From: James Adcock
To: Public Involvement (UTC)
Subject: Comments on Advanced Meter Infrastructure Rulemaking, Docket U-180525
Date: Tuesday, February 19, 2019 11:04:46 AM

Title: Comments on Advanced Meter Infrastructure Rulemaking, Docket U-180525

From:

James Adcock, Electrical Engineer
5005 155th PL SE
Bellevue WA 98006
jimad@msn.com

The ability to read and record patterns of usage from Advanced Meters over short periods of time -- a resolution of 15 minutes is suggested by UTC -- is a very powerful tool, not only for utilities and their regulators, but also for the ratepayers themselves.

For example, ratepayers could potentially examine their detailed, sub-hourly and per actual day patterns of usage to better understand just how much power that clothes dryer, hot tub, electric baseboard or furnace, or electric vehicle actually consumes, in order to better inform their choices of usage, and future more efficient appliances or vehicles.

But right now there is an asymmetry in who gets this detailed access to the ratepayers own data. The utility gets that detailed data. The regulators get access to that detailed data -- in aggregate. But the ratepayer themselves are being denied this detailed access TO THEIR OWN DATA -- THEIR OWN PATTERNS OF USAGE!

THIS IS NOT FAIR!

Utilities need to provide ratepayers TO THE SAME LEVEL OF DETAIL of patterns of usage as the utility itself collects, or is able to collect, from the ratepayer's meter. And ratepayers need to have access to this -- their own data -- for at least a year -- say 13 months -- so that they can examine their patterns of usage on a year-over-year basis. Are they becoming more efficient in their usages, or more spendthrift, for example? And what is actually causing the consumption?

This is not an unreasonable amount of data for a utility to store and provide to consumers. It is about 40,000 bytes of data for 13 months storage. Enterprise-level data storage costs about 2 cents per megabyte. So storing this much data per ratepayers would require an investment by the utility of about 1/10th of one cent per ratepayer!

Being given access to monthly, weekly, daily, or even hourly patterns of usage is not enough detail for a ratepayer to inform and modify their own patterns of usage. They need to be given the full 15-minute resolution of the meter -- they need to be given access to THEIR OWN DATA -- just like the utility and the regulators get!

Sincerely,

James L. Adcock