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ACADIA CENTER COMMENTS

Acadia Center submits the following comments in response to the Rhode Island Division of Public Utilities and Carriers and Office of Energy Resources' request for stakeholder comments on the Advanced Grid Capabilities and Questions for Stakeholders issued on August 20, 2017. Acadia Center is a non-profit, research and advocacy organization committed to advancing the clean energy future, and is at the forefront of efforts to build clean, low carbon, and consumer-friendly economies. Our approach is characterized by reliable information, comprehensive advocacy, and problem solving through innovation and collaboration.

Acadia Center participated in the Power Sector Transformation Initiative's earlier phases, as well as Docket 4600 and SIRI.

Acadia Center sees the Power Sector Transformation Initiative's overarching aim of developing a more dynamic regulatory framework to enable Rhode Island and its utilities to advance a cleaner, more affordable, and reliable energy system for the 21st century and beyond as a transformative step forward for state-level energy policy. The state's energy future is dependent upon an ambitious, effective, and comprehensive response to historic challenges and opportunities. Acadia Center commends the agencies for continuing to investigate the functionalities that are needed for an advanced grid as a part of this broader effort.

Acadia Center wishes to comment on question #4 regarding the benefits of advanced meter applications, particularly for income-eligible customers. Low-income customers benefit from lower system costs and improved service quality, such as better outage response, just like all other customers. These benefits can come from advanced meter applications, as well as other grid modernization investments. But it is not necessary for low-income customers to have advanced meters, or utilize all the functionalities of an advanced meter, to benefit from statewide investments and the activities of other customers.

Furthermore, it may not be useful to include all low-income customers, and possibly other low-usage customers, in the rollout of advanced metering, particularly in the short term, if those customers do not have sufficient load to shift.¹ If advanced metering is still rolled out to those customers, special consideration with respect to rate design should be given to low-income and vulnerable customers. It may be appropriate to make advanced rate designs opt-in for low-income and vulnerable customers, even when advanced rate designs are the default for most residential customers. For low-income customers who opt in to advanced meters or advanced rate designs, programs should be

¹ See *UtilityVision*, p. 7 (available online at: <http://acadiacenter.org/document/utilityvision/>).

made available to provide these customers with low-cost energy management technology, so that they have the same opportunities to benefit as other customers.

Conclusion

Acadia Center appreciates the opportunity to comment on Advanced Grid Capabilities and Questions for Stakeholders and looks forward to further collaboration on these issues.

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