

The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

D.P.U. 26-44

March 12, 2026

Investigation by the Department of Public Utilities on Its Own Motion Into the Use of Interval Data Collected by Advanced Metering Infrastructure to Settle Load with ISO New England Inc.

VOTE AND ORDER OPENING INVESTIGATION

I. INTRODUCTION

Consistent with the Department of Public Utilities' ("Department") grid modernization objectives, the Department opens this investigation to develop policies that will enable third-party electricity suppliers to offer time-varying rates ("TVR") to their customers and examine ways to enhance load settlement with ISO New England Inc. ("ISO-NE"). Specifically, this investigation will examine the necessary systems and system upgrades to allow load settlement with ISO-NE based on customer interval usage data collected by advanced metering infrastructure ("AMI"). The Department will solicit input from stakeholders, including the electric distribution companies ("EDCs"),¹ retail electricity suppliers, municipal aggregations, ISO-NE, third-party energy service providers, and other interested stakeholders. The Department has docketed this investigation as D.P.U. 26-44.

II. BACKGROUND

The deployment of advanced technologies on the electric distribution system has opened opportunities to improve customer affordability and the overall efficiency of the grid. The Department has consistently advanced the prudent use of technology for the benefit of customers. The Commonwealth's grid modernization objectives are to: (1) optimize system performance by attaining optimal levels of grid visibility, command and control, and self-healing; (2) optimize system demand by facilitating consumer price responsiveness and minimizing losses on the system; and (3) facilitate the interconnection of distributed energy

¹ The EDCs are Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil"), Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid ("National Grid"), and NSTAR Electric Company d/b/a Eversource Energy ("NSTAR Electric").

resources and integrate these resources into the EDCs' planning and operations processes. Grid Modernization, D.P.U. 15-120/D.P.U. 15-121/D.P.U. 15-122, at 101-104, 106 (2018).² The Department identified advanced metering functionality as the basic technology platform necessary to furthering the grid modernization objectives. D.P.U. 12-76-A at 12. The Department defined advanced metering functionality as: (1) the collection of customers' interval usage data, in near real time, usable for settlement in the ISO-NE energy and ancillary services markets; (2) automated outage and restoration notification; (3) two-way communication between customers and the EDCs; and (4) with a customer's permission, communication with and control of appliances. D.P.U. 12-76-B at 15 (emphasis added); see also D.P.U. 15-120/D.P.U. 15-121/D.P.U. 15-122, at 118 n.54; Second Grid Modernization Plans, D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B, Order on New Technologies and Advanced Metering Infrastructure Proposals at 191 n.75 (2022).³ The Department noted that because advanced metering functionality supports the grid modernization objectives, it must be a priority for the EDCs. D.P.U. 12-76-A at 12.

² In prior Orders, the Department included as a fourth grid modernization objective to improve workforce and asset management. Modernization of the Electric Grid, D.P.U. 12-76-A at 10 (2013); D.P.U. 12-76-B at 9 (2014). The Department subsequently determined that this should no longer be considered as a separate objective but as a benefit associated with the other three grid modernization objectives. D.P.U. 15-120/D.P.U. 15-121/D.P.U. 15-122, at 105-106.

³ The Department's initial definition of advanced metering functionality included: (1) large-scale conservation voltage reduction programs; (2) remote connection and disconnection of a customer's electric service; and (3) measurement of a customer's power quality and voltage. D.P.U. 12-76-A at 11.

The Department required each EDC to propose an approach to achieving advanced metering functionality as part of its five-year short-term investment plan (“STIP”).

D.P.U. 12-76-B at 17. To comply with this directive, the EDCs proposed to use AMI, which they define as “the deployment of smart interval ... meters enabled with two-way communications allowing customers to participate in Time Varying Rates programs.” See, e.g., D.P.U. 15-120, Grid Modernization Plan at 9, 12. Although the Department ultimately determined that statewide AMI deployment was not cost effective at that time, the Department reiterated its commitment to pursuing advanced metering functionality as a means to achieve the Commonwealth’s grid modernization objectives. D.P.U. 15-120/D.P.U. 15-121/D.P.U. 15-122, at 135. In a subsequent proceeding, the Department found it appropriate to consider a path to achieve advanced metering functionality through the full-scale deployment of AMI and directed the EDCs to include such proposals in their respective five-year strategic plans. Investigation by the Department of Public Utilities on its own Motion into Modernization of the Electric Grid – Phase Two, D.P.U. 20-69-A at 25, 29, 33, 36 (2021).

The EDCs filed their individual AMI Implementation Plans on July 1, 2021, and the Department approved each EDC’s plan on November 30, 2022 in D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B. The EDCs identified the enablement of TVR as one benefit of deploying AMI statewide, although each EDC represented the associated benefits differently.⁴

⁴ NSTAR Electric estimated the total benefits of AMI-enabled TVR starting in 2029 at a net present value of \$3.84 million out of a total benefit from deploying AMI of \$667 million. D.P.U. 21-80, Exh. ES-AMI-4, at 9, 24. National Grid modeled a range of opt-in and opt-out TVR and critical peak pricing schemes, with time-varying pricing benefits ranging from \$127.42 million to \$564.31 million out of a total benefit from deploying AMI ranging from \$672.45 million to \$1,247.50 million. D.P.U. 21-81,

In D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B, the Department required the EDCs to establish and moderate a statewide AMI Stakeholder Working Group (“Working Group”) and submit quarterly reports to the Department detailing consensus and non-consensus items.⁵

D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B at 325-329. The Department outlined four topics to be addressed by the Working Group: (1) customer and third-party access to customer usage data; (2) customer education and engagement; (3) billing of TVR offered by competitive suppliers; and (4) AMI deployment strategies that may expedite the ability for competitive suppliers to offer TVR products. D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B at 327.

The EDCs and stakeholders identified access to AMI interval usage data for billing purposes, in near-real time, as a non-consensus issue. D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B, AMI Stakeholder Working Group Progress Report at 6 (November 15, 2023). Further, the Cape Light Compact JPE (“Compact”) (a municipal aggregator) asserted that using actual customer usage data to settle load, as opposed to an average use profile, is necessary to take advantage of capacity savings by shifting load away from the peak. D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B, AMI Stakeholder Working Group Progress Report, at Att. E, October 31, 2023 Meeting Minutes at 8 (.pdf 325) (November 15, 2023). In the August 1, 2024 AMI Stakeholder Working Group Final Report, the EDCs noted that stakeholders have

Exh. NG-AMI-5. Unifil discussed the benefits of AMI-enabled TVR to customers but did not quantify them. D.P.U. 21-82, 2022-2025 Grid Modernization Plan at 89, 102.

⁵ The overarching objective of the Working Group was to “provide a forum for the Companies and interested stakeholders to collaborate in a non-adjudicatory setting to discuss AMI-related issues and to develop a joint proposal for Department review that sets forth all issues on which a consensus has been reached and identifying outstanding issues, if any, that remain to be resolved.” D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B at 326.

expressed concerns regarding the EDCs' position and requested Department guidance on this issue. D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B, AMI Stakeholder Working Group Final Report at 26 (August 1, 2024). The stakeholders assert that using AMI interval usage data for load settlement is foundational to a successful AMI deployment, and that without it, "customers will have neither the insights nor the motivation to change their behavior and respond to price signals, negating the major benefit of AMI deployment." D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B, AMI Stakeholder Working Group Final Report at 26 (August 1, 2024). On February 11, 2025, the EDCs submitted a request for further process to discuss non-consensus items identified in the AMI Stakeholder Working Group Final Report and the data access requirements established by An Act Promoting a Clean Energy Grid, Advancing Equity and Protecting Ratepayers, St. 2024, c. 239, § 79 ("2024 Climate Act").⁶ D.P.U. 21-80-B/ D.P.U. 21-81-B/D.P.U. 21-82-B, Letter to Secretary Marini from the EDCs (February 11, 2025). On February 14, 2025, the Compact, Mission:data Coalition, NRG Energy, and Vistra Corp jointly submitted a similar request. D.P.U. 21-80-B/D.P.U. 21-81-B/D.P.U. 21-82-B, Letter to Secretary Marini from Stakeholders (February 14, 2025). The Department held two technical sessions on May 6, 2025 and July 15, 2025, to address non-consensus items identified in the AMI Stakeholder Working Group Final

⁶ The 2024 Climate Act directed the EDCs to jointly establish a centralized data repository to allow customers and third parties, including competitive suppliers, access to advanced metering data, including billing, interval usage and load data, in near-real time for all customer classes. On February 18, 2026, the EDCs filed their plans in NSTAR Electric Company Advanced Metering Data Access Plan, D.P.U. 26-20; Massachusetts Electric Company and Nantucket Electric Company Advanced Metering Data Access Plan, D.P.U. 26-21; Fitchburg Gas and Electric Light Company Advanced Metering Data Access Plan, D.P.U. 26-22.

Report, including load settlement and data access topics described in the 2024 Climate Act. In the context of the technical sessions, the EDCs and stakeholders submitted comments and presentations on April 15, 2025, June 27, 2025, and August 5, 2025. On September 8, 2025, the Department issued a Hearing Officer memorandum addressing data access issues and stating that the Department would address several issues of concern to third-party suppliers, including load settlement, capacity tag calculation, and TVR, in a separate proceeding, which the Department opens with this NOI. D.P.U. 21-80/D.P.U. 21-81/ D.P.U. 21-82, Hearing Officer Memorandum at 4 n.2 (September 8, 2025). Then, on December 15, 2025, as noted in an Order opening a broad investigation into gas and electric delivery charges, the Department reiterated its intent to open this proceeding to ensure that competitive suppliers can “offer robust time-varying rates to their customers.” Investigation by the Department of Public Utilities on Its Own Motion into Gas and Electric Delivery Charges and Bill Redesign, D.P.U. 25-200, Vote and Order Opening Inquiry at 24 (December 15, 2025).

III. SCOPE OF THIS PROCEEDING

In this proceeding, the Department seeks to gather information that will assist us in:

(1) developing policies that will enable a competitive market for third-party suppliers to offer TVR and (2) examining the use of AMI interval usage data for the purposes of load settlement with ISO-NE. To this end, the Department seeks to investigate the steps necessary to enable the use of AMI data for load settlement, including, but not limited to, the following considerations:

1. the EDCs’ and ISO-NE’s capabilities, now and going forward, for transmitting, accepting, and using AMI interval usage data for the purpose of load settlement;

2. the resources, time, and steps needed to enable use of AMI interval usage data for load settlement in the ISO-NE energy and ancillary services markets, including any necessary actions to be taken by the EDCs, ISO-NE, retail electricity suppliers, municipal aggregators, third-party energy service providers, and any other stakeholders to fully utilize interval data; and
3. any additional considerations or implications related to the costs, benefits, and feasibility of upgrading each EDC's load settlement system to enable use of AMI interval usage data for load settlement in the ISO-NE energy and ancillary services markets.

IV. REQUEST FOR COMMENTS

A. Introduction

The Department seeks to investigate the costs, benefits, and feasibility of enabling use of residential and small commercial and industrial (“C&I”) customers’ AMI interval usage data to settle load with ISO-NE. To that end, the Department requests comments from EDCs, retail electricity suppliers including municipal aggregators, ISO-NE, third-party energy service providers, residential and C&I consumers, and other interested stakeholders to inform the advantages and disadvantages of alternative pathways to upgrading each EDC’s load settlement system to enable the use of AMI interval usage data for load settlement with ISO-NE. In addition to written responses from these stakeholders to the directed questions below, the Department welcomes written comments from any stakeholder related to the benefits, costs, and process needed to enable use of AMI interval usage data for load settlement with ISO-NE.

B. To EDCs:

1. Please explain:
 - a. whether and to what extent each EDC included plans to enable use of AMI interval usage data for load settlement in the ISO-NE energy and ancillary services markets, including any benefit-cost analysis conducted, as part of each EDC’s AMI Implementation Plan as filed in D.P.U. 21-80, D.P.U. 21-81, and D.P.U. 21-82;

- b. the extent to which the EDC's current AMI Implementation Plan achieves the first part of the advanced metering functionality definition established in D.P.U. 12-76-B, namely, the collection of customers' interval usage data, in near real time, usable for settlement in the ISO-NE energy and ancillary services markets;
 - c. whether, how, and why those plans changed during the deployment process, including supporting documentation;
 - d. what planned investments into load settlement system upgrades are included as part of the current AMI Implementation Plan or as part of any other capital investments in the short term (i.e., between now and 2027/2028 when AMI meters are fully deployed) and in the long term;
 - e. the timing of implementation of the AMI data repository discussed in D.P.U. 26-20, D.P.U. 26-21, and D.P.U. 26-22, any potential use of the AMI data repository for load settlement with ISO-NE; and
 - f. any efficiencies from coordinating the planning and deployment of the AMI data repository with the use of AMI interval usage data for load settlement with ISO-NE.
2. Regarding any system upgrades required to support the use of AMI interval usage data for load settlement with ISO-NE, please:
- a. identify all major systems (e.g., customer information system, meter data management system) that may be impacted or would require upgrades or modifications to enable use of AMI interval usage data for load settlement;
 - b. identify the primary steps needed to upgrade or modify the load settlement system and other major systems identified in part (a);
 - c. provide the timeline required to implement the upgrade or modification by system and action item identified in parts (a) and (b);
 - d. provide the total estimated cost of upgrade or modification by system and action item identified in parts (a) and (b);

- e. identify any portion of costs identified in part (d) that could have been avoided or reduced if investments to enable use of AMI interval usage data for load settlement in the ISO-NE energy and ancillary services markets were included as part of each EDC's AMI Implementation Plan as filed in D.P.U. 21-80, D.P.U. 21-81, and D.P.U. 21-82;
 - f. identify and provide any other estimated costs (e.g., potential stranded costs);
 - g. provide bill impacts by rate class for all costs identified in parts (d) and (f), if ratepayers were to be charged for the costs of the upgrades identified above; and
 - h. provide any and all documentation supporting each EDC's response to parts (a) through (g) above.
3. Please discuss the potential benefits to customers and the distribution grid of using AMI interval usage data for load settlement in the ISO-NE energy and ancillary services markets as it relates to:
 - a. reducing peak demand by enabling retail suppliers, municipalities, and third-party energy service providers to offer time-differentiated or behavior-based energy products (e.g., TVR, demand response incentives, and participation in virtual power plants) to residential and small C&I customers in Massachusetts;
 - b. enabling capacity tag calculations to reflect customer energy usage more accurately;
 - c. providing additional granularity and accuracy to ISO-NE and other parties involved in developing load forecasts;
 - d. improving customers' understanding and control over their electric bills; and
 - e. other benefits (e.g., cost savings to customers, reduction in peak demand, deferred infrastructure investments due to reduction in peak demand).
 4. Please discuss potential cost-sharing methods (e.g., sharing costs between suppliers and ratepayers) to minimize ratepayer costs associated with any necessary investments to enable the use of AMI interval usage data to settle load with ISO-NE. If any portion of the costs would be sought from ratepayers, provide bill impacts by rate class for each potential

cost-sharing method.

5. Please identify any additional considerations, implications, or process steps needed to support the use of AMI interval usage data for load settlement with ISO-NE.

C. To Retail Electricity Suppliers, including Municipal Aggregators:

1. Please describe the extent to which each EDC's current AMI Implementation Plan achieves the first part of the advanced metering functionality definition established in D.P.U. 12-76-B, namely, the collection of customers' interval usage data, in near real time, usable for settlement in the ISO-NE energy and ancillary services markets.
2. Please describe any limitations of the current system for load settlement on retail electricity suppliers' ability to offer time-differentiated or behavior-based energy products (e.g., TVR, demand response incentives, participation in virtual power plants, calculation of installed capacity tags, etc.) to residential and small C&I customers in Massachusetts. If limitations of the current system vary by EDC, please describe the differences.
3. Please discuss the potential benefits to customers and the distribution grid of using AMI interval usage data for load settlement in the ISO-NE energy and ancillary services markets as it relates to:
 - a. reducing peak demand by enabling retail suppliers, municipalities, and third-party energy service providers to offer time-differentiated or behavior-based energy products (e.g., TVR, demand response incentives, and participation in virtual power plants) to residential and small C&I customers in Massachusetts;
 - b. enabling capacity tag calculations to reflect customer energy usage more accurately;
 - c. providing additional granularity and accuracy to ISO-NE and other parties involved in developing load forecasts;
 - d. improving customers' understanding and control over their electric bills; and
 - e. other benefits (e.g., cost savings to customers, reduction in peak demand, deferred infrastructure investments due to reduction in peak demand).

4. Please identify and quantify any known benefits realized in other jurisdictions, including specific examples and monetized value of enabling use of AMI interval usage data for load settlement. Please include the results of any relevant cost-benefit analyses.
5. Please describe whether and how the benefits to the distribution grid and to customers associated with enabling use of AMI interval usage data for load settlement with ISO-NE may change depending on the timing of when such use of interval data is enabled.
6. Please discuss potential cost-sharing methods (e.g., sharing costs between suppliers and ratepayers) to minimize ratepayer costs associated with any necessary investments to enable the use of AMI interval usage data to settle load with ISO-NE.
7. Please identify any additional considerations, implications, or process steps needed to support the use of AMI interval usage data for load settlement with ISO-NE.

D. To ISO-NE:

1. Please describe the electricity usage data that ISO-NE currently receives from each EDC, particularly with respect to granularity and accuracy.
2. Please describe how that data is used by ISO-NE, including for load settlement, forecasting, capacity tag calculation, etc.
3. Please identify any benefits to ISO-NE associated with receiving AMI interval usage data for load settlement, rather than usage data based on load profiles, particularly with respect to potential differences in data granularity, interval length, and accuracy.
4. Please identify any benefits to ISO-NE associated with receiving AMI interval usage data for forecasting, capacity tag calculation, etc., rather than usage data based on load profiles, particularly with respect to potential differences in data granularity, interval length, and accuracy.
5. Please identify any costs to ISO-NE associated with receiving AMI interval usage data instead for load settlement, rather than usage data based on load profiles.
6. Please identify any additional considerations, implications, or process steps needed to support the use of AMI interval usage data for load settlement with ISO-NE.

E. Third-Party Energy Service Providers:

1. Please describe the energy services that your organization provides.
2. Please describe and document how the energy services that your organization provides may be impacted by the nature of the data provided by the EDCs as part of the load settlement process (e.g., load profiles vs. AMI interval usage data).
3. Please discuss the potential benefits to customers and the distribution grid of using AMI interval usage data for load settlement in the ISO-NE energy and ancillary services markets as it relates to:
 - a. reducing peak demand by enabling retail suppliers, municipalities, and third-party energy service providers to offer time-differentiated or behavior-based energy products (e.g., TVR, demand response incentives, and participation in virtual power plants) to residential and small C&I customers in Massachusetts;
 - b. enabling capacity tag calculations to reflect customer energy usage more accurately;
 - c. providing additional granularity and accuracy to ISO-NE and other parties involved in developing load forecasts;
 - d. improving customers' understanding and control over their electric bills; and
 - e. other benefits (e.g., cost savings to customers, reduction in peak demand, deferred infrastructure investments due to reduction in peak demand).
4. Please identify and quantify any known benefits realized in other jurisdictions, including specific examples and monetized value of enabling use of AMI interval usage data for load settlement.
5. Please discuss potential cost-sharing methods (e.g., sharing costs between suppliers and ratepayers) to minimize ratepayer costs associated with any necessary investments to enable the use of AMI interval usage data to settle load with ISO-NE.

V. PROCESS FOR SUBMITTING COMMENTS

The Department requires that all comments be filed no later than 5:00 p.m. on April 23, 2026. Please note that in the interest of transparency, all comments will be posted to the Department website as received, without redacting personal information such as addresses, telephone numbers, or email addresses. As such, consider the extent of information you wish to share when submitting comments. To promote administrative efficiency, the Department encourages joint comments wherever possible. All documents submitted to the Department in .pdf format by e-mail attachment must be sent to DPU.efiling@mass.gov and Jeffrey Leupold Hearing Officer jeffrey.leupold@mass.gov. The text of the email must specify: (1) the docket number of the proceeding (D.P.U. 26-44); (2) the name of the person or company submitting the filing; and (3) a brief description of the document. The email must also include the name, title, and telephone number of a person to contact in the event of questions about this filing. The electronic file name should identify the document but should not exceed 50 characters in length. Importantly, all large files submitted must be broken down into electronic files that do not exceed 20 MB. All documents submitted in electronic format will be posted on the Department's website through our online File Room as soon as practicable at <https://eeaonline.eea.state.ma.us/DPU/Flerom/dockets/bynumber> (enter "26-44").

The Department will announce next steps in this proceeding, which may include technical sessions and a reply comment period, after reviewing the initial comments.

VI. ORDER

Accordingly, the Department

VOTES: To open an investigation into developing policies that will enable a competitive

market for third-party suppliers to offer time-varying rates and the benefits, costs, and feasibility of enabling use of residential and small commercial and industrial customers' AMI interval usage data for load settlement in the ISO-NE energy and ancillary services markets; and it is

ORDERED: That the Secretary of the Department shall publish notice of this investigation in a statewide paper of daily circulation within the Commonwealth; and it is

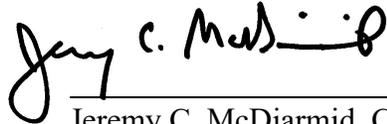
FURTHER ORDERED: That the Secretary of the Department shall send by electronic means a copy of this Order to each electric distribution company subject to the jurisdiction of the Department under G.L. c. 164 and to the Department's Distributed Generation service list, Grid Modernization service list, and Competitive Supplier contact list; and it is

FURTHER ORDERED: That the Secretary of the Department shall send by electronic means a copy of this Order to all persons on the Department's official service list; and it is

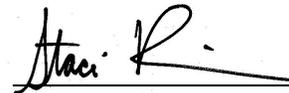
FURTHER ORDERED: That the electric distribution companies shall from five business days following the receipt of this Order through April 23, 2026 prominently display this Order on their respective websites; and it is

FURTHER ORDERED: That the electric distribution companies shall send by electronic means a copy of this Order to all persons on the AMI Stakeholder Working Group distribution list.

By Order of the Department,



Jeremy C. McDiarmid, Chair



Staci Rubin, Commissioner



Elizabeth A. Anderson, Commissioner