

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF COMPETITIVE  
OPPORTUNITIES REGARDING ELECTRIC  
SERVICE**

**CASE No. 94-E-0952**

**IN THE MATTER OF COMPETITIVE METERING**

**CASE No. 00-E-0165**

**PROCEEDING ON MOTION OF THE  
COMMISSION TO INVESTIGATE COMPETITIVE  
METERING FOR GAS SERVICE**

**CASE No. 02-M-0514**

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**INITIAL COMMENTS OF SENSUS METERING SYSTEMS  
REGARDING ADVANCED METERING AND AMI  
FUNCTIONALITY IN RESPONSE TO  
THE PUBLIC NOTICE OF REQUEST FOR COMMENTS**

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**DATED: DECEMBER 7, 2007**

**COUNSEL FOR SENSUS METERING SYSTEMS, INC.**

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

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AND NOW COMES **Scott H. DeBroff, Esquire** of Smigel, Anderson & Sacks, LLP, on behalf of his client, **Sensus Metering Systems, Inc.** ("Sensus" or "SMS") for the purpose of filing comments in the above-captioned proceeding, and they aver the following:

1. **Sensus Metering Systems, Inc.** with its headquarters in Raleigh, North Carolina, is a leading world-class provider of high-value metering, Automatic Meter Reading (AMR) and Advanced Metering Infrastructure (AMI) system solutions for water, gas, electric, and heat utilities as well as sub-metering entities worldwide.

2. Sensus has a significant presence in the New York market and has ongoing relationships with New York utilities. As a meter technology provider, they are participating in key initiatives to support the implementation of advanced metering throughout the United States and beyond. Sensus wishes to become an active party in this proceeding and offer its thoughts regarding the implementation proceedings and rulemakings to address the issues of standards, functionality and cost benefit issues.
  
3. All correspondence and pleadings in this docket for Sensus Metering Systems, Inc. should be directed to:

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## INITIAL COMMENTS ON ADVANCED METERING

4. On August 1, 2006, the Commission issued an order in these proceedings directing electric utilities to file comprehensive plans for development and deployment, to the extent feasible and cost effective, of advanced metering infrastructure (AMI) systems for the benefit of all customers.
5. In its August 1, 2006 Order, the Commission adopted a broad definition of “advanced metering”, and by doing so, intended to refrain from including requirements that might favor one manufacturer’s product over another, or that might limit innovation in the field.
6. We agree with the Commission that it is also important for the Commission to consider the AMI filings using a consistent standard, one that has a set of minimum functionality as its base.
7. In regard to the Commission’s question as to whether the list is sufficiently comprehensive or whether additional features or functions should be specified, we think that this list is a good start. In terms of the promotion of a “clear and comprehensive standard for functions they are intended to achieve”, this minimum functionality list is fairly complete. This list matches up very well with a similar exercise in Maryland, found in Case No. 9111, where in an “Investigation Of Advanced Metering Technical Standards, ...and Recovery of Costs of Advanced Meters and Demand Side Management Programs” is in process. The Maryland Public Service Commission put out a list of minimum requirements assumed in the electric companies’ proposals to implement an AMI system. The lists are almost identical, except for three items. First, the Maryland Commission seeks AMI implementation for all customers of an electric utility. Second,

the Maryland list includes the ability to monitor voltage at each meter and report the data. Finally, the Maryland list includes the ability to have remote connect/disconnect for all meters rated at or below 200 amps. Except for the voltage monitoring capability, the other two requirements bring significant, additional cost issues into the equation, and as far as the New York list is concerned, the New York list more appropriately leaves the two controversial matters out. The only concern in terms of minimum functionality we would have would be if there were supportable “minimum” capabilities which followed passage of any initial orders by this Commission, we would want there to be language in the legislation that specifically allows for consideration and adoption of such additional capabilities as determined by a collaborative of the parties involved.

8. In regard to the Commission’s question as to whether the list included items that should not become part of a Commission standard, Sensus does have a few concerns and we will address them individually.
9. In regard to the Commission’s question as to whether items on the list are accurately and /or sufficiently defined, and if not, how to improve on the definition, Sensus does have a few concerns and we will address them individually.
10. In regard to the Commission’s question as to whether there are other matters related to such an AMI standard not addressed by the questions, we will also address at the conclusion.

## COMMENTS ON THE LIST OF AMI STANDARDS

11. **ANSI compliant (must meet all ANSI standards)** – There is practically no electricity meter that is put into service unless it meets the ANSI standards. We agree with this standard, but think that the piece in parentheses is unnecessary and duplicative. Perhaps the best way to write the language may to simply say that “Advanced Meters must be compliant with all relevant ANSI standards.” There may be some ANSI requirements that do not apply to all meters so the draft Commission language could have the unintentional consequence of excluding some meters from being approved in New York State. We do not believe the proposed ANSI C12.22 standard should be adopted or embraced by utility commissions for the following reasons: 1) We believe that the “proposed” ANSI C12.22 standard would increase AMI system costs and lower system functionality, and 2) Compliance with ANSI C12.22 would eliminate certain system functionalities already developed and present in the FlexNet system.
12. **Bi-directional registration (supports net metering)** – We support this standard.
13. **Visual read capability for cumulative usage** – We support this standard.
14. **Ability to provide time-stamped interval data, at hourly or shorter time intervals -**  
We support the ability to time stamp data, but would acknowledge that some utilities may not want the Commission specifying data resolution intervals. This such standard should be flexible enough to incorporate the needs of all utilities, and for suggested language, perhaps the “Ability to provide time-stamped interval data with an interval duration of one hour or less” would be a good alternative.

**15. On-board meter memory capable of storing at least 60 days of readings** – This drafted standard is of substantial concern to us. With the capability that is built into the advanced meter and the AMI system that supports it, there is **no** need for 60 days of meter data to be stored on the meter. The 60 day requirement forces a utility to spend more for a higher end meter, which for a residential deployment, would add a heavy burden to the cost and in turn, the business case analysis. An on-board meter memory requirement closer to the one that has been promoted by the Maryland PSC is that all meters shall have a minimum of 14 days of data storage capability on the meter. We believe that the 14 day minimum standard is sufficient and will provide sufficient back-up to the utility.

One additional support for our recommendation is found as a result of the language in the definition for “Advanced Metering” as promoted by the Federal Energy Regulatory Commission. They define Advanced Metering as follows:

*“Advanced metering is a metering system that records customer consumption [and possibly other parameters] hourly or more frequently and that provides for daily or more frequent transmittal of measurements over a communication network to a central collection point.”*

The definition is taken from the 2007 Assessment of Demand Response and Advanced Metering Report submitted by the FERC. As the meters are read at least daily, it's hard to justify the meter having a 60-day data on board storage capability.

16. **Direct, real-time (defined as a time lag of five minutes or less) remote read-only access for customers and/or competitive providers to meter data** – We would support this if we had more clarity on the rationale for this standard as well as more language that gave additional detail about the capability. It would be important to understand what the data was going to be used for and what customers and competitive providers were seeking given the accessibility for such information. We would be okay with this requirement if it is intended only to support a home display. However, we would not support it if the intention is to support operation of energy management equipment. Input for energy management equipment is currently provided with KYZ outputs from the meter. This is impractical if the expectation is for all data to be derived from a back end AMI server or Meter Data Management (MDM) system.
17. **Capability to remotely read meters on-demand** – We support this standard.
18. **Utilizes open standards-based communication protocols and platforms, e.g., broadband, PLC, internet, XML, MV-90, Zigbee, DNP3, etc.** – While we of course are very supportive and compliant with industry standards, the distinction between “open” architecture and proprietary technology/services is very important, and needs to be clearly understood by this Commission and other regulatory bodies around the country who are examining these Advanced Metering/AMI issues. Our technology utilizes ANSI standards-based electricity meters, employs an open architecture and is interoperable with 3<sup>rd</sup> party devices. The WAN infrastructure of our FlexNet technology utilizes open standards based communication protocols, however the LAN infrastructure is proprietary and optimized to provide maximum performance and reliability for the utility operating environment. What we have tried to do is to utilize standards where they exist and find

ways to collaborate with our competitors and partners. We think that this requirement needs considerable re-working and more clarity, as it is currently a “catch phrase” for too many items.

19. **Two-way communications capability, including ability to remotely upgrade meter firmware-** We support this standard.

20. **Ability to send signals to customer equipment to trigger demand response functions, and/or connect with a home area network (HAN) to provide direct or customer-activated load control** – We support this requirement.

21. **Positive notification of outage/restoration** – We support this requirement.

22. **Self diagnostics, including tamper flagging capability** – We support this requirement and believe that most meters in the field today, have this capability.

23. **Upgrade capability** – We support the ability to upgrade meter software on a remote basis, but this requirement appears to be a re-wording of Functionality “i” and is probably unnecessary.

Sensus Metering Systems is pleased to offer these comments to the Commission and hopes that this comment period and reflection on minimum functionality issues will lead to a productive process to consider the recommendations made by the parties filing comments, and support the development and ultimate deployment of advance meters in New York State.

If there is a further process to address these functionality criteria and expound on the details given, Sensus would be pleased to participate in such.

Respectfully submitted,



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**COUNSEL FOR SENSUS METERING SYSTEMS, INC.**

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**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing “**Initial Comments of Sensus Metering Systems Regarding Advanced Metering and AMI Functionality**” upon the following by email:

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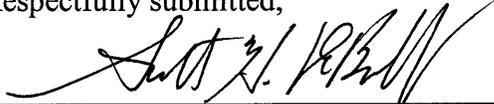
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Respectfully submitted,




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**DATED: DECEMBER 7, 2007**

**COUNSEL FOR SENSUS METERING SYSTEMS, INC.**