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Aida Camacho-Welch
Secretary of the Board
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Re: Comments on Advanced Metering Infrastructure (AMI) Data Transparency, Privacy & Billing, Docket No. EO20110716

Secretary Camacho-Welch:

I appreciate being given the opportunity to submit comments on the Advanced Metering Infrastructure (AMI) Data Transparency, Privacy & Billing, Docket No. EO20110716.

First, I appreciate the continued focus on customer ownership of data. This is imperative. However, I have several concerns about how customers will both be able to access their data and the data that will be provided. Green Button Connect and 15 minute interval data is insufficiently actionable. I encourage the Board mandate that utilities provide real-time usage data, including through wi-fi networks, with no specialized equipment.

It is an absolute disaster for PSE&G customers that the ability for wi-fi was not mandated as a requirement before procurement and rollout started. Their implementation should be paused indefinitely until wi-fi is mandated and the utility has provided assurances that it will be available to all customers with an AMI meter. The lack of ability for a customer to get their real-time data via wi-fi is a continuing monopolization of something the customer owns to the detriment of the customer. The only real reason the EDCs would want to block customers from this data is to stifle the ability of customers to reduce their electricity use and their dependence on the EDC. For the public interest and customer protection, that data must be available through wifi in real time. Additionally, value is tied to that data and the ability to settle with the AMI data. That ability is necessary for adequate demand response programs. Again, the EDCs not wanting to provide this data is attempting to extend their monopoly control and not allow for markets which would positively impact customers and ratepayers to develop.

I also request that utilities be mandated to provide real time voltage over those same wi-fi networks. Equipment like heat pumps, which will become much more common as we electrify, are more sensitive to voltage spikes. While utilities have a goal of providing voltage within a target band, an instantaneous spike above that band will cause heat pumps to shut down to protect the equipment. By mandating and allowing customers to access real time voltage data coming into their location, it will be possible to identify the cause of equipment shutdowns. Without the voltage data, customers will be left guessing about the cause, may be forced to replace parts to rule out other potential causes, and be left with incoming utility voltage when everything else has been discarded as a possibility. This additional expense and time will not be needed if the voltage data demonstrates that the issue is a spike in the

incoming feed. To be clear, this is NOT a hypothetical situation. This happened to me personally at my residence in Maplewood, NJ. Continued intermittent voltage spikes of 253V caused our state of the art LG Heat Pump to shut down until manually restarted in order to protect the inverter which powers the VRF compressor. The voltage spikes were only discovered to be the cause after considerable analysis, time and effort.

I am also concerned with the plan that would enable EDCs to be allowed to reject data field requests. I would suggest that the EDCs be required to provide a detailed reason for any data field request denial, with an automatic appeal of that denial to the Board if the entity who requested that particular data field would like an assessment to be made by the Board. Additionally, if the Board finds that the request was made without good cause, the EDC who denied the request should need to pay damages from shareholder funds to the entity who was denied.

On the proposal around having the equivalent of an App Store, it must be clear that the App Store cannot be a revenue generator for the EDCs. EDCs are already being paid (with a profit) by ratepayers for this infrastructure. Therefore, the basic case should be that the App Store will be free – and any additional charges should be justified by the EDC with a presumption of invalidity of any cost to the third parties or non-regulated EDC affiliates. Additionally, if there are charges, the minimum charges paid by any non-regulated EDC affiliate should be the maximum paid by any third party. This will ensure EDCs are not giving preference to their non-regulated affiliates. Anything less – where any third party pays more than a utility affiliate – will provide an appearance of unfair dealing.

Billing statements must use actual AMI data. Our bill has been estimated the vast majority of the last three years, and PSE&G continues to make excuses for the lack of a meter read. The latest is that our meter is blocked, even though it is at the front corner of our home which has never been blocked since we purchased the house in 2018. Estimated meter reads exist because of EDC laziness and lies. Given that the EDC is – at least in our case, and I can't imagine that we are alone - the reason for the estimated read, they should be required to settle using the best data available, which is the AMI data. PSE&G customer service takes NO responsibility, despite repeated customer attempts. The best thing possible, therefore, is to make it so customers don't need to interact with them. Customers should not be forced to deal with surprise bills which didn't have to happen but which did because of EDC incompetence.

I also worry that "system reliability" will be used unnecessarily and without basis by the EDCs to block information which should be shared with customers and third parties, such as system voltage. The Board should make it clear that any restrictions put forward for "system reliability" should be met with skepticism if that data would be worthwhile information for customers and third parties to have.

Given the prevalence of non-regulated affiliates and the ability of those non-regulated affiliates to undermine competition, EDCs should not be able to either expand or set up any non-regulated affiliates that would utilize this data whatsoever. As had been noted, sharing customer data with unregulated affiliates not necessarily for money – like shareholder benefit and other forms of consideration – are also inappropriate. There is a perception of impropriety between the regulated and non-regulated sides of the business, and this should not be another area where that is true.

Also, to facilitate maximum customer benefit, it must be as easy as possible for customers to access this data and the programs provided by third parties. Toward that end, third parties should not be required to negotiate routine contract terms with the EDCs. Rather, a standardized contract and terms between the EDCs and third parties should be developed and approved by the BPU. Provided any third party is then comfortable with the standardized terms, the third party would not need to negotiate independently. This will hopefully limit terms of adhesion and similar impacts of power differentials that the EDCs would otherwise attempt to force the third parties to accept.

I would also request that the Board consider how to help those customers who will never utilize this AMI data on their own, including going through and giving access via Green Button Connect and other programs. There should be protocols for non-profits and other organizations to access AMI data to target those who could be most helped from available programs and funds.

I would also encourage the Board to share anonymous AMI data with all universities, not just state colleges and universities.

I appreciate your consideration of these comments.

Regards,

Heather Payne