



April 1, 2015

Luly E. Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard,
Warwick, RI 02888

**Re: Investigation into the Changing Distribution and the Modernization of Rates in
Light of the Changing Distribution System
Docket No. 4600
Application for Stakeholder Membership of Utilidata, Inc.**

Dear Ms. Massaro:

Pursuant to the Rhode Island Public Utilities Commission's ("PUC") Notice of Commencement of Docket and Invitation for Stakeholder Participation, issued on March 18, 2016, Utilidata, Inc. ("Utilidata") hereby submits its application for membership on the stakeholder committee established in this docket. The Commission established the committee to develop a report on recommendations to "to guide the PUC's review of the Narragansett Electric Company d/b/a National Grid's . . . rate structure in future proceedings" and "to determine the factors necessary for determining rates pursuant to the Renewable Energy Growth Program, and to improve consistency within and across programs." In support of this application, Utilidata states:

1. Utilidata is a corporation organized under the laws of the State of Delaware, with a principal office at 245 Chapman Avenue, Suite 200, Providence Rhode Island 02905. Utilidata employs around 50 people in Rhode Island, ranging from software engineers to deployment and customer support staff.
2. Utilidata, Inc. is a leading provider of Volt/VAR Optimization ("VVO") technology. Utilidata's patented AdaptiVolt™ VVO solution leverages advanced digital signal processing techniques to extract better information from primary and secondary AMI voltage data, enabling real-time solutions for more intelligent and adaptive closed loop voltage control. Utilities, such as American Electric Power, Pacific Gas and Electric Company, and National Grid, have deployed Utilidata's technology as part of their grid modernization and infrastructure investment efforts as approved by their respective state commissions.
3. Utilidata has authorized William M. Pratt to represent its interests on the stakeholder committee.
4. Utilidata will actively participate in good faith in the development of recommendations on issues under consideration in the docket.

5. Utilidata has been an active participant in various grid modernization proceedings and has filed comments in state public utilities commission dockets or energy office inquiries such as: *Public Act 15-5 – Section 103 Demonstration Projects for Grid Side System Enhancements to Integrate Distributed Energy Resources*, Connecticut Department of Energy & Environmental Protection; *Modernization of the Electric Grid*, Massachusetts D.P.U. 12-76; *Investigation into Grid Modernization*, New Hampshire P.U.C., Docket No. IR 15-296; *Reforming the Energy Vision*, New York P.S.C. Case No. 14-M-0101; *Systems Integration Rhode Island*, Rhode Island Office of Energy Resources.
6. In the Rhode Island Office of Energy Resources’ Systems Integration Rhode Island (“SIRI”) investigation, Utilidata commented on the SIRI working group’s recognition of the need to improve the coordination of distribution utility planning processes to consider the distribution benefits of non-wires alternative (“NWA”) technologies, such as conservation voltage reduction (“CVR”) and VVO. Utilidata recommended robust measurement and verification (“M&V”) protocols as an integral part of NWA distribution planning.
7. VVO can reduce customer bills by reducing peak demand and energy losses. Unlike energy efficiency programs and other formal customer engagement programs, VVO deployment incurs no program administration costs to encourage customer participation, since all customers benefit from a VVO system. The savings generated by the system is not dependent on the number of customers participating. At the same time, VVO can reduce annual operating and maintenance expense through greater visibility into asset health and reduction in equipment tap operations, improve power factors, and facilitate the integration of renewable distributed generation on the system, while avoiding significant interconnection upgrade costs. Thus the benefits or avoided costs resulting from VVO deployment can be captured in rates across various state programs and policies, such as the Energy Efficiency Program, Renewable Energy Growth Program, Infrastructure, Safety, and Reliability Program, Standard Offer Procurement, System Reliability Procurement, Distributed Energy Resources, and Demand Response.
8. No other stakeholder will adequately represent Utilidata’s interest in supporting the appropriate rate treatment for the deployment of VVO technology. Utilidata can offer technical expertise that is necessary to the Commission’s consideration of the appropriate allocation of costs and benefits of VVO deployment across programs. An explanation of what VVO is and the likely net benefits of the investment is a highly technical matter requiring input by experts, which Utilidata can provide to the stakeholder committee without being duplicative of the input that other participants may present. Moreover, Utilidata can present data on the actual performance of the technology in the field as it has been deployed on other utilities’ distribution systems.

For all of these reasons, Utilidata respectfully requests that the PUC approve this application for membership in the stakeholder committee in this docket.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. M. Pratt', is written over a solid horizontal line.

William M. Pratt
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