

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

CASE 94-E-0952 – In the Matter of Competitive Opportunities
Regarding Electric Service

CASE 00-E-0165 – In the Matter of Competitive Metering

CASE 02-M-0514 – Proceeding on Motion of the Commission to Investigate
Competitive Metering for Gas Service

December 10, 2007

**COMMENTS ON ADVANCED METERING INFRASTRUCTURE
FROM ENERGY CURTAILMENT SPECIALISTS, INC.**

On October 10, 2007 the Commission issued an order seeking comments from parties concerning the features and functions of an Advanced Metering Infrastructure (“AMI”) system for the benefit of all customers. Energy Curtailment Specialists, Inc. (“ECS”) respectfully submits the following comments regarding development and deployment of an advanced metering infrastructure system.

I. INTRODUCTION

ECS is one of the largest full-service and leading demand response providers in the United States. Founded in 2001, to provide both wholesale markets and Investor Owned Utilities with reliable demand response resources, ECS is a registered Responsible Interface Party (RIP) with the New York State Independent System Operator (“NYISO”) in good standing. ECS’ vast portfolio of customers include a wide range of resources, including the largest industrial loads, state schools, universities, healthcare providers, as

well as property management and large commercial hotels. ECS represents more MW of curtailment in highly constrained transmission zones than any other demand response provider in New York State. ECS has been at the forefront of the demand response markets for the past several years, and is considered a leader in the demand response field.

II. CONSIDERATIONS

ECS supports the creation and deployment of an AMI that facilitates further development of demand response programs and provides opportunities for efficiencies. One primary benefit of an AMI is the ability to quickly process and access large amounts of usage data. AMI is a critical foundation for demand response initiatives, in that it provides access to energy usage, measurement and verification of demand charges, and data in real-time for end users. As the Commission seeks to develop an advance metering infrastructure it should take into consideration the need for flexibility to accommodate a number of approaches and technologies that have been developed for the benefit of and are now entrenched in New York's market for the past several years.

ECS believes both utilities and customers will benefit from AMI deployment through timely access to meter data, accurate and easily recovered data, monetary benefits through price signals, and customers' ability to participate in demand response programs more easily. However, there is a strong need to create rules and regulations that set standards for functionality across all utilities. The AMI must allow access to energy usage data in a timely manner, so that all parties have access to data. Third party providers of demand response, such as ECS, must have the ability to access meter data in a timely manner (with proper authorization), as metering and data information flow are

critical components for third party demand response providers. Any delay in meter installations and access to data only seeks to harm demand response programs and customers that participate in these programs.

ECS believes that a carefully implemented AMI system development will facilitate greater energy efficiencies, and greater participation in demand response programs. A full scale AMI deployment will eliminate the need for redundancy of systems. Currently, one market participant is proposing, at the New York Independent System Operator's ("NYISO") Price Responsive Load Working Group, to fully automate the reporting of data from demand response events. That same participant has proposed to implement the current Internet Based Communication System that is currently used by the ISO-NE demand response programs. ECS believes that a full scale AMI deployment could easily accommodate this same requirement without a duplicate (and hence more costly) infrastructure, and in fact would be a greater functioning system for all consumers in the state. By implementing a full scale, carefully developed AMI system the state will eliminate the need for ratepayers and the market to have to incur metering and implementation costs twice. Demand response providers have incurred multiple millions of dollars in expense to meter thousands of facilities that participate in NYISO's programs. Much of that expense has been picked up by NYSERDA. To develop a system outside of the current AMI initiative for NYISO's programs would make no sense and it would be costly as it would require many more millions of dollars to enable the current interval metering to at some point integrate with whatever AMI system is developed. Therefore, timely creation of an appropriate AMI protocol which takes into account the fact that there are existing technologies which need to be integrated, is essential.

It is clear that when looking at the cost-benefit analysis of an AMI system the Commission must consider the benefits that will be gained through the development of an AMI. As reserve margins continue to decrease in New York State it is even more critical that an AMI system be deployed so that further development of energy efficiency and demand response programs can continue to be more fully developed. Implementing an AMI system will allow customers to have greater access to energy usage data, will facilitate greater demand response participation, and will allow customers to respond better to time-of-use rates from the utilities.

III. FEATURES AND FUNCTIONALITY

Staff at the Commission seeks comments regarding features and functions for inclusion in a standard AMI system. ECS believes that the list of features and functions, as listed in the Notice Seeking Comments issued on October 10, 2007, are features that will provide broad capabilities. However, on-board meter memory capable of storing at least 60 days of readings should be increased to either 90-days or 120-days of capable storage, and time-stamped interval data will need to be at least 15-minute intervals, as this is required for most demand response programs.

ECS respectfully submits to the Commission that Meter Service Data Providers (“MDSP”) should be independent from Curtailment Service Provider’s (“CSP”) or RIP’s. The current rules allow CSP’s to also register as an MDSP with the New York State Public Service Commission. ECS believes this creates a serious conflict of interest as CSP’s that are MDSP’s have exclusive control over the interval data for participants in

NYISO's programs. ECS believes that the roles of the CSP and MDSP need to be separate thereby creating an independence and help to ensure data integrity.

IV. CONCLUSION

In conclusion, ECS would like to thank the Commission and staff for allowing us the opportunity to comment on what we believe is an important issue for demand response programs in New York. ECS respectfully submits that a carefully developed AMI system will facilitate the growth of demand response, provide customers with greater access into energy usage data, and assist customers to make better energy choices.

Respectfully submitted,



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V. COMMUNICATIONS

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