Rockland Electric Company

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October 7, 2021

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
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RE: Straw Proposal on Advanced Metering Infrastructure (AMI) Data Transparency, Privacy & Billing
Docket No. EO20110716
Comments of Rockland Electric Company

Dear Secretary Camacho-Welch:

Enclosed please find Comments of Rockland Electric Company in the above matter.

Respectfully submitted,

Margaret Comes
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ROCKLAND ELECTRIC COMPANY'S COMMENTS ON STRAW PROPOSAL ON ADVANCED METERING INFRASTRUCTURE (AMI) DATA TRANSPARENCY, PRIVACY & BILLING
Docket No. EO20110716

Rockland Electric Company ("RECO" or the "Company") submits these comments in response to the New Jersey Board of Public Utilities ("BPU") Staff's request regarding its Straw Proposal on Advanced Metering Infrastructure ("AMI") Data Transparency, Privacy and Billing ("Straw Proposal" or "Proposal").

I. Introduction

The Straw Proposal advocates sharing customer energy data and anticipates that each utility will develop a Data Access Plan ("DAP") that meets the directives of a future Minimum Filing Requirements ("MFR") order. The Straw Proposal notes that the DAPs will address data sharing, data access, data privacy, and billing reconciliation on a state-wide basis so that AMI is cost-effectively leveraged to meet its full promise. According to the Proposal, this effort will "facilitate carbon reductions, lower costs for customers, open paths to competitive third-party innovation, and enhance utility response to storms and outages."[1]

The Proposal represents an ambitious effort to change and standardize requirements for sharing customer data. RECO recommends discrete collaboratives to further explore these changes. This approach will facilitate access and sharing of customer data in an efficient and effective manner while protecting privacy interests and addressing cyber security concerns. RECO and its corporate affiliates, Orange and Rockland Utilities, Inc. ("O&R") and Consolidated Edison Company of New York, Inc. ("Con Edison"), have developed expertise in data sharing through decades of experience in information system design, data management, market facilitation, data access controls, and customer consent that can be leveraged in this effort.

RECO supports the Proposal's data sharing effort and has already implemented measures to provide customers with easy access to their data through its AMI rollout out (completed in April 2019) and complementary Green Button Connect ("GBC") application providing customers with control over data sharing. Additionally, RECO continues to integrate AMI data into its planning, operations and emergency preparedness efforts and expects this integration to expand and improve with time and experience.

RECO's overall view of the Straw Proposal is that, while the questions provide a useful starting point for data sharing discussion, they do not recognize the differences amongst the Electric Distribution Companies ("EDCs"). For example, unlike the other EDCs, RECO completed its AMI rollout and is already providing customers with usage data such that some questions are inapplicable to RECO. The RECO AMI experience can inform the BPU's consideration and evaluation of technical issues, such as appropriate data intervals, thereby promoting efficiency and cost effectiveness.

[1] Straw Proposal, p. 1.

Given the inherent complexity of data, data access, use cases, and data sharing, RECO strongly recommends that the BPU establish working groups to address the issues in the Straw Proposal. These working groups will encourage a consensus approach to these issues, as well as providing all stakeholders with an opportunity to participate. RECO recommends separate working groups for key topics that each require different subject matter experts to work in parallel to develop data sharing standards and processes.

For these working groups, RECO recommends that the BPU Staff undertake and lead stakeholder discussions and technical conferences to achieve a detailed understanding of needed steps to advance customers' and stakeholders' data sharing goals. Each EDC should participate in every working group as the EDCs will implement programs to meet the adopted BPU requirements. The EDCs should explain why they can and cannot implement certain proposals and provide lessons learned from an EDC affiliate's experience in other jurisdictions.

For each topic in the Straw Proposal, the BPU Staff includes suggested MFRs. Given that RECO is the only EDC that has fully deployed AMI and provides access to energy usage data through Green Button Connect, RECO suggests that MFRs be developed after other EDC AMI implementations are complete. After the other EDCs have rolled out their AMI programs is the most productive time for working groups to develop MFR frameworks that prioritize areas for the best and earliest successes, while laying out a longer-term plan for improvement.

RECO looks forward to working with stakeholders to develop these plans to provide actionable data within a private and cyber secure structure that helps empower customers and enable reaching New Jersey's Clean Energy Goals.

II. RECO's AMI System Gives Customers Insight into Their Energy Usage

RECO is a leader in implementing AMI and enabling customers to understand and share their energy usage data. In April 2019, RECO completed its service-territory wide AMI installation, rolling out 72,000 meters to all its customers. RECO's AMI system provides customers with energy use and other information within an hour through RECO's My Account DCX platform.[2] RECO's AMI installation provides commercial customers with interval data on a 5-minute basis and residential customers with interval data on a 15-minute basis.

a. RECO's Green Button Connect (GBC) Platform Enables Data Sharing

In addition to accessing their own energy usage, RECO's customers can agree to share data with third parties through RECO's Green Button Connect platform.[3] GBC provides a reliable

[2] RECO's parent company, O&R, and its affiliate, Con Edison, operate a portal, My Account, which allows customers to review and share their energy use data. Customers can also download their data through Green Button Download My data. RECO customers have the ability to review or share information with third parties. Moreover, working with the Staff of the New York State Department of Public Service and the New York State Energy Research and Development Authority ("NYSERDA"), O&R has worked on a project that shares information regarding hosting capacity with developers through a third-party portal.

[3] Green Button was launched in 2012 as a national data sharing standard intended to provide customers with access to their energy usage data in a convenient and secure manner. Green Button's protocols enable customers to download their own energy usage data and, if desired, upload it to a third-party application for analysis. Subsequently, Green Button Connect My Data® (GBC) was

protocol for customer authorization, data transfer, data formatting, and data exchange that can be used by registered third parties that have met technical and business requirements. A third party can register through GBC for data sharing approval which, for example, provides a mobile app that allows customers to enroll and/or participate in RECO's demand response programs. Customers who wish to share their data with that third party can subsequently log onto their My Account portal and authorize that third party to receive their energy usage data, including their demand response efforts (customers can authorize third parties on a one-time, ongoing, or temporary basis). The Company also automated data exchanges between utility systems and customer-authorized third parties. GBC standards also enable the exclusion of customer personally identifiable information ("PII") from shared customer data, thereby maintaining customer privacy.

RECO, O&R, and Con Edison implemented GBC for several reasons. GBC is a nationwide standard protocol that supports adoption by entities that operate in multiple jurisdictions and are already capable of receiving data in the GBC format. The GBC data format and data sharing process are also consistent with, and complementary to, the Company's My Account platforms. Most importantly, the GBC transfer process is secure and customer-driven. Overall, GBC contributes to the enhanced customer experience that AMI enables.

RECO's customers and third parties have benefitted from AMI implementation in numerous ways. With respect to various available sharing platforms, RECO notes that as of June 30, 2021:

- Energy Usage - RECO customers have logged into the online customer portal to view their energy usage information more than 35,000 times.
- Near Real Time Data – All RECO customers with fully commissioned AMI meters (*i.e.,* more than 73,000 customers) now have access to near real-time data available through their My Account portal on oru.com.
- Green Button Connect My Data – Currently, RECO customers can share their data with five authorized third party energy service companies / DER companies.

III. Privacy and Cybersecurity Controls Are Critical to Sharing Data

Privacy and cybersecurity best practices are essential components of sharing data. As described herein, before receiving any shared data from utilities, third parties must identify and mitigate their cyber risks. A common and comprehensive approach to managing cybersecurity risks in the evolving modern grid environment must focus on people, processes, and technology and is crucial to security. It is essential that implementation includes an industry-approved risk management methodology and alignment of control implementations with recognized and accepted industry standards, *e.g.*, National Institute of Standards and Technology ("NIST") standards. The cybersecurity industry continues to evolve, as does technology. Cyber insurance is also essential.

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launched, which enhances the standard by automating continuous data sharing between customers and third parties. RECO's GBC platform is branded as "Share My Data."

IV. RECO Supports Expanding Data Sharing through a Collaborative Process

Overall, the twelve items BPU Staff identified are appropriate for consideration in expanding data sharing to empower customers' energy choices and meet clean energy goals. However, RECO notes the issues are complex, highly technical, and should be vetted through a collaborative process. The Company offers the following high-level comments based on its experience and looks forward to future engagement.

1. Customer Consent and Hassle-Free Sharing of Energy Related Data

RECO supports the principle that customers control sharing their individual data, which is implicit in the Company's AMI rollout and GBC implementation, and adheres to New Jersey law and the BPU's regulations regarding customer data and, particularly energy usage data. Customer information, including energy usage information, should not be disclosed to third parties without the customer's consent (except in instances involving municipal aggregation). Consent processes are complex and nuanced, and the BPU should carefully evaluate the variety of ways customers may consent to the sharing of their information. For instance, through GBC, RECO allows customers to share their usage information in an easy, hassle-free way. Moreover, RECO customers can access their data on a near real-time basis, *i.e.*, approximately an hour from consumption. In addition to GBC, RECO shares granular customer usage data (collected via AMI) through Home Energy Reports ("HERs"), weekly AMI reports, and customers' My Account portal. This usage data provides customers visibility into their own unique usage patterns and allows them to reduce their utility bills through active management of their energy usage. But third parties, especially third-party suppliers, also share in the consent process, and should continue to do so. Current processes which require third-party suppliers to obtain informed consent from customers and working groups should carefully address how other third parties or platforms obtain informed consent.

The Straw Proposal's inquiry into the sharing of data to a home area network (HAN) raises significant cybersecurity concerns. RECO's affiliate, Con Edison, studied the benefits and concerns related to allowing sharing of data directly from AMI meters in 2020 and submitted a redacted third-party report[4] to the New York Public Service Commission explaining the cyber concerns associated with this sharing. Accordingly, RECO's AMI implementation does not support sharing of data to a home area network, but rather shares data through My Account, GBC and other platforms.[5] RECO and its cyber security experts are available to discuss HAN cybersecurity concerns with the BPU and stakeholders.

Regarding third-party access, RECO provides customer data to third parties via other methods, including Electronic Data Interchange ("EDI"). Customer consent to this dissemination of customer-specific information is essential to maintaining the customers' trust and compliance with the law, and RECO supports an approach that requires customer authorization for all third-

[4] Guidehouse HAN Study Report filed in 19-E-0065.

[5] RECO also notes that there are third-party devices that can provide customers with information on their home energy usage and potentially interact with appliances directly without compromising the AMI network.

party use of their customer-specific data. As noted above, the GBC platform provides a mechanism for the customer to consent to sharing data.

2. Adoption of Standardized Customer Privacy Requirements

RECO agrees with BPU Staff that there should be uniform cybersecurity and privacy protections for both customer data and utility IT systems. RECO recommends that any uniform cybersecurity and privacy provisions established by the BPU be readily adaptable and periodically reviewed, particularly as bad actors become increasingly sophisticated. New York currently prescribes a minimum level of requirements for which third parties receiving data must self-certify compliance.[6] In the on-going New York Data Access Framework Proceeding,[7] given the changing nature of cybersecurity and privacy technology, utilities have suggested a process, including governance, for updating these cybersecurity and privacy requirements annually. RECO recommends the BPU, through a collaborative process, adopt similar uniform cybersecurity and privacy requirements for customers, utilities, and third parties in New Jersey.[8]

The Straw Proposal describes the development of a Common Release Form ("CRF"). RECO recommends further discussion regarding the purpose of the CRF. For example, will the CRF include common consent language that customers would agree to? Will the CRF also include common data security and privacy requirements that would be imposed on third parties seeking to obtain customer data? To the extent the CRF refers to common requirements for third parties, RECO agrees that the requirements should be developed through a collaborative process, which would provide the latest required cybersecurity and privacy protections that third parties must meet. This will not only facilitate a smoother and faster data access implementation but also limit the risk that gaps in security and/or privacy protection would significantly imperil long-term customer trust and impede the development of market products tied to this data. Any additional appropriate non-disclosure agreement ("NDA"), data security or access agreements ("DSA"), or safety protections need to be clearly defined for each data type, and cybersecurity risks should be identified and mitigated. Security and governance of data should be consistent with all markets (*i.e.*, distribution, transmission, and wholesale) and avoid conflicts with the competitive nature of markets and data access. Standardization of these requirements for third parties will reassure customers when they authorize access to their data that the appropriate protections are in place.

In addition, as in New York, there should be a DSA that sets forth the terms and conditions for data sharing. This agreement should include indemnification, cyber security insurance, warranty, and other legal requirements associated with data sharing. The current New York Data Security Agreement could be used as a model, as it addresses appropriate operational and legal requirements, was standardized among utilities, and was vetted by stakeholders. New York

[6] 18-M-0376 Matter of Cyber Security Protocols and Protections in the Energy Market Place
[7] 20-M-0082 Matter of Strategic Use of Energy Related Data.
[8] Currently, New York requires the signing of a data security agreement, which includes 15 cybersecurity requirements that need to be self-certified. (18-M-0376 DSA/SA). These items include, among others, multi-factor authentication in use, and an incident response plan. In the Data Access Framework proceeding, the Utilities requested that parties also have a data inventory. Also, as part of the data access proceeding, the DSA will become a Data Access Agreement. These documents are currently used by all utilities and all third parties wishing to access systems or data. Additionally, through the New York Public Service Commission Data proceedings, the utilities expect that there will be a third-party process for evaluating cyber controls and sharing data.

utilities developed the agreement through a collaborative business-to-business process with stakeholders and the Department of Public Service Staff.

However, the BPU should not adopt the European Union's General Data Protection Regulation approach. Utilities should not be required to adopt these types of requirements, such as privacy by design, and consumer data rights such as data collection, deletion, and sharing. Privacy standards should not be developed piecemeal but rather on a common, nationwide standard. Any data sharing requirements should be guided by existing statutes and regulations.[9]

3. Using AMI to Achieve New Jersey's Clean Energy Goals, and Positioning New Jersey Grid to Account for Clean Energy Attributes

AMI will play a vital role in assisting the State's achievement of its clean energy goals in a variety of ways. As noted above, AMI is already providing information that assists customers in monitoring usage. With this information and capability, customers have the opportunity manage their energy use (including pursuing energy efficiency, distributed energy resources, like solar, and participation in demand response programs), possibly resulting in lower customer bills and providing grid benefits. In addition to the near real-time data available on a customer's My Account portal, customers can sign up for texts alerting them to upcoming higher bills or the need to conserve. RECO also provides customers with High Bill Alerts and Weekly Energy Reports to drive conservation.

AMI, coupled with data sharing capability will also facilitate DER aggregation and allow participation in the wholesale markets (which is the goal of FERC Order No. 2222 cited in the Straw Proposal). Identifying and prioritizing these benefits is best done in a collaborative stakeholder process that will facilitate discussion for informed, cost-effective decision making, particularly regarding technological requirements.

4. Maximizing Impact of AMI on Reliability, Planning, and Reporting Metrics

RECO recognizes the potential benefit of AMI rollout for reliability, planning, and reporting. Realization of these benefits depends on investment in, and deployment of, complementary technologies to collect and analyze data. RECO does not recommend MFRs that require all these capabilities to be in place from the start, as investment and implementation of these systems occurs in phases. A collaborative process provides more flexibility in strategizing an implementation plan and building on current initiatives.

For example, RECO is seeing reliability-related improvements from AMI from improved system insights and outage management. Since April 2020, AMI information is integrated into the Company's Outage Management System ("OMS"). This integration enhances the management of storm restoration as the Company can more quickly and accurately determine restoration times, more efficiently deploy field crews to restore customers, and improve the efficiency of outage management. Additionally, this integration sends outage messages from AMI meters to OMS, providing a clearer picture of service disruption(s) and allowing for a more efficient restoration effort. The Company can dispatch field crews to outages more quickly as well.

[9] See for example, *N.J.A.C.* 14:4-7 and -8 and *N.J.S.A.* 48:3-85.

These capabilities also increase the accuracy of reliability metrics,[10] such as System Average Interruption Frequency Index ("SAIFI") and Customer Average Interruption Duration Index ("CAIDI"), when combined with other operational tools. In addition, this information has provided RECO with the capability to post more accurate outage and restoration information to the public website.

RECO also anticipates using AMI data in system planning once it implements additional supporting technologies. Currently, the integration of granular data from AMI meters and other Distribution Supervisory Control and Data Acquisition ("DSCADA") devices (*e.g.*, reclosers, smart capacitors, and field sensors and power quality ("PQ") meters) is in the early stages of development and not accessible for planning, modeling, and operational purposes. The Company is working to improve the collection and archiving of this type of field data through the soon-to-be-implemented Advanced Distribution Management System ("ADMS"). As the Company implements ADMS and this data becomes more accessible, electric system planners will be better able to analyze and trend field data, validate operational assumptions regarding specific distributed energy resources (DER) technologies, and improve the accuracy of system modeling software. This approach will lead to a better understanding of the performance of DER and its effects on the electric delivery system, as well as improve the integration of DER. RECO looks forward to sharing its two-plus years of integrating AMI into the utility system and working with other stakeholders to continue improving its use in customer service, reliability and emergency response.

5. Data Granularity and Appropriate Rollout Schedule

RECO customers already receive granular usage data (in either 5- or 15-minute intervals, as discussed above) through their My Account portal and can share this data with authorized third parties via GBC on a near-real time basis, within an hour.

RECO cautions against pursuing more granular data without a solid business case, including a rigorous cost benefit analysis, and backing of stakeholders. The Straw Proposal recommends that utilities collect 5-minute meter interval usage data at watt-level precision[11] apparently for all customers. RECO currently collects 5-minute interval data for commercial customers and notes that increasing residential data from the current 15-minute interval to 5-minute interval data would triple the readings collected and stored for those customers, with little to no incremental benefit identified. Furthermore, since RECO's AMI deployment is complete, changes to current capabilities may incur additional cost to the Company and its customers.

Industry benchmarking conducted as part of Con Edison's AMI Business Plan showed that no peer utilities were collecting 5-minute data on all customers.[12] In fact, many peers were not collecting 5-minute interval data for any customers, and collect 15-minute intervals for commercial customers along with 60-minute intervals for residential customers. The Straw Proposal offers no substantive justification for this change except the general observation that

[10] RECO reports reliability metrics quarterly.
[11] RECO's AMI meter installation meets the parameters of the Board's Order authorizing this program. *See* Decision and Order, *In the Matter of the Petition of Rockland Electric Company for an Approval of an Advanced Metering Program; and for Other Relief*, BPU Docket No. ER16060524 (August 23, 2017).
[12] AMI Business Plan filed November 16, 2015

more data is better. The additional insights granted by this increase in granularity for residential customers are likely minimal, given that the typical consumption of residential customers is significantly lower than that of typical commercial customers.[13] This should be considered in collaborative sessions with stakeholders along with the justification for the programming and storage costs associated with making this change for residential customers.

6. Ensuring Fair Access and Competition for All Meter Capabilities

The extensive metering, communication and Information Technology infrastructure needed to maintain optimal customer service require controlled access from the utility. While RECO's AMI installation includes room for growth, maintaining appropriate bandwidth and service levels is critical to success. At this time, RECO does not believe that changes to the communications infrastructure are needed.

As to the Straw Proposal's suggestion that meters should be capable of "over the air" updates, RECO notes that, while some updates can be accomplished over the air, it is simply not possible for all reprogramming or upgrades to be completed over the air. Moreover, such a requirement is not cost-effective for RECO. There are restrictions related to some firmware upgrades that require physical interaction with the meters, resulting in additional costs. Additional measurement types would also require significant programming changes in both the meter and system and could not be processed over the air. In addition to cost and technology concerns, RECO does not believe a business case has been made justifying this "over the air" capability.

RECO disagrees with the Straw Proposal's position that the bandwidth from the RECO AMI system should be made available to others. As explained in the AMI cybersecurity report cited above, this system was installed as a RECO-only system. The benefits of one party control of the network are that one entity is responsible for customer service, system performance, and cybersecurity controls.

7. Billing and Settlement Best Practices

The Straw Proposal states that collection and use of AMI data by third-party suppliers will "enable the significant transition towards a more decentralized market structure, with increasing reliance on DER and customer energy management."[14] As stated earlier, RECO already provides AMI interval data to third-party suppliers via EDI and to third parties via GBC.

The Straw Proposal goes on to suggest implementing a third-party supplier consolidated billing ("SCB") model, whereby a third party performs the consolidated billing function. Under a SCB model, the EDC's charges would be included on a consolidated bill issued by the third-party. RECO opposes this model for several reasons. First, if such a model was implemented, multiple entities could offer consolidated billing in each EDC service territory, dramatically increasing the complexity of the billing process in New Jersey. For that reason alone, SCB is presently not used (nor have the detailed business rules or data transfer protocols been developed or approved)

[13] For example, even a large residential customer consuming 100 kWh in a day, the average 15-minute consumption is 1.04 kWh, and the average 5-minute consumption would be 0.35 kWh.
[14] Straw Proposal, p. 16

for electric retail choice in New Jersey.[15] Moreover, SCB implementation presents numerous process and policy complexities, such as responsibilities for billing accuracy, customer service, non-payment policies, purchase of receivables rules, consumer protections, and cost recovery. The EDCs, including RECO, previously detailed these significant complexities and for the reasons described in those comments, RECO continues to oppose SCB.[16]

Regarding billing efficiency and estimated bills, RECO uses (and has been using) actual AMI readings, wherever available, since installation was complete. RECO's filed AMI metrics demonstrate that estimates occur on 0.1 percent of bills.[17]

Historically, Peak Load Contribution (PLC) and Energy Reconciliation calculations for RECO customers were calculated using load profile methodology, except for Large Power customers for which Interval/hourly data was already available. With the pending completion of the Company's new Energy and Capacity Reconciliation Software, settlement can now be based on hourly interval data with a few exceptions (legacy meters and unmetered accounts). PLC for the current year was calculated using load profile, but the plan is to use actual peak hour AMI data for next year's calculations. However, the Company will need to keep load profiles when there are operation or communication issues with the meters.

8. Format of Data Sharing and Cost Implications

RECO supports the principle that AMI data be shared in a manner convenient for customers. Data access implementation will take significant internal utility and external effort, requiring design, architecture, capital investment, and continued, ongoing reliability, and cybersecurity management. RECO provides information to customers and third parties through the channels previously mentioned and believes this is already helping customers make informed energy decisions.

9. Promoting Academic Research into Reliability and Customer Clean Energy Adoption

RECO supports academic research by sharing anonymized, aggregated customer data with research institutions. Any data or information sharing must comply with the state and federal law, privacy, cyber requirements, and data sharing agreement and standards developed in this proceeding.

10. Appropriate Utility Use of AMI Data

AMI plays a critical role in providing 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 and effective rate design will encourage customers to be active partners with utilities and third parties, such as DER providers and energy efficiency companies, to achieve the Stacte's clean energy goals. Pairing AMI data with software data analytics and

[15] SCB has been approved and implemented (or is in the process of being implemented) in only a handful of jurisdictions -- Texas, Illinois and recently, Maryland -- across the country for retail choice programs.
[16] Consolidated Billing Report, *In re the Community Solar Energy Pilot Program Year 2 Application Form and Process*, BPU Docket No. QO20080556, (May 28, 2021).
[17] Any savings associated with reducing estimated bills were included in RECO's AMI business case and have already been absorbed into the Company's operations.

behavioral programs can provide more customized actionable recommendations to customers. The Company will leverage its experience in New York to provide similar opportunities in New Jersey.

With respect to utility use of data for its core function versus other functions, RECO notes that it does not intend to utilize smart meter data to achieve an unreasonable competitive advantage, but that utilities should be permitted to use the data in ways to advance clean energy objectives.

11. AMI Data Must Support Emergency Responder Effectiveness and Safety

Just as AMI data enhances the Company's response to emergencies, AMI information could enhance emergency responder effectiveness. RECO recommends working with emergency responders to explore the sufficiency of the information already provided by utilities and identifying what, if any, other types of information would be useful. Utilities could also familiarize emergency responders regarding the nature and limitations of AMI data. For example, AMI does not have the capability to indicate if a downed wire is live. Data that the utility uses to respond to emergencies and other operational needs is used in context with RECO's system. As a result, only utilities can safely and appropriately interpret this raw data. RECO currently provides information to municipalities that incorporates AMI data.

RECO recommends that any further sharing for this purpose should be information that can be disseminated for emergency responder use without misinterpretation. Direct access to these systems by emergency responders is both unnecessary and potentially dangerous. Moreover, any data or information sharing must comply with the state and federal law, as well as privacy and cyber requirements developed in this proceeding.

12. Stakeholder Engagement

Since April 2018, RECO has submitted AMI metrics to the BPU.[18] There are eight metric categories with 20 discrete metrics. The BPU and other parties to RECO's AMI proceeding, which was approved by the BPU *on August 23, 2017, in BPU DOCKET NO. ER16060524* ("AMI Order"), agreed to these metrics. They include information on customer engagement, use of customer portals, identification of false outages and environmental benefits achieved. RECO's rollout is complete and reporting these previously agreed-to metrics should continue. Any changes to or the need for additional metrics for RECO should be addressed through the stakeholder process.

RECO supports a collaborative stakeholder process to vet the complex, and sometimes highly technical issues listed in the Straw Proposal as well as those raised in RECO's comments above. A collaborative stakeholder process can facilitate discussion and informed, cost-effective decision making, particularly regarding technological requirements. Understanding the business cases and technical capabilities of utilities and other third parties coupled with privacy standards and cyber requirements all lend themselves to multiple stakeholder sessions focused on discrete topics. RECO looks forward to actively participating in these sessions.

[18] For RECO, rollout metrics are unnecessary given that rollout is complete.