



October 7, 2021

Via Electronic Mail

Aida Camacho-Welch
Secretary of the Board
State of New Jersey, Board of Public Utilities
44 South Clinton Avenue, 1st Floor
Post Office Box 350
Trenton, NJ 08625-0350

**Re: BPU Straw Proposal on Advanced Metering Infrastructure (AMI) Data Transparency,
Privacy & Billing
BPU Docket No. E020110716**

Dear Secretary Camacho-Welch:

New Jersey-American Water Company, Inc. ("NJAWC" or the "Company") welcomes the opportunity to provide comments on the Straw Proposal on Advanced Metering Infrastructure ("AMI") Data Transparency, Privacy and Billing, released on August 23, 2021 ("Straw Proposal"). Although the Straw Proposal focuses on the four investor-owned electric distribution companies, the Board of Public Utilities ("Board" or "BPU"), in its notice, indicated that Board Staff seeks comment on whether the same rules and processes should apply to all public utilities, as the concerns over data access will eventually apply equally to all public utilities.¹ NJAWC thanks the Board for the opportunity to provide input on this important topic.

NJAWC fully supports AMI deployment in the water industry. The transition to an AMI metering program will enable strategic and permanent improvements in safety, customer experience, operational efficiencies and environmental benefits. The Company looks forward to leveraging AMI to empower customers with near real-time consumption data to enable smart water use choices, enhance customer communication regarding customer water consumption patterns and unusually high water use, optimize NJAWC's ability to measure and address non-revenue water, and improve water system operations and management, among other things.

The Company supports and shares the Board's commitment to protect customer data. Cybersecurity is core to American Water's vision of resiliency and sustainability. As we continue to implement intelligent water and wastewater systems, working to ensure that industry-leading cyber controls are designed, built and integrated into all aspects of the technology is of paramount importance.² These controls and technologies protect our existing systems and enable the implementation of secure innovation,³ helping us enhance the customer experience while safeguarding the integrity of company information and systems. With AMI implementation, comes more data. This data and its usage are inherently valuable, sensitive information worthy of being protected from cyber-

¹ Straw Proposal, p. 1, fn. 2.

² We recognize that the threat landscape constantly evolves and expands, and therefore our cyber program is focused on continuous improvement and the advancement of new technology to reduce our cyber risk and improve our cyber resiliency.

³ The Company's cybersecurity program is consistent with industry best practices, including the National Institute of Standards and Technology (NIST) Cybersecurity Framework and the American Water Works Association (AWWA) Process Control System Security Guidance for the Water Sector. All Hazard Risk assessments, vulnerability assessments, and penetration tests are conducted internally and by independent third parties.

attack and unauthorized disclosure. NJAWC treats the security and privacy of customer information as a top priority. That includes individual customer water usage information.

NJAWC agrees that timely access to data by customers will play a critical role in their ability to monitor and understand their usage and make wise decisions regarding their water use. However, unlike the electric industry, the water industry does not have third party suppliers that will need to access customer data. In addition, the technology and functionality available to measure usage may vary from the electric industry to the water industry. Therefore, it may not be appropriate to apply the same data access rules to all public utilities.

In addition to data access, the Straw Proposal also notes two other points for broader utility consideration. First, the Straw Proposal notes that “while smart meter deployment has not yet been rolled out in the water or natural gas sectors in New Jersey, the principles developed as part of this proceeding will also be used to guide any AMI deployment in those industries as well, and Staff is committed to enabling any synergies in data collection or AMI-related software and infrastructure across utility sectors.”⁴ As noted above, the water industry is unique. Not only are there no third-party suppliers, there is also different metering technology that may have different functionality. These factors would need to be considered before principles developed in the context of the electric industry are applied to the water industry to ensure the principles applied are practical and manageable for water utilities to implement.

Second, the Straw Proposal notes that “Staff proposes to require that utilities develop a standard protocol for sharing networks to allow other regulated industries to utilize the already existing networks.”⁵ While the Company supports evaluating the feasibility of leveraging existing networks, doing so should not delay the implementation of AMI where cost effective solutions are otherwise available. Doing so may unnecessarily delay achieving the operational and customer benefits associated with AMI deployment.⁶

NJAWC appreciates the Board’s efforts to make AMI an integral part of New Jersey’s energy solutions by recognizing the benefits it can bring to the state and its residents. The Company believes the efficiencies and benefits associated with AMI deployment in the electric industry carry over to the water industry as well, and we look forward to working with Board Staff and other stakeholders to further its deployment in the water industry in an effective and efficient manner.

Very truly yours,



Christopher M. Arfa

⁴ Straw Proposal, p. 2.

⁵ Straw Proposal, p. 17.

⁶ This is consistent with Staff’s recommendation to “make the AMI data available on a rolling basis as these meters are installed across their service territories” rather than waiting for full AMI deployment, recognizing that access to critical energy-saving information shouldn’t be unnecessarily delayed. Straw Proposal, p. 8.