



# The Commonwealth of Massachusetts

## DEPARTMENT OF PUBLIC UTILITIES

### PROCEDURAL 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  
Request for Comments and Presentations

DATE: March 5, 2025

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

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#### I. INTRODUCTION

In this Memorandum, the Department of Public Utilities (“Department”) invites the parties to the above-referenced proceedings and members of the Advanced Metering Infrastructure (“AMI”) Stakeholder Group to participate in a Department-led session to discuss the matters described below. The Department reserves **Tuesday to Thursday, May 6-8, 2025** for the first session and, if needed, **Tuesday to Wednesday, July 15-16, 2025** for the second working group session. Working group participants may conduct presentations and/or submit comments to help guide those discussions. Comments, copies of any presentations, and participant lists shall be filed by no later than **Tuesday, April 15, 2025**. NSTAR Electric Company d/b/a Eversource Energy, Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid, and Fitchburg Gas and Electric Light Company d/b/a Unitil (individually, “company”; collectively, “EDCs”) shall distribute this memorandum in accordance with the instructions below.

#### II. MEMORANDUM DISTRIBUTION

The EDCs shall distribute an electronic copy of this memorandum to the AMI Stakeholder Group within three business days. The EDCs shall confirm and provide proof of distribution by **Wednesday, March 19, 2025**.

### III. BACKGROUND

On November 30, 2022, the Department issued a Final Order on the second grid modernization plans filed by the EDCs. Second Grid Modernization Plans, D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B (2022) (“Second Grid Modernization Order (Track 2)”). These plans included each company’s AMI implementation plan. In its Order, the Department directed the EDCs to convene a statewide stakeholder working group to address the following topics related to the EDCs’ AMI implementation plans: (1) customer and third-party access to customer usage data; (2) customer education and engagement; (3) billing of time varying rates (“TVR”) offered by competitive suppliers; and (4) AMI deployment strategies that may expedite the ability for competitive suppliers to offer TVR products. Second Grid Modernization Plans (Track 2) at 325-327. Additionally, the Department directed the EDCs to file quarterly status reports, culminating in the filing of a final report setting forth issues on which a consensus had been reached and remaining unresolved issues. Second Grid Modernization Order (Track 2) at 326. The EDCs filed the final report on August 1, 2024. For each topic identified by the Department, the final report presents consensus issues and unresolved “non-consensus” issues.<sup>1</sup> Final Report at 9-24. The final report also summarizes participant positions on a load settlement issue that arose during stakeholder discussions. Final Report at 24-26.

On November 20, 2024, the Legislature enacted An Act Promoting a Clean Energy Grid, Advancing Equity and Protecting Ratepayers, St. 2024, c. 239 (“2024 Grid Equity Act” or “Act”) that required the EDCs, among other things: (1) to jointly establish a centralized data repository in a cost-effective manner as approved by the Department, to allow customers and third parties, including competitive suppliers, access to detailed AMI customer data in near-real time, subject to customer approval and protections (Sections 79, 127); and (2) to submit for Department approval a plan for the implementation of AMI data access protocols not later than one year after the effective date of the Act, i.e., by February 18, 2026 (Section 128). The Act also establishes an option for electric customers to opt-out of inclusion in the implementation of AMI and requires each company to notify the Department of a customer’s decision to opt-out (Section 79). Further, the Act requires the EDCs to implement accelerated supplier switching once a company fully deploys AMI pursuant to its approved grid modernization plan (Section 79).

On February 11, 2024, the EDCs requested that the Department identify any further process on the issues addressed in the final report given the directives of the 2024 Grid Equity Act (D.P.U. 21-80/D.P.U. 21-81/D.P.U. 21-82, EDC Letter dated February 11, 2026). On February 14, 2025, four AMI Working Group participants, including one party to the instant proceedings, submitted a letter in support of the EDCs’ request (D.P.U. 21-80/D.P.U. 21-81/

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<sup>1</sup> The final report defines “non-consensus issues” as those on which “one or more stakeholders expressed concern, disagreement, or opposition to a proposal item or key topic that was not resolved through discussion or further information from the EDCs.” Final Report at 9.

D.P.U. 21-82, Cape Light Compact, NRG Energy, Vistra Corporation, and Mission:data Coalition Letter dated February 14, 2025).

IV. REQUEST FOR PRESENTATIONS AND/OR COMMENTS, AND INSTRUCTIONS FOR WORKING GROUP SESSION PARTICIPATION

The Department reserves **Tuesday to Thursday, May 6-8, 2025<sup>2</sup>** to convene a virtual working group session to discuss non-consensus issues identified in the final report and the statutory requirements set forth in the 2024 Grid Equity Act. The Department invites parties to these proceedings and stakeholders that participated in the AMI Working Group to provide presentations on these issues at the working group session. Alternatively, parties and stakeholders may submit comments on these issues. In the interest of administrative efficiency, the Department encourages stakeholders to collaborate to develop joint presentations and comments. Comments and copies of any presentations to be conducted shall be submitted to the Department at [dpu.efiling@mass.gov](mailto:dpu.efiling@mass.gov), [kerri.phillips@mass.gov](mailto:kerri.phillips@mass.gov), and [susan.geiser@mass.gov](mailto:susan.geiser@mass.gov) by no later than **Tuesday, April 15, 2025**. These submittals will be posted to the Department's online File Room in dockets D.P.U. 21-80, D.P.U. 21-81, and D.P.U. 21-82 for informational purposes only as soon as practicable. The Department anticipates relying on the discussions and comments to inform potential Department guidance on the EDCs' AMI data access protocol implementation plan filings due in February 2026 and the EDCs' development of a centralized data repository for AMI customer data.

To the extent that any party to these proceedings or AMI Working Group members intend to participate in the Department-led working group session, they shall provide a participant list on behalf of their organization to the Hearing Officers no later than **Tuesday, April 15, 2025**. The participant list shall identify the name, title, organization name, and email address(es) of the individual(s) participating. All other interested stakeholders and members of the public may view the work group session through a public link to be provided at a later date.

V. ISSUES TO ADDRESS

A. Non-Consensus Issues

The Department requests input on the following non-consensus issues: (1) third-party access to customer AMI usage data; and (2) customer usage data sharing and load settlement in the ISO-NE wholesale market. Final Report at 20-21, 25-26.

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<sup>2</sup> The Department will determine the precise days to convene the working group based on the proposed presentations and comments submitted and will provide a final agenda, including presentation order, at a later date.

### 1. Third-Party Access to Customer AMI Usage Data

The EDCs identify non-consensus issues between competitive suppliers and the EDCs regarding whether the Department's existing regulations would require customers to re-authorize their competitive suppliers that are not suppliers of municipal aggregation programs to access their interval data once AMI is deployed and a data platform is operational. Final Report at 20. Additionally, as stated above, the 2024 Grid Equity Act requires the EDCs to establish a centralized data repository to allow customers and third parties, including competitive suppliers, access to detailed AMI customer data in near-real time, subject to customer approval and protections. The Department requests input on the following questions.

- 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.
- 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?
- 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?
  - 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?
  - 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?
- 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?
- What efforts have the EDCs (and stakeholders) undertaken, or plan to undertake, to comply with the centralized data repository required by the Act?
  - What are the estimated costs to develop and implement the centralized data repository and what cost-containment measures can be deployed to ensure the centralized data repository is cost-effective?

- What, if any, role can Green Button Connect play in a centralized data repository?

## 2. Customer Usage Data Sharing and Load Settlement

The EDCs identify customer usage data sharing and load settlement in the ISO-NE wholesale market as a non-consensus item. Final Report at 20. The EDCs state that third-party suppliers, including municipal aggregation suppliers: (1) seek access to interval-level validation, estimation and editing (“VEE”) data in near-real time for billing purposes; and (2) identified shortcomings with the use of Green Button Connect. Final Report at 20, 24. The EDCs also state that they have not committed to being able to provide municipal aggregators and/or their suppliers with AMI data for verifying ISO-NE settlements/billing and that such a requirement would trigger different and more costly business requirements. Final Report at 20. The EDCs note that stakeholders request Department guidance on this issue. Final Report at 26.

The Department requests input on the following questions.

- 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?
  - If no, explain why not and identify the usage data the EDCs should use?
  - If yes, what additional work is required for the EDCs to provide this same data to suppliers?
- 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?

## B. Other 2024 Grid Equity Act Issues

- Are there any issues that must be addressed by the Department for the EDCs to implement accelerated switching as required by the Act?<sup>3</sup>
- Given that the Act entitles competitive suppliers and other third parties, subject to appropriate customer approvals and protections, access to AMI customer data in near-real time, what other aspects of service level agreements require Department guidance?

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<sup>3</sup> Given that competitive suppliers participated extensively in the AMI Stakeholder Group, it is administratively efficient for the Department to identify and explore, as necessary, any accelerated switching implementation-related issues in these proceedings.

VI. NEXT STEPS

The Department reserves **Tuesday to Wednesday, July 15-16, 2025** for an additional working group session, as needed, to the extent the Department requires further clarification and/or input on particular issues relating to the items described above.

VII. CONCLUSION

For any questions regarding this procedural memorandum, please contact the Hearing Officers at [kerri.phillips@mass.gov](mailto:kerri.phillips@mass.gov) and [susan.geiser@mass.gov](mailto:susan.geiser@mass.gov).