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September 30, 2022

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350
Trenton, NJ 08625

RE: Comments of Energy Technology Savings, Inc. DBA Logical Buildings ("Logical Buildings") on Docket No. EO20110716 – IN THE MATTER OF Advanced Metering Infrastructure (AMI) Data Transparency, Privacy & Billing

Dear Secretary Camacho-Welch,

Please find below the comments of Logical Buildings to the Draft Minimum Filing Requirements proposed by staff in the (AMI) Data Transparency, Privacy & Billing docket.

We appreciate being a part of the conversation regarding the importance of AMI data access for the development and commercialization of products to engage customers to participate in a meaningful way in their energy usage decisions.

Thank you and please let me know if you have any questions about this filing.

Sincerely,

Valerie Ross

Valerie Ross

SVP of Compliance & Regulatory Affairs

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Energy Technology Savings, Inc. DBA Logical Buildings

Comments of Logical Buildings Regarding AMI Data Transparency, Privacy & Billing

Logical Buildings is an industry leading sustainability, smart building and virtual powerplant software and solutions provider for the built world. Our ESG technologies are combatting climate change by empowering residential, commercial, and industrial energy users to earn money, enhance building health and reduce carbon footprint, all from within user-friendly, award-winning mobile apps.

We appreciate the opportunity to provide comments regarding such an important issue. We are very supportive of the Board's efforts in the area of data access, transparency, privacy and billing, and have the following thoughts on these subjects.

Logical Buildings agrees with Staff's conclusions in the Draft Minimum Filing Requirements (MFR) that AMI data is key to helping New Jersey meet its Clean Energy Goals. It is of utmost importance that AMI data be accessible by customers and their third-party Distributed Energy Resource providers (DERs). Such data sharing is necessary to incentivize companies to develop and commercialize distributed energy resources. These products and services allow customers to use their real-time data to manage their energy use during peak grid events.

We agree that the use cases set forth in the proposal should be "designed to provide energy consumers with the ability and incentive to engage with their energy usage and select options that reduce energy consumption or shift that consumption to times of day that alleviate strain on the electric grid."¹ More specifically, it is important that there be sharing of data in real-time to allow customers to determine the best time to decrease their energy usage. When such real-time data is available, companies can provide products and services to enable customers to make the informed energy usage decisions that limit their usage at the most relevant times.

Customer Ownership and Sharing of Energy Related Data

Logical Buildings agrees that customer data must be easily accessible by customers and third parties via one process that is the same for all utilities. It is also important to clarify and confirm that usage information generated by AMI meters belongs to the customer.

Allowing a customer to easily provide authorization for a DER provider to receive utility data is the first necessary step to allow for customer participation in making energy decisions based upon real-time, actionable data. There are an increasing number of products and services that customers can use with their smart devices which provide guidance to them during certain peak periods regarding the best and worst times to use energy. Some also provide insight into the level of carbon emissions relating to their energy use at peak times. Providing easy access to the data required for Customers to make energy reductions based on this detailed information is essential. As the number of customers utilizing such services increases, there will be impactful reductions for the grid at the most relevant times. Such timely energy reductions will be necessary to help achieve New Jersey's Clean Energy goals.

Logical Buildings strongly supports Staff's view that Green Button connect should be implemented to allow for seamless sharing of customer data with authorized third parties. Logical Buildings is a Green Button authorized DER provider in several states. This is an effective, standardized process that allows customers to easily authorize third parties to receive energy usage information in an efficient manner.

¹IN THE MATTER OF Advanced Metering Infrastructure (AMI) Data Transparency, Privacy & Billing, BPU Docket No. EO20110716 dated July 29, 2022, at page 5.

In addition to Green Button, other formats for sharing data should also continue to be utilized, such as EDI and utility web portals. These existing options remain necessary as different companies may continue to develop products/services which require access to data in varying formats.

AMI Data Provision Timelines

In order for new and innovative DER products and services to become widely available to support the grid, it is important that unvalidated data be available as soon as possible. In addition, Logical Buildings supports Staff's position that unvalidated AMI data be shareable with home area networks where feasible (i.e. single-tenant customers without range constraints) on a sub-15 second basis through a customer-owned qualified energy monitoring device that a customer may procure from the competitive market.

Data Granularity and Appropriate Rollout Schedule:

Logical Buildings supports Staff's proposal that there should be available 5-minute BQIU data interval at watt level precision. This is important because it provides customers with the ability to respond with energy reductions based upon their actual real time energy usage and to be rewarded for timely reductions. We also agree with Staff that it is important to have the retail settlement match with the wholesale market framework, which in PJM, is settled on a 5-minute basis.

Additional Data Fields

Logical Buildings supports the use of additional data fields as Staff describes in the MFR's. In addition, AMI data should provide power quality data metrics such as power factor and kVar, values critical to optimize DER resources.

Ensuring Fair Access and Competition for All Meter Capabilities

Logical Buildings agrees with Mission Data that "the MFR should not allow utilities to discriminate against any particular type of Wifi device."² It is imperative that DER providers know that the products and services they spend money on developing will have an equal chance of success in the marketplace, and will not be subject to possible discriminatory preference versus any utility applications.

Billing and Settlements

Logical Buildings agrees with Staff's recommendations that customer accounts should be settled using actual AMI data, rather than estimated data, and that each EDC establish the customer's Peak Load Contribution ("PLC") using each customer's load data. This is the only way to truly reward customers that reduce their usage at times that are most beneficial to the grid. Settling using estimated data provides no incentive for customers to reduce at the most crucial times for the grid. Utilizing actual AMI data will provide accurate price signals to optimize allocation of distributive energy resources crucial for supporting grid resilience and reliability.

² Mission Data Comment of Mission:data Coalition on Docket No. EO20110716 regarding Staff's Straw Proposal on Advanced Metering Infrastructure (AMI) Data Transparency, Privacy and Billing, dated October 7, 2021 at page 8.

Format of Data Sharing

As stated previously, Logical Buildings supports the recommendation that Green Button be used as the standard format to enable customers to provide consent for their data to be shared with relevant third parties. Green Button has been used successfully in many states, including New York and California. Logical Buildings supports the use of Green Button in NJ as well and believes it is a crucial step in the process of incentivizing companies to develop programs and apps that assist customers in managing their energy usage.

It is also important to ensure that the application/authorization process to become an eligible third party that participates in Green Button be efficient. In certain states, it can take up to a year to become eligible to receive customer data as a Green Button third party. Perhaps lessons learned in other states can be used to develop a streamlined certification process. The process should also ensure a DER provider is approved for all utilities under one application.

It is essential that the Green Button process be built to handle the growth and commercialization of DER products and services. There should be enough capacity available to handle the requests of potential customers from many DER providers simultaneously. Again, perhaps lessons can be learned from states where adjustments had to be made in order to handle the increased capacity within utility systems. There should also be utility standards of performance built into the process, along with reporting to confirm compliance with those standards. This will allow the process to be monitored in a way to ensure that it is effective in promptly allowing for access to customer data, as well as efficient for those receiving and utilizing the data for their products and services.

Logical Buildings is in agreement with Staff that utilities should not be permitted to charge a fee to customers for third parties to access customer data. It is important not to have in place any potential roadblocks to the development of DER products and services and to allow for equal access by all authorized third parties to customer data.

As stated previously, Logical Buildings agrees that the other methods of accessing data also be used as part of the overall data access process, such as via EDI and utility web portals.

Appropriate Utility Use of AMI Data

Logical Buildings agrees with Staff's recommendation that any use cases that are not part of the EDC's core functions should be open to competition. It is important to allow competitive development of distributed energy resources, which will rely heavily on fair access to data. DER providers need to know that the investments they make in developing and providing their products and services will be supported into the future by fair access to the data necessary to make them useful for customers seeking to make informed decisions about when to use energy. It is important that there be a level playing field where all parties have equal access to customer data.