



Control Number: 47472



Item Number: 141

Addendum StartPage: 0

Public Utility Commission of Texas

Attention:

Chairman DeAnn T. Walker
Commissioner Arthur C. D'Andrea
Commissioner Shelly Botkin

1701 N. Congress Avenue
PO Box 13326
Austin, TX 78711-3326

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PUBLIC UTILITY COMMISSION
FILING CLERK

Re: Docket No. 47472 – *Commission Staff's Petition to Determine Requirements for Smart Meter Texas*

Dear Commissioners,

I am writing as a concerned member of the public and a supporter of energy efficiency initiatives to express my sincere concerns about the Commissioners' and Staff's recent orders in connection with determining the requirements for Smart Meter Texas pursuant to the matter known as *Commission Staff's Petition to Determine Requirements for Smart Meter Texas*—PUCT Docket No 47472, SOAH Docket No. 473-18-0708 (the "**SMT Matter**").


A longstanding and important PUCT rule—16 TAC § 25.130(g)(1)(J) (the "**HAN Connectivity Rule**")—requires that, as a condition to charging their customers to recover the costs of deploying alternative metering systems ("**AMSs**"), utility companies (the "**Utilities**") support the capability of AMSs to communicate with home area network ("**HAN**") devices based on standards such as ZigBee. The HAN Connectivity Rule is critical to achieving energy-efficiency gains via AMSs. By empowering consumers to directly read their energy usage from an AMS *in near-realtime* (i.e, in 15-minute intervals) and with *unlimited polling frequency*, the HAN Connectivity Rule allows consumers to calibrate their energy usage in a manner that lowers their individual costs while also reducing stress on the grid.

In connection with the SMT Matter, the Commissioners have granted a coalition of Utilities a permanent waiver of the HAN Connectivity Rule. The Commissioners have also ordered the Staff to open a rulemaking to bring the PUCT rules in line with the waiver. The rulemaking process is expected to replace the HAN Connectivity Rule with a rule that, as compared with HAN connectivity, would require the Utilities to provide less data, on a more delayed basis, less often and through an inferior interface—namely, "SMT 2.0," a vaguely specified web portal that is not even expected to be available until 2020. These changes deprive consumers of visibility into and control over their own energy usage data while placing the Utilities in the privileged position of having full visibility into and control over that same data. This is retrograde, unacceptable and contrary to Texas public policy.

In a letter recently filed with the Commission, GridPlus Inc., a Texas energy retailer, detailed the harm and lost opportunities that likely will result from repealing the HAN Connectivity Rule. I support their conclusions. The timing of these actions by the Commission and Staff is particularly ironic. As innovation on the frontiers of Internet-of-Things (IoT), artificial intelligence and automated payment technologies flourishes, the day where household devices can be configured to achieve unprecedented energy efficiencies is finally within view. But SMT 2.0 will be too slow and limited to enable these technologies. For these technologies to thrive, the HAN Connectivity Rule *must* be reinstated. Consumer data should be directly in consumers' hands rather than siloed away behind an antiquated web portal controlled by the Utilities.

I urge the Commissioners and Staff to reconsider their decision and to preserve the HAN Connectivity Rule.

Sincerely,



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Date: September 10, 2018