

**UNITED STATES OF AMERICA  
BEFORE THE  
DEPARTMENT OF ENERGY**

Implementing the National Broadband )  
Plan by Studying the Communications ) Request for Information  
Requirements of Electric Utilities To )  
Inform Federal Smart Grid Policy )

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**COMMENTS  
BY  
THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES**

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These comments are submitted on behalf of the National Association of State Utility Consumer Advocates (NASUCA) in response to the request for information (RFI) of the Department of Energy (DOE) entitled “Implementing the National Broadband Plan by Studying the Communications Requirements of Electric Utilities to Inform Federal Smart Grid Policy.” See 75 Fed. Reg. 26206 (May 11, 2010).<sup>1</sup> NASUCA is a voluntary organization comprised of offices from 40 states and the District of Columbia, charged by their respective state laws to represent utility consumers before federal and state utility regulatory commissions, before other federal and state agencies, and before federal and state courts. Many NASUCA members have extensive experience with regulatory policies governing the utility industry and have participated in proceedings concerning smart grid and consumer privacy issues. NASUCA members’ primary interest is the protection of residential and other small utility consumers.

The technology issues identified in this RFI would not normally present significant concerns for NASUCA. Any mandated technology investment for utilities, transmission line operators and other public and private networks to optimize the functionality of the electric grid, however, brings with it a caution. Ratepayers will be expected to shoulder much of the investment expense, as they will be the arguable beneficiaries. But they are also the generators of the usage information without which any bi-lateral communication enhancements would be superfluous. To that end, infrastructure investments should be demonstrably effective, widely adopted, with

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<sup>1</sup>NASUCA is also submitting separate comments in response to the DOE RFI entitled “Implementing the National Broadband Plan by Empowering Consumers and the Smart Grid: Data Access, Third Party User, and Privacy.” See 75 Fed. Reg. 26203 (May 11, 2010).

benefits inuring to the consumers, as a general principle, not just to the utilities and other corporate entities seeking to leverage the technology.

While the primary thrust of this request for information concerns issues surrounding smart meters, NASUCA also takes note that the smart grid concepts extend throughout the generation, transmission and distribution grid, well beyond the meter. There is a growing body of evidence that conservation voltage reduction programs within the grid itself have the potential to conserve power output and produce savings for customers. NASUCA would be remiss to fail to take note of the potential for such saving and we would encourage DOE to pursue these issues separately and expeditiously.<sup>2</sup>

Respectfully submitted,

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<sup>2</sup>See “*Distribution System Efficiency Potential & Conservation Voltage Reduction*,” [http://www.smartgridnews.com/artman/uploads/1/6P\\_Distribution\\_System\\_Efficiency\\_Junkies.pdf](http://www.smartgridnews.com/artman/uploads/1/6P_Distribution_System_Efficiency_Junkies.pdf); “*Distribution Efficiency Conservation Voltage Reduction (CVR)*,” Bonneville Power Administration, Jillianne Welker (April 21, 2009), <http://www.nwcouncil.org/energy/neet/workgroups/6/Distribution%20Efficiency%20Presentation%204.21.09.ppt>; “Utility’s Voltage Reduction Plan Saves Energy” (February 26, 2006), <http://www.npr.org/templates/story/story.php?storyId=5236858>.