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**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

**I/M/O THE PETITION OF PUBLIC SERVICE  
ELECTRIC AND GAS COMPANY FOR  
APPROVAL OF ITS CLEAN ENERGY FUTURE-  
ENERGY CLOUD (“CEF-EC”) PROGRAM ON A  
REGULATED BASIS**

**BPU Docket No.: EO18101115**

I, Jess Melanson, of full age, do hereby certify as follows:

1. I am the Chief Operating Officer at Utilidata, Inc. (“Utilidata”) which moves to intervene in this matter as a Party. I understand that this application is being filed past the deadline for intervention as a Party, but there are substantial reasons set forth in this Certification and accompanying supporting brief as to why this application should be granted as if it were timely filed. I am familiar with the facts and circumstances concerning this matter and I make this Certification in support of and on behalf of Utilidata’s Motion to Intervene.
2. Utilidata has a significant interest in the outcome of this proceeding as it is the market leader in meter-based software.
3. Specifically, Utilidata is a software company with over a decade of experience operating the electric distribution grid, primarily for the purpose of optimizing voltage to make the

grid more efficient and reliable. Utilidata's platform uses advanced metering infrastructure (AMI) data to improve grid operations and deliver an industry-leading 3-5% energy savings.

4. Utilidata is the industry leader in building software applications for next generation smart meters having developed the first third-party application for Itron's meter platform and is building the core operational intelligence software for Landis+Gyr Technology, Inc.'s ("Landis+Gyr") next generation meter.

5. Utilidata's software platform and meter-based applications have the potential to significantly increase the value of an AMI deployment by enabling better performance and new use cases, which can streamline and modernize utility operations, provide an enhanced customer experience, benefit the environment, and serve as a means to achieve the goals of the 2019 Energy Master Plan: Pathway to 2050. In particular, meter-based software can quickly and cost-effectively provide the grid-edge visibility necessary for utilities to better plan, invest in, and operate the grid. This includes granular visibility into the secondary system which is critical to support electrification, demand flexibility, DER penetration, grid resilience, and grid efficiency.

6. Utilidata is substantially, directly and specifically affected by this proceeding, as the Board's decision will have an effect on Utilidata's business operations in Public Service Electric and Gas Company's ("PSEG") service territory. Utilidata's software leverages AMI data and is often deployed in conjunction with AMI rollouts, and therefore its business will be substantially, directly and specifically affected by the relief provided herein. Additionally, this proceeding will serve as a precedent for AMI decisions regarding other recently filed AMI petitions, including those filed by Jersey Central Power and Light ("JCP&L") and Atlantic City Electric Company ("ACE").

7. Even at this juncture, Utilidata's participation as an intervenor will add measurably and constructively to the scope of the proceeding since the proceeding is still at an early stage and the proceedings in companion dockets for JCP&L and ACE have not meaningfully commenced. Utilidata's experience in both using AMI data to improve grid operations and deploying meter-based software provides a unique and important perspective. Utilidata has seen first-hand the risks associated with deploying AMI without robust consideration of future use cases and the role of on-meter software.

8. In short, without consideration of these issues, the Board risks approving a PSEG AMI rollout that will be unable to achieve all of PSEG's proposed use cases, and will prematurely become a stranded asset. Utilidata has a detailed technical understanding of what it takes to execute many of these use cases and to build impactful software that can be deployed in smart meters. Success of such efforts is heavily dependent on the requirements of the authorizing regulatory order ultimately adopted by the Board, and the AMI hardware, software, and communications network procurement decisions that the utility makes based on that order. Utilidata can provide the Board informed insights on how to avoid these pitfalls and the explicit outcomes, capabilities, and performance standards required to maximize success.

9. In this regard, Utilidata's participation will add constructively to this case. Utilidata will participate in discussions with the parties in this matter to explain how its technology can assist PSEG in achieving its energy cloud goals.

10. On February 19, 2020, the Board ordered ACE, JCP&L and PSEG to file or update previously filed petitions for AMI implementation.

11. ACE and JCP&L submitted their petitions as recently as August 26, 2020 and August 27, 2020 respectively. Given the recent and consolidated nature of the Board's order,

which reflects the need to approach the issues raised in all three proceedings as common and unifying as to all, Utilidata urges the Board to consider the petitions together to establish a single set of comprehensive, integrated AMI standards across the state of New Jersey. As such, Utilidata should be granted full party intervention in all three proceedings to ensure the development of a complete record.

12. Significant issues have come before the Board since PSEG's initial petition in 2018 that are directly impacted by AMI. For instance, just weeks ago, on September 23, 2020, the Board issued an order implementing provisions of the Electric Vehicle Act of 2020. AMI, with meter-based software is critical to advance the adoption of electric vehicles and the development of EV charging infrastructure. Meter-based software allows for granular EV hosting capacity analysis to better implement site charging infrastructure, streamlines interconnection of charging infrastructure due to visibility into real-time grid conditions and enables flexible load management by sending price signals to charging infrastructure. In addition, meter-based software provides the visibility to facilitate the strategic deployment of DERs to better manage transportation electrification.

13. Utilidata's participation in this docket will contribute to the thorough examination of PSEG's proposal, including assessments of cost-effectiveness for customers and the competitive market.

14. Finally, Utilidata's expertise and interests are sufficiently different from any other party in this proceeding, and granting intervention as a Party will not cause confusion or meaningfully delay the conclusion of this proceeding. Utilidata is filing for intervention pursuant to the terms of the Board's Order and its intervention will clarify certain issues and contribute to the development of a complete record based on its unique, significant interests - benefits to this

proceeding which significantly outweigh the late filing of this Motion. Moreover, Utilidata will not seek to delay the proceeding in any manner and will promptly provide its filed testimony upon receipt of a Board order granting intervention.

15. For all of the reasons stated herein, Utilidata requests permission to intervene in the matter as a Party, with the full rights and obligations of a Party, to participate in conferences, discovery, testimony and cross-examination, settlement, and to be heard on all issues before the Board. Utilidata understands that it must take the proceedings as it finds them.

16. Utilidata agrees to abide by any schedule set for this proceeding, except that it specifically requests the right to submit pre-filed direct testimony promptly upon the issuance of a Board order.

17. All correspondence, filings, discovery, reports, and documentation generally regarding this matter should be sent to the following persons:

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I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

  
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Jess Melanson

Dated: October 14, 2020