COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF PUBLIC UTILITIES

INVESTIGATION BY THE DEPARTMENT OF PUBLIC UTILITIES ON ITS OWN MOTION INTO THE USE OF INTERVAL DATA COLLECTED BY ADVANCED METERING INFRASTRUCTURE TO SETTLE LOAD WITH ISO NEW ENGLAND INC.	:	D.P.U. 26-44

RETAIL ENERGY SUPPLY ASSOCIATION'S COMMENTS

The Retail Energy Supply Association ("RESA")[1] hereby files comments in response to the Department of Public Utilities' ("Department") March 12, 2026 Notice of Investigation and Request for Comments[2] in the above-captioned proceeding.

BACKGROUND

On March 12, 2026, the Department opened this proceeding "to develop policies that will enable third-party electricity suppliers to offer time-varying rates ('TVR') to their customers and examine ways to enhance load settlement with ISO New England Inc. ('ISO-NE')."[3] To facilitate those efforts, the Department offered an opportunity for interested stakeholders, including retail electric suppliers, to submit comments.[4] RESA

[1] The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

[2] Notice of Investigation and Request for Comments (Mar. 12, 2026) ("Notice").

[3] Vote and Order Opening Investigation (Mar. 12, 2026) ("Vote & Order"), at 1.

[4] *Id.* at 7-12; *see also* Notice, at 1 (inviting comments on topics identified in Vote & Order).

hereby submits its comments in response to the Notice regarding the issues specifically addressed to retail suppliers in the Vote & Order.

COMMENTS

When it passed the Electric Restructuring Act, the Massachusetts legislature found, among other things, that "the introduction of competition in the electric generation market will encourage innovation, efficiency, and improved service . . . ."[5] The General Court also declared that competitive electric markets "should open markets for new and improved technologies" and "provide electricity buyers and sellers with appropriate price signals."[6]

Any innovative solution that involves shaping consumer behavior by having them respond to immediate price signals and receive appropriate credit for actions taken to reduce or avoid consumption in response to those signals will depend on suppliers having real-time access to actual customer usage data. Supplier access to and load settlement based on the interval data available from advanced metering infrastructure ("AMI") will revolutionize the ability of retail suppliers to offer more innovative products to Massachusetts customers. The ability of suppliers to offer these innovative solutions will provide substantial benefits not only to the customers adopting those solutions, but to all customers and to the transmission and distribution systems by reducing costs and increasing reliability, and will facilitate the Commonwealth's public policy goals to support further development of "energy efficiency, renewable energy resources, demand response, electricity storage, microgrids, and EVs."[7] Thus, RESA urges the Department

[5] Acts of 1997 Chapter 164, § 1(f).
[6] *Id.* at § 1(g).
[7] D.P.U. 12-76-B (Jun. 12, 2014) ("12-76-B"), at 9.

to require the electric distribution companies ("EDCs") to provide: (a) electric suppliers with customer interval usage data collected by AMI in near real time; and (b) interval data for use in settlements in the ISO-NE markets. In addition, to allow consumers and the Commonwealth to begin to realize the benefits available as soon as possible, the Department should require the EDCs to make interval data available to suppliers and for ISO-NE settlements once a customer's AMI meter has been installed and not wait until the entire AMI deployment is complete.

I. THE EDC'S CURRENT AMI IMPLEMENTATION PLANS DO NOT ADDRESS THE USE OF INTERVAL DATA FOR ISO-NE SETTLEMENT

In 2014, the Department defined advanced metering technology as including "the collection of customers' interval usage data, in near real time, ***usable for settlement*** in the ISO-NE energy and ancillary services markets."[8] Despite this, none of the AMI implementation plans submitted by the EDCs address using the interval load data

[8] 12-76-B, at 3 n.1 (emphasis added); *see also* Vote & Order, at 2 ("The Department defined advanced metering functionality as: (1) the collection of customers' interval usage data, in near real time, usable for settlement in the ISO-NE energy and ancillary services markets . . . .") (emphasis in original).

available from advanced metering functionality for ISO-NE settlements.[9] However, in 2022, the EDCs each testified that, once AMI was deployed, they would be able to settle load based on that interval data (rather than load profiles).[10] Yet, the EDCs still have "not committed to being able to provide municipal aggregators and/or their suppliers with AMI data for verifying ISO-NE settlements/billing."[11]

II. THE CURRENT EDC LOAD SETTLEMENT PROCESS MAKES IT NEARLY IMPOSSIBLE TO ENCOURAGE ADOPTION OF TIME-DIFFERENTIATED OR BEHAVIOR-BASED ENERGY PRODUCTS

Interval data represents the exact, actual usage of a particular customer recorded by a meter. In contrast, a load profile is based on estimates and calculations of either an

[9] *See generally*, Docket No. D.P.U. 21-80, *Petition of NSTAR Electric Company d/b/a Eversource Energy for approval of its Grid Modernization Plan for calendar years 2022 to 2025* ("Docket 21-80"), 2022-2025 Grid Modernization Plan and Proposed Advanced Metering Infrastructure Investment Plan (Jul. 1, 2021) ("Eversource AMI Plan"); Docket No. D.P.U. 21- 81, *Petition of Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid for approval of its Grid Modernization Plan for calendar years 2022 to 2025* ("Docket 21-81"), Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid 2022-2025 Grid Modernization Plan ("National Grid AMI Plan"); Docket No. D.P.U. 21-82, *Petition of Fitchburg Gas and Electric Light Company d/b/a Unitil for approval of its Grid Modernization Plan for calendar years 2022 to 2025* ("Docket 21-82"), Fitchburg Gas and Electric Light Company (d/b/a/Unitil) 2022-2025 Grid Modernization Plan (Jul. 1, 2021) ("Unitil AMI Plan"); *see also* Docket No. D.P.U. 21-80, *Petition of NSTAR Electric Company d/b/a Eversource Energy for approval of its Grid Modernization Plan for calendar years 2022 to 2025*/Docket No. D.P.U. 21- 81, Petition of Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid for approval of its Grid Modernization Plan for calendar years 2022 to 2025/Docket No. D.P.U. 21-82, *Petition of Fitchburg Gas and Electric Light Company d/b/a Unitil for approval of its Grid Modernization Plan for calendar years 2022 to 2025* ("Dockets 21-80/81/82"), EDC Workshop Session Presentation (Jul, 15, 2025), at 25 ("The Eversource AMI plan and cost estimate that were filed and approved by the Department in D.P.U. 20-80 do not include any investments to overhaul the load settlement process to incorporate AMI interval meter data before the end of the AMI meter deployment."); *Id.* at 26 ("The National Grid AMI approved plan does not include costs to update the Load Settlement process to enable AMI Interval meter data for Load Settlement prior to the completion of AMI deployment."); *Id.* at 27 ("The Unitil AMI Plan that was approved by the Department does not include cost estimates for upgrading its load settlement process. This upgrade is essential to effectively use AMI interval meter data for load settlement.").

[10] *See* Dockets 21-80/81/82, Evidentiary Hearing Transcript (Apr. 7, 2022), at 811 (testifying that, once interval data was available for all customers in the Eversource service territory, it would be used for load settlement); *Id.* at 1012-13 (same); *Id.* at 809 (testifying that Unitil would have capability to use AMI data for load settlement by end of 2022); *Id.* at 1013 (testifying that Unitil would use actual interval data for both energy settlement and capacity tags); *Id.* at 810 (testifying that, once actual data was available, National Grid would use that data to report load to ISO-NE).

[11] Dockets 21-80/81/82, AMI Stakeholder Group Quarterly Report (Nov. 15, 2023), at 6.

individual customer or class of customers[12] that allocates a customer's or class of customers' total usage during a billing cycle to the individual hours in that cycle. Using a load profile is comparable to having an activity tracker estimate a user's steps in a given hour based on how many steps the user walked in an entire day, rather than recording the actual steps taken in each hour. Even worse, assigning a load profile to a particular customer based on the profile of the entire class of customers is comparable to an activity tracker determining an individual user's steps based on the average number of steps of all users even though other users may walk far fewer or far more steps.

Currently, the EDCs report supplier load to ISO-NE based upon load profiles.[13] As a consequence, suppliers cannot determine an individual customer's actual contribution to the supplier's overall load or costs. Without this information, suppliers cannot determine what type of time-differentiated or behavior-based energy product would reduce a particular customer's load or costs in any given hour.

As an example: Customer A and Customer B may use the same amount of energy in a day. However, Customer A may use most of its energy during off-peak hours, and Customer B may use most of its energy during on-peak hours. If ISO-NE bills the

[12] *See* M.D.P.U. 314 (Fitchburg Gas and Electric Light Company Terms and Conditions for Competitive Suppliers) ("Unitil Supplier Terms"), § 9; M.D.P.U. No. 1420 (Massachusetts Electric Company/Nantucket Electric Company Terms and Conditions for Competitive Suppliers) ("National Grid Supplier Terms"), § 9; M.D.P.U. No. 4A (NSTAR Electric Company d/b/a Eversource Energy Eastern Massachusetts Terms and Conditions – Competitive Suppliers and Competitive REA Suppliers) ("Eversource East Supplier Terms"), § 9; M.D.P.U. No. 5A (NSTAR Electric Company d/b/a Eversource Energy Western Massachusetts Terms and Conditions – Competitive Suppliers) ("Eversource West Supplier Terms"), § 9.

[13] *See* Unitil Supplier Terms, § 9.D(1) ("The Company shall identify or develop a load profile for each customer class or each Customer for use in each day's daily determination of hourly load."); National Grid Supplier Terms, § 9D(1) ("The Company shall identify or develop a load profile for each customer class or each Customer for use in each day's daily determination of hourly load."); Eversource East Supplier Terms, § 9D(1) ("The Company shall identify or develop a load profile for each Customer class or each Customer for use in each day's daily determination of hourly load."); Eversource East Supplier Terms, § 9D(1) ("The Company shall identify or develop a load profile for each customer class or each Customer for use in each day's daily determination of hourly load.").

supplier based on the load profiles of these customers or, even worse, the load profile of the entire customer class, the supplier cannot see the differences in when each customer uses its energy throughout the day. Thus, the supplier will not have the information necessary to know that Customer A and Customer B should be offered different products. As a consequence, the supplier could offer a product that fails to incentivize Customer B to reduce its usage during peak hours. In stark contrast, if the suppliers' load were settled based on actual, interval data for each of these customers, the supplier could offer different products that send each customer the appropriate price signal to incentivize desired behaviors (e.g., encouraging Customer B to reduce its usage during peak periods in order to meaningfully reduce the capacity and transmission costs associated with serving that customer).

In sum, load settlement based on actual customer interval data is necessary for ISO-NE to accurately bill suppliers for the total hourly consumption of the suppliers' customers. Moreover, this information is critical to the ability of retail suppliers to offer time-differentiated or behavior-based energy products to those customers that will benefit the customers adopting the solutions as well as all Massachusetts ratepayers.

III. THE BENEFITS OF USING INTERVAL DATA FOR ISO-NE LOAD SETTLEMENT ARE PROLIFIC

In jurisdictions in which suppliers have real-time access and load settlement is based on interval data, customers have adopted high value products that encourage conservation, energy efficiency, and renewable energy solutions. By providing these innovative programs on a competitive basis, retail suppliers can reduce the amount of ratepayer dollars needed to fund these types of programs and/or offer additional programs that supplement those funded by ratepayers. However, competitive suppliers can only

provide these high value offerings when they have the necessary data to send customers the appropriate price signals. Thus, supplier access to and ISO-NE load settlement based on actual customer interval data is critical to providing real-time price signals to customers that will incentivize them to adopt innovative solutions that benefit them and their fellow Massachusetts residents and further the Commonwealth's public policy goals.

A. ISO-NE Settlements Based On Interval Data Will Reduce Peak Demand

ISO-NE settlements based on AMI interval usage data will encourage customer adoption of time-differentiated and behavior-based energy products that

> will facilitate the reduction of peak demand by allowing retail customers to respond to price signals, as they currently do for airline tickets, hotel reservations, and other purchases. Empowered to shift their demand to off-peak periods, customers will be able to decrease their bills by avoiding the use of electricity when it is most expensive. In so doing, customers will decrease both their own electricity bills and even the bills of others who did not shift their load, by reducing the need for new generation, transmission, and distribution investments.[14]

In fact, because it can take years to build new infrastructure to increase supply, reducing demand is one of the most significant things that Massachusetts can do quickly to control costs in the short- and long-term. For example, with load settlements based on interval data, the Department can enable virtual power plants ("VPPs"), which can be established in a fraction of the time of new generation, that can transform the impact of demand response on shaving peak demand and result in immense cost savings.

[14] 12-76-B, at 11.

B. Settlements Based On Interval Data Will Enable More Accurate Peak Load Contribution Calculations

Capacity tags represent a customer's contribution to peak load and are multiplied by the capacity price set by ISO-NE to determine the customer's monthly capacity charge. In addition to capacity charges based on peak demand, customers are also subject to transmission charges based on their peak load contribution (known as transmission tags).

Tags calculated from load profiles, rather than interval data, represent an estimate based on the average of an entire class of customers.[15] Conversely, tags calculated from interval data are based on "customers actual peak kW at the time of the ISO-NE peak."[16] As a consequence, tags based on interval data are inherently more accurate and equitable.

When interval data is used to establish each customer's actual peak load contribution, customers are sent more accurate price signals. Conversely, when tags are calculated based on load profiles, even if a customer chooses to adopt solutions that allow it to reduce peak demand, it will not see the direct benefits of those changes. As a consequence, customers will not be incentivized to adopt products that encourage usage reductions during peak periods that would meaningfully reduce the capacity and transmission costs associated with serving that customer and overall peak demand for the benefit of all customers.

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[15] *See* "National Grid Method for Estimating ICAP for ISO-NE Reporting," https://www.nationalgridus.com/media/pdfs/microsites/energy-service-companies/ma-electric/2020-icap-tag-update-for-new-pwr-yr.pdf (last visited Apr. 22, 2026), at 2.

[16] *Id.*

C. Interval Data Will Improve The Accuracy Of Load Forecasts

Interval data provides detailed information on energy consumption at specific intervals, rather than in the aggregate or based on averages. With this information, both wholesale suppliers that serve Basic Service load and retail suppliers will be able to more accurately forecast the amount of supply that they will need to serve load. More accurate load information will reduce Basic Service reconciliations resulting from inaccurate EDC load forecasts. This reduction in reconciliations will further increase the accuracy of the price signals that customers receive.

Reconciliations distort the relationship between the EDCs' actual cost of providing Basic Service during a particular period and the market price of power. Unlike most New England states, this issue is exacerbated in Massachusetts because any over- or under-recovery of Basic Service supply costs is done in delivery rates and collected from or credited to all customers. This reconciliation process means that Basic Service rates, at any point in time, are higher or lower than the actual cost for that period.

Interval data will also let retail suppliers more accurately determine the amount of supply they will need to serve their Massachusetts customers. This increased accuracy will reduce hedging costs, which, in turn, will reduce competitive supply customer prices and provide those customers with more accurate price signals about the market price of power. These more accurate price signals will allow customers to make appropriate decisions regarding demand response and energy efficiency modifications to better manage their electricity consumption and costs.

D. Interval Data Will Improve Customer Understanding And Control

Interval data available from AMI has the potential to revolutionize how customers purchase electricity and change the way electricity is offered by giving customers and

their suppliers the information necessary to transform customer behavior. Access to interval data will enable customers to understand when and how they are using their energy. Further, ISO-NE settlements based on interval data will ensure that customers receive more accurate price signals that will allow them to better control costs. This information combined with technologies (e.g., dashboards, apps, alerts) that will allow customers to be notified when they are nearing peak demand and to see in real-time the effects of changes in their energy consumption behavior will provide customers greater understanding and control over their electric usage and bills.

E. Interval Data Will Provide Other Benefits

Access to interval data and more accurate price signals facilitated by the use of interval data for ISO-NE settlements will enable the development and adoption of retail product offerings, like TVRs and VPPs, that "will lower system peak demand and, ultimately, limit the need for future generation, transmission, and distribution investments."[17] Product offerings that reduce demand provide numerous benefits including direct cost savings to participating customers, system-wide price suppression for all consumers, mitigation of peak demand, avoided or deferred infrastructure investment, environmental and greenhouse gas (GHG) emissions reductions, intermittent renewable resource integration, and improved reliability.

In fact, products that encourage demand reductions "offer residential, commercial, and industrial customers the greatest opportunity to reduce their electric and gas bills cost-effectively."[18] Adoption of demand-side management solutions "also create

[17] *Cf.* D.P.U. 14-04-C (Nov. 5, 2014), at 8.
[18] D.P.U. 07-50-A (Jul. 16, 2008) ("07-50-A"), at 23.

downward pressure on wholesale gas and electric prices by lowering regional demand, thereby helping to lower energy bills throughout Massachusetts and the region."[19] In addition, product offerings that encourage customers to reduce usage during peak periods lower the cost for all electricity customers "by reducing the need for new generation, transmission, and distribution investments."[20] Product offerings that encourage customers to reduce demand also minimize the environmental impacts of energy production by obviating the need to rely on older, less efficient resources in periods of peak demand.

In addition, as the Commonwealth and other states around the region seek to rely on more intermittent resources to meet their decarbonization goals, "load shifting becomes more valuable."[21] Product offerings, likes TVRs and VPPs, provide peak load management that "can help improve grid reliability and help consumers manage wholesale costs."[22] Given the countless and wide-reaching benefits that can be provided by retail product offerings empowered by access to interval data and ISO-NE market settlements based on interval data, the Department should require that the EDCs to facilitate both as quickly as possible.

IV. LOAD SETTLEMENT BASED ON INTERVAL DATA CAN ENABLE SUBSTANTIAL VALUE CREATION AND SAVINGS

Supplier access to and load settlement based on interval data have facilitated the adoption of numerous product offerings, like TVRs and VPPs, in other jurisdictions that provide substantial value to participating customers and to the grid. For example, in 2025

[19] 07-50-A, at 4.

[20] 12-76-B, at 11.

[21] Massachusetts Electric Rate Task Force, "ISO New England Overview & Considerations for Rate Design" (May 19, 2025) (available at: https://www.iso-ne.com/static-assets/documents/100023/05_19_25_ma_electric_rate_task_force.pdf) (last visited Apr. 22, 2026), at 8.

[22] *Id.*

alone, NRG Business customers in Texas saved nearly $5 million by curtailing usage during peak demand events through NRG's Responsive Economic Dispatch program.[23]

The benefits of residential VPPs are also substantial. Through participation in VPPs, a typical residential customer reduces electricity usage by 20-30% during peak periods – this not only reduces costs for the customers that participate but also reduces overall costs. A Brattle Group study found that a California residential customer participating in the four VPPs evaluated in the study "potentially could receive participation payments of $500 to $1,000 per year."[24]

The Brattle Group study also found that, by 2035, a California statewide portfolio of VPPs "could avoid over $750 million per year in traditional power system costs."[25] In addition, the U.S. Department of Energy has determined that "[t]ripling the current capacity of VPPs—to 80-160 GW—by 2030 could address 10-20% of peak load and save on the order of $10B in annual grid costs through avoided generation buildout, delayed power infrastructure investments, and reduced operation of expensive peaker plants."[26]

V. INTERVAL DATA ACCESS AND LOAD SETTLEMENT SHOULD START AS SOON AS POSSIBLE

For the past two years, the Governor has required the Department to take steps to provide winter rate relief to residential customers in light of continuously rising winter

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[23] "NRG Energy Reports 2025 Customer Savings Through Responsive Economic Dispatch Program" (Feb., 10. 2026), https://www.nrg.com/about/newsroom/2026/02102026.html (last visited Apr. 23, 2026).

[24] "California's Virtual Power Potential: How Five Consumer Technologies Could Improve the State's Energy Affordability" (Apr. 2024), https://www.brattle.com/wp-content/uploads/2024/04/Californias-Virtual-Power-Potential-How-Five-Consumer-Technologies-Could-Improve-the-States-Energy-Affordability.pdf (last visited Apr. 22, 2026), at 6.

[25] *Id.*

[26] U.S. Department of Energy, "Virtual Power Plants Projects," https://www.energy.gov/edf/virtual-power-plants-projects#:~:text=Small%20changes%20across%20a%20few,electricity%20more%20affordable%20for%20Americans (last visited Apr. 22, 2026).

electricity costs.[27] Moreover, ISO-NE is projecting that, primarily due to electrification, "[n]et annual energy use is expected to grow by 1.2% annually" between 2025 and 2034.[28] The combination of rising costs and increased usage will only exacerbate energy affordability concerns for consumers.

By requiring the EDCs to take the steps necessary to provide suppliers with access to interval data and provide interval data for ISO-NE settlements, the Department can help to reduce demand and costs for all ratepayers. Thus, RESA urges the Department to require the EDCs to do everything possible to enable these functions as quickly as possible so that Massachusetts customers can realize the substantial value and savings available.

VI. THE EDCS SHOULD ABSORB ANY ADDITIONAL COSTS NECESSARY TO PROVIDE INTERVAL DATA FOR ISO-NE SETTLEMENTS

As noted above, during the evidentiary hearings conducted in 2022 by the Department regarding the EDCs' AMI implementation plans, the EDCs each testified that, once AMI was deployed, they would be able to settle load based on that interval data (rather than load profiles).[29] Thus, the costs associated with this capability should already have been included in the EDCs' AMI implementation plans. Moreover, the cost-benefit

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[27] Docket No. D.P.U. 25-200, *Investigation by the Department of Public Utilities on Its Own Motion into Gas and Electric Delivery Charges and Bill Redesign*, Department Letter to Distribution Companies re Winter Bill Relief and Proactive Management of Customer Costs (Feb. 10, 2026), at 1.

[28] ISO Newswire, "Enhanced long-term forecast predicts steady growth in energy use, peak demand" (May 1, 2025), https://isonewswire.com/2025/05/01/enhanced-long-term-forecast-predicts-steady-growth-in-energy-use-peak-demand/#:~:text=Net%20Forecast%20*%20Net%20annual%20energy%20use,to%20account%20for%208%2C049%20GWh%20that%20year (last visited Apr. 22, 2026).

[29] *See* Dockets 21-80/81/82, Evidentiary Hearing Transcript (Apr. 7, 2022), at 811 (testifying that, once interval data was available for all customers in the Eversource service territory, it would be used for load settlement); *Id.* at 1012-13 (same); *Id.* at 809 (testifying that Unitil would have capability to use AMI data for load settlement by end of 2022); *Id.* at 1013 (testifying that Unitil would use actual interval data for both energy settlement and capacity tags); *Id.* at 810 (testifying that, once actual data was available, National Grid would use that data to report load to ISO-NE).

analysis used by the EDCs to support the investment in AMI included the benefits associated with TVRs[30] – a product offering that, as discussed above, requires the use of interval data for ISO-NE settlements to be effective. Accordingly, any additional costs associated with enabling the capability to provide interval data for ISO-NE settlements should be absorbed by the EDCs.

If, despite the foregoing, the Department authorizes the EDCs to recover some or all of the additional costs they will incur to establish the capability to provide interval data for ISO-NE settlements, those costs should not be borne by retail suppliers who have no ability to control or influence those costs and will have to invest in their own system changes. Because the benefits resulting from establishing the capability to provide interval data for ISO-NE settlements will flow to all ratepayers (even those who do not adopt the innovative product offerings that will be enabled), consistent with Department precedent, the costs to achieve those benefits should be assessed to all ratepayers.[31]

[30] *See, e.g.*, National Grid AMI Implementation Plan, Exhibit NG-AMI-1, at 27:7-8 (testifying that benefits include those associated with full phase in of TVR); *Id.* at 29:1-2 ("The high-level BCA ratio is 1.51 assuming the Department adopts an opt-in TVR structure."); *Id.* at 30:2-3 ("The total estimated benefits are $728 million 20-year NPV (assuming the mid-point of an opt-in TVR scenario)."); Eversource AMI Implementation Plan, Exhibit ES-AMI-4, at 24 ("The quantitative benefit of TVRs to customers is calculated based on expected customer adoption of TVRs and the expected reduction and shifting of load across those customers (based on previous pilots and industry benchmarks).").

[31] *Accord Alliance to Protect Nantucket Sound, Inc. v. Department of Public Utilities*, 461 Mass. 166, 188 (2011) ("The department permissibly determined that the environmental benefits of PPA-1, including compliance with RPS and GWSA requirements, will accrue to all National Grid customers, and it is therefore appropriate to require all customers to share in the costs of acquiring these benefits, in accordance with departmental precedent."); D.P.U. 99-60-C (Oct. 6, 2000), at 13 (concluding that, because Basic Service benefits all customers, any over- or under-collection should be recovered from all customers); *see also* Docket No. D.P.U. 20-69, *Investigation by the Department of Public Utilities on its own Motion into the Modernization of the Electric Grid - Phase II*, Reply Comments of NSTAR Electric Company d/b/a Eversource Energy (Sep. 4, 2020), at 8 ("The comprehensive nature of benefits of full AMF deployment, makes recovery of associated costs from all customers appropriate.").

VII. BILL ENHANCEMENTS ARE NECESSARY TO SUPPORT ADOPTION OF THE MORE COMPLEX PRODUCTS THAT WILL BE ENABLED BY INTERVAL DATA

Currently, when customers are billed by an EDC, they are provided one piece of information about the product in which they are enrolled – the price per kilowatt hour.[32] In order for customers to see the impact of their decisions to adopt the innovative product offerings that will be enabled by interval data access and settlements, billing enhancements are also needed.

The EDCs only included proposals for rate-ready TVR billing in their AMI implementation plans.[33] "Rate-ready billing of TVR entails that suppliers provide to an EDC a set of TVR periods and prices that correspond to the agreed-upon ***standard*** parameters that allow an EDC to calculate a bill for a customer enrolled in that TVR rate."[34] These limitations do not support the billing of more complex pricing options (e.g., critical peak pricing, peak-time rebates).[35]

Although the dual billing option does not suffer from these same limitations, residential and many smaller commercial customers strongly prefer to receive one bill for their electric service. As a result, those customers will not be able to take advantage of the more innovative pricing and product offerings that will be enabled by interval data access and settlement and that will help reduce individual customer and overall system costs.

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[32] *See, e.g.*, Eversource Sample Electric Bill, https://www.eversource.com/business/account-billing/manage-bill/about-your-bill/understanding-your-bill/sample-electric-bill/wma (last visited Apr. 23, 2026).

[33] *Cf., e.g.*, Dockets 21-80/81/82, AMI Stakeholder Group Final Report (Aug. 1, 2024) ("AMI Final Report"), at 10 ("[T]he EDCs do not plan to accommodate dynamic pricing structures in their AMI rollouts. Instead, the Companies will accommodate standard TVR options.").

[34] *Id.* n.6 (internal quotations omitted) (emphasis added).

[35] *Id.* at 11.

Ideally, Supplier Consolidated Billing ("SCB"), by which retail suppliers bill their customers for commodity supply and other services, and also collect the distribution charges for the utilities, would provide the optimal means for advancing customer adoption of products that reduce costs. Absent SCB, bill-ready billing, at a minimum, provides a solution that will enhance the range of pricing and product offerings that are available to customers, especially customers that prefer to receive a single bill. "[B]ill-ready billing entails the sending of customer interval usage data to the supplier, which would compute the bill line items and send them back to the EDC for inclusion on the customer bill."[36] Each of the EDCs have indicated their willingness to make the necessary system enhancements to accommodate bill-ready billing.[37] Because bill-ready billing will ensure that customers that choose more complex pricing and product offerings can see the impact and value of those decisions, RESA urges the Department to take the necessary action to encourage the EDCs to complete the necessary system enhancements to offer bill-ready billing coincident with the enablement of interval data access and settlements.

CONCLUSION

For all the foregoing reasons, the Department should order the EDCs to provide electric suppliers with customer interval usage data, in near real time, and to provide interval data for use in settlements in the ISO-NE markets for each customer as soon as that customer's AMI meter has been installed.

[36] AMI Final Report, at 10 n.6 (internal quotations omitted).

[37] *Id.* at 11 ("Eversource intends to accommodate bill-ready billing for non-standard TVR options beginning approximately when TVR options are enabled for suppliers; National Grid and Unitil are in the process of evaluating the cost and feasibility of bill-ready billing.").

Respectfully submitted,
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Dated: April 23, 2026

Certificate of Service

I certify that I have this day served the foregoing document in the above-captioned proceeding in accordance with the requirements of 220 C.M.R. § 1.05.

Joey Lee Miranda

Dated: April 23, 2026