

PRESENTATION OF MISSION:DATA, NRG ENERGY, AND VISTRA CORPORATION

**May 6-8, 2025, DPU-Led Advanced
Metering Infrastructure Stakeholder
Working Group Session, D.P.U. 21-80/21-
81/21-82**



AGENDA



Three Foundational Elements for Maximizing the Benefits of Advanced Metering Infrastructure and “Time Varying Rates” (“TVR”)



Responses to DPU’s Questions from March 5, 2025 “Procedural Memorandum”

THREE FOUNDATIONAL ELEMENTS FOR MAXIMIZING THE BENEFITS OF ADVANCED METERING INFRASTRUCTURE AND “TIME VARYING RATES” (“TVR”)

TVR ARE FOUNDATIONAL TO COST-EFFECTIVE AMI DEPLOYMENT

“Many of the benefits of AMI will accrue to customers in the form of increased functionality and usability. For instance, access to usage information, insights, alerts, and availability of optional TVR enabled by AMI functionalities will provide customers with new opportunities to manage energy consumption and lower bills.”

-Second Grid Modernization Plans Order, D.P.U. 21-80-B/21-81-B/21-82-B (2022), at 229 (Eversource); 250 (National Grid)

TVR ARE FOUNDATIONAL TO COST-EFFECTIVE AMI DEPLOYMENT

“We expect that AMI will expand the opportunities and programs available to customers through rate design and TVR to reduce demand..... As such, rate design and DERs will play a larger role in demand forecasts in the next ESMP term.”

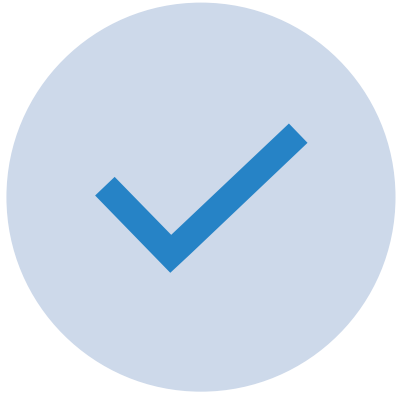
-ESMP Order, D.P.U. 24-10/24-11/24-12, at 140-141.

TVR ARE FOUNDATIONAL TO COST-EFFECTIVE AMI DEPLOYMENT

“A seasonal TOU rate provides a price signal that more accurately reflects the underlying costs of electricity delivery and supply compared to existing residential rates in Massachusetts. Exposure to these price signals will incentivize consumers to shift consumption to off-peak hours, which will reduce customer bills while also encouraging electricity usage patterns that reduce total system cost and therefore reduce long-term electric rates.”

-Interagency Rates Working Group, Long-Term Ratemaking Recommendations. March 2025, at. 13

THREE FOUNDATIONAL ELEMENTS FOR SUCCESSFUL TVR IN MA



**ROBUST CUSTOMER
PARTICIPATION**



**ACCURATE BILLING
AND SETTLEMENTS**



ACCESS TO DATA

ROBUST CUSTOMER PARTICIPATION

Customers Are More Likely to Engage with a Frictionless Customer Experience



ACCURATE BILLING AND SETTLEMENTS

Suppliers, whether basic service or competitive suppliers, should be billed by ISO-NE for the actual hourly interval usage of their customers, so that those suppliers can then bill customers for that hourly interval usage



ACCESS TO DATA

Customers and their designated third parties must have timely access to data so that third parties can provide customers actionable insights for reducing their consumption, and so that suppliers can accurately bill customers



RESPONSES TO DPU'S QUESTIONS FROM MARCH 5, 2025 "PROCEDURAL MEMORANDUM"

Q1: BASED ON THE TERMS OF THE 2024 GRID EQUITY ACT, WHAT ADDITIONAL CONSIDERATIONS, IF ANY, MUST BE ADDRESSED RELATING TO CUSTOMER AUTHORIZATIONS? IDENTIFY ANY CHANGES IN OR CLARIFICATION OF POSITION(S) ON THIS ISSUE, IF APPLICABLE, SINCE SUBMISSION OF THE FINAL REPORT.

- Once the centralized data repository is functional, existing customers should not face the burden of re-authorizing data access by their competitive suppliers
- DPU already requires that “Each Competitive Supplier or Electricity Broker must obtain verification that a Customer has affirmatively chosen to allow the release of the Customer's historic usage information to the Competitive Supplier or Electricity Broker.”
- The Grid Equity Act requires “appropriate customer approval and protections,” and the existing regulations that require verification meet this standard.
- Existing law (before Grid Equity Act) provides significant detail on the customer authorization process, but Grid Equity Act is restricted to this one clause, indicating the Legislature felt it unnecessary to prescribe more specific requirements for AMI Central Repository

Q2: HOW SHOULD THE DEPARTMENT REQUIRE COMPETITIVE SUPPLIERS OBTAIN AUTHORIZATION FROM NEW CUSTOMERS AND/OR RE-AUTHORIZATION FROM EXISTING CUSTOMERS TO ACCESS THEIR AMI USAGE DATA?

- For existing customers, the DPU should not burden customers by requiring them to re-authorize data access by competitive suppliers
- Several states with retail choice have transitioned to AMI, including PA, MD, NJ, DE, OH, TX, and we are unaware of any that have burdened customers with re-authorizing data access for suppliers and are unaware of customer complaints in these states regarding authorized suppliers accessing to more granular AMI data
- Many customers will likely ignore the request even if they have no objection to sharing their data. Any requirement that customers re-authorize data access would preclude “robust customer participation”
- To ensure that customers are properly informed, DPU could require any entity (e.g., utilities, suppliers) that the customer has previously authorized to receive their data to notify and inform customers how their interval data will be used and to provide contact information for any questions or for opting not to share interval data

Q2: HOW SHOULD THE DEPARTMENT REQUIRE COMPETITIVE SUPPLIERS OBTAIN AUTHORIZATION FROM NEW CUSTOMERS AND/OR RE-AUTHORIZATION FROM EXISTING CUSTOMERS TO ACCESS THEIR AMI USAGE DATA?

- **Response for New Customers:** For simplicity, we recommend using the same process as is used today for new customers to authorize competitive suppliers to have access to their data. We are unaware of shortcomings with this process
- If not already included, suppliers should include relevant language related to interval data access in their terms and conditions
- Finally, the customer authorization should be specific to the customer and not the meter, to allow for easy transitions if/when the customer moves

Q3A. IF THE DEPARTMENT REQUIRES COMPETITIVE SUPPLIERS TO OBTAIN RE-AUTHORIZATION FROM THEIR EXISTING CUSTOMERS, WHAT STEPS SHOULD THE DEPARTMENT REQUIRE SUPPLIERS TO TAKE TO OBTAIN SUCH RE-AUTHORIZATION FROM THEIR CUSTOMERS?

- We urge the DPU to avoid burdening customers with a requirement to re-authorize their suppliers, as it will deprive customers of the savings opportunities that justify the AML investments, and the 2024 Grid Equity Act does not require it
- For similar reasons, we discourage the DPU from requiring an EDC to take additional steps around reauthorization; it would create a complicated process and require extensive recordkeeping while providing minimal value

Q3B. WHAT STEPS SHOULD THE DEPARTMENT REQUIRE THE EDCs TO TAKE TO VERIFY THAT CUSTOMERS HAVE AUTHORIZED THE EDCs TO RELEASE THEIR AMI USAGE DATA TO THE SUPPLIERS?

- We recommend the same process that is used today.

Q3C: WHAT WOULD THE IMPACT BE OF A SUPPLIER FAILING TO OBTAIN A CUSTOMER'S RE-AUTHORIZATION IN TERMS OF THE SUPPLIER CONTINUING TO SERVE THE CUSTOMER?

- Even if a customer does not have to re-authorize their supplier to access their data, there might be instances where customers decide they do not wish to share their interval data with any party
- The decision not to allow supplier access to interval data and the decision to switch from a supplier to basic service or a different supplier are two very different decisions
- If a customer decided they did not want to share their interval data but still wanted to participate with a supplier, the supplier should continue to be able to serve that customer but would bill the customer as they do today monthly

Q4: WHAT LANGUAGE SHOULD SUPPLIERS INCLUDE IN THEIR CONTRACTS (AND CONTRACT SUMMARY FORMS) WITH NEW CUSTOMERS REGARDING THE CUSTOMER'S AUTHORIZATION FOR EDCS TO RELEASE ITS AMI USAGE DATA TO THE SUPPLIER?

- Supplier contracts should clearly state that the customer is authorizing the supplier to obtain information from the EDC that includes the customer's billing history and historical and future hourly interval electricity usage

Q5: WHAT EFFORTS HAVE THE EDCS (AND STAKEHOLDERS) UNDERTAKEN, OR PLAN TO UNDERTAKE, TO COMPLY WITH THE CENTRALIZED DATA REPOSITORY REQUIRED BY THE ACT WHAT, IF ANY, ROLE CAN GREEN BUTTON CONNECT PLAY IN A CENTRALIZED DATA REPOSITORY?

- For the centralized data repository to work, customers and their suppliers must be able to access all the customers' watt-level data at one time within 24-48 hours of measurement via .csv files through an automated mechanism
- XML-based solutions such as GBC have been inadequate for bulk transfer of mass market customer data in some regions. However, we support using GBC for the centralized data repository if:
 1. UtilityAPI implements their plans to use flat file transfers and provide data via .CSV
 2. The EDCs develop and implement Service Level Agreements ("SLAs") that require the GBC platform to function 99.5% of the time (similar to NH settlement)
 3. If GBC fails to perform during testing and it becomes apparent that it cannot meet the SLA upon full AML deployment, that the EDCs collaborate with suppliers to implement an alternative solution

Q6: SHOULD THE DEPARTMENT REQUIRE THE EDCs TO USE CUSTOMERS' AMI USAGE DATA IN THEIR REPORTING OF SUPPLIER LOAD TO ISO-NE FOR LOAD SETTLEMENT (AND CAPACITY TAG CALCULATION) PURPOSES?

- Yes, it is critical. This data is necessary for ISO-NE to accurately bill suppliers for the total hourly consumption of the suppliers' customers
- Without EDCs providing this data to ISO-NE, ISO-NE would bill suppliers based on an estimated load profile for those customers, rather than the actual load
- Since the amount that ISO-NE bills suppliers and the amount suppliers bill customers must align, suppliers would then need to bill customers based on the same estimated load profile, and not their actual hourly usage
- Customers who responded to TVR would see no benefit on their supply charges and would inevitably stop responding

Q7: ARE THERE ANY CHANGES IN OR CLARIFICATION OF POSITION(S) ON ISSUES BY THE PARTIES AND AMI STAKEHOLDER GROUP MEMBERS SINCE SUBMISSION OF THE FINAL REPORT?

- Issue #1: To ensure customer engagement, the DPU should require the EDCs to accommodate data sharing for individual AMI customers six months after each EDCs' commencement of AMI meter deployment
- If the DPU has yet to approve a statewide administrative process by that date, then the EDCs should demonstrate how they will be ready to accommodate data sharing for individual AMI customers as soon as possible following DPU approval
- The DPU should also require the EDCs to enable competitive supplier and municipal aggregator TVR by the end of 2026 (assuming the DPU has approved a statewide process)
- This will require the EDCs to use customers' AMI usage data in their reporting of supplier load to ISO-NE for load settlement (and capacity tag calculation) purposes

Q7: ARE THERE ANY CHANGES IN OR CLARIFICATION OF POSITION(S) ON ISSUES BY THE PARTIES AND AMI STAKEHOLDER GROUP MEMBERS SINCE SUBMISSION OF THE FINAL REPORT?

- Issue #2: Approving “Service Level Agreements” (“SLAs”) that govern the functionality of the AMI and the centralized data repository
- In many states, AMI deployments and data repositories have failed to meet expectations in terms of performance, uptime, support and the accuracy/consistency of the data provided. SLAs are critical for setting expectations and outlining remedial actions in the case of system errors
- Absent any arguments for the DPU to adopt different SLAs, we believe the DPU can adopt the same SLAs as the NH PUC adopted, as they offer an excellent template