

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

In the Matter of PSEG-LI Utility 2.0 Long  
Range Plan

Case 14-01299



**REPLY COMMENTS OF MISSION:DATA COALITION  
AND ADVANCED ENERGY MANAGEMENT ALLIANCE  
ON PSEG LONG ISLAND’S UTILITY 2.0 LONG RANGE PLAN**

1. **INTRODUCTION**

Pursuant to the New York Public Service Commission’s (the “Commission”) September 13, 2017 Notice Requesting Comments, the Mission:data Coalition (“Mission:data”) and the Advanced Energy Management Alliance (“AEMA”) respectfully submits these reply comments in the above-captioned docket regarding PSEG Long Island’s (“PSEG-LI”) Utility 2.0 2017 Annual Update (the “Annual Update”) . Mission:data is a non-profit national coalition of 40+ technology companies offering energy management technologies. AEMA<sup>1</sup> is a trade association under Section 501(c)(6) of the Federal tax code whose members include national distributed energy resources (“DER”), demand response, and advanced energy management service and technology providers, as well as some of the nation’s largest consumer resources who support advanced energy management solutions due to the electricity cost savings those solutions provide to their businesses. This filing represents the opinions of AEMA as an organization rather than those of any individual association members.

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<sup>1</sup> See AEMA Website: <http://aem-alliance.org>

Overall, Mission:data and AEMA commend PSEG-LI for filing a comprehensive annual update, and for providing significant detail in Appendix A on the specifics of its advanced metering infrastructure (“AMI”) deployment plan. We support the comments filed by the City of New York on October 17, that state, “AMI is consistent with the principles and goals articulated in the Commission’s Reforming the Energy Vision (‘REV’) proceeding. Advanced metering technology offers opportunities for customers to better understand and control their energy usage, and can facilitate energy efficiency, dynamic pricing, demand response, and other Utility 2.0 goals.”

The City of New York’s comments also highlight the costs of AMI, and Mission:data and AEMA offer these comments to ensure that the potential benefits of AMI are fully realized so that the deployment results in net benefits. In order for all customers to fully realize the benefits of AMI, PSEG-LI must implement robust access to data for customers and designated third parties acting on the customer’s behalf. Access to energy usage data can unleash much broader customer participation in demand-side management programs. Without strong customer participation, the benefits of AMI are unlikely to outweigh the costs, as we describe below.

## **2. PSEG-LI DOES NOT ADDRESS HOW CUSTOMERS WILL RECEIVE THE BENEFITS OF ADVANCED METERS BY ACCESSING DETAILED ENERGY USAGE DATA**

### **a. PSEG-LI should adopt Green Button Connect My Data to make maximum use of advanced meters.**

While the Annual Update has many laudable sections, it does not describe how customers will be able to directly benefit from advanced metering infrastructure (“AMI”). The ability for customers to see their energy usage data and easily have that information processed for them by new technologies such as smartphone apps or enterprise software platforms is a critical part of AMI cost-benefit analysis. In fact, the customer benefits from enhanced access to information about energy usage constitutes from 33% to 66% of total AMI benefits. A report by Dr. Ahmad Faruqi et al. in 2011, authored for the Edison Foundation’s Institute for Electric Efficiency,

found that consumer bill savings, either from load-shifting or conservation as a result of the information provided by AMI, account for 33% of total AMI benefits for a hypothetical “cautious” utility and 66% of total AMI benefits for a hypothetical “pioneer” utility.<sup>2</sup> The lack of detail in the Annual Update in this area indicates that PSEG-LI is missing sizable opportunities for customers to benefit from the AMI deployment.

For example, the Annual Update describes how PSEG-LI will support Green Button Download My Data,<sup>3</sup> despite conclusions from the utility industry that Download My Data is of limited usefulness for customers to take advantage of the detailed data collected by AMI. Green Button Download My Data (“DMD”) allows customers to manually download their electricity usage information in a standardized file format known as XML. This file can be uploaded by a consumer to third party software applications. DMD has some uses, but it requires customers to manually log into their utility’s website, download the Green Button XML file, and manually import it each time they want to access their data. DMD is helpful for one-time uses, such as sending the file to a rooftop solar installer to get a price quote. But DMD is too burdensome for ongoing data collection to be useful for emerging third-party data driven services becoming available to consumers. Most applications for energy efficiency require ongoing access; therefore, DMD is considered very limited in terms of overall usefulness.

The real breakthrough, critical to enabling the kind of ongoing monitoring and control that consumers expect with modern apps, is Green Button Connect My Data (“GBC”). As part of its AMI deployment, Con Edison has committed to providing all of its customers and their designated third parties with GBC by early 2018. Other New York utilities including National Grid, Orange & Rockland, NYSEG and Rochester Gas & Electric also committed to providing GBC as part of their Distributed System Implementation Plan.<sup>4</sup> With GBC, the utility hosts an

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<sup>2</sup> Ahmad Faruqui et al., July 2011. The Institute for Electrical Efficiency, The Edison Foundation. The Costs and Benefits of Smart Meters for Residential Consumers, p. 27.

<sup>3</sup> PSEG Long Island Utility 2.0 Long Range Plan, 2017 Annual Update, Appendix 1 – Smart Meter Full Deployment Business Plan at p. 23-25.

<sup>4</sup> Case 16-M-0411. Supplemental Distributed System Implementation Plan filed by the Joint Utilities dated November 1, 2016 at p. 141.

automated web service through which developers of energy management software can, with customer authorization, automatically and securely retrieve meter data. There is no need for the customer to repeatedly log in to the utility's website and download files. These authorizations are valid for an agreed upon time and can be revoked at any time by the consumer. These data can then be accessed and analyzed with third party software, including mobile applications.

While the term "Green Button" can refer to both DMD and GBC, it is important to understand the differences between the two. The stark contrast of usefulness between DMD and GBC to utility customers was recognized by the Edison Foundation in 2012. They wrote:

Green Button [DMD] requires customers to download their energy usage data to a computer and then manually upload it to a third party application. The downloading process is a barrier. As the Green Button movement matures, an automation process, known as "Green Button Connect My Data," where the customer clicks a button to push the data to a third-party, will become the norm.<sup>5</sup>

Mission:data notes that, while the Annual Update discusses merely DMD, orders from the Commission such as the REV Track Two order clearly demonstrate the importance of GBC in meeting the state's energy objectives. For example, the REV Track Two order requires utilities to provide "basic data" to authorized third parties free of charge. The REV Track Two order reasons that "ready access to information regarding customer energy usage is vital to the success of the DER market."<sup>6</sup>

**b. Even before implementation of Green Button Connect My Data, PSEG-LI should provide improved processes in the interim for customers to easily share their energy data with third-party service providers.**

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<sup>5</sup> "Green Button: One Year Later." Edison Foundation IEE Issue Brief, September, 2012, p. 7. [http://www.edisonfoundation.net/iee/Documents/IEE\\_Green%20Button%20Report\\_Final.pdf](http://www.edisonfoundation.net/iee/Documents/IEE_Green%20Button%20Report_Final.pdf).

<sup>6</sup> Case 14-M-0101, Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision. May 19, 2016. Order Adopting a Ratemaking and Utility Revenue Model Policy Framework at p. 137.

Before highlighting processes specific to GBC, Mission: data and AEMA strongly believe that PSEG-LI must have processes in place for third parties to access data with customer authorization in the interim. The current process is highly resource intensive for both PSEG-LI and third parties. Third parties have to send data requests for individual customers to PSEG-LI, and then PSEG-LI sends data back in a spreadsheet via email. PSEG-LI has been, somewhat understandably, reluctant to make this practice permanent. One potential solution is for each third party to have a single user account on a web portal, which includes all of the third party's customer accounts. The web portal would provide each customer's interval data. When third parties provide the required Letters of Authorization from the customer to PSEG-LI, those customers' accounts can be added to the third party's account. Several utilities have this structure in place, including Con Edison and National Grid.

This type of account "sharing," using the existing customer web portal, would benefit PSEG-LI, customers, and third parties. PSEG-LI staff would no longer have to pull customer-by-customer data for third parties, as it would be accessible automatically in the portal. Customers could be served at a lower cost, and third parties could work with smaller and smaller customers because of lower transaction costs in evaluating customers' energy usage data. In its Annual Update, PSEG-LI has suggested that third parties could simply get data from customers who download the data themselves. Most customers will not want to expend the effort to do this themselves. Even if customers are willing to download data and send it to third parties, it could trigger a Sarbanes-Oxley Act violation for some commercial customers, as there is no guarantee that customers have not altered their load data before providing it, thus violating the chain of custody. The only solution is for third parties to have *direct* access to customer energy usage information (with consent) from the utility.

3. **MISSION:DATA AND AEMA RECOMMENDATIONS FOR INCREASING THE CUSTOMER BENEFITS OF AMI**

Mission:data provides the following recommendations in order to make maximum use of AMI for the benefit of customers.

1. Provide consumers easy access to the best available information about their energy usage through two interfaces, including (i) energy usage information transmitted through PSEG-LI's Field Area Network ("FAN") and back to PSEG-LI's information technology systems and provided to the consumer and authorized third parties via the utility website; and (ii) real-time information directly from the Home Area Network ("HAN") radio in the advanced meter to a device controlled by the consumer and the ability for the consumer to easily share that data with energy management service providers of their choice.

To promote competitive markets for consumer-side services, the data collected by advanced meters should be provided in a standardized protocol in order to support innovative new technologies, as a component of basic utility service. Meter data transmitted through the FAN should be provided to the consumer via the Green Button Connect My Data standard, further described below. The HAN radio contained in each meter should be enabled as meters are deployed so that customers can experience immediate, tangible benefits. PSEG-LI should provide a "Bring Your Own Device" ("BYOD") offering to allow customers to easily connect any HAN-compliant device to the smart meter.

2. Provide customers and authorized third parties with access to historic billing information in a machine-readable, automated manner. Access to billing data is important so that new digital services can provide information to consumers on the exact bill impacts of their

energy decisions. Historical bills should also be able to be transmitted directly from the utility to any authorized third party electronically via a standardized XML format.

3. Provide consumers and third parties with rate information in standardized, machine-readable formats. Utility rate schedules should be published in standardized, machine-readable forms because it allows new technologies across the U.S. to easily calculate the bill impacts of certain decisions regarding energy efficiency or other distributed energy resources. Most people care about dollars, not kilowatt-hours. Providing innovative companies with access to PSEG-LI's approved rates in a standardized, machine-readable format, maintained in a centralized database, is important because it takes human beings out of the cost-calculation process and lets software do the work, regardless of how complex rates may become. The Commission should require PSEG-LI to maintain accurate and up-to-date rates in the National Renewable Energy Laboratory's Utility Rate Database so that software applications can easily convert kilowatt-hours or therms into dollars and present customers with accurate options for cost-saving measures.

4. The customer authorization process should be easy for consumers to use and require the least number of steps. Signing up for third party energy management services should be easy, like downloading a smartphone "app." By simplifying the user experience online and minimizing the number of customer actions required, i.e. the reducing the number of clicks, PSEG-LI can ensure that customers can immediately gain additional value from their smart meter with numerous software applications now available on the market. Customer authorization processes that require many inputs from customers or that require many steps will result in significantly less adoption of data-enabled energy management services and fewer benefits for consumers from the AMI investment.

