Ms. Luly E. Massaro
Commission Clerk, Public Utilities Commission
89 Jefferson Boulevard,
Warwick, Rhode Island 02888

RE: INVESTIGATION INTO THE CHANGING ELECTRIC DISTRIBUTION SYSTEM AND THE MODERNIZATION OF RATES IN LIGHT OF THE CHANGING DISTRIBUTION SYSTEM

Dear Ms. Massaro

GridUnity submits the following comments in response to the Public Utilities Commission’s Notice to Accept Comments on Draft Guidance Document Docket 4600-A. GridUnity is a platform-as-a-service analytics company that reliably and cost-effectively transforms customer engagement and optimization of utility services. The GridUnity platform powers stakeholder engagement in new energy options and accelerates the grid and market optimization required of our dynamic energy future. The GridUnity platform enables all stakeholders to develop a fact-based understanding of the distribution system and its behaviors as distributed energy resources (PV, EV, Wind, Storage…) drive industry change.

Our comments are:

1) We agree with the goals of the PUC, and we believe they can be met by currently-existing software tools. In addition, as the energy market evolves the new tools like the GridUnity platform have been architected to enable utilities to rapidly evolve their processes and analysis to meet ongoing customer and regulatory needs as they unfold.

2) We believe that the demonstration/offering by the utility was too modest of a deliverable to meaningfully meet the PUC’s stated goals. In fact, we feel it completely misses the purpose of having a portal; by relying heavily on manual efforts (as the utility stated) to provide data updates to the portal, the value of presenting data in the portal is reduced exponentially, because the data is not fresh (the utility stated the data may be over a month old)

3) GridUnity is in production use today in California and Hawaii and the system is currently used by large IOU’s to not only calculate LVM but also to accept complex distributed energy resources applications, automate the technical engineering screens and power flow analysis so the applications can be processed in less than a day.

As an advanced technology company interested in educating all stakeholders we would be happy to present the capabilities of the GridUnity platform to the PUC staff to ensure all parties understand how existing technology in production at other forward thinking utilities can be used to meet the Rhode Island PUC’s stated objectives.

Thank you for your time and consideration of our comments.

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