



In the matter of:

CEC 2008 Order Instituting Informational Proceeding and Rulemaking on Load Management Standards

CEC Docket No. 08-DR-01

PUBLIC COMMENT: WORKSHOP ON ADVANCED METER INFRASTRUCTURE (AMI) HELD MAY 27, 2008

Filed June 2, 2008

PUBLIC COMMENTS OF EMETER CORPORATION REGARDING THE CEC LOAD MANAGEMENT STANDARDS WORKSHOP ON ADVANCED METER INFRASTRUCTURE, HELD MAY 27, 2008

eMeter Corporation has followed the Load Management Standards OIR proceeding with interest. Following are comments related to the workshop on AMI conducted at the CEC on May 27, 2008.

The increasingly important role of metering data was made clear in this workshop. As a provider of meter data management (MDM) solutions for advanced metering implementations, we understand that the immense data stream made possible by AMI can be both a cornerstone and a stumbling block for utilities. On the one hand, innovative management of interval customer usage data has the potential to capture even more benefits than those originally scoped out in utility business cases for AMI. On the other hand, a utility that cannot manage the change to being a more information-driven organization will find AMI to be a daunting proposition and difficult to justify.

Also worth highlighting in the workshop was the key role that real-time customer usage data plays in load management, to both (1) capture residential energy efficiency benefits via customer feedback and (2) measure the actual impact of smart grid or AMI initiatives.

Regarding customer usage feedback, eMeter supports the Commissioners' concern about customer access to their own energy usage data. While the penetration rate of Internet access to web feedback or home area networking feedback is still being disputed, the fact remains that most utility customers' main interface with their energy provider is first through their monthly bill and secondly through their customer support phone numbers. Providing AMI information with the monthly bill is potentially appealing to customers, and there are ways to accomplish this without disrupting the business process. (Research in transpromotional marketing and bill re-design projects in the United States supports this idea, and a recent survey conducted in 10 European nations found that customers prefer print bill transparency to other access media such as the internet or their cell phones.)

Regarding the measurement of load impact, eMeter's experience in various large-scale AMI deployments in the U.S. and Canada shows that once a sufficiently scaled meter data management system is in place, there is no more need to speculate or estimate load impact, as the actual usage data can be configured to provide true measurements of the benchmarks put forth in business cases, demand-side management program verifications, etc.

Respectfully submitted,

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