

CASE 24-E-0526 – Petition of ConnectDER, Inc. and Tesla, Inc. to Establish a Statewide Process for Meter Socket Adapter Model Approval

Joint Utilities of New York Proposal Regarding Review, Approval, and Installation of Meter Socket Adapters (MSAs) in New York State

Background

On August 30, 2024, ConnectDER, Inc. (ConnectDER) and Tesla, Inc. (Tesla) submitted a petition to the New York State Public Service Commission (Commission), requesting that the Commission initiate a proceeding and issue an order establishing a statewide process for Meter Socket Adapter (MSA) installations.¹

In response to the Petition, the Joint Utilities² filed comments in response to the Petition on December 9, 2024, proposing general criteria for the testing and approval of MSAs by utilities, and stating that the approval of MSAs in their service territories necessitates rules that protect the utilities from liability for issues resulting from MSA malfunction.³

ConnectDER and Tesla filed comments in response to the Joint Utilities in late December 2024, commenting on the issues of implementation timelines, testing procedures, and to clarify positions O&R had taken regarding MSA installations in New York.⁴ On September 22, 2025, the Commission issued an order directing the Joint Utilities to file, within 90 days, a detailed proposal for the review, approval, and installation of MSAs.⁵

The Joint Utilities' response to the September 2025 Order is set forth below.

Joint Utilities' Proposal

No Liability

The Joint Utilities emphasize that approval of the use of MSAs necessitates the adoption of rules and regulations protecting the utilities from liability for damage attributable to an MSA installation to any person, equipment, or property. Such protections are integral to New Jersey's authorization of MSA installations,⁶ and should be part of New York's implementation, also. Likewise, no utility should be held responsible for any interference, adverse impacts, or performance issues resulting from the interfacing of utility-owned equipment and facilities (*e.g.*, meters) with customer-owned devices (*e.g.*, MSAs).

¹ Case No. 24-E-0526, Petition of ConnectDER and Tesla to Establish a Statewide Process for Meter Socket Adapter Model Approval (filed August 30, 2024) (Petition).

² The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation.

³ Case No. 24-E-0526, Joint Utilities of New York Response to Petition to Establish a Process for Meter Socket Adapter Approval in New York State (filed December 9, 2024) (Joint Utilities' Comments).

⁴ Case No. 24-E-0526, ConnectDER and Tesla Reply Comments Following Public Comment Period (filed December 20, 2024).

⁵ Case No. 24-E-0526, Order Directing Proposal (issued and effective September 22, 2025) (September 2025 Order).

⁶ See N.J.S.A 48:3-111.1(f) ("An electric public utility may not be held liable for damage, attributable to a meter collar adapter installed pursuant to this section, to any person or property.").

These requirements will be incorporated into utility tariff provisions. This approach aligns with legislative precedent in a neighboring state, New Jersey, and is intended to ensure that utilities are not exposed to risks outside their control.

The following lists the Joint Utilities' proposal for review and approval of MSAs.

Requirements for MSA review and approval

- MSA manufacturers should first obtain approval from the Department of Public Service (DPS) prior to installation in New York State. Approved MSAs should be listed on a publicly accessible DPS-maintained register of **certified non-metrology equipment**.
- MSAs should not appear on the DPS "approved metering device" list, as they do not perform metrology functions. DPS should instead maintain a dedicated, non-metrology MSA approval list. Any MSA models currently listed as metering devices (including specific ConnectDER or Tesla models) should be removed and reclassified to this MSA list.
- Only specific, explicitly tested versions of MSA products shall be considered approved. Any revision, redesign, or model update shall trigger re-review and potential re-testing.
- DPS approval does not eliminate the requirement for separate, independent utility review and approval before deployment within any utility service territory. Each utility retains final authority to evaluate compatibility with its metering infrastructure, work practices, and safety protocols.
- Utilities may deny approval based on safety concerns, incompatibility with metering infrastructure, conflicts with work practices, or operational risk. Utilities will establish minimum eligibility criteria for MSAs and conduct testing on a non-discriminatory basis, ensuring fair and transparent evaluation for all manufacturers.
- As a next step, MSA manufacturers should approach the relevant utility in whose service territory they seek to install MSAs. The relevant utility may examine the compatibility of the MSA with existing metering infrastructure and work methods and practices and conduct an initial fit test and evaluation.
 - To enable and inform this initial evaluation, the MSA manufacturer may be requested to provide samples of its product(s) to the relevant utility. A utility shall not be liable for any damage caused to an MSA sample through testing.
- If the MSA fails initial test and evaluation, the relevant utility will communicate any issues found during the initial evaluation to the MSA manufacturer.
- If the MSA passes the initial evaluation, the relevant utility may conduct a more detailed test and study of the MSA.
 - To enable this detailed study, the MSA manufacturer must supply the relevant utility with all relevant information, including but not limited to: datasheets, technical specification sheets, installation manuals and instructions, and copies of relevant technical certifications, test reports, and type-testing procedures describing how the MSA product has been vetted and tested by a Nationally Recognized Testing Laboratory (NRTL).
 - This study will include a detailed examination by the relevant utility of the compatibility of the MSA with the utility's metering equipment and required changes to work methods and procedures.

- The Joint Utilities note that MSAs are designed for various purposes, provide different functionalities, and may be comprised of diverse construction materials. MSAs from unique vendors will require different evaluation and approval processes.
- Once the testing process is complete and the utility has examined the relevant documentation, the utility will communicate to the MSA manufacturer a written decision on whether or not the manufacturer can provide MSAs to installers for deployment in the utility's service territory.
 - If the utility identifies concerns with the MSA that prevent it from passing the tests or require additional testing, this will be communicated to the MSA manufacturer.
- The utility reserves the right to deny approval due to equipment or personnel safety concerns, compatibility differences between the MSA and the existing metering infrastructure, or cost concerns.
 - For example, there may be physical incompatibilities. Existing meters may be ringless or ringed, or there may be a lever bypass in meter base enclosures that are not accessible after the MSA is installed.
 - Advanced meters may have technologies that could become ineffective after the installation of the MSA. For example, the MSA may interfere with the operation and performance of advanced meters with heat-rise detection or integrated arc-flash detectors.
- Prior to deployment of an approved MSA, the utility shall enter into a legal agreement with the MSA manufacturer and developer/customer relieving the utility from liabilities for any damage caused to an MSA from standard utility work practices and operating methods. If the deployment of an MSA is denied, the relevant utility will provide the rationale for such denial to the MSA manufacturer.

Additional Considerations

Joint Utilities Considerations

- MSA manufacturers, developers or the authorized MSA installer must provide advanced notice to the relevant utility via the utility's interconnection application portal or through direct outreach of plans to install an MSA at the premises of a customer served by the utility.
- Only one MSA is permitted per service. MSAs cannot be stacked or configured to exceed the allowable service entrance ratings.
- MSAs should be compliant with UL 414, NEC requirements, and have a continuous rating matching the rating of the meter it is installed upon, and be "service entrance rated," which includes service equipment that is fully rated for the available fault current and has provisions for bonding the system ground. Documentation to this effect is required.
- MSAs that are capable of islanding and electrically isolating a customer's premise from the area electric power system/utility network should be certified to the UL 1741 CRD for Multimode or UL 1008 for transfer switches.
- After the MSA manufacturer has submitted the detailed technical documentation for utility testing, a utility may, in its sole discretion, develop and execute a testing plan to test the MSA under fully energized conditions.

- The Joint Utilities should be allowed to freely collaborate with manufacturers in the testing and evaluation of MSAs without being subject to unreasonable or overly restrictive confidentiality requirements.
- The Joint Utilities propose a timeframe of one year for testing, subject to the individual utility having the necessary resources available and collaboration with the manufacturer and/or vendor.
 - Additionally, if unforeseen circumstances arise where the utility lacks adequate resources to complete the testing and approval of the device, extra time may be required. The utility shall have the authority to request additional MSA tests from entities seeking device approval, with all associated costs borne solely by the applicants.
- The Joint Utilities note that the testing process may require the involvement of NRTL staff members and other stakeholders.
- The Joint Utilities will work with manufacturers to make reasonable efforts to expedite the testing process where practicable.
- The utility is not obligated to use any telemetry available from the MSA, even if that telemetry is available to address advanced meter capabilities (*e.g.*, the MSA contains integrated heat rise detection to address concerns stipulated above).
 - Telemetry integration of the MSA into utility operations is out of scope for this response.
 - The utility has no financial obligation to pay for telemetry that is available from the MSA.
 - If the utility accepts telemetry from the MSA to mitigate operational concerns, the customer is obligated to provide the data at no cost, in perpetuity, to the utility.
- A utility would have the sole discretion to approve an MSA by proxy, or partially approve upon additional testing, if another one of the Joint Utilities has completed the testing and approval of a given MSA model.

Manufacturer Obligations

- Manufacturers must inform the relevant utility of any revisions to the MSA products that may affect their performance and could require re-evaluation and testing.
- The Joint Utilities may require new versions of MSA products to go through a utility testing and approval cycle.
- Manufacturers must promptly inform the utilities of all known defects that may affect MSA performance, regardless of whether a recall is initiated.

Application Review Considerations

- Once a specific type or model of MSA has been accepted and approved for installation by a utility and passes all reviews, subsequent applications that use this same model should not require the same level of review, allowing new applicants to leverage prior work of the utility. Applicants must conform to relevant utility requirements in place at the time of submission.

Operational Considerations

- MSAs with integrated communications shall not interfere with scheduled meter reads that are performed by the utility.
- Once the homeowner receives permission to operate (PTO), no further changes to the site are permitted following installation unless the homeowner notifies and received prior written approval from the utility. Changes to the site include any modifications that conflict with documentation and certifications provided during the Interconnection Approvals process and include any modifications that materially alter the originally approved configuration, functionality, or safety profile associated with the previously approved MSA installation.
 - MSA model-for-model replacements, for maintenance purposes, are permitted if no new functionality is introduced.
 - MSA upgrades of untested, unapproved models require a new application and review process.
 - Removal of the MSA from service requires notification to the utility.
 - Maintenance of the MSA requires notification to the utility.

Modifications to the Standardized Interconnection Requirements (SIR)

The Joint Utilities believe that modifications to the SIR are not necessary to accommodate and enable the implementation of MSAs, consistent with required installation documentation. Instead, and as noted previously, the Joint Utilities proposes that the DPS maintain a list of approved MSA devices, and that only these devices be considered for installation in the Joint Utilities' service territories. Each utility will decide what they permit.

Adjustments to Work Practices

An MSA might be incompatible with a utility's work practices. The Joint Utilities note that utility field technicians will need to adapt their work practices in the presence of MSAs. This is because a customer-owned device between the meter and the meter socket may impede serviceability as the utility requires direct access to the socket for maintenance and troubleshooting purposes. Any attached cables are a specific concern.

These adjustments are necessary to ensure continued safety, reliability, and serviceability of the utility's metering infrastructure. While work practices vary from utility to utility, some examples of everyday work practices that may need to be adjusted include:

- Additional procedures for MSA installation;
- New meter installation;
- Meter removal;
- In-field meter calibration checks;
- Meter socket inspections;
- DER interconnection approval (*e.g.*, MSA certifications/datasheets/test reports);
- Authority Having Jurisdiction (AHJ) Training;
- Emergency response; and
- Safety protocol steps.

Conclusion and Recommendations

If the Joint Utilities are directed to allow the installation of MSAs in their service territories, the utilities should not be liable for any damage attributable to an MSA, including property damage, damage to customer equipment, and personal injuries. The Joint Utilities request that MSA vendors also take the previously mentioned requirements for review and approval of MSAs into consideration. The Joint Utilities look forward to working with MSA vendors to clearly define testing and certification requirements, roles and responsibilities, and standards that help maintain system safety and reliability in the presence of MSAs. The JU also recognizes the importance of balancing safety and reliability with the need to support innovation and customer choice. To that end, the JU is committed to a transparent, fair, and collaborative process with all stakeholders.