

February 28, 2022

VIA EMAIL

Aida Camacho-Welch, Secretary
Board of Public Utilities
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Re: AMI Data Access Proceeding (BPU Docket No. EO20110716)

Dear Secretary Camacho-Welch:

On behalf of the Competitive Suppliers, and the Retail Energy Supply Association (“RESA”) we respectfully request that the Board convene the next stakeholder meeting in the Advanced Metering Infrastructure (“AMI”) Data Access proceeding. In order to facilitate the use of AMI meters that will soon be installed by the electric utilities, we believe it is critical that the Board continue to build on the foundational work set forth in its August 24, 2021, Straw Proposal in order to establish the regulations necessary for effective customer data access and protection.

In its Straw Proposal on AMI Data Transparency, Privacy, and Billing, Board Staff explained the next steps in the proceeding as follows:

Parties will be provided 45 days to file comments, after which Staff anticipates having one or more stakeholder meetings to discuss that feedback. Once all feedback is received, Staff expects to recommend that the Board approve an MFR order on data access, use cases, and technology requirements, which will be followed by a rulemaking proceeding to codify the requirements placed on each electric public utility with an AMI deployment plan.¹

Staff also sought comment on “whether stakeholders prefer working groups over other methods of engagement like comment periods, work sessions, and audits, and if so why.”² However,

¹ BPU Straw Proposal at 2 (emphasis added).

² BPU Straw Proposal at 19.

despite the Board's clear promise of further stakeholder engagement, there has been no further activity in this docket in the last four months nor any follow-up by Board Staff regarding the numerous stakeholder comments that were filed in October 2021.

It is essential, more efficient, and less costly to establish clear AMI data access standards before the state's EDCs have installed AMI meters rather than waiting until after the meters are deployed. The EDCs should be required to incorporate the data access standards in the initial build out of their systems and to make the data available to the market concurrent with the deployment of their AMI systems and smart meters. Any delay in addressing data access will unnecessarily delay New Jersey customers from utilizing the innovative energy efficiency, demand response, and carbon reduction solutions that the Competitive Suppliers and other TPSs look forward to offering in New Jersey. Customers' access to AMI data will provide them with a better understanding of and control over their energy usage. TPSs must have access to this data as soon as it becomes available so that they can begin to digest and analyze their customers' usage patterns and design solutions to meet their needs.

Board Staff recognized the critical importance of AMI Data Access Plans (DAPs) in their August 2021 Straw Proposal, stating: "Staff agrees that DAPs are a critical element in achieving the benefits of the AMI goals of the EMP. These DAPs will enable robust next-generation program design and will allow customers to meaningfully engage with their usage data with an adequate level of access and control. To that end, customers must also be able to freely share their data with third parties and preserve their ability to promptly terminate such access."³

Board Staff further emphasized: "Data access is critical to competition, market innovation, and allowing customers to engage with their own energy usage, all of which are in the public interest. A functional DAP is necessary to ensure that New Jersey customers receive the full benefit of their investment in AMI infrastructure, and successful implementation of a DAP is, in Staff's view, a key metric of whether ratepayer investments in AMI infrastructure are considered used and useful."⁴

³ BPU Straw Proposal at 3.

⁴ BPU Straw Proposal at 19.

We therefore request that the Board schedule the next stakeholder session in the AMI Data Access proceeding as soon as possible and the Competitive Suppliers and RESA stand ready to actively participate in the Board's deliberations on these critical AMI data issues.

Thank you for your assistance in this matter.

Respectfully submitted,



Murray E. Bevan

cc: Attached Service List (via e-mail)

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