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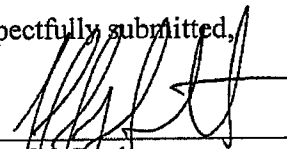
SHARYLAND UTILITIES, L.P.'S	§	BEFORE THE STATE OFFICE
REQUEST FOR APPROVAL OF AN	§	
ADVANCED METERING SYSTEM	§	OF
(AMS) DEPLOYMENT, AMS	§	
SURCHARGE, AND NON-STANDARD	§	
METERING SERVICE FEES	§	ADMINISTRATIVE HEARINGS

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER NATURAL RESOURCES USA, INC.'S  
THIRD REQUEST FOR INFORMATION**

Sharyland Utilities, L.P. ("Sharyland") files this response to Pioneer Natural Resources USA, Inc.'s ("Pioneer") Third Request for Information ("RFI") to Sharyland. Sharyland received Pioneer's Third RFI on April 2, 2015. Per agreement with Counsel for Pioneer, Sharyland's response to Pioneer's Third RFI is due on April 17, 2015. This response is therefore timely filed. All parties may treat these answers as if they were filed under oath.

Sharyland reserves the right to object at the time of the hearing to the admissibility of information produced herein.

Respectfully submitted,




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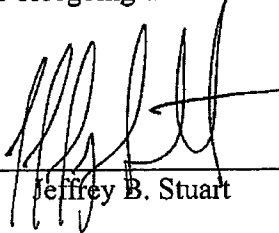
*Attorneys for Sharyland Utilities, L.P.*

April 17, 2015

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on all parties of record on this 17<sup>th</sup> day of April 2015.

  
\_\_\_\_\_  
Jeffrey B. Stuart

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.1**

Refer to the Direct Testimony of Mr. Daniel Price, page 3, lines 5-7.

- a. Does the advanced meter at the customer's premise measure and record the customer's time differentiated delivered energy, received energy, and demand usage?
- b. Define "received energy."
- c. Does "received energy" refer to energy and power received from distributed generation ("DG")?
- d. Explain fully whether "received energy," can be introduced into Sharyland's distribution system from sources other than DG.
- e. Identify how many of Sharyland's customers currently qualify as being able to produce "received energy," i.e., from how many customers does Sharyland expect to receive energy as defined in the earlier parts of this question?

**RESPONSE**

- a. Yes, Sharyland's advanced meters will have the ability to measure and record the customer's time differentiated delivered energy, received energy, and demand usage. Most meters will be installed initially only with the ability to measure and record the energy and demand delivered from the electric grid to the customer. If a customer enters into an interconnection agreement pursuant to P.U.C. SUBST. R. 25.211 and requests to measure out-flow energy from the customer's side of the meter to the electric grid, Sharyland intends to implement any changes necessary to allow the meter to measure and record received energy as well. It is Sharyland's understanding that additional programming is the only change that is required, but will work with its vendor, Landis+Gyr, during the actual installation and deployment of its AMS to determine if any other changes would be necessary.
- b. Received energy refers to out-flow energy from the customer's side of the meter to the electric grid.
- c. Received energy refers only to energy received from distributed generation located on the customer's side of the meter.
- d. Sharyland is not aware of any Commission regulation or ERCOT market rule that contemplates a utility receiving energy from a customer source other than DG.
- e. Sharyland currently has 63 DG interconnection agreements.

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

Preparer: Daniel G. Price; Ed Echols  
Sponsor: Daniel G. Price

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.2**

Describe any and all modifications that must be made to the standard AMS meter (and operating software and/or any other components, as applicable) to enable the AMS meter and operating software to measure and record received energy.

**RESPONSE**

In order to measure and record received energy at the point of interconnection, Sharyland's standard AMS meter would need additional programming that can be accomplished over-the-air. Sharyland will work with its vendor, Landis+Gyr, during the actual installation and deployment of its AMS to determine if any other changes would be necessary.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.3**

Identify any and all costs that Sharyland would incur to enable the AMS meter to measure and record received energy. Separately identify software costs, hardware costs, and vendor costs. Provide any and all support for your response.

**RESPONSE**

Based on discussions with Landis+Gyr, Sharyland does not expect that there would be additional costs associated with the programming necessary to measure out-flow energy. Sharyland will continue to work with its vendor, Landis+Gyr, during the actual installation and deployment of its AMS to determine if any additional changes and costs would be necessary.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.4**

Refer to the Direct Testimony of Mr. Price, page 3, line 10.

- a. Define and explain fully what is meant by an "appropriate HAN device."
- b. Will a typical household already have a HAN device in operation? If the answer is no, of what use is the ability to communicate usage data recorded by the meter to a HAN device? Explain fully.

**RESPONSE**

- a. The term "appropriate HAN device" refers to a Home Area Network device that is capable of communicating with the advanced meter via the ZigBee radio.
- b. Sharyland has no direct knowledge of whether a typical household has a HAN device in operation. Presumably there would be no purpose of having a HAN device prior to the installation of an advanced meter because there would be no method for the existing meter to communicate with a HAN device, but such devices would have use after the installation of an advanced meter. P.U.C. SUBST. R. 25.130(g) requires that deployment and use of an AMS for which an electric utility seeks a surcharge for cost recovery include an AMS that has the capability to communicate with devices inside the customer's premises through a HAN.

Preparer: Daniel G. Price  
Sponsor: Daniel G. Price



**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
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**PNR-SU 3.5**

Refer to the Direct Testimony of Mr. Price, page 3, lines 29-31.

- a. Will the collectors store, retain, and then transmit, all data measured and recorded by the meter, including energy received by a non-DG resource?
- b. If the answer to part of a above is no, explain fully why any data (specifically including energy received by a non-DG source, if applicable) will not be stored, retained, and/or transmitted by the collector.

**RESPONSE**

- a. Generally, the collectors store and transmit all information that the advanced meters are programmed to record and send to the collectors.
- b. Not applicable.

Preparer: Daniel G. Price  
Sponsor: Daniel G. Price

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
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**PNR-SU 3.6**

Refer to the Direct Testimony of Mr. Price, page 10, lines 1-11

- a. Will all information that is currently being collected and maintained by Sharyland's existing CIS be collected and maintained in the new CIS associated with the AMS?
- b. If the answer to part a above is no, specifically identify what information will not be collected and maintained and explain why such information will not be collected and maintained.

**RESPONSE**

- a. Yes. The new CIS system will collect and maintain all of the data elements that are currently being collected by the existing CIS.
- b. Not applicable.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.7**

Refer to the testimony of Ms. BJ Flowers, pages 6-7. With respect to customer education and notice, will non-residential customers be notified when their current meter(s) will be replaced and sent the new meter number with the corresponding ESI ID and premise name and old meter number?

- a. If the answer is yes, how far in advance will the notice be given?
- b. If the answer is no, explain fully why only residential customers will be directly notified.

**RESPONSE**

- a. As discussed by Ms. Flowers in her direct testimony, Sharyland has established a website dedicated to its AMS Deployment Plan that will include information about the schedule for the installation of the advanced meters. In addition, Sharyland intends to mail a letter to residential customers and to place a door hanger on residential customers' premises, but does not intend to do so for non-residential customers. Neither the website, the letters, nor the door hangers will include specific information about a customer's meter number, ESI ID, or premise name.
- b. Sharyland's deployment plan is designed to replace individual meters based on the location of the meter, not the physical address of a customer. Sharyland does not intend to mail letters or provide door hangers to non-residential customers prior to a specific meter being replaced because (i) the mailing address of such customers often do not coincide with the physical location of the meter to be replaced, and (ii) such customers often have multiple meters which may be replaced at different times during the deployment plan.

Preparer: BJ Flowers  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
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**PNR-SU 3.8**

Refer to the Direct Testimony of Ralph Goodlet, page 49. Explain fully whether an advanced meter replacing an existing IDR meter will be exempt from the AMS surcharges for the full 12-year surcharge period.

**RESPONSE**

Consistent with PURA § 39.107(h), the AMS Surcharge will not apply to those customers that are required by the Electric Reliability Council of Texas, Inc. to have an interval data recorder meter. Customers that are required to have an interval data recorder are defined in ERCOT Protocol 18.6.

Preparer:     BJ Flowers  
Sponsor:     BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.9**

What is Sharyland's proposed settlement procedure in the event of missing usage or demand data or meter or telemetry or database failure? Describe fully.

- a. Will any form of data estimation or load profile segment be used in place of missing data?
- b. If data estimation will be used, will Sharyland adhere to the Edison Electric Institute's Uniform Business Practice Rules? If so, please explain that process fully. If not, explain fully what alternative procedure will be used. Provide any and all support for the use of this alternative procedure.

**RESPONSE**

ERCOT is the entity responsible for settlement of the market. As such, Sharyland does not have a proposed settlement procedure.

- a. Sharyland expects that instances will occur where AMS daily data is not collected from a meter or a meter is not communicating and therefore does not transmit complete data for a particular day. The Meter Data Management System ("MDMS") is designed to provide an estimate if any part of a particular day's data is missing. As discussed at the April 1, 2015 Technical Conference, the MDMS is expected to calculate an estimated average daily use and assign a midnight register read. Subsequently, the MDMS will assign values for any missed intervals such that the energy between the end of day midnight register read and the prior day's midnight register read are accounted for by either the actual interval values received or the estimated intervals.
- b. Yes. Sharyland plans to adhere to the Edison Electric Institute's Uniform Business Practices Guidelines. Given that Sharyland's Deployment Plan has not yet been approved, Sharyland has not installed its MDMS system, and therefore has not developed the programming that the MDMS will utilize.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.10**

Will Sharyland be metering demand using fixed block, rolling, or other demand intervals for demand measurements and settlement of charges? Explain fully the Sharyland demand calculation or measurement process for settlement following activation of the AMS.

**RESPONSE**

Sharyland will use a fixed block 15 minute interval for capturing the peak kW used for Non-Coincident Peak ("NCP") billing. Advanced meters recording for NCP demand kW is not changing from current demand register meters. Determination of demand by the meter is based on the counting pulses within the meter, and then the meter's programming converts the sum of the pulses within a 15 minute period to kW. The meter then compares the demand register's value to the current 15 minute demand, if the current 15 minute demand is higher than the value in the demand register, the meter replaces the 15 minute demand in the register. This process continues throughout the billing cycle and results in the meter displaying the highest 15 minute kW during the bill cycle. The demand register is captured and then the demand register is reset to zero. The demand capture process is set in motion for the meter to record the highest kW for the next bill cycle.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.11**

Will Sharyland make available to the customer interval and summary data for IDR meters for data that is not posted to the Smart Meter Texas portal? If so, identify the format Sharyland will use to make the data available, how it can be requested, and to whom (including the email address and other contact information) the request for the data should be sent.

**RESPONSE**

Sharyland's plan is to install an advanced meter for those customers that are required by ERCOT to have an interval data recorder meter and to provide the interval data to the Smart Meter Texas ("SMT") web portal. Sharyland plans to make the IDR meter data available in SMT in the daily AMS data transmission that is currently used by other utilities. Additionally, Sharyland will continue to provide the customer's REP of record the "IDR" and summary meter data through the market's monthly billing process (*i.e.*, the TX SET 867-03(IDR) EDI transaction). Sharyland does not intend to provide data to customers outside of the SMT process. Customers will also be able to obtain data from their REP of record.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.12**

How long will Sharyland store usage, demand, and other billed data in its own database? Explain fully how this data will be made available to customers if the data is not posted to the Smart Meter Texas portal.

**RESPONSE**

Sharyland plans to store data for a period of twenty-four months, and then such data will be archived for a period of twelve months. As mentioned in the response to PNR-SU 3.11, Sharyland does not intend to make data available to customers outside of the normal Smart Meter Texas web portal's processes.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers



**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.13**

Fully describe what customer support Sharyland will provide to customers to assist in resolving any problems they have with the Smart Meter Texas portal.

**RESPONSE**

The Smart Meter Texas ("SMT") web portal has its own call center personnel to assist customers with any issues associated with SMT. As such, any issues associated with the Smart Meter Texas ("SMT") web portal should be directed to the SMT call center rather than Sharyland. It is Sharyland's understanding that the SMT call center personnel will contact the applicable utility to the extent necessary. Sharyland will continue to maintain its current staffing of customer service representatives, but issues associated with the SMT web portal should generally be addressed to the SMT call center.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.14**

How will the geographical coordinates of each advanced meter base be recorded? Will that data be made available to the customer? Explain fully.

**RESPONSE**

Sharyland will record the coordinates for the advanced meters at the time that the meter is installed. Sharyland does not currently have plans to proactively provide this information to customers, but will work with customers to provide this information upon request.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.15**

What performance metrics will Sharyland measure and calculate to determine data quality of each advanced meter after installation?

**RESPONSE**

Please see the Supplemental Direct Testimony of BJ Flowers at Pages 4 – 8. Sharyland will adhere to the to the Uniform Business Practices standard for Validation, Editing, and Estimation, and will address any issues in accordance with ERCOT Protocols, Market Guides, and other applicable ERCOT guidelines. Sharyland also expects to employ a strategy of “Every Meter Every Day” to ensure that the data for all meters is being received for all meters on a daily basis.

Preparer: BJ Flowers; Ed Echols  
Sponsor: BJ Flowers

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO  
PIONEER'S THIRD REQUEST FOR INFORMATION**

**PNR-SU 3.16**

Provide a full and complete narrative explanation as to why, with respect to the Secondary >10 kW rate case, Sharyland proposes to receive fees for AMS that are 2.45 times greater than the cost of the meter for which the fee was developed.

**RESPONSE**

The proposed surcharge recovers the costs of the AMS, not just the initial cost of the meter. As defined in the PUC's substantive rules, an AMS includes not only the advanced meter but also any associated hardware, software, communications systems, and meter information networks. The AMS surcharge is based on the net present value of the projected net revenue requirement for Sharyland's AMS for the years 2015 through 2027. The forecasted AMS revenue requirement includes the carrying costs on the investment in the AMS facilities, depreciation, operating expenses, and taxes. The forecasted AMS net revenue requirement is allocated to customer classes based on the forecasted number of customers. The PUC approved McKinsey model was used to develop the forecasted AMS net revenue requirements and the customer class allocations.

Preparer: James W. Daniel  
Sponsor: James W. Daniel