

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF COMPETITIVE OPPORTINITIES** : **Case No. 94-E-0952**  
**REGARDING ELECTRIC SERVICE** :

**IN THE MATTER OF COMPETITIVE METERING** : **Case No. 00-E-0165**

**PROCEEDING ON MOTION OF THE COMMISSION TO** : **Case No. 02-M-0514**  
**INVESTIGATE COMPETITIVE METERING FOR** :  
**GAS SERVICE** :

**COMMENTS OF  
CONSTELLATION NEWENERGY, INC.  
ON ADVANCED METERING INFRASTRUCTURE**

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**INTRODUCTION**

Pursuant to directives of the New York Public Service Commission (“Commission”) in its October 10, 2007 *Notice Seeking Comment* in the above-captioned dockets, Constellation NewEnergy, Inc. (“Constellation”) hereby submits its comments regarding advanced metering infrastructure (“AMI”).

**CONSTELLATION COMMENTS ON ADVANCED METERING INFRASTRUCTURE**

Constellation appreciates the Commission’s efforts to establish consistent AMI requirements that can be measured against a clear and comprehensive standard for the functions an AMI system is intended to achieve. Constellation agrees with the Commission that having a robust and flexible AMI system is a necessary step for New York to achieve its ambitious energy efficiency and peak load reduction goals. In particular, the AMI system will be needed to support expansion of the NYISO’s demand response programs – especially as customers move beyond the ICAP Special Case Resource Program – and become more active in economic programs that involve bidding load curtailment into the day-ahead and real-time energy markets.

AMI is also a prerequisite to realizing the full benefits that demand response resources can achieve in support of the electric distribution system, as has been demonstrated through programs similar to the one created by Con Edison.

To that end, Constellation strongly supports the Commission's efforts to impose consistent standards. Consistency across utility territories will allow competitive providers of commodities, energy services, data management, demand response, as well as equipment manufacturers, to offer standardized products across the state. This will result in greater value for ratepayers through more competitive pricing and will provide them with a greater variety of choices of products and services.

The list of standards provided by the Commission in its Notice outline most of the standards that should be included in each utility's AMI plan. Constellation would suggest the following modifications to improve the standards:

1. Meters should provide a pulse signal that can be read directly from the meter by building automation systems. Where there is no building automation system, there are inexpensive recorders available that can pick up the pulses from the meter and transmit them *via* phone or IP to the customer or competitive provider. The Commission alludes to this feature in the Notice's function (j), but it should be more completely stated.
2. Direct access to this meter data should be given, at no additional cost, to the customer or competitive provider. Since the cost of this AMI equipment is already in rate base, customers should be able to have access to the data.

In addition to these two specific suggestions, Constellation would recommend a broader guidance statement by the Commission that would require utilities to coordinate their AMI plans

with requirements by the NYISO for its demand response programs. While the NYISO currently does not require direct, or real-time, access to meter data for customers in the ICAP Special Case Resource Program, these standards are subject to change. A number of other ISO/RTOs, including ISO-NE and PJM, require direct access to meter data for their equivalent programs. If utility AMI plans are not coordinated with NYISO requirements, a large number of customers may have to install redundant metering and telemetry equipment at a substantial (and unnecessary) cost.

### CONCLUSION

As modified as suggested herein, the Commission's proposed AMI standard will help support the robust and flexible AMI system needed for New York to achieve its ambitious energy efficiency and peak load reduction goals.

Respectfully Submitted,

/s/ Michael E. Kaufmann

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*On Behalf of  
Constellation NewEnergy, Inc.*

**Dated: December 10, 2007**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have served on this 10<sup>th</sup> day of December, 2007 the foregoing document by electronic mail to all parties on the Service List for this proceeding.

/s/ Michael E. Kaufmann

Michael E. Kaufmann