qualified through the App Lab, Landis + Gyr publishes the application to the App Marketplace consistent with the details of the app submittal.

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PUC 2-19
App Lab

Request:

Does an application have to be reviewed in the App Lab to enter the App Marketplace?

Response:

Yes. An application must be reviewed and approved in the App Lab to enter the App Marketplace.

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PUC 2-20
App Lab

Request:

Please explain what happens if an application fails review.

Response:

If an application fails review, the reasons for not reaching qualification are provided to the App Developer/Publisher to address and resubmit in the future.

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PUC 2-21
App Lab

Request:

Who owns the intellectual property of applications submitted through the App Lab?

Response:

The intellectual property of applications submitted through the App Lab is the source code of that application. The App Developer owns the source code.

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PUC 2-22
App Marketplace, App Manager, and Marketplace Governance

Request:

Please provide a link or other form of access to the App Marketplace, if different from <https://appmarketplace.landisgyr.com/en-US/home>.

Response:

The link provided in the request is the active public link for the App Marketplace.

PUC 2-23
App Marketplace, App Manager, and Marketplace Governance

Request:

Will the App Marketplace be curated by Landis + Gyr, the Company, or a third party?

Response:

The App Marketplace will be curated by Landis + Gyr.

PUC 2-24
App Marketplace, App Manager, and Marketplace Governance

Request:

Please identify the applications on the App Marketplace that the Company wants to install on customer meters, and whether they are free or require payment/subscription. If an application requires payment/subscription, is the cost per-user, per-meter, or an upfront cost? What is the total licensing cost for the applications, assuming 100% AMF deployment?

Response:

The only application the Company plans to implement during the AMF deployment is the Sense application, which is already loaded on the AMF meter.

Beyond the AMF deployment, the Company has not yet identified any applications in the App Marketplace that it wants to install on customer meters and as such, no costs have been identified.

PUC 2-25
App Marketplace, App Manager, and Marketplace Governance

Request:

Were application licensing fees accounted for in Docket No. 22-49-EL? Will application licensing fees be treated as CapEx or OpEx?

Response:

All costs associated with the Sense application, including licensing fees, were accounted for in Docket No. 22-49-EL. There were no costs associated with any future Grid Edge applications included in Docket 22-49-EL. If there are any application licensing fees associated with these future applications, they will be treated as OpEx.

PUC 2-26
App Marketplace, App Manager, and Marketplace Governance

Request:

Please address how revenue-sharing agreements between App Publishers and Landis + Gyr align with Mission:data Coalition's request that the Company acting by itself or via its vendors be prohibited from charging commission fees on software applications to either ratepayers or software developers.

Response:

Agreements between App Publishers and Landis + Gyr are negotiated and executed without the Company's involvement.

The Company has no plan currently to charge a commission fee on software applications to either customers or software application developers. To the extent the Company sought to recover fees or other related application expenses from customers, those expenses would be subject to Commission review and approval.

PUC 2-27
App Marketplace, App Manager, and Marketplace Governance

Request:

Will there be version control or rollback capabilities for applications? Who will control application versions and rollbacks?

Response:

Yes, there will be version control or rollback capabilities for applications. These will be coordinated between the App Developer and Landis + Gyr. The Company will receive notification of any new versions or roll backs from Landis + Gyr and will then manage and control the updates of any new versions or roll backs for applications it has installed on customer meters.

PUC 2-28
App Marketplace, App Manager, and Marketplace Governance

Request:

Are access/change logs maintained for the App Marketplace?

Response:

Yes, access/change logs for the App Marketplace are maintained by Landis + Gyr.

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PUC 2-29
App Marketplace, App Manager, and Marketplace Governance

Request:

Please provide a link or other form of access to the App Manager.

Response:

There is no link or other form of access to the App Manager for external users. App Manager is an internal application for the Company to use to manage applications and is not intended to be accessed by anyone other than internal users of the Company.

PUC 2-30
App Marketplace, App Manager, and Marketplace Governance

Request:

Will the Company have its own version of the App Marketplace? Is that the role of the App Manager? If not, please explain the role of the App Manager. What is managed? Who specifically will manage it, an internal team, or a vendor?

Response:

The Company does not envision having its own version of the App Marketplace. The App Manager is a Company application, which is part of the head-end system, to be managed by a team internal to the Company. The App Manager is a component of the App Ecosystem that will be used by the Company to manage the applications lifecycle. The role of the App Manager is to enable the provisioning and registration for all Revelo meter edge intelligence cards (EIC) and to allow the Company to manage the secure import, distribution, installation, or removal of applications, as well as monitor diagnostics.

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PUC 2-31
App Marketplace, App Manager, and Marketplace Governance

Request:

Please state the cost of procuring the App Manager and who will bear that cost.

Response:

App Manager was procured by the Company to support the delivery of the Sense application associated with the AMF deployment, and those costs are included in the approved project plan and costs.

PUC 2-32
App Marketplace, App Manager, and Marketplace Governance

Request:

Please explain if the Company will curate what applications may be installed on a customer's meter. If so, please explain why an application on Landis + Gyr's App Marketplace would not be available for customers (besides not being suitable for Revelo meters). What will be the Company's decision-making process?

Response:

Yes, the Company will control and execute the installation of applications on a customer's meter using App Manager. Some examples of why an application on Landis + Gyr's App Marketplace would not be available for Rhode Island Energy customers are that (1) the application may be duplicative of another application already available to Rhode Island Energy customers or (2) the application is specific to a function or program that is not applicable to Rhode Island Energy customers. The Company will review applications for relevance and fit into its overall customer programs and offerings when determining if they should be made available to customers. The Company will also perform benchmarking with other utilities who offer applications, as well as obtain customer input and feedback.

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PUC 2-33
App Marketplace, App Manager, and Marketplace Governance

Request:

Are access/change logs maintained for the App Manager?

Response:

Yes, the Company will maintain access/change logs for the App Manager.

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PUC 2-34
App Marketplace, App Manager, and Marketplace Governance

Request:

Please explain how customers can view applications that are available to be installed on his or her meter.

Response:

The Company will include on its website the applications that are available to be installed on a customer's meter. In addition, the Company may also use other communications channels such as email, newsletters or social media to inform customers how to obtain and utilize these applications.

PUC 2-35
App Marketplace, App Manager, and Marketplace Governance

Request:

Please explain how applications will be installed on customers' meters.

Response:

The meters purchased by the Company for the AMF deployment come with the Sense application already installed on the edge intelligence card (EIC). Any future applications will be installed on customers' meters over the radio frequency (RF) network using the head-end system and App Manager.

PUC 2-36
App Marketplace, App Manager, and Marketplace Governance

Request:

Can applications be installed on a customer's meter using the Home Area Network? If not, please explain why not.

Response:

No, applications cannot be installed on a customer's meter using the Home Area Network. Due to potential security and operational concerns, applications now can only be installed on the edge intelligence card via the radio frequency mesh network.

PUC 2-37
App Marketplace, App Manager, and Marketplace Governance

Request:

Can applications not on the App Marketplace or App Manager be installed on a customer's meter?
If so, please explain how.

Response:

No, applications that are not in App Manager cannot be installed on a customer's meter, and App Manager can only choose applications that exist on the Landis + Gyr App Marketplace.

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PUC 2-38
App Marketplace, App Manager, and Marketplace Governance

Request:

If the Company blocks an application, can a customer install it on his or her meter independently (e.g., through Landis + Gyr)?

Response:

No, a customer cannot install an application independently on his or her meter. All applications installed on the AMF meter's edge intelligence card (EIC) must be done by the Company.

PUC 2-39
App Marketplace, App Manager, and Marketplace Governance

Request:

Please explain who controls application installation on customer meters. If the Company will install utility-facing applications on customer meters, will Commission approval be sought beforehand? Will tariff changes be filed?

Response:

The Company controls application installation on customer meters. If, in the future, the Company plans to install any applications – whether utility- or customer-facing – beyond the Sense application, the Company would present the costs of which it plans to recover from customers, plan details, and any necessary tariff changes, to the Commission as determined to be appropriate at that time.

PUC 2-40
App Marketplace, App Manager, and Marketplace Governance

Request:

Please explain what customer data is collected through installed applications. Can customers access that data? If so, please explain how a customer would access it.

Response:

The data collected through an installed application and the customers' ability and method to access that data will depend on the specific application installed. The Company has not identified any specific applications to install beyond the Sense application.

For Sense, the customer provides his or her phone number to connect with their utility account and then confirm his or her address. After consenting, the customer's usage data from the meter is shared with Sense to receive real-time and load disaggregation insights. The customer could request from Sense the data that provides these insights.

PUC 2-41
App Marketplace, App Manager, and Marketplace Governance

Request:

Will customers be notified when a new application is installed or when an existing application is updated?

Response:

The Company has not identified or developed a communications plan for any applications beyond the Sense application. Please see DIV 1-7 for specific details on the communications plan for the deployment of the Sense application.

The Company would envision that for future applications, the customer would be notified when a new application is installed or when an existing application, including Sense, is updated through some or all the same channels used for the Sense application deployment.

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PUC 2-42
App Marketplace, App Manager, and Marketplace Governance

Request:

Will customers have visibility into data being shared with third parties? Please explain why or why not.

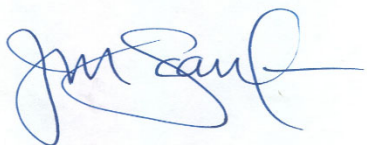
Response:

Yes, consistent with the Company's Privacy Notice (<https://www.rienergy.com/site/legal/privacy-notice>) customers will have to authorize any data to be shared with third parties.

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

August 12, 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 8/5/2025

Name/Address	E-mail Distribution List	Phone
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