



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: Service Lists (email only) in NSTAR Electric Company, D.P.U. 21-80;
Massachusetts Electric Company and Nantucket Electric Company, D.P.U. 21-81;
and Fitchburg Gas and Electric Light Company, D.P.U. 21-82

FROM: Kerri DeYoung Phillips and Susan L. Geiser, Hearing Officers

RE: Department-Led AMI Stakeholder Working Group Sessions

DATE: May 23, 2025

CC: Mark D. Marini, Department Secretary (email only)

I. INTRODUCTION

On May 6, 2025, the Department of Public Utilities (“Department”) convened the Advanced Metering Infrastructure (“AMI”) Stakeholder Working Group for a technical session to address non-consensus issues arising from the final report of the AMI Stakeholder Working Group as well as the statutory requirements set forth in An Act Promoting a Clean Energy Grid, Advancing Equity and Protecting Ratepayers, St. 2024, c. 239 (“2024 Climate Act”). In this Memorandum, the Department seeks additional comments and outlines next steps. In particular, the Department invites comments from the parties to D.P.U. 21-80, D.P.U. 21-81, and D.P.U. 21-82 and members of the AMI Stakeholder Working Group on topics identified below and to also identify any remaining unresolved issues for which Department feedback or guidance is sought related to the data access protocol implementation plan filings to be submitted in February 2026 by NSTAR Electric Company, Massachusetts Electric Company and Nantucket Electric Company, and Fitchburg Gas and Electric Light Company (collectively, “Companies”) pursuant to the 2024 Climate Act. Additionally, the Department requests input on the issues identified below regarding ISO-NE load settlement and accelerated switching. Finally, the Department confirms July 15, 2025 as the date for a second virtual technical session to address ISO-NE load settlement and accelerated switching, as well as any remaining data access protocol questions, and cancels July 16, 2025, the second day previously reserved for technical sessions.

II. MEMORANDUM DISTRIBUTION

The Companies shall distribute an electronic copy of this memorandum to the AMI Stakeholder Group within three business days. The Companies shall confirm and provide proof of distribution by **Thursday, June 5, 2025**.

III. REMAINING QUESTIONS

A. Central Data Repository and Data Access Protocol Implementation Plan

1. Describe the granularity of data (i.e., customer level, building level, etc.) that the Companies propose to make accessible through the centralized data repository.
2. If the Companies cannot provide third parties with building-level and aggregated data through Green Button Connect (“GBC”):
 - a. describe the options for making this data available to third parties and how the consent thresholds would be implemented for each option;
 - b. how customer data will be aggregated at the building level or broader; and
 - c. how customer data will be anonymized when included in aggregated or building-level data if the thresholds not requiring individual customer consent are met.
3. For purposes of demand response and distributed energy resource (“DER”) aggregations:
 - a. describe the available options, including whether GBC is an option, for the Companies to provide customer-specific information (i.e., account number; premise address; copy of utility bill for prior six months; demand response aggregation zone; load zone; monthly kWh register readings) to third parties upon a customer request;
 - b. identify the frequency with which the information would need to be provided; and
 - c. identify any preferred option and discuss the advantages of this option.

4. What additional usage data, if any, should be accessible through GBC beyond that identified by the Companies (Companies' May 6 Presentation at 33)?¹ Explain why.
5. Acknowledging that customer account information will not be available for aggregated or anonymized building-level information, what additional customer account information, if any, should be accessible through GBC beyond that identified by the Companies (Companies' May 6 Presentation at 33)?² Explain why.
6. What factors should be considered in defining the 2024 Climate Act's requirement of "near real-time" access? Does the Companies' proposal (Companies' May 6 Presentation at 33) for next-day availability of individual customer data (i.e., non-bill ready, post-preliminary validation, estimation and editing ("VEE") completion data) satisfy the 2024 Climate Act's requirement to provide third parties, including competitive suppliers, access to customer AMI usage data in near real-time? Why or why not?
7. Identify and discuss any concerns with the Companies' proposal (see AMI Stakeholder Final Report at 16) for next-day availability of customer usage data after VEE and data cleaning routines?
8. Identify and discuss any concerns with a requirement that GBC use flat file transfers and provide data via .CSV (see Joint Comments at 6)?
9. Identify and discuss any concern with a requirement that the Companies commit to a 99.5 percent uptime rate for the GBC platform or the Companies' development and implementation of a Service Level Agreement and, in the event of GBC failure during testing, to collaborate with stakeholders to implement an alternate solution (see Joint Commenters' May 6 Presentation, Slide 19). Regarding access by competitive suppliers to their customers' AMI usage data through the centralized data repository, discuss the benefits and limitations of an opt-in versus an opt-out consent approach (see Companies' May 6 Presentation at 27, 30).
10. Regarding access by municipal aggregators and/or their supplier(s) to municipal aggregation customers' AMI usage data through the centralized

¹ The Companies proposed using GBC to share customer usage data (over the billing period and for 15-minute intervals), peak demand, and with future functionality, billed amount.

² The Companies proposed using GBC to share customer account number, address, meter, and supplier information.

data repository, discuss the benefits and limitations of an opt-in versus an opt-out consent approach (see Companies' May 6 Presentation at 30).

11. What, if any, limitations should be imposed on third party access to AMI usage data? For the third parties identified in the Department of Energy Resources' May 6 Presentation at 7 and the Companies' proposals regarding vetting of third parties (see AMI Stakeholder Final Report at 17), what are the appropriate criteria to demonstrate business need for obtaining access to AMI usage data? Who should be responsible for determining whether the third party has met the criteria and why?
12. Regarding access to AMI usage data through the centralized data repository by government and research institutions (see Companies' May 6 Presentation at 30), discuss:
 - a. whether the approach to consent (i.e., opt-in or opt-out) should differ from access by other third parties, and if so, whether an opt-in or opt-out consent approach is more appropriate and why;
 - b. whether usage data shared with these third parties should be anonymized.
13. Regarding the Companies' proposal that AMI usage data be accessible to third parties six months after each company's commencement of "scaled" AMI deployment (see AMI Stakeholder Final Report at 17), discuss how the Companies define or should define "scaled" and the appropriateness of the Companies' proposed timeline.

B. ISO-NE Load Settlement

1. What is the status of each company's development of an ISO-NE load settlement plan using AMI usage data, including estimated deployment timelines and costs?
 - a. How does the estimated timeline align with the Joint Commenters' request that the Department require the Companies to enable competitive supplier and municipal aggregator time varying rates ("TVR") by the end of 2026 (see Joint Commenters at 9-10)?
2. Do the Companies anticipate offering basic service TVR while they continue to use existing load profile practices for ISO-NE load settlement (see Companies' May 6 Presentation at 12)?
3. Will competitive suppliers and municipal aggregators be able and/or willing to offer TVR if the EDCs do not report AMI usage data to ISO-NE for load settlement? Please explain.

4. Identify and discuss the potential impact of the “Retail Operations” system enhancements on the Companies’ load settlement processes (see Companies’ May 6 Presentation at 51)?
5. Identify and discuss the Companies’ use of load profiles for ISO-NE load settlement affect the ability of demand response and DER aggregators to participate in the wholesale market?

C. Accelerated Switching

1. What is the status of each company’s development of an implementation plan for accelerated switching, including estimate timelines?
2. What input is needed to develop an implementation plan for accelerated switching?

IV. REQUEST FOR COMMENTS

The Department invites parties to these proceedings and members of the AMI Working Group to provide comments and input by **June 18, 2025** on remaining questions identified in Section III.A regarding the central data repository and the data access protocol implementation plan filings, and to identify any remaining unresolved issues for which Department feedback or guidance is sought related to the Companies’ February 2026 filings.

Further, the Department invites parties to these proceedings and members of the AMI Working Group to provide comments by **June 18, 2025** on remaining issues identified in Sections III.B and C regarding the 2024 Climate Act’s accelerated switching requirement, ISO-NE load settlement matters, and to identify related issues for further discussion at the July 15, 2025 technical session.

V. NEXT STEPS

After consideration of any comments and input applicable to the central data repository, the Department endeavors to provide guidance to the Companies to inform their February 2026 filings pursuant to the 2024 Climate Act.

Additionally, the Department confirms **July 15, 2025** for a second virtual Department-led AMI Working Group session to address ISO-NE load settlement and accelerated switching. The Department cancels the second reserved date, July 16, 2025. A more detailed agenda for the July 15, 2025 technical session will be provided at a later date.

VI. CONCLUSION

For any questions regarding this procedural memorandum, please contact the Hearing Officers at kerri.phillips@mass.gov and susan.geiser@mass.gov.