



Control Number: 48745



Item Number: 16

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DOCKET NO. 48745

COMPLIANCE FILING OF ENTERGY §
TEXAS, INC. IN RESPONSE TO §
ORDERING PARAGRAPH 6 OF THE §
FINAL ORDER IN DOCKET NO. 47416 §

PUBLIC UTILITY COMMISSION

2018 NOV 21 AM 11:49

OF TEXAS
PUBLIC UTILITY COMMISSION
FILING CLERK

**RESPONSE OF ENTERGY TEXAS, INC.
TO STAFF SECOND REQUEST FOR INFORMATION:
STAFF 2: 1-8**

Entergy Texas, Inc. ("Entergy Texas" or "the Company") files its Response to Staff Second Request for Information. The response to such request is attached and is numbered as in the request. An additional copy is available for inspection at the Company's office in Austin, Texas.

Entergy Texas believes the foregoing response is correct and complete as of the time of the response, but the Company will supplement, correct or complete the response if it becomes aware that the response is no longer true and complete, and the circumstance is such that failure to amend the answer is in substance misleading. The parties may treat this response as if it were filed under oath.

Respectfully submitted,

Wajiha Rizvi

Wajiha Rizvi

Entergy Services, Inc.

919 Congress Avenue, Suite 701

Austin, Texas 78701

(512) 487-3962 telephone

(512) 487-3958 facsimile

Attachments: STAFF 2: 1-8

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Staff Second Request for Information has been sent by either hand delivery, email, facsimile, overnight delivery, or U.S. Mail to the party that initiated this request in this docket on this the 21st day of November 2018.

Wajiha Rizvi

Wajiha Rizvi

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 48745

Response of: Entergy Texas, Inc.
to the Second Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: John Gregory Fenn
Sponsoring Witness: TBD
Beginning Sequence No. WG1
Ending Sequence No. WG3

Question No.: STAFF 2-1

Part No.:

Addendum:

Question:

Please provide an overview of Green Button Connect My data ("GBC") that describes:

- a. the steps a customer must take in order to authorize a competitive service provider ("CSP") direct access to their meter data through ETI's Customer Engagement Portal ("CEP");
 - b. the process a customer must take to terminate a data sharing agreement with a CSP; and
 - c. a description of how the GBC standard protects a customer's information.
-

Response:

Information included in the response contains highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

- a. Please see the attached.
- b. Please see the attached.
- c. The GBC standard protects a customer's information by removing from view the customer's account number, address, and name. Information is also encrypted in transit to the third party and, as part of the sign-up process for the third party, a set of encryption keys is exchanged.

The Green Button effort was created with the support of the U.S. Department of Energy, National Institute of Standards & Technology, Smart Grid Interoperability Panel, and the White House. The Green Button Alliance is a leader in the development of the Green Button utility data-exchange standard, which ensures that customer data does not contain any personally identifiable data and must be transmitted using a secure-transmission process.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO
PARAGRAPH 4 OF DOCKET NO. 48745 PROTECTIVE ORDER**

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101, 552.104 and/or 552.110. E TI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Wajiha Rizvi
Entergy Services, Inc.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 48745

Response of: Entergy Texas, Inc.
to the Second Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Rodney W. Griffith
Sponsoring Witness: TBD
Beginning Sequence No. WG20
Ending Sequence No. WG20

Question No.: STAFF 2-2

Part No.:

Addendum:

Question:

Please provide all information ETI will require from a CSP prior to permitting a CSP to access ETI's CEP to obtain customer meter data authorized by a customer.

Response:

The GBC functionality of ETI's CEP is expected to be available by the fourth quarter of 2019 (referred to as "CEP Release 2"). Accordingly, ETI is currently developing the processes and requirements for GBC, and in particular the information that ETI will require from a CSP prior to permitting a CSP to access ETI's CEP to obtain customer meter data authorized by a customer. In developing those processes and requirements, ETI will work with its CEP vendor, which has implemented GBC for other utilities in the country. In addition, ETI will analyze the processes and requirements implemented by other utilities that have implemented GBC, as well as any relevant Green Button Alliance guidance. ETI will also identify and include appropriate industry-standard requirements.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the Second Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Rodney W. Griffith
Sponsoring Witness: TBD
Beginning Sequence No. WG21
Ending Sequence No. WG21

Question No.: STAFF 2-3

Part No.:

Addendum:

Question:

Please confirm or deny that ETI plans to inform a customer that if they authorize access to their electricity information they should contact the CSP to understand how the CSP will use, collect, store, share, and/or disclose their information to others.

Response:

Confirm. ETI intends to include that information either as part of or as a separate paragraph in the customer acknowledgment material depicted on slide 9 of the illustrative screen shots included with ETI's response to Staff 2-1.

ENTERGY TEXAS, INC.
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Response of: Entergy Texas, Inc.
to the Second Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Rodney W. Griffith
Sponsoring Witness: TBD
Beginning Sequence No. WG22
Ending Sequence No. WG22

Question No.: STAFF 2-4

Part No.:

Addendum:

Question:

Does ETI have terms and conditions that CSPs must agree to in order to access customer data from the CEP? If not, why not?

Response:

See the Company's response to Staff 2-2. ETI will have terms and conditions that a CSP must agree to in order for ETI customers to be able to authorize a CSP to access customer data.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 48745

Response of: Entergy Texas, Inc.
to the Second Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Rodney W. Griffith
Sponsoring Witness: TBD
Beginning Sequence No. WG23
Ending Sequence No. WG23

Question No.: STAFF 2-5

Part No.:

Addendum:

Question:

If the answer to STAFF 2-4 is affirmative, please provide the terms and conditions.

Response:

See the Company's response to Staff 2-4.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the Second Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Rodney W. Griffith
Sponsoring Witness: TBD
Beginning Sequence No. WG24
Ending Sequence No. WG24

Question No.: STAFF 2-6

Part No.:

Addendum:

Question:

Does ETI plan to require CSPs to have privacy policies in place in terms of how they will utilize customer information before CSPs are allowed to access customer data from the CEP?

Response:

Yes. ETI will require CSPs to have privacy policies in place in terms of how they will utilize customer information before CSPs are allowed to access customer data from the CEP. See also the Company's response to Staff 2-2.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 48745

Response of: Entergy Texas, Inc.
to the Second Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Rodney W. Griffith
Sponsoring Witness: TBD
Beginning Sequence No. WG25
Ending Sequence No. WG26

Question No.: STAFF 2-7

Part No.:

Addendum:

Question:

Refer to the SMT 2.0 Business Requirements approved in the final order of Docket No. 47472.1 Please list and explain all similar requirements that ETI plans to implement in its CEP.

Response:

Information included in the response contains highly sensitive protected (“highly sensitive”) materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Please see the attached requirements for the CEP related to downloading and sharing meter data with third parties, including through Green Button Connect and Green Button Download.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO
PARAGRAPH 4 OF DOCKET NO. 48745 PROTECTIVE ORDER**

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Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Wajiha Rizvi
Entergy Services, Inc.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 48745

Response of: Entergy Texas, Inc.
to the Second Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Rodney W. Griffith
Sponsoring Witness: TBD
Beginning Sequence No. WG31
Ending Sequence No. WG32

Question No.: STAFF 2-8

Part No.:

Addendum:

Question:

Please list and explain all requirements that ETI plans for its CEP in addition to those listed in the company's response to STAFF 2-6 and not listed in ETI's Attachment A to its compliance filing.

Response:

Information included in the response contains highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Upon clarification from Staff, ETI understands that the RFI referred to in Question 2-8 should be 2-7 and not 2-6. Attachment A to ETI's compliance filing included the list of all planned functionalities for ETI's CEP. Please see the attached file for a list of non-functional requirements for the CEP.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO
PARAGRAPH 4 OF DOCKET NO. 48745 PROTECTIVE ORDER**

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Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

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