Date Filed: October 26, 2026

Witness: Jared A. Lawrence
Request from: Department of Energy and Environmental Protection

Question:

(Phased AMI Enabled TVR Availability) Please explain whether the Company evaluated offering AMI-enabled TVR on a voluntary, pilot, or geographic basis to customers whose meters and supporting systems are operational before system-wide deployment is complete. Summarize the principal benefits, risks, and operational considerations identified and explain the basis for the Company's proposed timing.

Response:

With respect to TVR, the Company's proposed AMI Implementation Plan places emphasis on vital objective of deploying the full span of AMI's technical capabilities, while providing a positive customer experience. To achieve these important objectives, the AMI Implementation Plan ensures there is adequate customer usage data to inform in-depth stakeholder discussions on consensus TVR designs and policies. Customers typically want to maintain control and have options regarding future TVR. Therefore, it is important that customers have access to a robust set of their own AMI interval usage data and a reliable Rate Comparison Tool to make informed decisions about their TVR options.

Furthermore, the Company's AMI Implementation Plan avoids confusion about eligibility (based on whether a customer has received an AMI meter) that could cause frustration and increase the customer service burden during the AMI deployment. By planning to launch TVR broadly for all customers approximately one year after completion of AMI meter deployment, the Company is providing the foundation for thoughtful consensus-based TVR design and the data and tools for customers to make positive decisions.

In contrast, an accelerated TVR (partial) launch during AMI meter deployment, while technically feasible, assuming consensus can be reached on the pilot rates, would be a decision that would run the risk of sub-optimally designed rate components, inadequate access to data and tools for participating customers to assess and be confident in their options, and eligibility confusion that could cause frustration with TVR and the broader AMI deployment. Therefore, the Company's TVR timeline is designed to leverage the optimal path to higher customer satisfaction, higher sustained TVR adoption and, ultimately achievement of the highest benefits that TVR can offer.