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October 7, 2021

Via Electronic Mail

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 S. Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350

Re: Comments of Public Service Electric and Gas Company to Straw Proposal on Advanced Metering Infrastructure (AMI) Data Transparency, Privacy & Billing (Docket EO20110716)

Dear Secretary Camacho-Welch:

Public Service Electric and Gas Company (“PSE&G”, or the “Company”) appreciates the opportunity to submit comments on the “Straw Proposal on Advanced Metering Infrastructure (AMI) Data Transparency, Privacy & Billing” (“Straw Proposal”) issued by the New Jersey Board of Public Utilities’ (“BPU”, or the “Board”) Staff on August 23, 2021. The Company commends Staff’s initiative to develop a robust proposal to further the development of data access plan (“DAP”) requirements to expand the benefits of AMI to customers.

Introduction and Summary

PSE&G understands the importance of expeditiously developing statewide standards for DAPs for AMI data and fully supports the stakeholder process as the preferred means to achieve this goal. As is noted in the Straw Proposal, PSE&G has begun to deploy AMI in its electric service territory pursuant to its “Clean Energy Future-Energy Cloud” or “CEF-EC” program with expected completion of AMI meter installations by 2025.¹ PSE&G shares the Straw Proposal’s

¹ In January 2021 the Board issued an Order approving a Stipulation approving PSE&G’s CEF-EC program to install approximately 2.2 million AMI meters over a four year period, plus the requisite network infrastructure and supporting information technology (“IT”) resources. *In the Matter of the Petition of Public Service Electric and Gas Company for Approval of Its Clean Energy Future-Energy Cloud (“CEF-EC”) Program on a Regulated Basis*, NJ BPU Docket No. EO18101115, Decision and Order Approving Stipulation (January 7, 2021) (“CEF-EC Approval Order”).

vision of a standardized, statewide framework that enables customers, third party providers of energy related services, and utilities to transparently and safely access customer AMI data.

PSE&G encourages the Board and Board Staff in this proceeding to prioritize and focus resources in the short term on the most critical elements of DAP design that best align with the planned deployment of AMI functionality over the short term, and address other important, but less critical, elements of DAPs over a longer term. While accelerated statewide installation of AMI meters is anticipated to conclude by 2025 for all of New Jersey’s electric customers,² it has been made clear in the proceedings to approve electric distribution utilities’ (“EDCs”) AMI installation programs that the full benefits of AMI meter functionality will be realized over a much longer period – up to twenty years.³ Thus, in the comments below, PSE&G primarily recommends that Board Staff refine the process for developing DAPs and minimum filing requirements (“MFRs”) by:

- Prioritizing, through focused working groups, the core DAP elements aligning with AMI functionality in the near term: customer consent, third-party data sharing format, cyber security, and utility use of AMI data;
- Addressing other important aspects of the Straw Proposal including settlement/peak load and future/advanced AMI capabilities, over the longer term.

In this manner, the Board will avoid premature codification of technical, and likely costly, DAP elements well before realization of full AMI functionality is available, while delivering key AMI data access benefits in the early years following AMI deployment. Additionally, the Company’s comments substantively address the principals for the DAP elements set forth in the Straw Proposal and cost responsibility. Finally, PSE&G provides comments on the complexity of supplier consolidated billing (“SCB”), and recommends that issue be tabled for consideration outside of the AMI DAP process, since it is not an issue directly related to AMI data.

Comments

I. Prioritization of Core DAP Elements That Track Near Term AMI Functionality

A. Need for Prioritization and Meaningful Working Groups

The Straw Proposal presents a broad and comprehensive array of DAP-related principles spanning near and long-term AMI capabilities. PSE&G submits that to expeditiously provide the benefits of data access to customers, these items cannot all be adequately addressed and implemented contemporaneously through the truncated process that is seemingly contemplated – receipt of comments followed by “one or more” working groups, culminating in codification in short order of MFRs for all of these elements.

² Straw Proposal, §I(2).

³ See, e.g., PSE&G’s CEF-EC Petition, as Amended (April 1, 2020).

Accelerated AMI deployment is a transformational event. The Company observes that a similar transformational event took place in the 1990's in the form of industry restructuring, and at that time the Board created a stakeholder process utilizing working groups, comprised of all interested parties including Staff and Rate Counsel, to address the many policy considerations involved with restructuring, as well as a separate working group to address the technical issues related to data transfer (ie. to enable implementation of the policy issues developed in the aforementioned working groups). These working groups met and thoroughly vetted the issues associated with the various subjects, which led to informed Board decisions that had the benefit of that dialogue. In the instant matter, the Company recommends that the Board follow a similar path and expand the proposed process ("one or more stakeholder meetings to discuss the feedback received") to a broader working group process to address the full scope of policy considerations contained in the Straw Proposal.⁴

To that end, the following issues should be considered by working groups over the next year to two years to deliver the core AMI data access functionality (and consistent with that available in other states where AMI has been deployed): Customer Consent, Data Sharing Mechanisms/Formats, Data/Cyber/System Security, and Utility Use of AMI Data. Since all desired functionality cannot reasonably be rolled out at once, the working groups should be charged with prioritizing recommendations and should develop a "building-block" approach that considers the time and resources required to develop and implement proposed system and process enhancements. In this manner, initial DAPs and platforms for data sharing can be delivered expeditiously when relevant AMI functionality becomes available, while other issues addressing future AMI capabilities continue to be considered.

⁴ For example, Staff has proposed the initiation of a working group to provide on-going recommendations related to a common framework for customer privacy protections to be expressed in the NJ Common Release Form (NJ-CRF). Consistent with the Company's recommendation, this working group could be broadened in scope to consider all policy considerations related to customer privacy and consent. Staff has also expressed interest in "having the Board require electric EDCs to adopt standardized "best practices" for developing AMI data to drive applications that promote clean energy objectives." The Company believes that its proposed working group structure is an ideal forum to consider those best practices, including a thorough review of practices of other jurisdictions and the vetting of the needs of the full constituency of likely users of AMI data in New Jersey. Additionally, this forum would allow the EDCs to educate all interested parties on the functionality and capabilities of the AMI systems being implemented, as well as the use-cases that accompanied the EDCs' proposals and/or final Board-approved programs (such as the Company's "Release 1 Use Cases" included in its Stipulation of Settlement of the CEF-EC program). Lastly, we note that other jurisdictions that implemented AMI data solutions utilized industry stakeholder sessions to forge the policy. *See, Smart Meter Procurement and Installation*, PA PUC PUC Docket No. M-2009-2092655 at p 29, 2012 WL6839305 (Pa.P.U.C.) (pagination not available) (Final Order entered Dec. 6, 2012); *I/M/O Baltimore Gas and Electric's Energy Efficiency, Conservation and Demand Response Programs Pursuant to the Empower Maryland Energy Efficiency Act of 2008*, MD PSC Case No. 9154, Order No. 87285, 2015 WL 8529284 (Md. P.S.C.) at *15 (Order effective Dec. 8, 2015).

B. Substantive Comments on The Core DAP Principals

i. Customer Privacy and Consent

PSE&G supports the notion that customer's usage data from the AMI meters belongs to the customer. Customers should have the responsibility and control over the sharing of that data, with customer consent as a key guiding principle. The requirement for that consent is clear in the current regulations and has been a hallmark in the effort to insure consumer protection during the evolution of industry restructuring and retail choice. Written customer consent is also recognized as a key customer protection in other jurisdictions that have implemented AMI and considered data access rules.

The Company supports the proposal by Staff to create a working group charged with providing "ongoing recommendations related to a common framework for customer privacy protections," and believes that this working group should establish the ground-rules related to consent, including how it should be given, what it authorizes, and which entity is required to maintain it, as a pre-requisite for the work of other working groups. Additionally, this working group should also consider the details associated with the proposed "New Jersey Common Release Form".

With respect to the current retail choice process, current regulations require third party suppliers ("TPSs") to obtain and retain customer authorization. This process puts the responsibility of insuring compliance (with consent) on the entity that is requesting the information, rather than having the utility secure consent for each transfer of data, and enables the transfer of data without considerable administrative burden while preserving customer privacy. Additionally, the fact that TPSs are licensed entities with the Board provides greater assurance of compliance with the regulation. To that end, it would be advisable for the Board to consider a licensing or registration requirement for entities that will access and use customers' AMI data (similar to the requirements for gas and electric TPSs, or Energy Agents and Energy Consultants), as an element of the overall strategy for insuring customer privacy. These requirements should also include specific cyber security standards that data trading-partners must satisfy.

ii. Data Sharing, Format, and Standardization

The Straw Proposal includes multiple recommendations related to data attribute requirements, including: (1) AMI data must be provided in real or near-real time (defined as a requirement that data be available no later than 24 hours after the meter readings are captured); (2) utilities should support the sharing of data to home area networks on a sub-15 minute basis; (3) instantaneous usage and demand measurements should be available on a near real-time basis; and (4) the standard DAP should require utilities to collect 5-minute interval usage data at watt-level precision. These detailed requirements for data sharing would benefit from further stakeholder input, through an expanded working group, to ensure that the specific requirements correspond with specifically-identified needs.

Additionally, as PSE&G (and likely other NJ EDCs) has established functional requirements related to the meters and AMI system currently being deployed, MFRs related to

data sharing should also recognize these existing AMI meter and systems capabilities, rather than imposing all contemplated features. Any desired attributes that are not compatible with the current AMI meter and system capabilities (and included in the EDCs' Board-approved AMI plans) could be considered in the prioritization of elements of the DAP and included in the AMI roadmap – but such consideration should also recognize the impact of this prioritization on the Company's planned AMI deployment and implementation of use-cases, including the treatment of expenditures already made or planned to be made, consistent with the Company's Board-approved AMI plan.

The Straw Proposal recommends that access to customer energy use data be implemented in a “useful, timely, standardized and quality-assured manner.” With respect to data quality, though the above data attributes are assumed to be useful and timely, and would likely become standardized across the EDCs, they may sacrifice quality if not established in a collaborative manner, and not reflecting EDC system and processes. As an example, PSE&G performs validating, editing and estimating (“VEE”) of its AMI data on a day-following basis (i.e., on the morning of day two PSE&G performs a validation of the AMI data for day one) – consistent with industry standards. Thus, the provision of data at a frequency any less than daily (as proposed) would subject the data to the possibility of subsequent modification through the VEE process. Though the provision of data more frequently than daily is possible, users of that data would need to be aware that it might not be exactly the same as the data ultimately used for billing.

The Straw Proposal also recommends that “utilities share data with customers and other authorized parties ... in a variety of easy-to-access formats,” and seeks comments on three specific means of sharing data: (i) Green Button Connect, (ii) Electronic Data Interchange (“EDI”); and (iii) CSV files. PSE&G presently utilizes Green Button “Download My Data” to provide customers access to their interval usage data (“IU data”). Through this process customers can download their interval data and send it to third-parties at their discretion, and also provide third-parties access to their data and control the timeframe of that access, via the portal. This differs from Green Button “Connect My Data” protocols, which is a newer capability that allows customers to provide automated secure transfer of their data to authorized third parties. A benefit of Green Button Connect is that it places the control of who gets access to a customer's data in the customer's hands.

PSE&G also utilizes EDI to enable electronic data transfer with all TPSs, including enrollments and drops, billing usage, related supplier charges, and historical usage. EDI has proven to be an efficient means of transferring information between the Company and TPSs. However, it is not as efficient with respect to historical interval data, especially when transferring up to 24 months of data to a supplier, which PSE&G is currently providing by sending a CSV file through email (though the current process could be enhanced by requiring this data transfer via a portal). To that end, further discussion and consideration of data transfer means should consider the specific attributes of data that are required to serve near-term market needs, and consider factors such as customer consent, data accuracy, data storage and transfer costs, and AMI system capabilities when developing proposed requirements. A goal of this effort should be to limit the

number of paths for providing data to customers and customers' agents, and to standardize the specific paths that are developed.

Finally, the Straw Proposal poses the question of whether New Jersey should adopt a centralized statewide data warehouse, versus a decentralized and more common model where all functionality is retained at the EDC-level. Staff references New York, New Hampshire and Texas as examples of other jurisdictions that have adopted a centralized model. Though these three states may have proceeded down a "centralized path", New Jersey should look towards other jurisdictions that have similar market structures when seeking best practices to potentially emulate. For example, Texas has a far different retail access model than New Jersey (and by that matter most other jurisdictions that have "restructured"), and therefore may not be a proper model of best practices for New Jersey. New York, on the other hand, is much more aligned with New Jersey regarding general market structure, and though New York has adopted a centralized structure, it is PSE&G's understanding that the details of that structure are still in development. The Company is open to considering the benefits of that structure, but the details regarding the structure and its operation must be developed before it can be appropriately evaluated, and New York's developing structure should not be considered a best practice until it is up and running, and can be evaluated accordingly. New Jersey should operate in a deliberate manner when developing AMI data requirements – in this case insuring that EDCs' AMI systems can satisfy basic, global needs for data while minimizing the risk of EDCs' building system functionality to satisfy niche needs – only to transition to a different structure at some point in the future. Simply stated, it is not a clear best-practice to centralize data processing at the outset – which is why a working group process is the optimal means to develop the path forward.

iii. Data, Cyber, and System Security

It is imperative that development of standards for DAPs includes processes and related systems designed to protect against unauthorized access to AMI data. The Straw Proposal contemplates a working group charged with focusing on customer privacy protections should also "regularly meet to address and propose to the Board best practices related to privacy and cybersecurity." The Company supports this proposal and believes that this working group must stay focused in this area.

In addition to customer data privacy, cyber-security, and protection for data systems, recommendations and MFRs should prioritize the security and privacy of the distribution system. While the Company fully supports the use of AMI data as an additional tool in its effort to manage its distribution system and to support emerging capabilities like DER integration (consistent with its use cases related to the same), PSE&G recommends data relating to "real time power flow mapping from the feeder to the customer meter" (see Section II.3 of the Straw Proposal) be discussed in more detail in a full working group process. The Company is generally concerned that the provision of power flow mapping information (and similar information containing operational details related to the Company's distribution system) can create risks to distribution system security, and should be fully vetted before the Board establishes an MFR in this area.

iv. Utility Use of AMI Data

Section II part 10 of the Straw Proposal recommends that the Board establish a principle that the EDCs' usage of AMI meter data be limited to core functions, such as billing, settlements and reliability. However, Staff also notes a proposed exception related to the EDCs' delivery of energy efficiency ("EE") services, as it expects AMI data will significantly enhance the delivery of EE to end-use customers.

PSE&G agrees that the EDCs should retain the ability to utilize AMI data to develop and deliver EE services, and notes that the EDCs' EE programs are vetted through fully litigated proceedings and annual program review, providing ample opportunity to address any concerns with the EDCs' use of AMI data with respect to its EE programs. Further, the Company believes that to the extent concerns are raised by parties related to the Company's use of AMI data, those concerns should be considered on a case-by-case basis, rather than attempting to address all circumstances globally through regulation. The Board should avoid overly-prescriptive MFRs that could stifle EDC innovation and prevent customers from realizing the full benefits of AMIs.

II. Longer-Term Consideration of Other DAP Elements

A. Settlement/Peak Load Considerations

In its Straw Proposal, Staff proposes that the EDCs transition from current Peak Load Contribution ("PLC") and load settlement processes that utilize load profiles and estimates to establish customer-specific PLCs and energy load obligations, to a new regime relying exclusively on IU data in these processes.

By way of background, the load settlement process is how PSE&G establishes the hourly load obligation (kW per hour) for all suppliers serving load in PSE&G's transmission zone, including TPS and BGS suppliers, and reports these load obligations to PJM. PJM in turn utilizes this information to financially settle with suppliers. PLCs are values established by PSE&G to reflect a customer's generation capacity requirement, and are reported (by the Company) to PJM daily. PJM utilizes the values to develop generation capacity obligations for each supplier. PSE&G presently does utilize IU data to establish PLC values for large industrial and commercial customers where interval meters are installed and utilized for billing⁵, and is developing the functionality to utilize IU for the derivation of PLC values for all industrial and commercial customers in the near future.

Regarding load settlements, PSE&G currently utilizes roughly 14,000 interval meters and the interval data generated by those meters in its load settlement process. Some of these meters are

⁵ For all customers on rate schedules that require peak demands for billing purposes and who do not use interval meters for billing, the calculation to establish PLC values utilizes the weighted average of each customer's June to September billing demands. Lastly, for customers served on rate schedules not requiring peak demands for billing purposes and who do not use interval meters for billing, PLC values are calculated by taking the customer's summer billed energy in kWh, divided by the number of hours in the summer billing period. For these rate schedules that do not use interval meters for billing, load profiles are utilized to create rate class scaling factors that are applied to customer-specific metered usage (as described above) to derive the PLCs.

installed at the premises of customers that are eligible to receive default service on Basic Generation Service Commercial and Industrial Energy Pricing (“BGS-CIEP”), which requires interval metering to bill customers and to pay BGS suppliers. The Company also uses the data from those meters to establish hourly load values in the load settlement process for BGS CIEP suppliers or for TPSs serving customers eligible for BGS CIEP default service. Regarding customers that receive default service on BGS Residential and Small Commercial Pricing service (“BGS-RSCP”) – which is presently approximately 2 million out of 2.3 million customers eligible for such service - interval data is not required to pay BGS-RSCP suppliers, as BGS-RSCP is a flat cents-per-kilowatt hour rate. Interval data is also not required to bill customers for energy, as energy components of BGS-RSCP rates only change by the season or for some rate classes by the time-of-day. Therefore, for most BGS RSCP customers, PSE&G utilizes load profiles to allocate monthly-read billed usage to hourly data in the load settlement process for BGS-RSCP suppliers.

Though the Company understands the basis of the Straw Proposal’s recommendation for the EDCs to transition to the utilization of IU data in the load settlements and PLC processes for all meters, the timing for that transition should recognize the required system enhancements and reflect the overall needs for that granularity in these processes. The Company’s current use of interval data for load settlement for roughly 14,000 meters involves daily calculations and data transfers of roughly 336,000 discrete hourly values. If the Company were to transition this process to the utilization of interval data for all customers in the load settlement process, the daily data process for discrete hourly values would grow exponentially, to roughly 55,000,000 values. A change of that magnitude would represent a significant process modification and require a rebuild of the Company’s load settlement system and processes, and interfaces to other systems. There would be similar impacts to the Company’s PLC-calculation process if IU data were utilized in the derivation of PLCs values for all customers. Though technically feasible, such modification should reflect a clearly identified need and, if there is one, should occur through an orderly transition to increased use of AMI data in these processes.⁶

Lastly, though Staff proposes that the settlement process should utilize actual IU data (with the use of load profile data minimized), this should be a goal for final settlement (referred to as Settlement B) which establishes final load obligations in a roughly two month lag (example: the load obligations of suppliers for calendar January are due to PJM by the end of March) – and not (next day) Preliminary Settlement (referred to as Settlement A) which by definition is an estimate of load responsibility.

Therefore, a roadmap to AMI data utilization related to energy settlements and PLC derivation should recognize the following, and prioritize related system and process enhancements accordingly: (1) the expected complexity of system and process modifications; (2) the majority of customers currently do not require interval data-based load settlement, nor do BGS Suppliers; (3) the subset of TPSs that will seek to offer products that require the proposed changes to the

⁶ For example, there is not an immediate need from a billing or load settlement standpoint to migrate all BGS-RSCP customers to interval data-based settlement or PLC determination in the immediate future, especially on a rolling basis. Moreover, since customers may opt-out of an AMI meter, PSE&G will be required to maintain its current load profiling and PLC processes even if it migrates its settlement and PLC processes to full-interval.

settlement and PLC processes will likely require time post-AMI deployment to develop those products; and (4) the current processes will need to be retained when the project is complete.

B. Future Meter and Network Capabilities

The Straw Proposal recommends that the Board establish a principle that “fair access and competition exist for all meter capabilities, as reasonably appropriate,” and presents a series of proposed elements for inclusion in future MFRs. PSE&G notes that both the development and management of “apps” as described in the Straw Proposal (and specifically in the proposed elements) involve nascent market offerings, and further discussion amongst the stakeholders should occur before specific requirements can or should be established.

Additionally, questions presented in the Straw Document related to the “sizing” of meter memory and processing capabilities, and communication network bandwidth, seem premature and will require specifics to make determinations and to understand the impact on the Company’s Board-approved AMI deployment and systems from functionality, schedule and expenditure perspectives, including the issue of stranded investment recovery for meters, and other investment already made. Also, as noted in the Straw Document, any and all “apps” (or any technology that directly interfaces with the Company’s meter equipment), will need to satisfy to-be-developed security and screening requirements. Lastly, Staff proposes to require that utilities develop a standard protocol for sharing networks to allow other regulated industries to utilize their networks. This sharing construct would require considerable evaluation, including consideration of data and system security, cost responsibility, and whether the network itself is shared, versus the provision of data from the EDCs.

III. Cost Responsibility for AMI Data Access Should Be Shared By Third Parties

The Straw Proposal seeks comment on whether it is appropriate for utilities to make investments “to support the State’s goal of enabling customers to control their own energy usage and to provide this data free of additional charge to entities with legitimate interest in data, including TPSs, DER aggregators, and other energy services companies.” PSE&G believes that utility and third party investments are likely required, but utility customers alone should not subsidize (and be responsible for) all costs incurred to implement and provide all features being considered in the DAP, particularly considering that not all utility customers will utilize all of the contemplated non-utility features, or will utilize the services of third party energy services providers.

IV. Supplier Consolidated Billing Is Complex And Is Not An AMI Data Access Issue

The Straw Proposal requests comments on implementing supplier consolidated billing (“SCB”) as “part of the push towards maximizing the benefits of AMI deployment” with the objective of “furthering communication opportunities between electricity suppliers and customers [to] enable increased customer service and participation in the energy future.” The Company offers that (1) the issue of SCB has been considered numerous times over the years and appears to be only be of interest to a small subset of TPSs, (2) SCB is not offered in many other jurisdictions, likely due to the significant complexity and cost associated with its implementation, (3) billing

options and other means currently exist that provide suppliers the opportunity to communicate with customers, (4) there are many system and policy-related challenges associated with implementing SCB that will be difficult to address concurrently with the development and implementation of the AMI DAP, and (5) SCB is not a specific attribute of AMI. For these reasons, SCB should be deferred for future consideration.

Enhancing communications between TPSs and customers should be considered in the context of what is currently available. TPSs currently have two options for billing: (1) dual billing, whereby each party, the TPS and the utility, issues its own bill to the customer (in which the TPS can communicate with the customer at-will), or (2) UCB, where the TPS can include its charges and other information on the utility's bill to the customer. Under the UCB option, TPSs send their charges to PSE&G for inclusion on the Company's bill to the customer, and they have the option of adding their logo and up to 50 rolling lines of text on the utility bill. TPSs may also include their own inserts in the utility bill. Thus, UCB offers suppliers the opportunity to leverage the utility bill as a communications medium to its customers. Though SCB may offer an additional method of communicating with customers, it should be recognized that TPSs have many other ways today to do that – such as through direct mail, emails, texts, social media or other electronic media platforms – and it is not clear if and how customers look to their bill as the means of receiving information. For example, many companies today offer automatic debiting of charges from accounts – in such cases it is not clear if and how much attention such customers pay to messaging in the actual invoice.

Before the Board initiates a significant step in migrating to SCB, it should understand if other available communications methods offer a more cost effective means of satisfying the objecting of enhancing communications between TPSs and customers.

Moreover, the following are examples of the numerous process complexities and policy hurdles that must be considered and overcome when considering SCB:

- Accuracy: TPSs would need a process to assure the accuracy of customers' utility distribution charges, including consideration of the variety and complexities of the Company's tariff(s) for the billing of such things as net metering, community solar, equal payment plans, deferred payment arrangements, and time of use rates;
- Would suppliers be calculating and presenting all charges, or would the utility still need to calculate its own charges and send them to the supplier solely for bill presentment? Related to this, how would errors be addressed?
- Regulatory Requirements: Would TPSs' SCBs need to comply with all required existing bill presentment and customer notice requirements applicable to utilities' bills? Would there be any new or additional requirements for SCB?
- Customer Service: TPSs' call centers would need the ability to handle increased call volumes and presumably satisfy all regulatory and other customer service requirements on behalf of the utilities, including rules pertaining to customer inquiries, disputed charges and complaints.
- Disconnect for Non-Payment Policy and Procedures: A policy determination would need to be made regarding the ability of a TPS that issues SCBs to direct

distribution companies to disconnect customers for non-payment of bills, including supplier charges. If permitted, TPSs would need to develop related practices.

- TPS Creditworthiness: A policy determination would be required related to whether TPSs issuing SCBs should be required to meet incremental credit requirements to secure the payments due to the distribution utilities. Rules and contractual terms will have to be established related to supplier default.
- Data Transfer protocols: Uniform EDI (or other) transactions would need to be developed that incorporate the full breadth of utility billing calculation and bill presentment requirements, to insure that TPSs offering SCB present utility bill details accurately and completely, and to avoid Utility expense to build and support varied interfaces with different TPSs that offer SCB.

The following issues involve PSE&G, as a combination gas and electric distribution company, and its customers:

- Would an electric TPS issue a SCB bill and purchase the receivable for PSE&G's gas and electric distribution charges as well as PSE&G's gas supply charges, in addition to the supplier's electric supply charges?
- What process would be used for customers receiving gas and electric supply from different TPSs?
- Would implementation of SCB result in PSE&G customers presently receiving a single bill for all charges to begin receiving two bills?
- Would a TPS be required to provide all regulated billing and presentment requirements such as but not limited to: community solar, net metering, budget billing, deferred payment arrangements and on bill financing for energy efficiency programs?

As the above list is simply a sampling of issues that would need to be addressed, and because these issues are not directly related to enabling customers to realize the benefits of their AMI usage data, PSE&G recommends that this issue be considered after all other DAP issues have been resolved, and only if there is support for pursuing SCB from a majority of TPSs in the State.

Conclusion

The Company appreciates the opportunity to provide comments in this manner. Due to the complexity and scope of the issues presented in the Straw Proposal, the Company strongly recommends that Board Staff next establish working groups to delve into the various core subject areas and not just a small subset of topics, to ensure that the necessary facts, including a common understanding of the EDCs' AMI system capabilities and roll-out plans, are understood by all participants, and that DAP elements are adequately vetted and prioritized. This approach emulates the successful process the Board undertook at the time of energy restructuring that effectively transformed the industry approximately twenty years ago. Prioritization can help ensure the near-term DAP needs are implemented as expeditiously as possible to align with the timing of available AMI functionality as deployment progresses.

Additionally, when considering the desired elements of the data access plans, it will be critical to develop solutions that serve the broad needs of customers, and to avoid niche needs that serve a specific business entity's needs. It will also be important to understand if any of the identified needs correspond to the EDCs' use cases, so as not to spend time and resources developing alternative processes for something the EDCs will be delivering as part of the AMI plan development. To that end, the working groups should ultimately develop and propose an AMI roadmap that satisfies customers' near-term needs, and that prioritizes ongoing development in a manner that recognizes the time and effort required to design and implement system enhancements. The Straw Proposal indicates a preference that the EDCs implement the elements of their DAP coincident with meter "roll-in". While some functionality can be clearly provided at the time of program and meter implementation, the roadmap produced by the working group should plan "what comes when" in a manner that balances needs and wants with what's possible from a network connectivity and development standpoint. Lastly, as the technology and customers' needs continue to evolve, some of the working groups should remain engaged to consider the longer term issues identified above. The Company is committed to actively engage in this process, and to ensure the benefits of its AMI system are realized by its customers.

Very truly yours,

A handwritten signature in blue ink that reads "Katherine E. Smith" followed by a stylized flourish.

Katherine E. Smith