

Luly Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

May 4, 2015

**Re: Docket No. 4513 – In re. Metering Pilot for Streetlights**

Dear Ms. Massaro:

I write on behalf of the Washington County Regional Planning Council and the RI League of Cities and Towns (collectively the Municipalities) in response to the comments filed by the Division of Public Utilities and Carriers on April 30, 2015. The Municipalities have also learned more details about the Rhode Island Department of Transportation (RIDOT) DOT Phase 1 and, as a result, hereby change their position on the need for Phase 2.

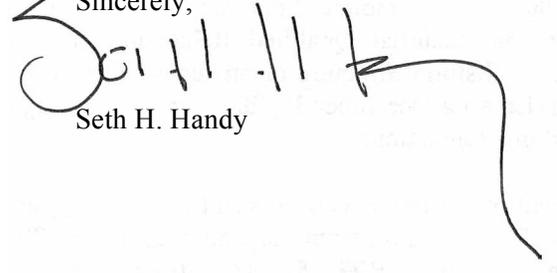
RIDOT Phase 1 uses a CimCon controller. Newer CimCon controllers, like those to be used in RIDOT Phase 2, use the Silver Springs communication module. RIDOT Phase 1 will help us all compare the consumption of these lights using unmetered, traditional meters and controllers, but the network will not be the same as is likely to be deployed widely. Therefore, the Municipalities now agree that it makes sense to include RIDOT Phase 2 in the metering pilot.

The Division's consultant answers two questions. The Municipalities disagree with both answers but address only the second question. The consultant goes beyond the question posed by the Commission by stating, "This comparison will help inform whether the incremental cost of installing street light controllers and meters is offset by the additional energy reductions that become possible by individually controlling the output of any street light." The Commission did not call for such a comparison in the pilot, and there can be no accurate cost/benefit comparison using controllers procured by a utility or state agency under a regulatory order and not in the free market. Prices change with the procurer, with time, and with volume. RIDOT does not have sufficient volume to achieve the same prices as a municipal collaborative, and therefore any price-based conclusions are invalid. Further, there are significant monetary and non-monetary reasons to install a control network that such an analysis would not quantify such as public safety, linkage to traffic signal controllers, parking systems, meter reading, security cameras, and gunshot detectors. Communities will be influenced by much more than the monetary considerations of just dimming the lights.

The consultant goes on to conclude that since DOT Phase 1 is not sufficient, a municipal pilot is necessary. He ignores DOT Phase 2. Like National Grid's proposal, he does not address how to resolve the Commission's concerns at the least possible cost. DOT Phase 2 does exactly that—it minimizes ratepayer cost, is located on roadways where various operating schedules can be tested, and includes

metered lights for comparison to the controller's measurements. The Commission's concerns can and should be answered using the DOT projects.

Thank you for considering these comments.

Sincerely,  
  
Seth H. Handy

cc. Service List