

Control Number: 47472



Item Number: 131

Addendum StartPage: 0

COMMISSION STAFF'S PETITION §
TO DETERMINE REQUIREMENTS §
FOR SMART METER TEXAS §

PUBLIC UTILITY COMMISSION

2018 JUN 26 AM 11:23

OF TEXAS

PUBLIC UTILITY COMMISSION
FILING CLERK

**ENERNOC, INC. AND MP2 ENERGY TEXAS LLC
JOINT RESPONSE TO MOTION FOR REHEARING**

COMES NOW, EnerNOC, Inc., an Enel Group Company (“EnerNOC”), and MP2 Energy Texas LLC (MP2T) and file this Joint Response to the Joint Utilities’ Motion for Rehearing and in support thereof would show the following:

I. BACKGROUND

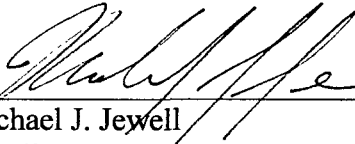
On May 29, 2018, the Commission issued its Final Order (“Order”) in this proceeding. On June 15, 2018, the Joint Utilities filed a Motion for Rehearing on the Commission’s Order requesting limited clarifications. A response to the Motion for Rehearing is timely filed on or before July 8, 2018, which is the 40th day following the issuance of the Commission’s Order.¹

II. DISCUSSION

EnerNOC and MP2T support the Joint Utilities’ request that the Commission clarify its Order regarding the basis for the Commission’s grant of a waiver to 16 TAC § 25.130(g)(1)(J) and the identification of customers who will continue to receive home area network (“HAN”) functionality. EnerNOC and MP2T respectfully submit that Commission approval of the requested clarifications would be consistent with the signatories’ agreement in the Stipulation.

¹ Administrative Procedure Act, Tex. Gov’t Code § 2001.146(b) (West 2016 & Supp. 2017).

Respectfully submitted,

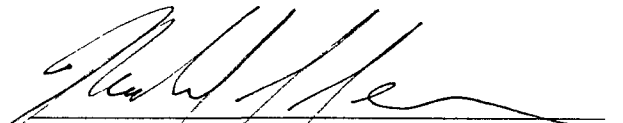


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ATTORNEY FOR ENERNOC, INC. AND
MP2 ENERGY TEXAS LLC

CERTIFICATE OF SERVICE

I, Michael J. Jewell, Attorney and Representative for EnerNOC, Inc. and MP2 Energy Texas LLC, certify that a copy of this document was served on all parties of record in this proceeding on the 26th day of June, 2018 in accordance with PUC Proc. R. 22.74.



Michael J. Jewell