

Ms. Carmen Diaz Acting Secretary
New Jersey Board of Public Utilities
Division of Clean Energy
44 S. Clinton Ave. 1st Fl
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September 30, 2022

RE: Docket No EO2010716
Straw Proposal on Advanced Metering Infrastructure (AMI), Data Transparency,
Privacy and Billing

Dear Ms. Diaz

Thank you for the opportunity to comment on the above reference matter.

Data transparency in the EDC's AMI system statewide is an extremely important and critical functionality of the overall AMI system and transition to the State's goals of 100% clean energy as set forth in the 2019 Energy Master Plan 2019 EMP). Data transparency in the AMI system is important in allowing the State the ability to track and monitor its progress towards achieving its overall clean energy goals in near real time.

I. Customer Ownership and "Hassle-free" Sharing of Energy Related Data

1. No restriction of data management by and through EDC-specific electronic data interchange (EDI).

Under no circumstances should the BPU allow, permit or even contempt the restrictive use of EDC-specific EDI systems for AMI data sharing and exchange. The restrictive use of individual EDC-specific EDI system is the very opposite of a "hassle-free" sharing of customer's energy related data. It would be the absolute opposite of an open and transparent customer AMI data availability system.

ensure the implementation of a customer AMI data system that manages the customer's privacy while providing for open and enhanced competition for the customer's data, since in the end, regardless of the fact that the data passes through the AMI systems managed by the EDC, the data is the sole ownership and property of the customer who should be free to share their data within a centralized system that is not wholly controlled and restricted by individual EDC-specific EDI systems.

Managing customers sharing of their AMI data through individual EDC-specific EDI systems means contractors and third parties will need to learn and establish 4 separate EDI accounts and possibly 8 separate EDI accounts if and when the AMI data management is expanded to natural gas systems. For a contractor or a third party to manage 4 to 8 different customer data management systems is not "hassle-free".

The AMI customer data management system authorized by BPU should be a centralized system that is essentially real time data transfer with a public facing interchange that is Green Button Connect or equivalent.

2. DER aggregation

It is essentially that the customer AMI data management system authorized by BPU allow for the full aggregation of DER data in anticipation of implementation of FERC Order 2222. The EDC and BPU as well as third parties already have years of experience in the metering and data management in the solar metering and data telemetering systems. However, the current solar metering and data management system is limited to operations within PJM GATS. Under this proposal the solar and storage customer data should be implemented as an open and transparent system within the customer's AMI data management system.

The potential capacity of distributive solar and storage in the New Jersey residential and commercial markets, as well as community solar systems is an essential component and strategy in meeting the State's clean energy goals. To continue the cost effectiveness of residential and commercial customer-sited solar, it is important that the customer AMI data management system include the availability for DER aggregation. DER aggregation must be in place within the customer AMI data management system before the state considers any modifications to the current net metering system and SREC II incentive systems, so customer sited solar can be afforded the advantages of FERC Order 2222.

The customer AMI data management system must allow for the ability of third parties to have visibility as to where it would be best to install customer-sited DER and community solar systems. The customer AMI data management system should be linked to the EDC's hosting capacity system and should expand the current static hosting capacity requirements to full transparent dynamic hosting capacity capabilities.

Thank you for the opportunity to provide comments on Docket No EO2010716 Straw Proposal on Advanced Metering Infrastructure (AMI), Data Transparency, Privacy and Billing. Developing and implementing a fully transparent and "hassle-free" customer AMI data management will not only provide benefits to the customer but it will also provide data on enhanced system reliability and resiliency.

The increased availability and usage of EVs and heat pumps, will increase electric load over the next 30 years at approximately 2% per year. This increase in load is almost exactly similar to the increase in load that occurred between 1970 and 2000 in New Jersey to accommodate expanded use of AC. However, this increase in electric load over the next 30-years will provide significant benefits to individual residential, commercial and industrial customers through increased energy efficiency and energy cost effectiveness, not available or realized by customers over the last 30-years. This is because the next 30-year increase in electric load will see a significant decrease in the use and cost of fossil fuels to the customer.

As documented by RMI's in their cost evaluation of the 2019 EMP as part of their 2019 Integrated Energy Plan (IEP), implementing the 2019 EMP strategies will result in a 40% decrease in energy use across all customer classes. In addition, RMI documented a significant increase in the benefits of implementing the 2019 EMP strategies over costs at a minimum of 2 to 1 benefit to costs¹.

If planned appropriately through integrated distribution planning (IDP), this decrease in energy use can also result in a significant decrease in energy cost to the customer, especially large energy users. That decrease in energy cost depends on the full and transparent "hassle-free" availability of customer's AMI data to plan, develop and implement the expansion of the distribution grid to achieve

¹ A benefit to cost ration greater than 1 defines the 2019 EMP strategies as cost effective

100% clean energy by 2050 as set forth in the 2019 EMP. That planned expansion of the distribution grid should not be limited to just EDC resource acquisition. With the full and transparent “hassle-free” availability of customer’s AMI data, the expansion of the distribution grid can include the full use and functionality of grid-interactive buildings to ensure customer energy and cost savings as set forth in the 2019 EMP and the RMI IEP total cost evaluation.

Very Truly Yours

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