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VIA ELECTRONIC MAIL
Honorable Aida Camacho-Welch
Secretary
State of New Jersey
Board of Public Utilities
Post Office Box 350
Trenton, New Jersey 08625-0350

Re: Notice of Advanced Metering Infrastructure (AMI) Work Session
Docket No: EO20110716

Dear Secretary Camacho-Welch:

I enclose Rockland Electric Company's comments in response to the Notice of Advanced Metering Infrastructure (AMI) Work Session. Please note that Rockland Electric Company is making this filing solely in electronic form pursuant to the Board's directive in its Emergency Order dated March 19, 2020 in BPU Docket No. EO20030254.

Please contact me if you have any questions regarding this filing.

Very truly yours,

/s/ JoAnne Seibel

JoAnne Seibel
Project Specialist

Rockland Electric Company
Comments on Notice of Advanced Metering Infrastructure (AMI) Work Session
Docket No. EO20110716

Rockland Electric Company (RECO or the Company) submits these comments in response to the Notice of Advanced Metering Infrastructure (AMI) Work Session and specifically addresses the second panel's topic of Data Access, Sharing and Transparency. The Company recognizes the importance that data plays in furthering the New Jersey's clean energy goals. Sharing data with both customers and third parties can support the seven strategies of the Energy Master Plan. Customer protections, including privacy policy and standards and customer consent rules; data access mechanisms; and data security protections are critical processes and standards that must be developed prior to implementation of any data sharing procedures. The Company supports a collaborative process to develop consistent statewide policies and procedures for data sets and data sharing which recognize the capabilities and limitation of electric distribution companies' (EDCs) existing systems.

Importance of Customer Data and Distribution System Data

Data can be separated into two categories – customer data and distribution system data. Both are important to the attainment of the State's clean energy goals and the Energy Master Plan's seven strategies. Customer data is a powerful tool that customers, distributed energy resource (DER) developers, and other third parties can use to support market development and can be useful in meeting the Governor's ambitious clean energy goals. Customers with access to their own granular consumption and other related data have the ability to proactively take greater control of their energy usage and bills while providing benefits to the grid. AMI plays a critical role in providing the granular data to customers needed for greater control of their energy usage and bills which can also lower customer costs through reductions in peak demand. More granular data will encourage customers to be active partners with utilities and third parties, such as DER providers and energy efficiency companies, to achieve the State's goals.

Utilities, as trusted energy advisors, can engage customers to achieve these benefits by leveraging the customer's data to inform the customer of potential energy savings programs as well as impacts of DER and electrification end uses. Utilities use customer data to develop programs that support the customer in managing their energy usage and bill and provide benefits to the grid and thereby all customers. In addition, making customer data available to DER developers and other third parties, with the appropriate customer consent and subject to all applicable privacy and security provisions, can support development of tailored products and services that will lead to increased DERs in the State. Programs such as Community Solar and Energy Efficiency can benefit from customer data, not only in the development of products and services but also in the management of their existing customers.

Similarly, the availability of distribution system data, such as load and voltage, in a useful way can be critical to the success of renewable and clean energy market development and the achievement of the State's clean energy goals and targets. This information can provide an

opportunity for DER providers to focus their efforts on deployment of DER that support the reliability and resiliency of the distribution system and enhance the ability of customers to adopt clean energy technologies.

System data availability is important to DER providers who may use some types of system data as inputs to technical and business decisions, such as where to market services or locate resources to support grid needs while furthering the State's clean energy goals. Providing useful information related to hosting capacity, load serving capacity, beneficial locations for DER interconnection and detailed information to those in the DER interconnection queue, planned capital infrastructure investments, and in the future potential non-wire solution opportunities increases process transparency and helps to animate the clean energy economy. For example, understanding where capacity exists on the grid to support electric vehicle (EV) charging load, through appropriate system data will allow third parties to deploy EV charging infrastructure in lower cost locations driving cost-effectiveness while supporting the State's EV goals.

Provision of system data for these purposes translates into benefits for not only DER providers and clean energy program administrators, but also for customers who rely on developers to provide clean energy services such as community solar or EV charging stations. Development of such systems provide benefits to all customers through lower electricity system costs and reduced carbon emissions.

Consumer Protections, Privacy Standards, and Data Security Protections

Maintaining customers' trust and protecting their privacy and the security of the grid is vital to the development of data access standards and protocols. It is important to address the exchange of system and customer analysis and data while maintaining customer protections and system security. Sharing of system data will need to be evaluated and vetted for any cyber security concerns and NERC Critical Infrastructure Protection compliance. Privacy policies and standards applicable to anonymized, or aggregated, customer data should be developed to maintain the anonymity of customer-specific data.

Customer data includes customer energy usage data, customer-sited generation data, account, and load profile information. Customer data can be customer-specific or aggregated, such as at the building or community level. The specific use case may drive the type of data required. Customer consent to the dissemination of customer-specific information to third parties is essential to maintaining customers' trust. Data that is anonymized should not require customer consent prior to dissemination if customer identifying data is sufficiently couched so as not to provide customer specific information.

In addition, to maintain customer confidence in the New Jersey Board of Public Utilities (Board) as protectors of customer interests in their data and in utilities as the custodians of the data, customers should be permitted to opt-out of having their identifiable information shared. This

would not apply to anonymized, or aggregated, data through which an individual customer cannot be identified.

Privacy policies and standards should be developed and applied on a statewide basis to create certainty and transparency to third parties who use this data. Privacy standards often consist of a two-part test, a customer count threshold and a usage threshold. For example, a 15/15 privacy standard for aggregated datasets provides that an aggregated dataset may be shared only if it contains at least 15 customers, with no single customer representing more than 15 percent of the total usage for the group. This standard may be appropriate for purposes of community planning. Different privacy standards may be developed for different use cases, but the number of standards should be kept to a minimum to ease the administrative burden and increase transparency and understanding by third parties.

Providing data to a multitude and variety of third-party providers increases potential security risks for the utility. To manage data security risks, a data security agreement (DSA) should be developed that would be required by all third parties using or accessing utility systems. The DSA is an agreement between the Company and the third party that governs the exchange of customer data. The DSA terms and conditions include, but are not limited to, an attestation that the third party has received the customer's consent to access the data, notice requirements to report a data security incident, and an attestation, whereby third-parties attest to meeting the data security procedures and requirements listed therein. In addition, cybersecurity insurance can help protect the utility and ratepayers in the event the third party causes a security incident.

In New York, a DSA (common to all electric utilities) must be executed by all third parties using or accessing utility systems, including those using GBC and EDI transactions as well as DER suppliers. Further, each of these third parties must complete the utility's attestation.

Granular Distribution System Data Provided by AMI

Historically, distribution system data has been used by utilities to aid in internal planning and operations functions. For example, distribution system operators use system data to facilitate grid operation decisions and maintain system reliability and service quality, including reducing the frequency and duration of outages. System planners use system data to perform planning analysis, such as load flow analyses, load forecasting, investment planning, and other needs-based analyses. Smart meters have the ability to capture voltage which system planners can use to understand the quality of service being provided throughout a circuit including the last meter on the circuit. This information is critical to managing more accurately the voltage levels distributed from substations. With this smart meter data EDCs can reduce the voltage levels being distributed to a point that still provides acceptable power quality. In many cases, without that information, EDCs distribute higher levels of voltage to ensure power quality to the last meter on a circuit. Reducing voltage levels equates to less purchased power, reduced costs and a cleaner environment.

The Company's AMI deployment provides increased granularity of system data allowing the Company to refine the forecast and contingency process to address system needs with the right projects at the right time in a continued effort to improve the overall safety and reliability of the system in the most economical way while taking statewide goals into consideration. More granular system data leverages advanced capabilities in the Company's system modeling software to support probabilistic and scenario-based forecasting and analysis, which allows the Company to better project system needs and improve its understanding of how both traditional and non-traditional solutions will address reliability and capacity requirements to meet design standards within specific geographic/operating regions.

As a key component of the planning process, these refinements in forecasting ability translate into an increase in the animation of the market for DER providers and other third parties by focusing opportunities for deployment of clean energy resources into areas of the electric delivery system that will have the most positive impact for the Company and its customers.

Data Access

Sharing granular data needed to support clean energy programs and goals in a variety of delivery methods will increase the likelihood of its use. The type of data, either customer-specific or aggregated, as well as the potential user may drive the ability to access the data. For example, aggregated customer data may be useful to local governments, state agencies, and academic institutions to evaluate, analyze and implement policies and develop action plans in support of the clean energy environment. Providing access to that data in a method that does not require significant Information Technology investment may be sufficient, and even preferable as a cost-effective solution.

Determining the use cases for customer and system data will be key to understanding the data access methods. However, the costs to develop and maintain any delivery method and the underlying data sets must be weighed against the benefits provided to ratepayers, the State, and utilities. Leveraging existing utility systems can minimize the costs of implementation and the bill impact on customers resulting from such implementation.

While developing common delivery methods statewide can produce a level of certainty for third parties, customers and utilities, it is important to be cognizant of each utility's existing systems and programs, the cost to implement new protocols and processes, and the ongoing administrative functions required to maintain the systems. Working toward a common functionality with differing delivery mechanisms may be sufficient to further the Energy Master Plan's (EMP's) strategies, especially in the near term, while managing costs for customers.

RECO, along with its affiliates Orange and Rockland Utilities, Inc. (O&R) and Consolidated Edison Company of New York, provide customer data to third parties via a variety of methods, including Green Button Connect (branded as *Share My Data*), Electronic Data Interchange (EDI), and Green Button Download. In addition, RECO shares near real time, granular customer usage data (collected via AMI) through customers' My Account online portal. Sharing tailored

information with customers empowers them with another tool to actively manage their usage. Currently, O&R provides Home Energy Reports (HERs) and weekly AMI reports to customers. This data provides customers visibility into their own unique usage patterns and gives them the information to help them make more informed decisions to reduce their utility bills through active management of their usage. Customers can also set alerts within the My Account Portal to engage them at the time they are consuming energy. This alert provides customers the ability to adjust their usage patterns prior to the end of their billing month thereby potentially preventing high bills and payment issues. Moreover, customers can play an active role in providing benefits to the electricity grid by managing their consumption to support peak reduction. This information can be especially important for EV owners and other customers seeking to electrify their residences.

Sharing system data via hosting and load serving capacity maps is another avenue for supporting increased deployment of solar, energy storage, EV charging infrastructure, and other DERs. Hosting and load serving capacity data helps guide DER investments and marketing activities by helping third parties identify areas of the grid where the costs of interconnection are likely to be the lowest. This information allows prospective interconnection customers to make more informed business decisions before committing resources to an interconnection application. In addition, these maps can support EVs, through informed siting of EV charging infrastructure, while also supporting informed business decisions that increase achievement of the State's clean energy goals. Hosting capacity can vary across different circuits, as well as segments within a distribution circuit itself.

To realize the benefits of DER at the system and consumer level, it is also necessary that DER providers provide information to the EDCs that support designing, operating, and planning the grid to operate with high levels of DER penetration.

Collaborative and Iterative Process

The Company recommends a collaborative process among EDCs, Board Staff, and stakeholders to strike the right balance between advancing clean energy objectives, maintaining customer privacy and data/system security, and managing costs to customers. This process should leverage use cases based on actual data user needs and requests to inform privacy standards. In addition, an iterative process can focus attention and prioritize the limited resources available on standards to meet use cases in the near term that will support achieve of the EMP's strategies. An iterative process also provides lessons learned to inform development and implementation of additional procedures and mechanisms. This type of approach may also minimize costs to all parties, including utilities, ratepayers, and third parties seeking data. RECO, having recently completed a full deployment of AMI, has valuable experience and lessons learned that can be shared with the EDCs. Proper planning of the AMI infrastructure and equipment based on the uses cases each EDC expects to complete is critical. A collaborative process would provide a conduit to communicate these experiences.

Through a collaborative process, the EDCs can work with interested third parties to gain an understanding of their needs and strive to provide helpful and easy-to-use tools. RECO supports a stakeholder process to define standardized data sets and access processes, which must include appropriate data security and privacy terms and requirements. Such standardization can provide certainty and transparency to third parties, including customers.

Development and prioritization of use cases can inform development of the data sets, including granularity and latency, as well as a standardized set of data access processes, which must include required privacy standards and consumer protections that apply to the availability of specific types of data. Use cases should be prioritized based on cost considerations, availability of current utility data and systems to export the data, use for core utility functions, and value offered relative to the achievement of New Jersey's clean energy goals.

While standardization of processes and methods for delivering data can provide clear, consistent treatment, the Board should consider the varying billing and other systems employed by each EDC so that data can be made accessible in the near term without incurring significant costs. A flexible development plan should consider utilities evolving data availability and capabilities, stakeholder feedback, and necessary privacy or consent rules.

A collaborative process can begin with initial use cases and the minimum data and user functionality needed to effectuate them. Once implemented, additional customer and stakeholder feedback can be gathered to inform additional use cases which may incorporate potential new data sets, delivery mechanisms, and associated privacy and protection standards.