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May 8, 2026

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
Rebuttal Testimony of Nicole Gooding**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company"), enclosed please find the rebuttal testimony of Nicole Gooding 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
WITNESS: GOODING
REBUTTAL TESTIMONY**

PRE-FILED REBUTTAL TESTIMONY

OF

NICOLE GOODING

May 8, 2026

**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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1 **I. Introduction and Qualifications**

2 **Q. Please state your full name and business address.**

3 A. My name is Nicole Gooding, and my business address is 4145 Quaker Lane, North
4 Kingstown, Rhode Island 02852.

5
6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by The Narragansett Electric Company d/b/a Rhode Island Energy (the
8 “Company” or “Rhode Island Energy”) as Acting Manager – AMI Business Integration.

9
10 **Q. What are your responsibilities in that position?**

11 A. My responsibilities include leading the overall Business Integration efforts and delivery
12 of the functionality associated with the Rhode Island Energy Advanced Metering
13 Functionality (“AMF”) project.

14
15 **Q. Please describe your educational background and professional experience.**

16 A. In 2017, I graduated from the University of South Carolina with a Bachelor of Science
17 degree in International Business, Finance and Risk Management. In June 2017, I joined
18 National Grid USA Service Company, Inc. as an Associate Project Manager in the Gas
19 Complex Capital Delivery department, progressing to Project Manager in October 2018,
20 where I managed gas distribution projects in Rhode Island and Massachusetts. In 2021, I
21 moved to Goulston & Storrs PC as a Project Management Organization Specialist,

1 working on implementing project management practices and policies across the business.

2 I completed my Master of Business Administration degree in December 2021 from the
3 College of William and Mary and Project Management Professional Certification in June
4 2022 from the Project Management Institute. I joined Rhode Island Energy in July 2022
5 in the position of ISR Manager, where I was responsible for the filing and reporting of
6 Electric Infrastructure, Safety, and Reliability (“ISR”) Plans, as well as the electric
7 distribution system five-year investment plan. In February 2025, I transitioned to become
8 a Lead Change Management Specialist on the AMF project.

9
10 **Q. Have you previously testified before the Commission or any other regulatory body?**

11 A. Yes. I previously have testified before the Commission in support of the Company’s
12 Fiscal Year (“FY”) 2026 Electric ISR Plan, FY 2024 Electric ISR Plan, and FY 2023
13 Electric ISR Annual Reconciliation. I also have participated in technical sessions in this
14 docket and as part of the Electric ISR Plan Budgeting and Planning Processes, in Docket
15 No. 23-34-EL. I also testified in Docket Nos. 23-37-EL and 23-38-EL, Petitions for
16 Acceleration of System Modification Due to Distributed Generation Projects for the
17 Tiverton and Weaver Hill projects, respectively.

18

1 **II. Purpose and Organization of Testimony**

2 **Q. What is the purpose of your testimony?**

3 A. My testimony has two main components. First, I outline the Company’s process and
4 timeline for the development of the Green Button Connect (“GBC”) functionality since
5 the Commission’s authorization to proceed with the Advanced Metering Functionality
6 (“AMF”) Business Case in Docket No. 22-49-EL, along with the costs incurred to date
7 and remaining anticipated costs. Second, I respond to the April 29, 2026 Supplemental
8 Testimony of Michael Murray on behalf of Mission:data Coalition (“MDC”).

9
10 **Q. How is your testimony organized?**

11 A. Section I of my testimony provides an introduction and my qualifications. Section II of
12 my testimony states the purpose of my testimony and how it is organized. Section III
13 discusses the development and implementation of the GBC functionality, and Section IV
14 responds to MDC’s Supplemental Testimony.

15
16 **III. The Company’s Development and Implementation of the GBC Functionality**

17 **Q. Did the Company include the GBC functionality in the AMF Business Case filed in**
18 **Docket No. 22-49-EL?**

19 A. Yes. GBC is described in Section 5.5 of the AMF Business Case, which discusses the
20 technical overview of the Customer Systems and, specifically, the Customer Portal,
21 through which GBC will be available for customers to monitor their usage data. Pages 8-

1 9 of the Company's GBC Plan describe the data that customers will be able to provide
2 third parties through GBC.

3
4 **Q. How did the Company describe the GBC functionality in the AMF Business Case?**

5 A. The Company described how GBC would provide a mechanism, among others, to allow
6 customers to monitor their electric energy usage data. GBC would allow customers to
7 authorize their energy data to be shared with third-party providers, who could offer
8 services such as demand reduction awareness or notifications to avoid high-cost hours of
9 energy consumption. The Company summarized the potential uses of GBC at Bates Page
10 64 of 200 of the AMF Business Case, among other places.

11
12 **Q. Did the Company indicate in the AMF Business Case when the GBC functionality**
13 **would become available?**

14 A. Yes. The Company included GBC in Figure 6.3, which included AMF functionalities to
15 be developed during AMF meter deployment.

16
17 **Q. When did the Company begin developing GBC?**

18 A. The Company began its development of GBC in February 2025 along with the other
19 Release 3 functionalities scheduled to be phased in six months after meter deployment
20 started. Meter deployment began in June 2025.

21

1 **Q. Please describe the status of the GBC functionality and the work that the Company**
2 **has done to develop it.**

3 A. GBC was put in production as of February 2026, and the Company continues to perform
4 testing to ensure that customers and third-party vendors have seamless onboarding and
5 data sharing capabilities. The Company has completed training for both the Customer
6 Service Center and the GBC Administrator. The Company is still drafting its Terms and
7 Conditions for third-party vendors and developing marketing materials for customers.

8
9 Some of the major steps to develop GBC leading up to where the Company is today are
10 outlined below:

- 11 • Launched the AMF Customer Portal, which is where a customer consents to sharing
12 data and where the usage data is shared from;
- 13
14 • Collected business requirements and completed an impact analysis to determine what
15 departments would require awareness and training in advance of the GBC rollout;
- 16
17 • Completed functional and technical design documents along with system integration
18 testing;
- 19
20 • Received the Green Button Connect certification;
- 21
22 • Named and trained a GBC Administrator to review and manage third-party
23 applications and answer any escalated questions;
- 24
25 • Test the end-to-end process in production (ongoing);
- 26
27 • Draft Terms and Conditions for third-party vendors to agree to regarding data privacy
28 (ongoing);

- 1 • Build a webpage for customers that explains Green Button Connect and will include
2 the list of approved third-party vendors (ongoing).
3

4 **Q. Will the Company deliver a functioning GBC platform for Rhode Island customers?**

5 A. Absolutely. The Company committed to providing GBC functionality as part of Group 3
6 in the AMF Functionality Roadmap included in its overall AMF Business Case. The
7 Company is in the process of delivering on that commitment.

8
9 **Q. What costs has the Company incurred to date to develop GBC?**

10 A. The Company has incurred approximately \$170,000 to date in capital costs and \$24,000
11 in operating and maintenance costs related to Green Button Connect.

12
13 **Q. Please describe in detail the testing performed to date to ensure GBC will function
14 properly when rolled out to customers.**

15 A. The Company initially performed the necessary testing with the Green Button Alliance to
16 pass certification. The Company also completed system integration testing which
17 included over 30 different scenarios. This included testing the third-party vendor form
18 and the Green Button Connect Administrator interface.

19
20 Now, the Company is testing in production with one of its IT vendors where the vendor is
21 acting as a GBC third-party vendor. The vendor has completed the third-party application

1 on the Company's AMF Customer Portal site, was approved by the Green Button
2 Administrator, and has received customer usage data.

3
4 **Q. Has the Company uncovered any issues with GBC during testing and deployment?**

5 A. One of the reasons any new technology goes through testing prior to rollout is to uncover
6 any issues and correct them before the system goes live. The Company's GBC
7 functionality is no different. Through the testing I described above, the Company had to
8 troubleshoot certain issues with GBC.

9
10 As an example, while completing system integration testing, it was discovered that
11 several of the fields in the third-party vendor form would default back to a preset value
12 regardless of the data that was entered. This could cause incorrect vendor information to
13 be captured upon enrollment. This issue was resolved in November 2025.

14
15 The Company also found that giving consent to share data through the AMF Customer
16 Portal requires customers to establish new login credentials. This was different from what
17 the Company had anticipated, which was that customers would use their same login
18 credentials for the AMF Customer Portal and the "My Account" platform, which
19 customers use to log in to pay their bills.

20

1 **Q. Has the Company addressed this login issue?**

2 A. In the short term, customers will be able to create an account with new login credentials
3 for GBC. The AMF Customer Portal website will indicate clearly and explicitly the steps
4 to create these credentials. The process takes less than five minutes. In the slightly longer
5 term, the Company's vendor, VertexOne, is developing a solution that will allow
6 customers to use the same login credentials for the Customer Portal and GBC, allowing a
7 seamless experience. The Company expects this solution to be deployed within a few
8 months.

9
10 **Q. Have you personally tested Rhode Island Energy's GBC functionality?**

11 A. Yes. As mentioned earlier, we are completing additional testing with one of our IT
12 vendors who is acting as a GBC third party in our system. I created my own AMF
13 Customer Portal account, completed the application on the third-party vendor's website
14 and was routed to approve the sharing of my data. I then was routed back to the third-
15 party vendor site, where I could see my usage information.

16
17 **Q. Did you perform this testing on the actual GBC platform that will go live for Rhode
18 Island Energy Customers?**

19 A. Yes.

20

1 **Q. Did you successfully share your energy data with a third party?**

2 A. Yes. We were able to see my usage data populate on the third-party site after I had
3 consented to share the data. The testing did highlight some other technical issues the
4 Company will continue to troubleshoot with VertexOne prior to GBC roll-out to
5 customers, but the capability to share the data to a third-party vendor was confirmed
6 through this process.

7
8 **Q. How will the Company handle any technical issues that may arise during GBC**
9 **rollout to customers?**

10 A. The Company's vendor, VertexOne, provided support to the Company throughout the
11 GBC implementation and will continue to assist in resolving issues and to provide
12 ongoing maintenance and support to the Company.

13
14 **Q. How has the Company prepared for the GBC rollout to customers?**

15 A. The Company has trained the Customer Service Call Center agents regarding GBC,
16 including the process for both customers and third-party vendors, along with who to
17 contact internally if there are escalated issues. Additionally, the Company has trained a
18 dedicated GBC Administrator. This Administrator will be responsible for answering any
19 customer or third-party vendor support requests or questions escalated by Call Center
20 agents.

21

1 **Q. Who will be responsible for evaluating third-party vendor applications for GBC?**

2 A. The GBC Administrator will evaluate third-party vendor applications, with my support
3 for the remainder of the AMF project.

4
5 **Q. How has the GBC Administrator trained to evaluate third-party vendor
6 applications?**

7 A. The GBC Administrator has been trained to review the completeness of the application,
8 specifically ensuring that the third party has provided contact information as well as
9 sufficient technical capabilities and customer data privacy protections.

10

11 **Q. Please provide an update on the Company's efforts to encourage participation in
12 GBC.**

13 A. The Company is in the process of creating a GBC webpage on the Rhode Island Energy
14 website that provides information for customers. This will also be the location where the
15 Company will include a list of approved third-party vendors.

16

17 The Company has not yet made formal communications to customers about GBC but is
18 working on additional marketing materials that will be shared with customers in the near
19 term. The AMF project team also is discussing GBC with other internal teams to see if
20 any vendors the Company works with in other contexts would be interested in becoming
21 a third-party vendor.

1 **IV. Responses to MDC’s Supplemental Testimony**

2 **Q. Are you familiar with the April 29, 2026 Supplemental Testimony of Michael**
3 **Murray on behalf of MDC?**

4 A. I am.

5
6 **Q. At a high level, what is your response to Mr. Murray’s testimony?**

7 A. Overall, Mr. Murray’s testimony is unsupported and premature. He predicts the future
8 failure of the Company’s GBC functionality before it has even gone live for vendors and
9 customers based on unfounded comparisons to his experiences with other unnamed
10 utilities. He accuses the Company of shutting small customers out of the ISO New
11 England (“ISO-NE”) day-ahead market for demand response aggregation when ISO-NE
12 has not even finalized its requirements for participation. And in dismissing Rhode Island
13 Energy’s GBC functionality based on his reported experience with Louisville Gas and
14 Electric Company (“LG&E”), Mr. Murray appears to ignore the extensive testing
15 undertaken by Rhode Island Energy to try to ensure that GBC functions properly when it
16 goes live.

17

1 **Q. Let’s talk about LG&E first. Mr. Murray states that the Commission should reject**
2 **the Company’s GBC Plan because LG&E’s GBC “is a demonstrable failure and a**
3 **waste of money.” (Page 4, Lines 16-17). Do you agree that Mr. Murray’s perceptions**
4 **of LG&E’s GBC provide a basis for rejecting Rhode Island Energy’s GBC Plan?**

5 A. No, I do not. The Company has stated throughout this docket and previously in the AMF
6 Business Case that it would use its affiliated companies’ programs as a starting point. Mr.
7 Murray overlooks the extensive additional testing that the Company has done in advance
8 of GBC rollout here to preemptively identify and address potential issues. The Company
9 also has trained a dedicated GBC Administrator to field questions or issues that may arise
10 during enrollment, and the Company’s vendor, VertexOne, will provide support during
11 this time period. Further, during the course of the additional GBC testing the Company
12 has undertaken, I personally have successfully shared my meter data with a third-party
13 vendor using the Company’s GBC functionality. Mr. Murray’s assertion that his
14 experience with the LG&E GBC – which comes from working through individuals he has
15 not identified and whom the Company has not had an opportunity to question – dictates
16 the outcome for all of Rhode Island simply does not hold up.

17
18 **Q. How will Rhode Island customers be protected from Mr. Murray’s so-called “fatal**
19 **flaws” in GBC?**

20 A. First, it is important to remember that the large-scale rollout of any new technology likely
21 will have some glitches or pose challenges to some users as the Company, third-party

1 vendors, and customers adjust to the new technology. Even extensive advanced testing
2 and training cannot foresee all circumstances that may arise. For these reasons, the
3 Company also has resources in place, including the GBC Administrator and support from
4 VertexOne, to assist with resolving issues that may arise during the GBC rollout. But
5 these kinds of rollout or launch issues are not “fatal flaws.” Rhode Island customers are
6 protected from spending money on a GBC system that does not work because the cost
7 cap that the Commission established in the AMF Business Case docket requires the
8 Company to keep spending – even if over the cap – until it has achieved the
9 functionalities identified in the AMF Business Case, including GBC.

10
11 **Q. Mr. Murray claims that the Company’s vendor, VertexOne, has never implemented**
12 **GBC successfully (Page 5, Lines 10-12). Are you aware of a successful GBC**
13 **implementation by VertexOne?**

14 A. Yes. There is a utility in Mr. Murray’s home state of Washington that uses VertexOne for
15 GBC, and its program is operational.

16
17 **Q. Mr. Murray provides as an example of a “successful GBC implementation”**
18 **Consumers Energy in Michigan. (Page 11, Lines 5-8) Do you know what company**
19 **Consumers Energy uses for its GBC?**

20 A. Consumers Energy uses UtilityAPI for GBC.

21

1 **Q. Is UtilityAPI a member of MDC?**

2 A. UtilityAPI is listed on MDC's website as a member company.
3

4 **Q. Let's turn to Mr. Murray's second criticism of the Company's GBC Plan, which is**
5 **that the Company's GBC will not allow the transfer to third parties of sufficient**
6 **information to allow customers to participate in ISO-NE's day-ahead market. What**
7 **is Mr. Murray referring to?**

8 A. I believe Mr. Murray is referring to Order No. 2222 of the Federal Energy Regulatory
9 Commission ("FERC"), *Order No. 2222: Participation of Distributed Energy Resource*
10 *Aggregations in Markets Operated by Regional Transmission Organizations and*
11 *Independent System Operators (Docket No. RM18-9-000)* ("FERC 2222"). FERC 2222
12 provides a mechanism for behind-the-meter participation by distributed energy resources
13 ("DER") aggregators to provide wholesale market services through resource aggregation.
14 The DER aggregators, not the utilities, will have sole responsibility for FERC compliance
15 with respect to metering data and settlement. The DER aggregators will have the option
16 to assign a meter reader to provide the metering data, which in many cases may be the
17 relevant local utility.

18
19 **Q. Has ISO-NE finalized its requirements for implementing FERC 2222?**

20 A. No. ISO-NE has targeted November 1, 2026, as the effective date for its updated tariffs to
21 come into compliance with FERC 2222.

1 **Q. Does the Company intend to use GBC to facilitate FERC 2222 participation?**

2 A. The Company cannot determine its processes relating to FERC 2222 data requirements or
3 its methods for providing information until ISO-NE has finalized its specific
4 requirements for implementing FERC 2222. It is premature to evaluate specific solutions
5 for FERC 2222 implementation or to presume that the Company would fulfill the
6 implementation requirements through GBC. Further, using GBC to facilitate FERC 2222
7 participation through the addition of more function blocks is outside the scope of the
8 approved AMF Business Case and the scope of the Commission's review of the GBC
9 Plan in this docket.

10

11 **Q. From a technical perspective, are there any impediments to the Company**
12 **incorporating additional GBC function blocks later if the Company subsequently**
13 **decided to use GBC to facilitate FERC 2222 participation?**

14 A. Any proposal by the Company to facilitate FERC 2222 participation likely would be
15 subject to Commission review pursuant to a request for cost recovery. From a technical
16 perspective, nothing would preclude the Company from rolling out GBC now as
17 approved in the AMF Business Case and outlined in the GBC Plan in this docket and then
18 subsequently expanding GBC functionality if this was the best solution.

19

1 **Q. Let's turn to MDC's third stated reason for rejecting the Company's GBC Plan,**
2 **that the Company intends to draft its own terms and conditions. Mr. Murray claims**
3 **that the Company will draft "unfair, coercive and anticompetitive" terms and**
4 **conditions. (Page 16, Lines 4-6). What is your response to this?**

5 A. Mr. Murray has no factual basis to level these accusations against the Company. First, the
6 Company has stated numerous times that GBC will allow customers to share billing-
7 quality data 24 hours after usage. Second, as the Company also has stated previously, the
8 Company's role in evaluating third-party vendors is to confirm that the third-party
9 vendors have both the technical capability and a completed application on file to ensure
10 that the third-party vendors can receive the customer data and provide the analysis and
11 insights to customers that they say they can. The Company intends to work with third-
12 party vendors to facilitate their registration.

13

14 **Q. Would you like to make any closing remarks about the Company's GBC Plan?**

15 A. The Company has proceeded thoughtfully and methodically to develop and roll out to
16 customers a GBC functionality that aligns with the AMF Business Case and provides
17 customers with an efficient way to share their energy usage data with third parties for the
18 purpose of obtaining energy usage insights and potentially finding ways to take greater
19 control of their energy usage. The Company has undertaken extensive testing to confirm
20 that its GBC functionality works and made reasonable efforts to address any
21 technological issues prior to rollout to customers. Further, the Company has developed a

1 marketing campaign to make customers aware of the GBC functionality and is working
2 proactively to try to recruit third-party vendor participation. The Company also has
3 appropriate resources at the ready – both internal and external – to address any
4 technological issues that may arise during the rollout and to guide customers through the
5 enrollment process. These reasons support allowing the Company to proceed with the
6 GBC Plan as laid out in the approved AMF Business Case and consistent with the
7 Commission’s authorizations in Docket No. 22-49-EL.

8
9 **IV. Conclusion**

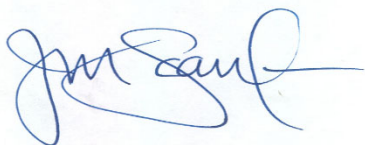
10 **Q. Does this conclude your testimony?**

11 **A.** Yes, it does.

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

May 8, 2026

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 4/30/2026

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