



October 7, 2021

**VIA ELECTRONIC MAIL**

Aida Camacho-Welch  
Secretary of the Board  
New Jersey Board of Public Utilities  
44 South Clinton Avenue  
P.O. Box 350  
Trenton, NJ 08625

**Re: Advanced Metering Infrastructure (AMI) Data Transparency,  
Privacy and Billing  
BPU Docket No. EO20110716**

Dear Secretary Camacho-Welch,

These comments are respectfully submitted on behalf of South Jersey Gas Company (“SJG”), Elizabethtown Gas Company (“ETG”) and New Jersey Natural Gas Company (“NJNG”) (collectively, the “Companies”) in accordance with the August 23, 2021 Notice (“Notice”) issued in the above-referenced proceeding. The Companies incorporate by reference their comments previously submitted to the New Jersey Board of Public Utilities (“BPU”) in this proceeding on December 7, 2020 (“December 7 Comments”).

As reflected in the Notice, BPU Staff is soliciting stakeholder input on a Straw Proposal, which addresses issues such as the critical capabilities that AMI, or “smart meters”, should provide to customers, and the key considerations for facilitating data access, including data sharing, enabling academic researchers access to data, promotion of retail competition, and the role of AMI in achieving New Jersey’s long-term clean energy and environmental objectives.

As recognized by the Notice, smart meter deployment has not yet been rolled out in the gas or water sectors in New Jersey, but these industries may seek to do so in the future. As reflected in the December 7 Comments and reiterated here, the Companies submit that AMI holds the potential to be an integral part of New Jersey’s clean energy transition and will benefit customers seeking to better understand and control their own energy usage. AMI is also a necessary tool to support Demand Response programs that the State might consider necessary in the Clean Energy Future. Thus, the wide-scale deployment of smart meter technology across all energy sectors, including the natural gas distribution systems owned and operated by New Jersey local distribution companies (“LDCs”), would help to facilitate our collective efforts to satisfy the State’s environmental goals.



That said, because AMI is in the nascent stages for the LDCs, it is impractical for the LDCs to address with specificity the issues contained in the Notice at this time. We recognize that the principles developed as part of this proceeding could potentially also be used to guide LDC AMI deployment, and we agree that it makes sense to enable synergies in data collection or AMI-related software and infrastructure across utility sectors, where practicable. The Companies, where possible, would endeavor to leverage data mesh networks with other utilities through joint-use agreements or other methods to take advantage of efficiencies and minimize costs to our customers. The Companies caution, however, that the development of standard protocols across all industries would not be appropriate at this time given the current early stages of LDC AMI deployment. Thus, it is respectfully requested that any protocols developed in this proceeding as they relate to electric distribution companies embed sufficient flexibility pending the deployment of AMI by the LDCs.

SJG, ETG, and NJNG appreciate the opportunity to submit these comments and look forward to continued collaboration with the BPU and all stakeholders to support the State's energy efficiency and clean energy goals and ensure that the benefits associated with AMI are realized by all New Jersey utility customers.

The Companies respectfully request that all future communications related to this matter be addressed to the following individuals: Deborah Franco, Vice President, Rates, Regulatory Affairs & Sustainability ([dfranco@sjindustries.com](mailto:dfranco@sjindustries.com)), Dominick DiRocco, Vice President, External Affairs ([ddirocco@sjindustries.com](mailto:ddirocco@sjindustries.com)), Kyle Nolan, Vice President, Strategy ([knolan@sjindustries.com](mailto:knolan@sjindustries.com)), Cindy Capozzoli, Director, Rates ([ccapozzoli@sjindustries.com](mailto:ccapozzoli@sjindustries.com)), Andrew McNally, Director, Government Relations ([amcnally@sjindustries.com](mailto:amcnally@sjindustries.com)), Olivia Ryter, Strategic Project Administrator Lead, Innovation and Business Improvement ([oryter@sjindustries.com](mailto:oryter@sjindustries.com)), Mark Kahrer, Senior Vice President, Regulatory Affairs ([mkahrer@njng.com](mailto:mkahrer@njng.com)), Andrew Dembia, Regulatory Affairs Counsel ([adembia@njng.com](mailto:adembia@njng.com)) and Scott Edgerton, Director, Energy Delivery Support ([sedgerton@njng.com](mailto:sedgerton@njng.com)).

Respectfully submitted,

A handwritten signature in black ink that reads "Deborah M. Franco".

Deborah M. Franco  
VP, Rates, Regulatory & Sustainability  
SJI Utilities

A handwritten signature in blue ink that reads "Andrew K. Dembia".

Andrew K. Dembia  
Regulatory Affairs Counsel  
New Jersey Natural Gas Company