



September 29, 2025

State of Rhode Island
Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

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

MISSION:DATA COALITION PROPOSED TOPICS FOR TECHNICAL SESSION(S)

I. Introduction

Mission:data Coalition (“Mission:data”) is a not-for-profit organization focused on policies that improve utility customers’ access to, and utilization of, their own energy usage and cost data, including the ability to easily and electronically share that information with any third party, including distributed energy resources (“DERs”).

We respectfully submit the following recommendations regarding the proposed topics for the upcoming technical session(s) in the above captioned Docket related to Green Button Connect (“GBC”) and Home Area Network (“HAN”) customer registration and User Experience, customer data privacy and security, the Company’s Grid-Edge Computing digital platform, as well as additional related topics to GBC HAN technical platform capabilities.

II. Green Button Connect

1. Data recipient registration
 - a) Detailed requirements and timelines for processing registration requests
 - b) How are changes to registration information made and how quickly those changes will be reflected in customer-facing consent screens
 - c) Available resources and documentation for the registration process

2. User experience
 - a) How the consent screen changes as the third party changes its “scope of use”
 - b) How the consent screen changes as the third party changes its requested data types (aka “function blocks”)



- c) Number of steps or “screens” the customer sees
 - d) Review the participation and registration steps for utility customers and for third parties either with screenshots or a live demonstration
3. Live demonstration of LG&E platform (if Rhode Island’s will mirror LG&E’s)
4. Gas data in Green Button Connect
- a) Whether and how natural gas usage and billing data can be made available via Green Button Connect
 - b) Walk-through of how a customer is supposed to share their natural gas information in order to receive a Home Energy Rebate (“HOMES”) as authorized under the Inflation Reduction Act Section 50121, including how each meter reading is documented as being “actual” or “estimated”
5. Electricity data in Green Button Connect
- a) Historical electric data
 - i. How much historical energy usage data (whether 15-minute or monthly) and billing data is available
 - ii. How third parties can specify the minimum amount of energy data needed for their application, i.e. 1 year or 2 years, during the consent process
 - b) Which “function blocks” are supported
 - c) Example XML file showing all the information described in the Company’s compliance filing
 - d) For customers with rooftop solar, will third parties receive interval usage data with negative numbers when the premise is exporting energy to the grid? This has been an issue in other jurisdictions such as New Hampshire, where some utilities’ software systems do not handle negative numbers.¹
6. Green Button Connect data quality and accuracy
- a) The processes and markings that ensure data transmitted to third parties via GBC are high quality and accurate
 - b) A detailed review of the energy usage schema selected by Rhode Island Energy (RIE) and the alternative schemas available.

¹ See, e.g., New Hampshire Department of Energy Complaint CPT 2023-002



- c) Whether and how Green Button data (usage, billing, etc.) is checked against bills for accuracy and consistency
7. Utility assessments of Green Button Connect third parties
- a) Process and requirements for third party assessments
 - b) Who is responsible within RIE for this review
 - c) What is the timeframe for each review
 - d) Whether such review requires competitive providers to reveal sensitive information about their applications to RIE
 - e) Liability RIE is assuming when determining a third party's eligibility to deliver services
8. Review the process of revoking third party access
- a) Criteria for revocation
 - b) Roles and responsibilities
 - c) Steps for due process
 - d) Customer notification
 - e) Pathway for reinstating third parties
 - f) Reenrolling customers
 - g) Reputational or financial harms incurred by third parties

III. Home Area Network

- 1. How will a customer access and use Sense
- 2. How does the Sense app on the meter communicate with the Sense mobile app
- 3. Does Sense only work when the customer is at home, i.e. their mobile phone is connected to their home Wi-Fi network
- 4. How Sense will help a customer send their disaggregated energy usage to another, non-Sense provider
- 5. Sense as a technology provider for the platform
 - a) The content of Sense's terms and conditions
 - b) Commission's jurisdiction over Sense
 - c) The process and timeline to deploy third parties, aside from Sense, to be eligible technology providers for this platform.
 - d) Example RFP for a meter-based app that would allow customers to collect real-time usage onto any Wi-Fi device or cloud-based service of their choosing



IV. Company's Grid-Edge Computing Digital Platform Governance

1. Comprehensive review of the fee structures that developers are required to pay to Landis+Gyr
 - a) Full terms of these arrangements
 - b) Their impact on market dynamics
2. Application approval process, including criteria used for evaluation, timelines, and how to address conflicts of interest.

V. Other Topics

1. Whether load settlement at ISO-NE will occur using smart meter data, the reasons why, the quality of data transmitted to ISO-NE, and whether Green Button data matches the data transmitted to ISO-NE

Thank you for the opportunity to provide these comments. We look forward to a transparent and inclusive discussion during the upcoming technical sessions.



CERTIFICATION

I hereby certify that on September 29, 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 regular mail.

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