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November 18, 2025

Nicholas Ucci
Director of Government Affairs
Rhode Island Energy
280 Melrose Street
Providence, RI 02907

VIA EMAIL AND MAIL

Dear Mr. Ucci:

Our organization has followed with both interest and concern the ongoing implementation of Rhode Island Energy's (RIE) meters with advanced metering functionality (AMF), also known as smart meters. As we have expressed previously, the privacy implications of these new meters are significant. Unlike traditional meters, smart meters can collect highly granular usage data that can reveal intimate details about a household, such as when residents are home, when they typically return from work or school, and other household-specific activities.¹ The prospect that such sensitive data may be collected, stored, and then potentially shared with law enforcement officials, or sold or distributed in ways customers may not fully understand, is deeply concerning.

We initially raised privacy concerns about these devices in 2023 when this program was first approved. In an October 2023 letter, we requested clarity about the plans your company had to protect consumer information. You responded that "Rhode Island Energy shares ACLU's concerns over protection of consumer data with the use of AMF meters." You also directed us to both the AMF Business Case, which included a Data Governance Plan, as well as RIE's "three-phase customer communications plan,"² housed within RIE's Customer Engagement Plan. A copy of this previous correspondence is enclosed.

It appears that these RIE documents, now at least two years old, continue to serve as the primary sources governing data privacy for smart meters. However, the Data Governance Plan does not provide concrete, enforceable privacy and data usage protections that consumers can understand but instead relies on vague references to internal policies and frameworks developed by "the Company."³

¹ <https://smartgrid.ieee.org/bulletins/july-2018/security-and-privacy-concerns-in-smart-metering-the-cyber-physical-aspect>

² <https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2022-11/2249-RIE-AMFPlan-Book2%2011-18-22.pdf>. Page 277. The "communications plan" includes only one sample concerning privacy protections while mentioning "multiple layers of safeguards designed to keep your electricity usage data private." In an actual consumer communication, data protection information is limited to two paragraphs and again echoes the "multiple layers of safeguards" abstract language without details. See https://rienergy.com/site/-/media/rie-jss-app/home/more/frequent-questions/advanced-meters/RIE_Electric-Meter-FAQ-Sheet-2025_final.ashx?sc_lang=en&hash=0B59063739C680F88AE9B37D07F16D35

³ Which seemingly means all of PPL Corporation and its various subsidiaries.

For example, page 300 of the AMF Business Case and Attachments submitted to the Rhode Island Public Utilities Commission states:

The approach is also reflected in its risk-based cybersecurity framework that tracks across people, processes, and technology: Setting forth policies and standards intended to ensure the Company works to common security objective by regularly updating cyber, privacy, and security guidance (including incident management and reporting) for those with legitimate business needs to access customer data; addressing privacy throughout the data lifecycle, working to prevent accidental misuse/loss/exposure of information; and ensuring cybersecurity controls are implemented, information risks are understood, and technologies are selected to keep pace with threats.⁴

This broad language does not provide the public with any clear, actionable assurances about how their personal data will be protected, who may access it, and under what circumstances. Because Rhode Islanders must either agree to install these meters or face additional charges on their monthly bills, it is especially important that the policy provide explicit protections and transparency, both so that consumers can make an informed decision and those who participate in the program have a good sense of how their data is being protected. But we have been unable to find any meaningful updates to RIE's documents on this issue since 2023.

Given the statewide installation of these meters, we believe it is vital for RIE to adopt and publicly articulate robust, transparent, and enforceable privacy and data usage protections. This need is particularly urgent in light of the increased use by law enforcement of privately collected data on residents gathered from third parties. We would therefore appreciate receiving more specific information from you than that provided in 2023 that explains in detail the specific privacy safeguards in place for consumer data.

Thank you for your time and attention to this request. I look forward to your response.

Sincerely,



Madalyn McGunagle
Policy Associate

Enclosure

cc: J. Gregory Cornett, President of Rhode Island Energy (via mail)
Linda George, Administrator of the Division of Public Utilities and Carriers (via mail and email)
Ronald Gerwatowski, Chairman of the Public Utilities Commission (via mail and email)

⁴ <https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2022-11/2249-RIE-AMFPlan-Book2%2011-18-22.pdf>

November 21, 2023

VIA EMAIL

Ms. Hannah Stern
Policy Associate
ACLU – Rhode Island
128 Dorrance Street
Providence, Rhode Island 02903

Dear Ms. Stern:

Thank you for your correspondence regarding the protection of consumer data associated with the deployment of “smart meters,” dated October 31, 2023.

On November 18, 2022, Rhode Island Energy submitted its Advanced Metering Functionality (AMF) Business Case¹ to the Rhode Island Public Utilities Commission (PUC) in Docket No. 22-49-EL. Rhode Island Energy shares ACLU’s concerns over protection of consumer data with the use of AMF meters. To that end, Attachment G of the AMF Business Case includes a “Cybersecurity, Data Privacy and Data Governance Plan” (referred to as the Data Governance Plan), which “provides a framework that includes a comprehensive set of principles and standards that address cybersecurity, data privacy, data governance, information classification, and enterprise security standards for PPL Corporation and its affiliates and subsidiaries.”² Section 10.2 of the AMF Business Case discusses this Data Governance Plan in more detail, as well as the ways in which customers’ data can be shared using secure, controlled, and standards-based processes.

In addition, Rhode Island Energy has developed a Customer Engagement Plan that will include a three-phase customer communications plan, FAQs and other materials designed to engage and educate customers on their new AMF technology, including data privacy concerns.³

In response to your request, the Data Governance Plan, along with other materials associated with PUC Docket No. 22-49-EL, are accessible at: <https://ripuc.ri.gov/Docket-22-49-EL>. The PUC authorized Rhode Island Energy to deploy AMF, subject to certain conditions, as set forth in the PUC’s Open Meeting Motions and Votes on September 27, 2023.⁴

Rhode Island Energy takes security and privacy concerns seriously and remains committed to making AMF data accessible, while keeping it secure and maintaining its customers’ privacy.

¹ “AMF” is used generically to refer to the functionality provided by advanced meters or smart meters.

² Attachment G, Book 2, AMF Business Case and Attachments. Rhode Island Energy is a subsidiary of PPL Corporation.

³ See Section 9.3 of the AMF Business Case and Attachment F (Sample Communications).

⁴ The PUC’s rulings did not modify the Data Governance Plan as proposed by Rhode Island Energy in its AMF Business Case. A summary of the PUC’s Open Meeting Motions and Votes is accessible at: https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2023-11/2249-PUC-OM-VOTES_9-27-23.pdf.

Nicholas S. Ucci
Director of Government Affairs
Rhode Island Energy

280 Melrose Street
Providence, Rhode Island 02907
nsucci@rienergy.com



Respectfully,



Nicholas S. Ucci
Director of Government Affairs

CC: David Bonenberger, President, Rhode Island Energy (via email)
Linda George, Administrator, Division of Public Utilities and Carriers (via email)
Ronald Gerwatowski, Chairman, Public Utilities Commission (via email)

October 31, 2023
VIA MAIL & EMAIL

Nicholas Ucci, Director of Government Affairs
Rhode Island Energy
280 Melrose Street
Providence, RI 02907

Dear Mr. Ucci,

On October 24, 2023, *The Providence Journal* featured a detailed story about your company's plans to install smart meters at the residences of Rhode Island Energy customers. The article further indicated that, in response to privacy concerns that this technology raises, your company has "developed a plan to protect customer information."¹ In light of legitimate concerns about the protection of consumer data, and with the understanding that smart meters gather uniquely identifying information that previous energy use meters did not, I am writing to ask that Rhode Island Energy provide us and the public with a copy of the plan which has been developed to ensure customer privacy as smart meters become widely used across the state.

As you know, privacy considerations with smart meters must take into account the wide swath of information that these meters can collect that previous systems could not. Due to the regular collection and transmission of data to Rhode Island Energy, it is possible for an analysis to determine "which time [a resident] will be home,"² and even such granular data as the specific television programs that are being watched.³ That such detailed information about consumers may be collected – and then shared with law enforcement or other officials, or potentially sold or distributed in ways that consumers may not be fully aware of – is deeply concerning.

We trust that as this process moves forward, Rhode Island Energy will adopt and diligently implement robust privacy protections that may assure all customers in Rhode Island that they are not trading basic amenities like lighting and electricity for the compromising of their privacy as revealed by their energy use. It is particularly important that any plan to protect customer information applies to both commercial and government entities, including police. In the meantime, we hope that, in the interest of transparency, you can provide us with a copy of your customer information protection policy that promotes the responsible transitioning to this contemporary technology.

Thank you in advance for your time and attention to this request. I look forward to your response.

Sincerely,



Hannah Stern
Policy Associate

CC: David Bonenberger, President of Rhode Island Energy (via mail)
Linda George, Administrator of the Division of Public Utilities and Carriers (via mail and email)
Ronald Gerwatowski, Chairman of the Public Utilities Commission (via mail and email)

¹ <https://www.providencejournal.com/story/news/environment/2023/10/24/smart-electricity-meters-rhode-island-what-to-know-install-cost/71253193007/>

² <https://www.cbsnews.com/texas/news/are-smart-electricity-meters-a-privacy-risk/>

³ <https://www.cnet.com/news/privacy/researchers-find-smart-meters-could-reveal-favorite-tv-shows/>