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

**I/M/O THE PETITION OF ATLANTIC CITY  
ELECTRIC COMPANY FOR APPROVAL OF  
THE SMART ENERGY NETWORK PROGRAM  
AND COST RECOVERY MECHANISM AND  
OTHER RELATED RELIEF**

**BPU Docket No.: EO20080541**

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 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.

6. In particular, meter-based software can quickly and cost-effectively provide the grid-edge visibility required for utilities to better plan, invest in and operate the grid to integrate grid modernization and capacity improvements. This includes granular visibility into the secondary system which is critical to support demand growth for electrification, demand flexibility, DERs penetration, grid resilience and grid efficiency.

7. 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 the ACE 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.

8. Utilidata's participation as an intervenor will add measurably and constructively to the scope of the proceeding. 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 firsthand the risks associated with deploying AMI without robust consideration of future use cases and the role of on-meter software. In short, without consideration of these issues, the Board risks approving an ACE AMI rollout that will be unable to achieve all of ACE's

proposed and potential 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, and the AMI hardware, software, and communications network procurement decisions that the utility makes based on that order. Utilidata can provide the Board insights on how to avoid these pitfalls and the explicit outcomes, capabilities, and performance standards required to maximize success.

9. Additionally, 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 ACE in its 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 on August 26, 2020 and August 27, 2020 respectively. Given the recent and consolidated nature of the Board's order, Utilidata urges the Board to consider the petitions together to establish comprehensive 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 that are directly impacted by AMI. For instance, on September 23, 2020, the Board issued an order implementing provisions of the Electric Vehicle Act of 2020. AMI, approved with the right performance standards and deployed with the right capabilities, is critical to advance the adoption of electric vehicles and the development of EV charging infrastructure. AMI can provide granular EV hosting capacity analysis to better site charging infrastructure, streamline interconnection of charging infrastructure



using real-time grid conditions and enable flexible load management by sending price signals to charging infrastructure.

13. Utilidata's participation in this docket will contribute to the thorough examination of ACE's Petition, 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 will not cause confusion or 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. Moreover, Utilidata will not seek to delay the proceeding in any manner.

15. For all of the reasons stated herein, Utilidata should be permitted to intervene in this matter as a Party. As set forth above, Utilidata's intervention will serve to assist the Board, as it brings unique knowledge to these proceedings.

16. Accordingly, 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.

17. Utilidata agrees to abide by any schedule set for this proceeding.

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

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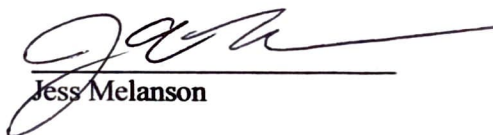
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I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

  
Jess Melanson

Dated: October 14, 2020