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November 10, 2025

Jordan Z. Sasa, Esquire
Senior Legal Counsel
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 Attorney Sasa:

I am writing in follow up to your November 4, 2025 email scheduling a procedural conference in the above captioned Docket. In your email, you indicated that the Rhode Island Public Utilities Commission (“Commission”) does not anticipate the need for an evidentiary hearing in this Docket. You then stated that if any party believes a hearing is necessary an explanation should be provided. To that end, please accept this letter, and the enclosed letter from Michael Murray, as Mission:Data Coalition’s request for an evidentiary hearing.

As you know, Rhode Island Energy’s filing in this Docket was ordered by the Commission in Docket 22-49-EL – In Re: Rhode Island Energy Advanced Metering Functionality Business Case And Cost Recovery Proposal. In particular, the Order (No. 25353) stated:

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 any stakeholder deemed necessary, but the plan must be filed by the company and **will be reviewed by the Commission in a contested proceeding.** (emphasis added)

Jordan Z. Sasa, Esquire
Senior Legal Counsel
November 10, 2025
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To date, the intervening parties have only had the ability to issue data requests and participate in the October 29, 2025 Technical Session. However, the intervening parties have not had an opportunity to set forth their positions through testimony in a contested proceeding. Furthermore, while Rhode Island Energy's employees participated in the October 29, 2025 Technical Session, they did not provide testimony under oath, and there was no transcript of the Technical Session.

Mission:data Coalition believes that there are several issues, including some raised at the October 29, 2025 Technical Session, which still need to be addressed through an evidentiary hearing. Some of these issues are set forth in the enclosed letter from Michael Murray, President of Mission:data Coalition. It is also Mission:data Coalition's position that any Commission Order in this Docket should be based on a fuller evidentiary record than exists at this time. To that end, Mission:data Coalition respectfully requests that the Commission establish a procedural schedule to include the issuance of further data requests, the submission of pre-filed testimony, and an evidentiary hearing.

Thank you in advance for your consideration of this request.

Sincerely,



Joseph A. Keough, Jr.

Enclosures

cc: Service List (via electronic mail)



November 10th, 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)

Dear Commissioners:

Mission:data Coalition ("Mission:data") believes that additional discovery and a hearing in this proceeding are essential to avoiding costly mistakes in the deployment of advanced metering and data-sharing systems.

Mission:data has recently obtained information from Rhode Island Energy's ("RI Energy" or the "Company") affiliate in Kentucky ("LG&E") regarding Green Button Connect ("GBC"). Our findings, summarized below, indicate that GBC as proposed is unlikely to meet basic functional requirements in Rhode Island, causing significant customer frustration and wasted funds. Additional evidence in this proceeding, obtained through discovery and witness cross-examination, is necessary to ensure a just resolution of these matters at the lowest cost for Rhode Island ratepayers.

A recent decision in a Colorado Public Utilities Commission proceeding (Proceeding No. 24A-0547E) underscores the need for additional evidence in this proceeding. After authorizing \$2 million of ratepayer funding on GBC in 2017 with only minimal specifications, last week the Colorado Commission was forced to order significant modifications to Xcel Energy's GBC after concluding that the utility had failed to provide a functional GBC system. The Colorado Commission specifically noted the first step of the authorization process was not functional, which matches our experience with LG&E.

Given the information below, Mission:data respectfully asks the Commission to permit additional discovery in this docket and for a hearing in order to cross-examine Company witnesses.

1. LG&E's Green Button Connect Is Broken and Not Functional

Several times at the October 29th technical session, the Company stated that Rhode Island would be getting very similar, or identical, GBC software as its Kentucky affiliate, LG&E. Indeed, the user experience, customer-specific data points, and third party registration processes are to be copied from Kentucky.

The problem is that LG&E's GBC is essentially non-functional. Mission:data registered as a data recipient with LG&E beginning on July 22, 2025. Mission:data has developed Green Button software and successfully integrated with approximately ten (10) other electric utilities. The purpose of our registration and use of GBC is to support public-interest research, such as validating that Green Button systems are operable and provide correct data about customers, and to ensure utility accountability. However, LG&E's GBC does not actually work.

After receiving login credentials in August, 2025, we attempted the first step of directing volunteer ratepayers to LG&E's website to authorize data sharing with us. However, LG&E does not provide a URL for granting an authorization. This is essential functionality for a GBC platform because it is the first step of the process: Before we can send electronic requests to LG&E for customer data, the customer must grant his or her authorization. Yet this authorization URL does not appear to exist. Neither is there any technical documentation available.

After multiple rounds of technical support requests to LG&E, LG&E technical support admitted to us via email on October 2nd, 2025 that GBC full functionality does not exist: "We are still working through the process of configuring this option [GBC] but the one-time share [Green Button Download My Data] should suffice in the meantime."

On November 3rd, 2025, Mission:data conducted a detailed examination via Zoom of LG&E's customer web portal with the assistance of a volunteer ratepayer located in Lexington, Kentucky. We searched extensively for GBC functionality and were unable to find any way to use GBC. The only offering similar to GBC that we found is Green Button Download My Data, which allows customers to download a file to their computer. This experience confirms the admission from LG&E technical support.

To summarize, Mission:data made multiple attempts to use LG&E's GBC platform and was unable to do so. LG&E confirmed via email to us that GBC does not exist. This reality is inconsistent with the portrait of LG&E's GBC that was provided by the Company at the October 29th, 2025 technical workshop.

2. LG&E’s Green Button Connect Is “Certified,” Raising Questions About the Integrity and Credibility of Certification

Mission:data is confident that LG&E’s GBC would not pass certification tests today because it is inoperable. And yet LG&E filed its certification from the Green Button Alliance with the Kentucky Public Service Commission on June 30, 2023.¹

There could be multiple reasons why the certification, from over two years ago, is no longer an accurate representation of LG&E’s GBC system. But whatever the reason, this should give the Commission pause. Placing faith in GBC certification is no longer prudent given the situation at LG&E.

At the October 29th technical session, Company representatives stated that the Rhode Island GBC platform was certified by the Green Button Alliance in May, 2025. Given that LG&E’s system non-functional system received certification, information must be gathered from the Company in order to ensure that the same outcome will not occur in Rhode Island. Additional discovery and witness cross-examination is necessary to bring facts to light regarding the following topics: what software was actually tested; why LG&E’s certified software is not operable; the similarities and differences between LG&E’s and Rhode Island’s GBC software; and whether the Company intends to comply with the requirement to notify the Green Button Alliance upon any change in its software that may affect certification.²

3. Hawaii Electric Company’s Green Button Connect Uses LG&E’s/RI Energy’s Vendor and Has Zero Users

In addition, Mission:data has learned that Hawaiian Electric Company (“HECO”) uses My Meter®, the GBC platform made by Accelerated Innovations, LLC that is also used by RI Energy.³ According to HECO’s website showing customer engagement metrics, as of June 30, 2025, not a single customer has ever used GBC.⁴ In addition, as the Company indicated at the October 29th technical session, only fifteen customers in Kentucky use GBC.

The extremely small or nonexistent utilization of GBC at both HECO and LG&E raises questions about RI Energy’s ability to deliver a functional platform that delivers value to consumers. Further information should be gathered through discovery and cross-

¹ https://psc.ky.gov/pscecf/2020-00350/rick.lovekamp@lge-ku.com/06302023090741/Closed/02-LGE_KU_Green_Button_Certification.pdf

² See, e.g., id at 2: “A new application for authorization shall be filed whenever there is a change in the design or construction of a product for which a certificate has been issued.”

³ <https://acceleratedinnovations.com/wp-content/uploads/2024/05/Rhode-Island-Energy.pdf>

⁴ <https://www.hawaiianelectric.com/about-us/performance-scorecards-and-metrics/customer-engagement>

examination in order to give the Commission confidence that its GBC platform will ultimately work. In addition, the Commission could consider requiring a live demonstration.

4. Colorado Commission Orders Redo of Green Button Connect Owing to Insufficient Data, Poor User Experience and a Lack of Testing

Last week, the Colorado Public Utilities Commission ordered remedial changes to Xcel Energy's GBC platform,⁵ many of which are directly relevant to LG&E and Rhode Island Energy.

Originally approved in 2017 at a cost of \$2.0 million, the Colorado Commission did not specify GBC requirements in detail.⁶ However, through testing of Xcel's GBC platform in 2025, Mission:data identified numerous fatal flaws in filed testimony in the proceeding. For example, the GBC did not have an authorization URL; it does not provide a complete data set for common energy management uses; and the user experience suffered from numerous bugs and defects.⁷ In addition, Mission:data found that Xcel's GBC certification from the Green Button Alliance was false because it certified Xcel for providing natural gas usage information, when in fact no natural gas data is available.⁸

The Colorado Commission ordered numerous improvements to data access, specifically the following:

1. Green Button bugs and defects identified by Mission:data must be fixed within 6 months, or else the platform must be replaced from a competitively-sourced vendor
2. Complete dataset: To avoid conflicts when customers enroll in competing programs or virtual power plants, Xcel must include the customer's applicable rate and program participation information via GBC

⁵ November 5th, 2025 oral deliberations of the Colorado Public Utilities Commission, Proceeding No. 24A-0547E. Available on YouTube at <https://www.youtube.com/watch?v=iOy25qhV8vk> (GBC discussion begins at 4:43:00). Written order to be published within one month.

⁶ Decision No. C17-0556 (adopted July 25, 2017), Proceeding No. 16A-0588E, Section H at 21-23. https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=869034&p_session_id=

⁷ Answer Testimony of Michael E. Murray. Proceeding No. 24A-0547E, June 26, 2025. https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1047073&p_session_id=

⁸ Motion of Mission:data Coalition for Penalties on Public Service Company of Colorado Pursuant to § 40-7-105, C.R.S. Proceeding No. 24A-0547E, July 28, 2025. https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1046616&p_session_id=

3. Arbitrary 2-year authorization limit was removed: Previously, Xcel prohibited GBC authorizations after 2 years, despite a commission-approved data-sharing consent form from 2015 that allows indefinite authorizations

These improvements are necessary, but they will undoubtedly come at a cost, meaning that the initial \$2.0 million cost will inevitably and unnecessarily increase.

Mission:data is concerned that Rhode Island could experience the same disappointments as Colorado. With troubling observations made about LG&E's virtually non-existent GBC platform and without a test system to verify that it actually works, we believe that additional discovery and cross-examination of witnesses is warranted. Our goal is a GBC platform that works correctly in Rhode Island from day one. However, ensuring this outcome will require more information from the Company.

Sincerely,

Michael Murray

Michael Murray, President

Mission:data Coalition

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