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Via Electronic Mail

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**Re : Straw Proposal on Advanced Metering Infrastructure (AMI) Data
Transparency, Privacy & Billing
BPU Docket Nos. EO20110716**

Dear Secretary Camacho-Welch:

The Division of Rate Counsel (“Rate Counsel”) provides its comments regarding the *Straw Proposal on Advanced Metering Infrastructure Data Transparency, Privacy and Billing* (“Straw Proposal”) published by the New Jersey Board of Public Utilities (“BPU” or the “Board”) Staff in Docket No. EO20110716 on August 24. The stated purpose of the Straw proposal is “to determine the appropriate standardized Data Access Plans (“DAPs”) that each New Jersey public utility will be required to adopt.”¹ Staff further plans to use the principles in the Straw proposal as the basis for a Minimum Filing Requirement (“MFR”) order, requiring each of the State’s investor-owned electric distribution companies (“EDCs”) to design and implement DAPs.

Preliminary Statement

Rate Counsel supports Staff’s effort to address these important issues. However, as a threshold issue, and considering AMI on the whole, Rate Counsel continues to be concerned by the degree to which the Board and Staff simply assume that the cost-effectiveness of AMI is a given, and that even if AMI is not cost-effective, AMI will help achieve New Jersey’s Energy Master Plan goals. Both of these assumptions are unsupported. First, any analysis of an AMI program must be on a case by case basis, reviewing the specific facts of the individual utility and

¹ Straw Proposal at *1.

its program. Board Staff appears to rely heavily upon the Capstone and Gold Standards Reports from Navigant. Rate Counsel has extensively critiqued both reports.² The conclusions of those reports have never been fully vetted nor has there been an opportunity to probe issues with methodology, calculations or for any bias on the part of the authors of those reports. Neither report has been admitted as evidence in any proceeding or otherwise vetted. They were simply “accepted” by the Board. The reports therefore lack any evidentiary value, as there has never been an opportunity to cross-examine the Reports’ authors or effectively probe any statement within the Report.

Additionally, Rate Counsel cautions that, just because a smart meter or its communications network can fulfill a certain function, does not mean it should be used for that function. AMI should not be used to duplicate capabilities or services already available in the market, nor should requirements be established which cost more to implement than the incremental benefits they offer. Instead, every MFR should be subjected to a cost-benefit analysis prior to being enacted. Additionally, when evaluating the benefits of AMI, Rate Counsel notes that the level of benefits secured from AMI can vary widely by utility. Therefore, the key to reducing AMI benefit variability, and to securing customer benefits from AMI in excess of customer costs, is to maximize the value of every available AMI capability as quickly as possible. Thus, strategies to maximize and speed the benefits of AMI capabilities, and in particular its greatest capability (data), make sense for the Board to pursue.

Lastly, Rate Counsel believes an MFR order for AMI uses would deliver even greater benefits to customers. Reasonable and practical AMI application standards are urgently needed. Rate Counsel provides MFR recommendations for AMI applications at the end of these comments.

Comments Regarding the Twelve Components in the Straw Proposal

1. Customer Ownership & “Hassle-Free” Sharing of Energy Related Data

Rate Counsel believes that the Board should protect customer ownership of energy usage data. The Board’s regulations already provide significant customer protections. As noted in Rate Counsel’s December 7, 2020 comments, on the November 23, 2020 “AMI Work Session,” the Board’s rules make clear that utilities are prohibited from disclosing, selling, or transferring individual proprietary information, including a customer’s energy usage to a third party without the affirmative written consent of the customer or by a Board-approved alternative method. N.J.A.C. 14:4-7.8. See also N.J.S.A. 48:3-85(b).

However, further clarification is needed to identify customer ownership in terms of 1) what rights does a customer have to his or her own energy usage data, and 2) what rights do utilities have to customer energy usage data. These questions should be the focus of the customer privacy policy on the rights to the data. Rate Counsel recommends the Board base its privacy policy on the European Union’s General Data Privacy Regulation (GDPR) because it

² See e.g., Direct Testimony of Paul J. Alvarez, BPU Docket No. EO18101115, at p. 49-53 (Aug. 31, 2020).

provides an extensive guideline consistent with New Jersey’s policy of protecting customers and their data.³ The GDPR includes ten straightforward, logical requirements:

1	Lawful, fair, and transparent (data) processing	6	Privacy by design (default mechanisms to protect customer data from release)
2	Limitation of purpose, data, and storage	7	Data policy impact assessment (when considering a privacy policy change)
3	Data subject rights (inquiries of and corrections to data maintained on me)	8	Data transfers (accountability for customer data protection)
4	Consent (no transfer without)	9	Data protection officer (person responsible at organization)
5	Personal data breaches (what to do if)	10	Awareness and training (of employees)

However, “Hassle-Free” sharing (known by economists as “reducing transaction friction”) is extremely important, and generally is a very good policy to adopt. In accordance with this policy, Rate Counsel recommends that no third party should ever be charged a fee to access an authorizing customer’s energy usage data. Rate Counsel also agrees that utilities must make more detailed energy usage data available to customers with smart meters as they are rolled out, and that 24-hour latency is a reasonable target, and that access to sub-15 second energy usage readings from AMI meters in certain, limited circumstances is a potentially valuable capability to support.

While utilities design their AMI communications around this target, and should be able to meet it most of the time for the vast majority of their customers, it is not a good idea to make this too strict of a requirement. To construct an AMI communications network which is 100% certain of meeting this standard will cost far more than such a strict application is worth. Further, future requirements to strengthen this requirement to a few seconds or minutes for all customers all the time would be even more prohibitively expensive, and should be avoided. Customers who think they need such reduced latency can secure it through special arrangements made by either the utility or by the customer.

To meet this requirement, Rate Counsel believes there are two approaches for the utility – “tunneling” or a “bridge.” Tunneling is a lower-cost approach, whereby special communications and data network “tunneling” provisions are made on an ad-hoc basis for those few occasions when near real-time feedback is desired. For example, when a customer wants to know how much energy their dryer is using, they could access a special smart meter feature on their online account with the utility. For no more than a few minutes, an application in the utility website would retrieve the current data from the requesting customer’s meter in near real time. Such data does not need to wait for the daily smart meter data download associated with typical usage data processing (for billing) and the 24-hour latency target.

³ See Regulation (EU) 2016/679 2016 O.J. (L 119/1).

However, while tunneling is relatively low cost, there are two limitations with this approach. First, it is not available to all customers all the time. It is more of an “exception reporting” approach. This makes it unusable for programmatic applications, for example in a demand response program customers might join by the thousands. The second problem is that it could conceivably provide a utility with a competitive advantage over unregulated energy managers, who would not have access to this feature.

The second option is a higher-cost approach, typically involving hardware in the home. The hardware acts as a “bridge” between the smart meter and the customer’s home area network thereby linking it to the internet beyond, similar to smart TVs, smart thermostats, voice activated digital assistants, and home security cameras. The advantage to this approach is that those customers who want reduced latency to AMI data can buy a bridge on their own, avoiding costs to the majority of other customers who will never use the capability. This is consistent with the beneficiary pays policy. If the bridge option is installed exclusively by the utility, a bridge could confer competitive advantages to the utility. It is therefore important that any smart meters a utility installs work with multiple bridge brands, or at least, at a minimum, that any third-party which a customer authorizes gets the same access, at the same terms and latency, as the utility has available for its own use. Bridges and near real-time reporting must not be allowed to restrict customer choice or to advantage utility businesses over other businesses.

2. Adoption of Standardized Customer Privacy Requirements

The foundation for a customer privacy policy appears to have been set in N.J.A.C. 14:4-7.8, which addresses the customer privacy aspects of retail choice, and which states that customer information shall not be disclosed to a third party without written customer consent. However, more extensive customer privacy standards are warranted. Based on a review of the privacy policies available on their websites, Exelon, as well as Orange and Rockland, appear to incorporate the European Union’s General Data Privacy Regulation, but it is not clear how these policies apply to their New Jersey-based utilities. That said, GDPR provides a sound basis for privacy policies for utility customers in New Jersey and should be emulated by the utilities and included in the Board’s MFRs.

However, Rate Counsel cautions against the use of a Common Release Form. Rather than prescribing a specific form, Rate Counsel recommends that the Board prescribe the minimum fields such a form must include. Given that Green Button’s Connect-My-Data has already established a standard for the minimum required fields for a customer authorization, and given that compliance with the Connect-My-Data standard is highly desirable (as discussed below), Rate Counsel recommends using the fields available in the Connect-My-Data standard form as a minimum.

3. Using AMI to Drive Efficient Achievement of New Jersey's Clean Energy Goals, and Positioning New Jersey's Grid to Appropriately Account for Clean Energy Attributes

While AMI can and should be used to drive efficient achievement of New Jersey's Clean Energy Goals, State mandates in pursuit of that goal should not be overly prescriptive. For example, the Board should avoid establishing requirements which may involve significant utility costs when no such requirements are necessary or sufficiently valuable. To avoid this result, Rate Counsel recommends all requirements should be evaluated by a cost-benefit analysis on a utility-by-utility basis before being enacted.

Certain uses for AMI data are likely to add to the cost-effectiveness of the EDCs' AMI roll-outs such as uses for energy efficiency evaluation, measurement, and validation; universal peak-time rebate; and distribution planning. However, the communication of grid status issues to customers and aggregators, are not necessarily an appropriate role for AMI, because it can be best handled through other communication channels, such as text messages, e-mail messages, automated outbound recorded messages, social media, and mass media. It may also not be necessary or beneficial to use AMI data for near real-time grid operating decisions, due to the AMI communications network capacity considerations and costs discussed previously. When it comes to distribution operations, utilities can get sufficient amounts of near real-time data regarding grid state from a handful of devices (or even a handful of smart meters) on each circuit. The additional benefit of getting data from a thousand smart meters per circuit in near real-time all the time is likely to be minimal at significant cost.

Regarding the "use cases" provided by Staff, please see the comments below on each:

- *Instantaneous usage and demand measurements on a near real-time basis.* While meters can record these measurements in this manner, as previously discussed, care must be taken to ensure that there is no requirement to communicate measurements for all customers in this manner all the time. Rather, it should be required to be cost beneficial prior to implementation.
- *Ability for the customer to be notified about high bills on a near real-time basis.* This would require utilities to design communications networks to collect meter data from all customers in near-real time all the time. Further, high bill alerts do not necessarily need to be communicated in near real-time to be effective. It would be appropriate and sufficient for high bill alerts to be communicated on a one-day lag, consistent with the 24-hour target for meter data collection.
- *Ability for customer to be notified about voluntary conservation requests.* Rate Counsel believes this is useful for customer to be notified about voluntary conservation requests, but it is not a function that smart meters must fulfill. Customers can be notified of conservation events through multiple media – text messages, e-mail messages, automated outbound recorded messages, social media, and mass media. Loads, from smart

thermostats to smart appliances, can be controlled by smart phone via customers' home area networks. To require smart meters to do these things will entail extra costs which duplicate existing capabilities and offer no incremental benefits.

- *Ability for customers to understand how and when their own generation is exporting to the grid, including instantaneous two-way meter data where applicable.* While it is conceivable this could be of benefit, the incremental benefit of the requirement must be compared to the incremental costs. Again, the requirement of smart meters and communications networks to be instantaneous for all meters all the time is likely prohibitively expensive. Further, all PV solar inverters offer wireless compatibility with home area networks, providing net-metered customers with instantaneous readings of DER production. This capability, combined with the “tunneling” or “bridge” capabilities described earlier, should be sufficient to meet this need without adding costly communication network capacity.
- *Ability for customers with DERs to fully participate in DER aggregations/FERC Order No. 2222.* Rate Counsel believes more detail is necessary to substantively respond to this use case. As a preliminary matter, the cost implications of this are potentially significant and two-way metering and telemetry requirements are typically governed by a utility's interconnection and/or inverter standards, and vary significantly by size. Therefore, Rate Counsel recommends that any consideration of this proposal coincide with a review of each utility's interconnection standards and/or inverter standards.
- *Ability for the customers to understand how the size of the DER they interconnect to the grid will affect interconnection costs.* Rate Counsel believes this is another issue which would be better addressed in an interconnection and/or inverter standards discussion, not an AMI data discussion.

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

Rate Counsel believes it is appropriate for the Board to use AMI data to improve reliability, distribution planning, and reporting. However, Rate Counsel believes AMI has shown to be of limited reliability value – as was proven by Tropical Storm Isaias in the Rockland Electric, ConEd, and Long Island service areas last year. In regards to the elements of the DAP listed by Staff, the first three elements in this principle listed by Staff are appropriate, but Rate Counsel would like additional information on what is meant by “Barriers to third party data access regarding outages and other emergency conditions are appropriately lowered, with specific reporting on number of authorized access connections made and maintained.”⁴

5. Data Granularity and Appropriate Rollout Schedule

Rate Counsel believes Staff should be cognizant of the data storage and communication network capacity needs associated with this requirement. Before AMI, one year's worth of

⁴ Straw Proposal at *13.

energy usage data was available in just 12 data points per customer (one per billing period). In contrast, with AMI, there are 8,760 data points in a year for one-hour intervals; 35,040 data points/year for 15-minute intervals; and 105,120 data points/year for 5-minute intervals. It is unclear how many customers are going to be looking for this level of granularity. Moreover, longer intervals should mean less data to communicate. Therefore, Rate Counsel recommends that the Board require the utilities to use 10-, 12-, or 15-minute intervals to begin with, as this is common in the utility territories with fully deployed AMI. Further, since AMI meters can update with wireless data capabilities, the intervals can be changed in the future.

6. Ensuring Fair Access and Competition for All Meter Capabilities

As stated above, Rate Counsel believes ensuring fair access and competition for meter capabilities is important and this includes communications network capacity. AMI communications network capacity is not fixed, but can be increased simply by adding data collectors throughout a utility's service area. Public networks offer reasonable flexibility, and are able to scale up and down with little notice. Nonetheless, as discussed earlier, communications network capacity comes at a cost. Also, a handful of grid devices (or a handful of smart meters) per circuit can typically provide all the near real-time data (current, frequency, volts, and power factor) a utility might need to optimize grid operations on a day-to-day basis.

Accordingly, Rate Counsel generally supports the listed elements Staff suggests to include in any future MFR, but has additional comments on the second and final bullets. The second bullet states that app distribution mechanisms or open-access platforms must provide "tangible benefits to customers." Rate Counsel recommends that, unless such mechanisms or platforms provide economic benefits to customers in excess of customer costs (meaning, revenue requirements), the mechanism or platform should not be deployed. This requirement should apply even to the Connect My Data standard compliance Rate Counsel recommends, though Rate Counsel believes the relatively low cost and high benefit with this standard will become evident in an appropriately-constructed cost-benefit analysis.

Regarding the "data warehouse" concept discussed in the final bullet, Rate Counsel notes that most of the features and functionality offered by such a warehouse to residential users are already available from utility websites, or with "Connect My Data" standard compliance. The cost to comply with the Connect My Data standard is relatively low (as low as \$225,000 per utility to start by one estimate).⁵ Therefore, the features and functionality of a data warehouse are too costly and somewhat duplicative to those of "Connect My Data." Further, data warehouse features and functionality, which are not already available through other means, are valuable to just three parties: 1) customers with multiple facilities, and in particular customers with multiple facilities across more than one distribution utility; 2) Third-Party Suppliers (TPS) and aggregators; and 3) researchers. As a result, and assuming compliance with the Connect-My-Data standard is required by Staff, Rate Counsel believes any costs for a data warehouse should be allocated to the beneficiaries of that data. Further, given that the Texas data

⁵ *Green Button Cost-Benefit Analysis Report*, prepared by Dunsky Energy Consulting for the Ontario Ministry of Energy, Conservation and Energy Efficiency Branch, Oct. 2017, p. 21.

warehouse has been in operation for some time, Rate Counsel believes more information, such as the results of any user and/or management surveys of SmartMeterTexas, should be examined before a decision to implement a statewide energy data warehouse in New Jersey is made.

7. Billing and Settlement Practices

In general, Rate Counsel believes the application of average usage profiles to allocate costs is biased against low energy users (including low-income customers), and mutes the financial incentive for customers to shave their peak usage. As a result, Rate Counsel believes the use of AMI data to settle energy costs and determine peak load contribution by customer is more accurate and a less discriminatory approach to energy and capacity market cost settlement. Rate Counsel also agrees with Staff that it will stimulate energy management and DER markets, and therefore have the potential to advance progress on the State's EMP goals. Rate Counsel encourages the Board to analyze the impact of such a policy on the residential customer class as a whole before adopting it as the preferred policy. Rate Counsel notes that meter-specific cost identification is already standard practice in Texas's ERCOT market (though ERCOT has never had a capacity market). It is also the stated policy of the Ohio Public Utilities Commission (which regulates EDCs with smart meters and participates in PJM).⁶ Regarding supplier-consolidated billing, Rate Counsel thinks this may make sense for certain energy charges.

8. Format of Data Sharing and Cost Implications

Concepts like "Connect My Data" standard compliance and the statewide data warehouse concept appear attractive in that they allow customers to "self-serve." While some customers are likely to perceive self-service as extra work, other customers (and TPSs) may appreciate that self-service involves no dependence on utility personnel, no bottlenecks, and no delays. Although utilities maintain customer service resources to respond to customer (and TPS) data requests using EDI and CSV options, it can be difficult for finite resources to respond to unpredictable, but frequently-occurring, peaks in data request volume. As with all other AMI data issues, benefit-cost analyses should form the basis for any decision by the Board. The savings in customer service resources made available through self-service must be weighed against the capital and ongoing O&M costs associated with concepts like Connect My Data standard compliance and the statewide data warehouse. Rate Counsel encourages Staff to complete such analyses before establishing MFRs one way or the other.

That said, when considering the costs and benefits of Connect My Data standard compliance, Rate Counsel recommends Staff encourage the utilization of other benefits that can be created by this standard. Connect My Data standard compliance offers other benefits in customer choice and EMP goal attainment which should be available. This is because a growing community of home energy managers, smartphone app developers, and aggregators are designing their software and business models around the Connect My Data standard. Given that Connect My Data is the leading energy use data-sharing standard, mandated in California,

⁶ *Power Forward: A Roadmap to Ohio's Electricity Future*, report by the Ohio Public Utilities Commission to the Public, (Aug. 2018), p. 32.

Colorado, Illinois, New York, and Texas, such businesses find it effective to write software code and business processes around a single standard serving tens of millions of potential consumers. If these businesses are asked to re-work software code and business processes around every individual utility, with dramatically fewer potential customers, many of their business models would be invalidated.

Aligning New Jersey with the current business models can be beneficial to the State's electricity customers. For example, certain companies make energy management apps based on the Connect My Data standard available for free. These apps even include the "high bill alert" capability Staff has proposed mandating as part of the MFR. Thus, Connect My Data standard compliance can help stimulate energy management markets (called "market animation" in New York's Reforming the Energy Vision proceeding), securing demand reduction and energy conservation benefits along the way. Without Connect My Data standard compliance, these potential benefits will not be immediately available to New Jersey electric customers. Thus, Rate Counsel believes the small initial and ongoing cost of Connect My Data standard compliance is likely worth these potential benefits, and supports it.

9. Promoting Academic Research into Reliability and Clean Energy Adoption by Customers

Rate Counsel does not have concerns with sharing anonymized data with researchers so long as individual customers cannot be identified by their usage. This is not a concern for residential customers, as residential customer's energy usage will likely not be high enough or distinctive enough to permit identification. However, this may not be the case for large commercial and industrial customers. In Illinois, the Commission approved a ComEd anonymized data sharing plan for researchers and commercial interests subject to "the 15/15 rule". If any data set (for example, a zip code) contains fewer than 15 records, the data is not shared. Further, if any one customer's usage represents more than 15% of the usage in a data set, that customer's data is removed from the data set.⁷

10. Appropriate Utility Use of AMI Data

The appropriate use of energy usage data should be enshrined in each utility's data privacy policy as described above in response to Staff Principle No. 2. Prohibitions against affiliate or advantageous use should employ the Board's regulations on affiliate relations and competitive services as a foundation. If a utility desires the use of energy usage data to help market certain utility programs, such as energy efficiency programs, Rate Counsel recommends that utilities be allowed to use energy usage data on the same nondiscriminatory basis as other parties, so long as such uses are disclosed in a utility's data privacy policy. Rate Counsel agrees with the other use protections Staff describes in this section.

⁷ See Illinois Commerce Commission, Investigation of Applicability of Sections: 13-0506 16-122 and 16-108.6 of the Public Utilities Act, Docket No. 13-0506 at p. 17 (Jan. 28, 2014).

11. AMI Data must Support Emergency Responder Effectiveness and Safety

Rate Counsel has no comment on this particular component of the Straw Proposal.

12. Stakeholder Engagement

As a general rule, Rate Counsel supports performance reporting requirements, as well as prohibitions on cost recovery for utilities who do not deliver the AMI benefits promised. However, Rate Counsel believes the issue of cost recovery should focus on AMI benefit delivery rather than the use of data plans. Further, Rate Counsel believes any utility's concern about delays, related to a working group set up to develop performance measures for AMI, is outweighed by the opportunity for the Board to ensure utility accountability for benefits they have projected in their AMI benefit-cost analyses. The implementation of hundreds of millions of dollars in AMI investments without sufficient assurances of benefit is more onerous on ratepayers than several months of delay. Performance reporting, properly executed, with penalties for non-performance, is the best way to ensure that AMI benefits to customers exceed costs to customers. And working groups are Staff's best option to ensure performance reporting is properly developed and executed.

Regarding the proper development and execution of an AMI performance reporting program, Rate Counsel strongly recommends that the following principles be applied to every AMI performance reporting program:

- Performance metrics should always be outcomes-oriented, never process oriented. For example: "Count of calls into the call center" is a process metric; "Annual call center costs" or "call center headcount" are outcomes metrics. "Circuits with CVR" is a process metric; "average annual voltage per circuit" is an outcomes metric.
- Every performance metric should include a pre-deployment baseline and a post-deployment target. Post-deployment targets should include dates.
- Post-deployment targets should be established in strict accordance with the assumptions employed in the AMI benefit-cost analyses the Board relied upon when making its decision.
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Rate Counsel will participate in any AMI performance reporting working group the Board might order.

Additional Concepts That are Desirable and Prudent to Accomplishing Lower Consumer Costs

In the Straw Proposal, Staff requested comments on "(i) whether the principles set forth below are the appropriate places for the EDCs to focus; (ii) whether there are modifications or clarifications to these principles that will aid an equitable clean energy transition and/or lower consumer costs; and (iii) whether there are additional concepts that are desirable and prudent to

accomplish these goals.”⁸ Rate Counsel provides the following comments in response to that request.

Rate Counsel notes that the Straw Proposal appears very concerned about maximizing the value of AMI data. While this is an important concern, Rate Counsel is more concerned with shortcomings in AMI applications generally, and in the utilities’ AMI benefit-cost analyses specifically. When these analyses understate customer costs, or overstate customer benefit estimates, the level of benefits a utility must deliver to ensure AMI cost-effectiveness falls. This ultimately reduces the benefits delivered to customers by utilities from AMI investments. Much greater benefits from AMI, both environmental and economic, could be secured by issuing MFRs for AMI applications rather than MFRs for AMI data plans. As a result, Rate Counsel recommends the following MFR standards for AMI applications:

- Customer costs (meaning revenue requirements), not utility costs, should serve as the basis of comparison to benefits in any AMI cost-benefit analysis;
- Cost over-runs should be the responsibility of utilities, not customers;
- Stranded costs (book value of meters in service) should be included in the definition of AMI costs;
- Headcount reductions, or avoided marginal costs per activity, should be used to estimate O&M savings, as opposed to the use of fully-loaded costs per activity for such estimates;
- Customer discount rates, not corporate or societal discount rates, be used to convert nominal future values (both benefits and costs) into present value;
- Alternatives to proprietary ownership of AMI communication networks and software, such as the use of public carrier networks, or the use of software as a service, should be evaluated as to technical and economic pros and cons as part of every AMI application;
- Operational benefits, from O&M savings to revenue assurance, should be accrued and delivered to customers as rate reductions to the extent missed due to rate case timing;
- Indirect benefits (such as the benefit to New Jersey’s economy from utility spending) should be ignored in cost-benefit analyses, unless indirect costs (such as the economic impact of rate increases to the economy) are also included in such analyses;
- Outcomes-based performance reporting and targets should be established for all critical assumptions employed in AMI benefit estimates;
- A plan to use AMI data in demand-side management program evaluation, measurement, and validation should be part of every AMI deployment plan;
- The benefits of a conservation voltage reduction plan should be explored as part of AMI deployment;
- A universal peak-time rebate program should be part of every AMI deployment plan.

Last, Rate Counsel notes that the use of AMI data, if properly implemented, in demand-side management program evaluation, measurement, and validation (EM&V); conservation

⁸ Straw Proposal at *8.

Secretary Camacho-Welch

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voltage reduction (CVR); and universal peak-time rebate programs, have potentially significant economic benefits to New Jersey customers and the equitable transition to clean energy. Investigation into the potential benefits of these programs is therefore important to determining the cost-effectiveness of the EDCs' AMI roll-outs. Rate Counsel recommends that future Straw Proposals or working groups be established to address these critical applications. Rate Counsel looks forward to participating in those discussions.

Conclusion

Rate Counsel appreciates the opportunity to comment on this important topic.

Respectfully,

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