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December 5, 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 Objection To The Narragansett Electric Company d/b/a Rhode Island Energy’s Motion To Object And Motion For A Protective Order With Respect To Mission:Data Coalition Data Request 1-1(b).

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 OBJECTION TO THE NARRAGANSETT ELECTRIC COMPANY  
D/B/A RHODE ISLAND ENERGY'S MOTION TO OBJECT AND MOTION FOR A  
PROTECTIVE ORDER WITH RESPECT TO MISSION:DATA COALITION DATA REQUEST 1-  
1(b)**

**I. INTRODUCTION**

As the Rhode Island Public Utilities Commission ("Commission") stated in its  
Notice of Public Hearing:

"By way of background, in Docket No. 22-49-EL, The Narragansett Electric Company d/b/a Rhode Island Energy (Company) filed an Advanced Metering Functionality (AMF) Business Case to support its investment plan to replace current electric meters with advanced meters. The Commission approved the investment **subject to** the Commission holding the Company **accountable** for representations about **the values that customers will receive from AMF by way of "accountability metrics" in key areas.**" (emphasis added)

"One of those accountability metrics pertained to **planning and transparency relating to customer-facing technologies**, specifically addressing functionalities provided by Green Button Connect (GBC), Home Area Network (HAN), and Grid-Edge Computing, **which are intended to enhance customer access to energy data and facilitate integration with other third-party technologies.**" (emphasis added)

Thus, this Docket is focused on whether customers of the Narragansett Electric Company d/b/a Rhode Island Energy (the "Company" or "Rhode Island Energy") will receive value from AMF and specific functionalities including GBC, HAN and Grid Edge computing. To answer this question, this Docket will examine whether these functionalities will actually enhance customer access to energy data and facilitate

integration with other third-party technologies. The data request at issue seeks to probe these issues.

As such, Mission:data Coalition (“Mission:data”) requests that the Commission deny the Company’s motion as it untimely; contrary to the Commission’s Rules of Practice and Procedure (“Rules”) regarding discovery; and contrary to the Rhode Island Superior Court Rules of Civil Procedure.

## II. ARGUMENT

### A. The Company’s Motion Is Not Timely

In citing the legal standard governing this dispute, the Company ignores several key provisions. The first is the time limit imposed by Rule 1.19, which reads:

“Objection to a data request in whole or in part on the ground that the request is unreasonable and/or the material is not relevant or not permitted or required by law shall be made by motion filed **as soon as practicable and in no event later than ten (10) days after service of the request.**” (emphasis added)

The Company’s motion fails both tests. First, Mission:data’s data request was served on November 19, 2025, and the Company’s motion was not served until December 1, 2025 – twelve days after service. The basis for the Company’s motion (e.g. the alleged “scope” of this Docket; confidentiality; and, irrelevance) would have been known to the Company upon receipt of the data request, and twelve days is not “as soon as practicable.” This standard is especially important in this Docket as the hearing is scheduled for December 17, 2025 and the response is due December 10, 2025. The Company’s December 1, 2025 motion deprived Mission:data of the ten-day period to respond to the motion as provided for under Rule 1.16 in order to address this issue in a

timely manner. It also forced Mission:data to respond to the motion while trying to prepare its testimony, which is due on December 5, 2025.

Second, filing a motion twelve days after service is certainly not compliant with the “in no event ten (10) days after service” outer limit, and Rule 1.19 does not provide for ten “business” days, or ten days “excluding weekends.” As such, it is untimely and should be summarily denied.

**B. The Data Request Is Not Objectionable Under The Commission’s Rules Or the Rhode Island Superior Court Rules Of Civil Procedure**

In citing the Commission’s rules regarding discovery, the Company’s motion contains an important omission – Rule 1.19.A.1., which states:

“The Commission favors prompt and complete disclosure and exchange of information and encourages informal arrangements amongst the parties for this exchange. It is further the Commission's policy to encourage the timely use of discovery as a means toward effective presentations at hearing and avoidance of the use of cross-examination at hearing for discovery purposes.”

Data requests play a vital role in in any proceeding before the Commission because they help to fully and transparently examine each party’s position and limit the number of issues presented to the Commission at hearing.

The same is true of the Rhode Island Superior Court Rules of Civil Procedure, and in this regard, the Company has once again omitted a portion of these rules. The Company’s memorandum states: “Under Superior Court Rule 26, “[p]arties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action[.]” Super. Ct. R. Civ. P. 26(b)(1).” (Company motion, p.5) This is not a full citation of Rule 26. The full citation is:

“(1) *In General.* Parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party, including the existence, description, nature, custody, condition and location of any documents, electronically stored information or tangible things and the identity and location of persons having knowledge of any discoverable matter. It is not ground for objection that the information sought will be inadmissible at the trial **if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.**” (emphasis added)

Not only is the data request in question relevant to this Docket, as described below, it is reasonably calculated to lead to the discovery of admissible evidence in this Docket. And contrary to the Company’s position, it does not seek confidential information.

### **1. Relevance**

The Company states “the AMF Order identified as the purpose of the current docket “to understand the technical issues around data governance and customer access to data” (Company motion, p. 3) The Green Button Certification testing report sought by Mission:data is directly relevant to technical issues around data governance and customer access to data.

Attached as Exhibit 1 to this Objection is a sample of the type of testing report Mission:data seeks. This report was produced in Colorado Public Utilities Commission Proceeding 24A-0547E involving Xcel Energy's distribution system plan and virtual power plants. Xcel Energy claimed to offer Green Button Connect functionality, but there were disputes about whether it was actually working. The test report is relevant and beneficial to the Commission because it describes the URLs of the servers that were tested, which will help the Commission understand whether a "live" production version of Rhode Island Energy’s Green Button Connect was evaluated, or whether a test system

was used for certification. In the example from Colorado, the URLs listed on page 1 show "xe-staging.planetecosystems.com" which is clearly a staging server, not the "live" system available to customers. Whether Xcel Energy's certification misrepresented its "live" system was a key question in the Colorado Commission's oral deliberations that occurred recently on November 5, 2025, and Mission:data believes that similar issues in Rhode Island cut to the heart of AMF planning, transparency and benefits for customers.

In addition, the test report shows which specific "function blocks" were evaluated (called "certDataScopeFBs" on page 1 of Exhibit 1). This is important to know because certification is not simply a binary "certified" or "not certified." In fact, there is an array of different function blocks that each have their own pass/fail record, with each function block representing valuable capabilities for ratepayers. Without this information, the Commission's ability to make informed decisions in this case could be impaired.

Further, as the Company correctly notes, "As part of the AMF Order, the Commission required metrics relating to "Planning and **Transparency** for Customer-Facing Technologies." (Company motion, p. 2, emphasis added) Frankly, it is concerning that the Company is fighting against production of the certification testing. Its objection is the opposite of transparency, and it should raise alarms.

As the Commission made clear in its AMF order, the Company was held to accountability metrics to justify "...its proposed investment plan to replace the current automated metering reading (AMR) system and an accompanying new cost recovery

mechanism” for advanced AMF meters. (AMF Order, p. 1) As the Commission noted, there were several considerations regarding cost justification:

“As indicated above, the CapEx Cap was only one accountability measure designed to protect ratepayers. Additional accountability metrics are required to address weaknesses in the value case. The metrics will cover three areas: Updates/Additions to Service Quality Mechanisms; **Planning and Transparency for Customer-Facing Technologies**; and Timely Functional Use of AMF Capabilities.” (AMF Order, p. 21, emphasis added)

With regard to Planning and Transparency for Customer Facing Technologies, the Commission stated:

“...the functionalities provided by Green Button Connect, Home Area Networks, and Grid Edge Computing ... are intended to enhance customer access to energy data and facilitate integration with third-party technologies... It will be important to understand the technical issues around data governance and customer access to data.” (AMF Order, p. 22)

As noted in Mission:data’s November 10, 2025 correspondence to the Commission requesting a hearing, it has many concerns about technical issues and customer access regarding Rhode Island Energy’s forthcoming Green Button Connect platform. Many of these concerns center on the implementation of Green Button Connect by Rhode Island Energy’s affiliate Louisville Gas & Electric (LG&E) because, as Rhode Island Energy stated in its May 12, 2025 filing in this Docket: “PPL customers in Kentucky have the option of utilizing Green Button Connect My Data. Once the functionality is deployed, Rhode Island Energy customers with AMF meters will have the same GBC capabilities, data fields, and historical information that Kentucky electric customers have.” (Company Compliance Filing, p.4)

Rhode Island Energy’s motion claims that Mission:data “raised concerns about the GBC platform selected by the Company’s vendor, based on **purported** low GBC

enrollment in other jurisdictions.” (Company motion, p. 4) To be clear, there is nothing “purported” about low GBC enrollment in Kentucky. As Rhode Island Energy acknowledged in response to Division Data Request 1-4, LG&E’s Green Button Capabilities became operational on June 30, 2023. Since that time, only 15 of 1,026,097 customers with AMF meters have used Green Button Connect, or 0.001%. This is an astonishingly low participation rate and is likely because LG&E’s Green Button Connect system is essentially non-functional.<sup>1</sup>

Rhode Island Energy also argues that:

“The Commission required the Company to obtain Green Button Alliance certification as part of the AMF Business Case...It has done so...Mission:Data does not now get to serve as referee of this independent process.” (Company motion, p.6)

There are two flaws in this argument. First, obtaining a Green Button Alliance Certificate does not guarantee that Rhode Island Energy’s system will work.<sup>2</sup> LG&E has a Green Button Alliance Certificate, and its Green Button Connect system is essentially non-functional. Obtaining the certificate itself is not the end of the analysis and does not demonstrate that Rhode Island Energy satisfied the metric that its Green Button Connect system will enhance customer access to energy data and facilitate integration with third-party technologies.

Second, Mission:data does not claim to be the referee in this matter. Clearly, the referee is the Commission, which will base its decision on the evidence in the record. In

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<sup>1</sup> Mission:data’s pre-filed testimony provides a more detailed discussion of these issues and is incorporated by reference.

<sup>2</sup> Mission:data’s pre-filed testimony provides a more detailed discussion of these issues and is incorporated by reference.

this regard, Rhode Island Energy ignores the fact that one of the primary goals of discovery is to obtain evidence for the Commission to consider.<sup>3</sup> “Relevance” is determined by the Commission, not Rhode Island Energy.

## **2. Confidentiality**

Rule 26 of the Rhode Island Superior Court Rules of Civil Procedure only exempts “privileged” information as noted above. The requested testing report is certainly not privileged, nor is it confidential as Rhode Island Energy claims. As the Commission can see from the Colorado report produced as Exhibit 1, it does not contain any “state secrets.” It merely shows whether certain tests passed or failed. Rhode Island Energy’s claim that its testing report contains “...confidential and competitively sensitive information belonging to third parties, including testing protocols, that competitors, including Mission:Data’s members, could use to their competitive advantage” is completely unsupported. (Company’s motion, p. 4) As noted above, these types of reports have been made public in other jurisdictions, and it is hard to see what competitive advantage could be gained from this type of pass/fail report.

Similarly, Rhode Island Energy’s claim that the certification “test report is the “answer key” to the certification “test” and that it shows not only the test results, but also the detailed steps included in the test” is also a gross mischaracterization.

(Company motion, pp. 6-7) The detailed steps included in the tests are already publicly

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<sup>3</sup> See A Practical Guide To Discovery & Depositions in Rhode Island (MCLE, Inc. 2010) Discovery in civil cases has six primary purposes: 1. To narrow issues; 2. To obtain evidence; 3. To expose groundless or fraudulent claims; 4. To eliminate unfair surprise; 5. To further the use of summary judgment; and, 6. To facilitate settlement.

available.<sup>4</sup> Like many other standards organizations, the Green Button Alliance makes its testing protocols available to the public in order to educate stakeholders and help utilities implement compliant software. The notion that a Green Button test resembles a high school SAT exam with randomly-selected questions from a confidential pool is preposterous and does not reflect how open, non-proprietary standards such as Green Button are developed. Again, the test report only shows whether each test passed or failed. Rather than being confidential or proprietary, the test result provides important facts about the Company's adherence to a publicly-available standard.

### III. CONCLUSION

For the reasons set forth herein, Mission:data Coalition prays that the Rhode Island Public Utilities Commission deny the Narragansett Electric Company d/b/a Rhode Island Energy's Motion To Object And Motion For A Protective Order With Respect To Mission:Data Coalition Data Request 1-1(b).

Mission:data Coalition,  
By its attorney,

/s/ Joseph A. Keough Jr.

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<sup>4</sup> <https://files.greenbuttonalliance.org/dc-cmd-test-data-sheet>

# **EXHIBIT 1**

Test Summary

Test Session Type: \*\*\*\*\* CMD Certification Session \*\*\*\*\*

Test Platform: CMD Certification Platform ver. 3.3 EU/RC

Test start date: Wed Dec 06 14:05:49 EST 2023

Test end date: Wed Dec 06 19:35:54 UTC 2023

Test Configuration	
Config file:/home/don/Git/GreenButtonAlliance/OpenESPI-GreenButtonCMDTest/SOAPUI/etc/gbcmcert_target.conf	
Parameter	Value
FileName	gbcmdcert_target.conf
applicantName	Xcel Energy Inc.
GBACertId	16014996-8d13-5f93-8d78-2876085772aa
authorizationServerDomain	xe-staging.planetecosystems.com
resourceServerDomain	xe-staging.planetecosystems.com
SFTPServerDomain	...EMPTY...
dataCustodianResourceEndpoint	https://xe-staging.planetecosystems.com/greenbutton-connect/gbc/espi/1_1/resource
authorizationServerAuthorizationEndpoint	https://xe-staging.planetecosystems.com/greenbutton-connect/gbc/espi/1_1/oauth/authorize
authorizationServerTokenEndpoint	https://xe-staging.planetecosystems.com/greenbutton-connect/gbc/espi/1_1/oauth/token
accessTokenLatency	0
cacheLoadDelay	0
client_id	a168f8dc5861dfdc9956
client_secret	8c159ea6a2a8b26061cd3e648aa4c5ff19ae9dad3f60cfc2462c783d96dbb2f5
applicationInformationId	dcafc9f-156a-5acd-9d04-9df4c037c6a6
authorizationId	...EMPTY...
registration_access_token	de548a1d604de3cc45cc17a824b537017c39362c
registration_access_token_client_id	...EMPTY...
registration_access_token_secret	...EMPTY...
client_access_token	...EMPTY...
client_access_token_client_id	a168f8dc5861dfdc9956
client_access_token_secret	8c159ea6a2a8b26061cd3e648aa4c5ff19ae9dad3f60cfc2462c783d96dbb2f5
certDataScopeFBs	FB=1_3_4_5_10_13_15_31_37_39
offlineAuthorizationID	...EMPTY...
offlineAccess_token	...EMPTY...

Test Suite [FB_01] Energy Usage Common	
Result: PASS	
Test Case	Result
TR_CPYRT001 Verify the implementer has purchased the NAESB ESPI standard	PASS

CERT001 [POS] Verify ApplicationInformation entry contains valid Certification Link	PASS
CERT002 [POS] Verify Authorization feed contains valid Certification Link	PASS
CERT003 [POS] Verify Authorization entry contains valid Certification Link	PASS
CERT004 [POS] Verify Batch/Subscription feed contains valid Certification Link	PASS

<b>Test Suite [FB_03] Energy Usage Connect My Data</b>	
<b>Result: PASS</b>	
<b>Test Case</b>	<b>Result</b>
FND002 [POS][R] Authorized GET access to ApplicationInformation entry	PASS
FND003 [POS][C] Authorized GET access to Authorization feed	PASS
FND004 [POS][C] Authorized GET access to Authorization entry	PASS
FND005 [POS][A] Authorized GET access to Batch/Subscription feed	PASS
FND006 [POS][C] Authorized GET access to ReadServiceStatus	PASS

<b>Test Suite [FB_13] Energy Usage Security and Privacy</b>	
<b>Result: PASS</b>	
<b>Test Case</b>	<b>Result</b>
TC001 Use of HTTPS	PASS
TC003 Data Custodian implements TLS 1.2	PASS
TC004 Verify Data Custodian does NOT support TLSv1.0 and TLSv1.1	PASS
TC005 Reject TLS_RSA_WITH_NULL_SHA cipher suite	PASS
TC008 Quality of Certificate	PASS
TC009 Root of trust	PASS
TC010 Tokens and IDs have no PII	PASS

<b>Test Suite [FB_31] Energy Usage Authorization and Authentication w/o Pre-Negotiated Scope</b>	
<b>Result: PASS</b>	
<b>Test Case</b>	<b>Result</b>
OAD001 [NEG] Malformed Authorization Code Requests	PASS
OAD002 [NEG] Authorization Code Request (Retail Customer Passes Authentication and DENIES access)	PASS
OAD003 [NEG] Access Token Request Authorization Header and malformed Access Token Authorization Code Request Rejection	PASS
OAD004 [NEG] Invalid Authorization Code Grant Access Token Request (code field-value pair contains a previously used authorization code)	PASS
OAD005 [POS] Successful Access Token Request	PASS
OAD006 [NEG] Invalid Access Token Requests for ApplicationInformation	PASS
OAD007 [NEG] Invalid Access Token Requests for Authorization entry	PASS
OAD008 [NEG] Invalid Access Token Requests for Authorization feed	PASS
OAD009 [NEG] Invalid Access Token Request (GET RESTful Batch/Subscription request contains registration_access_token)	PASS
OAD010 [NEG] Invalid Access Token Request (GET RESTful ReadServiceStatus request contain invalid access tokens)	PASS
OAD011 [NEG] Malformed Refresh Token Requests	PASS

OAD012 [POS] Valid refresh_token request	PASS
OAD013 [NEG][old A] Valid refresh_token request invalidates prior access_token	PASS
OAD014 [NEG] Malformed Client Credentials Grant Access Token Requests	PASS
OAD015 [POS] Validate JSON structure returned for Client_Credentials Grant Access Token Request	PASS
OAD016 [NEG] Invalid Access Token Request (Access Token contained in the Authorization Header has expired)	PASS

<b>Test Suite [FB_37] Energy Usage Query Parameters</b>
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<b>Result: PASS</b>
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Test Case	Result
QRY001 [POS][A] Query Parameters - published-min/max	PASS
QRY002 [NEG][A] Query Parameters - Verify Query Parameter Contents are Validated	PASS

<b>Test Suite [FB_39] Energy Usage PUSH Model</b>
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<b>Result: PASS</b>
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Test Case	Result
PSH001 [POS] Notification Push/POST to ThirdParty of ApplicationInformation	PASS
PSH002 [POS] Notification Push/POST to ThirdParty of Authorization	PASS
PSH003 [POS] Notification Push/POST to ThirdParty of Subscription	PASS

**CERTIFICATION**

I hereby certify that on December 5, 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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