

Ms. Stephanie De La Rosa, Clerk
State of Rhode Island
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

December 11, 2025

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

Google LLC (Google) appreciates the opportunity to comment on The Narragansett Electric Company d/b/a Rhode Island Energy’s (the Company) Advanced Metering Functionality (AMF) Business Case.

We commend the Company and the Commission for the important work of providing customers with greater access to their energy data. Google is committed to accelerating the transition to a carbon-free energy future, and a key part of this is empowering customers with the data and tools needed to make smarter energy choices. Through products like our Nest thermostats, we have seen firsthand how access to energy data can help customers manage their usage and contribute to a more reliable and cleaner grid.

We strongly support the Company’s move toward Green Button Connect, which will allow customers to securely share their interval energy data with third-party vendors. We view this as a positive and necessary step towards maximizing customer choice and greater data access.

In evaluating the proposed Home Area Network (HAN) plan for real-time energy data, Google sees an important opportunity to ensure that the initial deployment evolves into a maximally inclusive and competitive ecosystem that benefits all Rhode Islanders. We note the plan's current design focuses on a single method and vendor for accessing real-time data directly from the meter. While this initial approach may streamline deployment, our key recommendation is to establish a clear path and timeline for integrating a broader range of third-party devices and applications, such as smart thermostats, EV chargers, and other home energy management systems. Such an open and inclusive ecosystem is essential for fostering competition and allowing the most effective consumer technologies to flourish and scale vital programs, like demand response, which are critical for reducing peak demand and maintaining grid reliability.

While the Company’s filing mentions a potential future "app ecosystem," we believe the Commission can significantly enhance the long-term value of the AMF investment by directing the Company to develop a concrete action plan and timeline for enabling open, inclusive, third-party access to the real-time data stream from the meter via Wi-Fi. This proactive step would promote a level playing field for all technology providers, maximizing consumer choice. This, in turn, will drive down costs and accelerate innovation for all Rhode Islanders.

Other states, including Massachusetts and New York, are moving toward similar advanced

metering technology. By establishing a clear timeline for open access, Rhode Island would set a vital precedent for maximizing customer choice and driving innovation to empower consumers with the widest array of choices to manage their energy usage effectively, encouraging others in the region to follow suit.

For questions or further information please contact:

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