Joint Utilities of New York Response to Petition to Establish a Process for Meter Socket Adapter Approval in New York State

Background

In 2021, the companies ConnectDER and Tesla presented at the New York Interconnection Technical Working Group (ITWG) on the topic of wide scale adoption of meter socket adapters (MSAs). The companies described their products and stated their wish for the Joint Utilities (JU) to approve installation of MSAs. Subsequently, in August 2024, ConnectDER and Tesla submitted a petition to the New York State Public Service Commission, requesting that the Commission open a proceeding, and issue an order establishing a statewide process for MSA approvals and installations.

The JU provide the comments below in response to the August 2024 petition. Please note that these comments are intended to complement any comments submitted by the utilities on an individual basis.

Joint Utilities Position and Observations

The JU note that approval of the use of MSAs hinges on rules relieving the utilities from liability for damage to equipment attributable to a MSA installation. Currently, no such rule exists in New York. Furthermore, careful review of the MSAs is required by utility meter and engineering staff. The JU also provide the following observations:

- The 60-day time limit (proposed in the August 2024 petition) for a utility to test and approve new MSAs is far short of the time that is needed for such a testing activity. The JU recommend establishing a mutually agreeable time limit that would be determined between the manufacturer and each utility. The JU propose a timeframe of six months to one year for testing. Such timeframe also would be subject the utility having the necessary resources available to perform the review. If unforeseen circumstances arise (including if there are multiple simultaneous or overlapping MSA approval requests) and the utility lacks adequate resources to complete the testing and approval of the device within the timeframe, additional time may be requested or required.
- MSAs should be tested in fully energized operating conditions.
- Certification by recognized testing labs such as Underwriters Laboratories (UL) is important and required, but some MSAs being introduced are complex and may require highly customized test plans. These test plans will require utility witness testing, involving collaboration between the MSA vendor, the utility, Nationally Recognized Testing Laboratories (NRTLs), and potentially other stakeholders.
- MSAs should be compliant with UL 414, have a 200A continuous rating, 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.
- The utilities should be allowed to freely collaborate in the testing and evaluation of MSAs, and non-disclosure agreement provisions should explicitly allow for such collaboration among utilities in testing and evaluation.

- A customer-owned device between the meter and the socket may impede serviceability since the utility requires direct access to the socket for maintenance and troubleshooting purposes. Any attached cables are a specific concern. Many operations groups within the utility beyond meter services could be impacted. MSA installation requirements must include provisions that provide for unimpeded utility access.
- Utilities will need to implement alternate work and safety practices when working in the presence of MSAs.
- Review is needed to determine if an MSA may interfere with a smart meter's high temperature alarming feature.
- Utility representatives on the New York State Electric Meter Engineering Committee (NYSEMEC) agree that MSAs introduce different risks to the point of common coupling at residential installations, depending on the MSA's functionality, design, and intended application. These considerations must be addressed to enable continued safety and service reliability.

Conclusion and Recommendations

If the JU are to allow the installation of MSAs in their service territories, a utility would have no liability and would be held harmless as a result of any non-function or malfunction of the MSAs, interference with utility meter functioning as a result of the MSA, or any other non-performance of, or adverse impact from, the MSAs. Any impact on the utility's ability to timely obtain meter read information, bill customers, or provide utility services pursuant to applicable laws, rules, and regulations as a result of any non-function or malfunction of the MSA shall be deemed to not be the result of the utility's culpable conduct or was not due to the neglect of the utility. The JU request that MSA vendors also take the previously mentioned observations into consideration. The JU looks forward to working with ConnectDER, Tesla, and other 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.