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Comment: Silver Spring Networks is pleased to recognize the wise inclusion of the Smart Grid in the SEP's interim report. The Smart Grid will serve as the foundational infrastructure of many of the most important innovations that our energy system will undergo in the coming years. The State of New York stands to benefit greatly from sound implementation of Smart Grid technologies. We offer two recommendations to inform the ongoing work of the SEP: 1) **CONSIDER SMART GRID POLICIES AT THE DISTRIBUTION, NOT TRANSMISSION, LEVEL:** On page 4-10 of the interim report, the Board acknowledges the important of the Smart Grid, but incorrectly suggests that it should be approached in the context of the bulk transmission grid. The vast preponderance of the currently un-networked, and therefore not "smart," parts of the grid is at the distribution level. In fact, if there is any part of the grid that boasts reasonable intelligence, it is at the bulk transmission level. 2) **DISTINGUISH BETWEEN SMART GRID NETWORK INFRASTRUCTURE VERSUS DEVICES, APPLICATIONS, AND SERVICES:** The Smart Grid is best understood as a journey, rather than as a destination. However, any serious Smart Grid implementation must begin with open, interoperable networking infrastructure to provide connectivity between devices, applications, and services. Therefore, the critical decision at the outset is in the robustness and functionality of the networking infrastructure upon which utility Smart Grid projects are built. The SEP would do well to guide utilities toward a network-first approach, in order to assure successful adaptation to and integration of evolving Smart Grid technologies in devices, applications, and services. We look forward serving as a resource and supporter of the SEP's invaluable and important work, and we welcome any opportunity to share information and perspective from our leadership position in the Smart Grid industry. Sincerely, Michael Jung Policy Director Silver Spring Networks 503.360.3881 mobile michael.jung@silverspringnet.com

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