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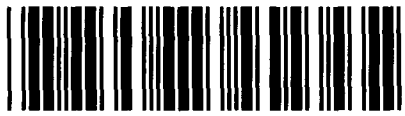

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Addendum StartPage: 0

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 OF TEXAS**

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PUBLIC UTILITY COMMISSION
FILING CLERK

COMPLIANCE FILING OF ENTERGY TEXAS, INC.

Pursuant to Ordering Paragraph 6 of the Commission's final order in Docket No. 47416,[1] Entergy Texas, Inc. ("ETI" or the "Company") presents this filing to initiate a proceeding to address: (1) whether and to what extent ETI will participate in Smart Meter Texas; (2) what changes, if any, should be made to ETI's web-based customer interface; and (3) whether and to what extent ETI should provide third-party direct access to customer AMS data. In support of this filing, ETI shows as follows:

I. BUSINESS ADDRESS AND AUTHORIZED REPRESENTATIVES

The business address of the Company is:

Entergy Texas, Inc.
350 Pine Street
Beaumont, Jefferson County, Texas 77701

The business mailing address of the Company is:

Entergy Texas, Inc.
P.O. Box 2951
Beaumont, Texas 77704

The business telephone number of the Company is (409) 838-6631.

The authorized representatives for the Company in this proceeding are:

Deanna Rodriguez
Vice President, Regulatory & Public Affairs, Texas
Entergy Texas, Inc.
919 Congress Avenue, Suite 740
Austin, Texas 78701

[1] *Application of Entergy Texas, Inc. for Approval of Advanced Metering System ("AMS") Deployment Plan, AMS Surcharge, and Non-standard Metering Service Fess*, Docket No. 47416, Final Order (Dec. 14, 2017).

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Senior Counsel
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Inquiries and pleadings concerning this filing should be directed to the following representatives:

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Austin, Texas 78767
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II. JURISDICTION

The Commission has jurisdiction over this application pursuant to PURA §§ 39.452(k)-(l), which became effective on May 18, 2017.

III. AFFECTED PERSONS

The Company and its retail customers (other than customer accounts that are unmetered or receive service at transmission voltage) will be affected by the decisions resulting from this filing.

IV. DESCRIPTION OF FILING

On July 18, 2017, in Docket No. 47416, ETI filed its Application for Approval of its Advanced Metering System ("AMS") Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fees. On October 23, 2017, the parties to the proceeding filed a stipulation and settlement agreement. Among other things, the agreement provided that "ETI is authorized to proceed with its web-based customer interface and the costs will be included in the AMS surcharge. Subject to the foregoing sentence, the issue of whether ETI should participate in Smart Meter Texas ("SMT"), changes to ETI's web-based customer interface, and issues of third party access to AMS data will be deferred to a future proceeding."

In its final order, the Commission approved ETI's application consistent with the agreement of the parties. Further, Ordering Paragraph 6 of the final order further directed as follows:

> Unless the final order in Docket No. 47472[2] provides otherwise, within 90 days after the final order in Docket No. 47472 is signed, ETI shall initiate a proceeding to address whether and to what extent ETI will participate in Smart Meter Texas; what changes, if any, should be made to ETI's web-based customer interface; and whether and to what extent ETI should provide third-party direct access to customer AMS data.

The present filing is made to initiate a proceeding consistent with Ordering Paragraph 6. The final order in Docket No. 47472 was signed on July 12, 2018, and 90 days later is October 10, 2018; accordingly, this filing is timely made.

With regard to the issues to be addressed in this proceeding, and as further detailed in the attached report and supporting affidavit of Rodney W. Griffith, ETI proposes as follows:

1. ETI should not be required to participate in SMT because ETI's web-based customer interface (i.e., ETI's Customer Engagement Portal or "CEP") will provide all required

[2] *Commission Staff's Petition to Determine Requirements for Smart Meter Texas*, Docket No. 47472 [then pending].

functionalities and is projected to cost significantly less than requiring ETI to participate in SMT, among other reasons;

2. ETI's proposed web-based customer interface (the CEP) reasonably addresses the applicable requirements for access to AMS data, and no changes to the interface are needed at this time; and
3. ETI's proposal to provide third-party direct access to customer AMS data via Green Button Connect My Data is reasonable and consistent with industry security standards and Commission rules.

The attached report provides ETI's review and analysis of the identified issues and support for the recommendations listed above.

V. NOTICE AND PROTECTIVE ORDER

ETI proposes to provide notice of this filing by providing a copy of this filing to all parties who participated in Docket No. 47416. Because ETI will provide notice directly to all parties from the prior docket that addressed these issues, ETI proposes an intervention deadline of approximately 30 days following the date of this filing and provision of notice.

ETI requests that the Commission's Standard Protective Order be issued in this proceeding.

VI. PROPOSED PROCEDURAL SCHEDULE

ETI proposes the following schedule for initial processing of this proceeding:

Event	**Deadline**
Deadline for intervention	November 9, 2018
Deadline to request a hearing	December 7, 2018
If hearing is not requested, parties to submit an agreed Proposed Order. If hearing is requested, parties to submit a proposed procedural schedule or a request for referral to the State Office of Administrative Hearings.	December 14, 2018

VII. CONCLUSION AND REQUESTED RELIEF

ETI requests that the Commission: (1) determine that ETI has complied with the filing requirements of Ordering Paragraph 6 of the Docket No. 47416 final order; (2) conclude that ETI

should not be required to participate in SMT; (3) conclude that ETI's plans for its web-based CEP satisfy the requirements of applicable Commission rules and does not require modification; (4) conclude that ETI's providing third-party direct access to customer data via Green Button Connect My Data satisfies the requirements of the Commission's rules; and (5) in the alternative, in the event the Commission should conclude that ETI is required to participate in SMT and/or order ETI to participate in SMT, then ETI requests that the Commission authorize recovery of all upfront and ongoing costs associated with ETI's participation in SMT. Finally, ETI requests that the Commission grant such further relief to which the Company may be entitled.

Respectfully submitted,

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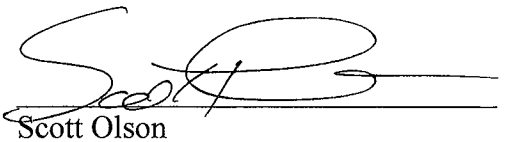
By: 
Scott Olson
State Bar No. 24013266

ATTORNEYS FOR ENTERGY TEXAS, INC.

Certificate of Service

The undersigned certifies that a copy of the foregoing Compliance Filing of Entergy Texas, Inc. has been sent by facsimile, e-mail, regular mail, or hand-delivered to all parties of record in Docket No. 47416 on this 9th day of October, 2018.



Scott Olson

DOCKET NO. _____

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

STATEMENT UNDER SECTION 4
OF STANDARD PROTECTIVE ORDER

The undersigned attorney for Entergy Texas, Inc. ("ETI") submits this statement under Section 4 of the Standard Protective Order adopted in this case.

As set forth in the affidavit of Rodney W. Griffith that is included as part of the filing package in this case, certain information included in ETI's filing contain information that is commercially sensitive. As Mr. Griffith explains in his affidavit, the public disclosure of this information would cause harm to ETI and its suppliers. As such, these materials are protected under TEX. GOV'T CODE §§ 552.101, 552.104, and 552.110 and TEX. UTIL. CODE § 39.001(b)(4).

I have reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Highly Sensitive Protected Materials (Highly Confidential) designation it is given in ETI's filing.

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ATTORNEY FOR
ENTERGY TEXAS, INC.

Report of Entergy Texas, Inc. in Response to Ordering Paragraph 6 of the Final Order in Docket No. 47416, *Application of Entergy Texas, Inc. for Approval of Advanced Metering System (AMS) Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fees.*

OCTOBER 2018

Table of Contents

Attachments

I. Introduction

On July 18, 2017, Entergy Texas, Inc. ("ETI") filed its Application for Approval of Advanced Metering System ("AMS") Deployment Plan, AMS Surcharge, and Non-standard Metering Service Fees with the Public Utility Commission of Texas (the "Commission" or "PUCT"). The application was assigned PUCT Docket No. 47416.

As a part of its application in Docket No. 47416, ETI proposed that it would not utilize Smart Meter Texas ("SMT") but rather it would use its own web-based customer portal to address issues of customer and third-party access to customer meter data. At the time of the application, ETI affirmed that its web-based customer portal would have the functionality that allows customers to download their AMS data in an industry standard file format (e.g., Green Button Download My Data ("GBD"), but that it was still exploring the various methods by which third-party direct access to customer data (e.g., Green Button Connect My Data ("GBC"))[1] might be feasible as well as studying the related privacy and data security aspects of providing third-party direct access. ETI's current web-based customer portal is Entergy My Account Online. Along with the deployment of the AMS, ETI will be implementing a more robust web-based customer portal, which is now known as the Customer Engagement Portal ("CEP"). (As detailed later in this report, enabling customer and third-party access to AMS meter data will be just two of the many functionalities included in the CEP.)

On December 14, 2017, the Commission issued a final order in Docket No. 47416 approving the Company's application consistent with the stipulation and settlement agreement of the parties. The parties had agreed to sever, and address at a later time, certain issues regarding SMT and access to customer meter data from the AMS. Consistent with the agreement of the parties, Ordering Paragraph 6 of the Commission's final order provided as follows:

> Unless the final order in Docket No. 47472[2] provides otherwise, within 90 days after the final order in Docket No. 47472 is signed, ETI shall initiate a proceeding to address whether and to what extent ETI will participate in Smart Meter Texas; what changes, if any, should be made to ETI's web-based customer interface; and whether and to what extent ETI should provide third-party direct access to customer AMS data.

[1] The Green Button initiative is an industry-led effort to provide utility customers with easy and secure access to their energy usage information in a consumer-friendly and nationally standardized format.

[2] *Commission Staff's Petition to Determine Requirements for Smart Meter Texas*, Docket No. 47472 [then pending].

This report supports the Company's compliance filing in response to Ordering Paragraph 6. It provides information regarding SMT that has been provided to ETI or researched by ETI, and it provides ETI's analysis of that information as it relates to the issues posed by the Commission in Ordering Paragraph 6.

The Commission rules that are applicable to issues of access to customer meter data include subsections (g)(1)(E) and (j)(1) of 16 TAC § 25.130. In particular, 16 TAC § 25.130(g)(1)(E) provides that, among other things, an AMS shall provide or support certain minimum system features in order to obtain cost recovery through a surcharge pursuant to the rule, including:

> (E) the capability to provide direct, real-time access to customer usage data to the customer and the customer's REP, provided that:
> (i) hourly data shall be transmitted to the electric utility's web portal on a day-after basis.
> (ii) the commission staff using a stakeholder process, as soon as practicable shall determine, subject to commission approval, when and how 15-minute IDR data shall be made available on the electric utility's web portal.

Further, 16 TAC § 25.130(j) provides as follows:

> (j) **Access to meter data.**
> (1) An electric utility shall provide a customer, the customer's REP, and other entities authorized by the customer read-only access to the customer's advanced meter data, including meter data used to calculate charges for service, historical load data, and any other proprietary customer information. The access shall be convenient and secure, and the data shall be made available no later than the day after it was created.
>
> (2) The requirement to provide access to the data begins when the electric utility has installed 2,000 advanced meters for residential and non-residential customers. If an electric utility has already installed 2,000 advanced meters by the effective date of this section, the electric utility shall provide access to the data in the timeframe approved by the commission in either the Deployment Plan or request for surcharge proceeding. If only a Notice of Deployment has been filed, access to the data shall begin no later than six months from the filing of the Notice of Deployment with the commission.
>
> (3) An electric utility shall use industry standards and methods for providing secure customer and REP access to the meter data. The electric utility shall have an independent security audit of the mechanism for customer and REP access to

meter data conducted within one year of initiating such access and promptly report the results to the commission.

(4) The independent organization, regional transmission organization, or regional reliability entity shall have access to information that is required for wholesale settlement, load profiling, load research, and reliability purposes.

(5) A customer may authorize its data to be available to an entity other than its REP.

In light of these requirements and for the reasons detailed in this report, the Company submits the following with regard to the issues identified in Ordering Paragraph 6:

1. ETI should not be required to participate in SMT because ETI's proposed web-based customer interface (i.e., ETI's CEP) will provide all required functionalities and is projected to cost significantly less than requiring ETI to participate in SMT, among other reasons;

2. ETI's proposed web-based customer interface (the CEP) reasonably addresses the applicable requirements for access to AMS data, and no changes to the interface are needed at this time; and

3. ETI's proposal to provide third-party direct access to customer AMS data via Green Button Connect My Data is reasonable and consistent with industry security standards and Commission rules.

The remainder of this report addresses each of these issues in greater detail.

II. Whether and to what extent ETI will participate in Smart Meter Texas?

A. ETI could not participate in SMT in lieu of operating its own web portal to serve its retail customers.

ETI should not be required to participate in SMT. ETI, as a utility providing bundled electric service in a non-competitive retail service area, already does and will continue to maintain its own web portal for providing service to its retail customers. In fact, as described below, SMT is only a repository for meter data in ERCOT, and it does not provide, nor was it ever intended to provide, the vast majority of functionality that ETI needs from its web portal in order to interact with and provide service to its retail customers. In the sole area of overlap between SMT and ETI's web portal — providing meter data access to third-parties — ETI is implementing the industry standard, GBC, at a fraction of the costs that ETI's customers would incur through higher rates to provide the same data access via SMT. In short, joining SMT would impose an unnecessary and significant additional cost burden on ETI's customers for functionality they will already have and would likely lead to avoidable confusion, unnecessary calls, and potentially even complaints.

As indicated by the Commission in its final order in Docket No. 47472, SMT is an interoperable, web-based information system that, among other things (1) stores retail customers' electric-usage data in increments of 15-minute intervals recorded by advanced meters and (2) via various user interfaces, provides secure access to those data to retail customers, retail electric providers ("REPs") of record, other parties that retail customers authorize to have access to their electric-usage data, and the Electric Reliability Council of Texas ("ERCOT"). SMT was also intended to provide a convenient and easy to use process whereby customers within the ERCOT market can grant third parties access to their usage information and give them permission to communicate with their Home Area Network ("HAN") devices, although the Commission recently limited continued HAN functionalities to existing customer situations.[3]

[3] On August 16, 2017, Commission Staff filed the petition that initiated Docket No. 47472, Commission Staff's petition to Determine Requirements for Smart Meter Texas. The petition requested that the Commission determine what changes, if any, should be made to the business requirements for the continued operation of SMT under the joint development and operations agreement. A final order was issued in that case on July 12, 2018. The order approved a set of mostly agreed business requirements under which SMT would operate.

SMT was established and is now jointly maintained by four transmission and distribution utilities (the "Joint TDUs"): AEP Texas Inc.; CenterPoint Energy Houston Electric, LLC; Oncor Electric Delivery Company LLC; and Texas New Mexico Power Company ("TNMP"). CenterPoint and Oncor signed a Joint Development and Operating Agreement ("JDOA") dated December 31, 2008 to cooperate in the funding, development, hosting, operation, and maintenance of a common data repository, web portal, and call center. AEP and TNMP became parties to the JDOA in January 2010 and July 2011, respectively, following PUCT approval of their advanced metering deployment plans. ETI understands that IBM is the current vendor engaged by the Joint TDUs to operate and manage SMT.

A report prepared by the Joint TDUs, "Understanding Smart Meter Texas," was filed in PUCT Project No. 41171, *Repository of Advanced Metering Implementation Documents*, on January 17, 2014. The report was designed to provide a comprehensive understanding of SMT, including the context in which it was developed. As a summary, the report explained as follows:

> SMT is the product of a collaborative stakeholder-driven process initiated by the Public Utility Commission of Texas (PUCT), designed to support the Advanced Metering System (AMS) deployment in the Texas competitive electricity market by leveraging the wealth of Customer usage data made available by smart meters and the associated AMS communications and information technology infrastructure. Although uniquely designed and developed for the Texas electricity market, SMT is relevant to other jurisdictions that have smart meter deployments and desire to implement the Green Button initiative.[4]

Further, the report described the market structure that is in place for the Joint TDUs in ERCOT; namely a market structure in which the main functions of the vertically integrated electric power market – generating power, transmitting electricity over power lines to customer premises, and selling electric power to end-use customers – were split into three distinct and separate business entities: power generation companies ("PGCs"), transmission and distribution service providers ("TDSPs"), and REPs.[5] The report then explains as follows:

> This type of market structure complicates and presents unique challenges to the effective exchange of smart meter information between the market participants.

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[4] *Repository of Advanced Metering Implementation Documents,* PUCT Project No. 41171, "Appendix A: Understanding Smart Meter Texas," at 3 (Jan. 17, 2014).

[5] *Id* at 21.

> For example, the entity that owns and reads the smart meter, the TDSP, is not the same entity that interfaces with the retail customer, the REP. The REP needs the Customer smart meter usage information for billing, product development, and supply risk management. Another complicating factor is that a REP may have Customers in multiple TDSP service areas and will need to interface with those TDSPs to receive the smart meter usage information. All of these complications and the requirements of the market participants were addressed in a collaborative process that resulted in the interoperable SMT solution.[6]

The market structure in ETI's service area is substantially different from that in ERCOT. The main functions of the electric power market in ETI's service area have not been split or unbundled into separate business entities. ETI provides bundled generation, transmission and distribution, and retail electric services to its retail customers. In the ETI service area, the entity that owns and reads the meter (ETI) is the same entity that interfaces with retail customers. There are no REPs or other forms of retail electric provider that operate in ETI's service area, and ERCOT oversees no customer registration or switching processes in the ETI service area. Further, it is the Midcontinent Independent System Operator, Inc. ("MISO") and not ERCOT that is the independent system operator in the ETI service area.

In light of the differences between the market structures in ERCOT and the ETI service area, ETI requested certain waivers in Docket No. 47416 that were supported by the settlement agreement of the parties and approved by the Commission. For example, Finding of Fact 28 of the Commission's final order in Docket No. 47416 states that: "Certain requirements in 16 TAC § 25.130 that involve retail electric providers (REPs) are only applicable in a deregulated retail electric market in which REPs provide retail electric service to customers and or are specific to the Electric Reliability Council of Texas (ERCOT) market and its protocols. Unless specifically noted, requirements that specifically involve REPs do not apply to ETI or its deployment plan or AMS operations. Thus, ETI requested a waiver to the extent that it is deemed that any such requirements would otherwise apply." Finding of Fact 34 stated that "Granting the waivers described in findings of fact 27 through 33 is reasonable."[7]

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[6] *Repository of Advanced Metering Implementation Documents,* PUCT Project No. 41171, "Understanding Smart Meter Texas," at 23 (Jan. 17, 2014).

[7] *See also* Conclusion of Law 8 and Ordering Paragraph 4 for approval of the waivers.

Because of the market structure in the ETI service area, ETI, unlike the TDSPs in ERCOT, already maintains a web portal to interface with its retail customers – analogous to what REPs in ERCOT do for their retail customers. Customers can log onto their Entergy My Account Online today to see their usage, pay their bill, and address multiple other matters. With the deployment of AMS, the functionality of the web portal (the CEP) will be enhanced to display interval data and provide customers the ability to use new tools that can, for example, forecast usage and bills, which can help customers budget their expenses. That type of functionality is necessary in today's environment, and a robust web portal such as ETI's CEP is necessary to meet customers' expectations. Attachment A to this report provides a complete description of all the of functionalities of the CEP, which shows that, in addition to providing usage data to customers and authorized third-parties, which is all that SMT does, the CEP provides a necessary, convenient and efficient way for ETI to provide service to its retail customers, presumably similar to how most REPs function in ERCOT with respect to engaging with their own customers.

Regardless of whether ETI participates in SMT, ETI will be incurring costs with regard to the CEP. SMT would not, for example, provide the tools for forecasting usage and bills that are noted above. Neither could customers compare bills with similar premises, receive energy saving tips, or pay their electric bill on SMT. In fact, the majority of ETI's CEP costs would not be avoided if ETI joined SMT. In other words, SMT cannot and was never intended to provide the web-based functionality that is necessary for a REP or a vertically-integrated electric utility like ETI to provide service and interact with its customers. It is merely a data repository, and with or without SMT, ETI would still need to maintain and operate its CEP.

Accordingly, the question of whether ETI should participate in SMT is not a question of whether ETI could use SMT in lieu of its CEP (it could not). The essential question is whether ETI should participate in SMT solely to provide third-party access to customer data. That is unnecessary and unreasonable because, as is detailed in Section IV of this report, ETI will provide third parties with access to meter data that meets or exceeds all Commission requirements for access via the industry standard GBC. And, because the Green Button data standards are being implemented along with the broader upgrading of the ETI web portal for its customers concurrent with AMS deployment, ETI will be able to provide third-party access for a

fraction of the cost that would be incurred if ETI were to also join SMT for that sole functionality.

B. Joining SMT would come with substantial, avoidable cost.

Joining SMT is not a cost that should be borne by ETI's customers. ETI requested that representatives of SMT provide ETI with information regarding the potential costs if ETI were to participate in SMT. The SMT representatives were responsive to the request, and, as seen in the letter provided as Attachment B to this report, the JDOA sets up cost sharing based on a party's "Pro Rata Share." The Pro Rata Shares are calculated each June 30th by dividing a party's customers whose accounts will be presented in SMT by the total customer accounts presented in SMT. As indicated in Attachment B, assuming ETI will have approximately 475,000 customers with advanced meters where that data could be presented through SMT (in addition to the CEP), which is a reasonable approximation of the number of meters, ETI's Pro Rata Share would be calculated as 6.06%.

The SMT representative's letter further explains that, pursuant to the JDOA, for a new party to enter the agreement, the new party is required to reimburse all existing JDOA parties (a one-time payment) an amount equal to the new party's Pro Rata Share (6.06% for ETI) times all project costs previously paid by the JDOA parties. The letter indicates that ETI's buy-in to join the JDOA at the end of 2018 would be approximately **$7.7 million**.

In addition, ETI would be required to pay its Pro Rata Share of annual ongoing SMT-related costs, which are anticipated to be in the $10 million range each year. Thus, ETI's share going forward would be approximately **$600,000 annually**.

Moreover, in addition to the costs that SMT would charge to ETI for participating in SMT, ETI would incur internal costs to develop systems that would be able to interact with SMT. ETI estimates that its up-front costs to integrate with SMT would be in the range of $500,000 to $1,000,000. Additionally, there would be ongoing internal ETI costs to participate in SMT, but that cost is not developed at this time.

In contrast, the up-front design fees related to including GBC in the CEP are projected to be less than $[redacted]. The ongoing fees for this functionality over the first five years of operations

are projected to average less than $[redacted] a year. The up-front design fees related to including GBD in the CEP are less than $[redacted]. The ongoing fees for this functionality over the first five years of operations are projected to be nominal.

In summary, the following table shows the costs for ETI to join SMT versus the costs to implement the Green Button functionalities through the ETI CEP:

	Smart Meter Texas	**ETI CEP[8]**
Initial Costs	$8.2-$8.7 million	$[redacted]
Ongoing Costs	$600,000, plus any ETI internal costs	$[redacted]

Accordingly, ETI joining and participating in SMT would add significantly more costs for customers than if ETI addresses data access requirements as planned through the ETI CEP. This is perhaps not surprising given that including the Green Button functionalities in the CEP will be an incremental solution to an existing interface by ETI to serve its retail customers, while, given the market structure in ERCOT, the Joint TDUs did not have the option of using their own pre-existing interface with retail customers because the Joint TDUs do not have retail customers. As such, to address meter data access issues, the Joint TDUs needed to develop, construct, and maintain a new web-based interface for REP customers and other third parties. ETI is in a different situation entirely.

C. ETI's participation in SMT may cause customer confusion.

In addition to the cost concerns, ETI is concerned that participation in SMT would create challenges in terms of customer confusion. As indicated above, SMT was developed, among other things, to address ERCOT market conditions that are different from the market conditions in the ETI service area. Accordingly, for example, on the FAQ page of the SMT website, there are multiple references to REPs and ESI IDs that would need to be revised or annotated to

[8] CEP costs do not include internal Company loaders, but such loader amounts are expected to be modest because most of the costs for development of GBD and GBC are third-party costs.

explain to ETI customers and others that these terms do not apply in the ETI service area.[9] Making these changes to SMT would require ETI to negotiate with the Joint TDUs despite ETI representing approximately 6% of the meters. Further, even with clarifying updates to SMT's FAQs, ETI would expect some customer confusion and/or concern with respect to the SMT website and its functionality relative to ETI's My Account Online that customers already use currently and to the CEP once it is implemented. ETI understands that SMT was developed in order to provide retail customers with a convenient and secure repository of meter information, but ETI's participation in SMT would have the effect of undermining that purpose by increasing confusion for customers and third parties.

While, based on discussions among ETI and SMT personnel to address such differences, it may be feasible for ETI to join SMT by using such workarounds as treating ETI as both the "TDSP" and "REP of Record" with regard to its customers for purposes of the SMT systems, ETI remains concerned that the differences between the markets will be a continuing source of confusion for customers and the third parties. ETI also expects it would require a continuing effort to explain the distinctions between ERCOT and the ETI service area to customers and third parties using SMT. ETI further notes that, although other electric utilities in ERCOT have deployed advanced meters (such as the Austin and San Antonio municipally-owned utilities and electric cooperatives such as Denton County Electric Cooperative and Pedernales Electric Cooperative), none of them utilizes the SMT web portal.

D. Summary

In sum, joining SMT solely to enable third parties to have access to ETI customer AMS meter data would be significantly more costly for ETI and its customers than using the CEP as planned. Use of the SMT also has the potential to result in customer confusion on an ongoing basis. As further detailed below, the data access that customers and third parties will have under the CEP will meet or exceed all applicable requirements and be provided in an industry-standard format. Accordingly, ETI recommends that it not be directed to participate in SMT.

[9] *See* https://smartmetertexas.com/CAP/public/home/home_faq.html (last visited October 2, 2018).

III. What changes, if any, should be made to ETI's web-based customer interface?

As indicated in the introduction above, 16 TAC §§ 25.130(g)(1)(E) and (j) provide a number of requirements for customer access to AMS data. ETI's web-based customer interface is being updated in conjunction with the AMS deployment and will meet or exceed all applicable requirements. As ETI witness Hugh Vernon Pierce explained in his direct testimony in Docket No. 47416, "The customer web portal will provide customers access to their interval data (on a day-after basis), and it will have functionality that allows customers to download their AMS data in an industry-standard file format and then share that file with whomever they choose (e.g., Green Button Download My Data)."

The Commission's final order in Docket No. 47416 affirmed the Company's plans for its customer web portal in Findings of Fact 78-83:

> 78. ETI's AMS deployment plan contemplates providing AMS data and enhanced tools to its customers via a web-based customer interface developed for ETI and its customers.
>
> 79. ETI's AMS will support providing usage data for residential, commercial, and industrial accounts in at least 15-minute intervals that will be available to customers on ETI's web-based customer interface the next day.
>
> 80. The web-based customer interface proposed in ETI's application is reasonable, subject to determinations contemplated in finding of fact 83. ETI's web-based customer interface meets the functionality requirements of 16 TAC § 25.130(g)(1), as modified by any waivers granted to ETI.
>
> 81. The estimated capital costs and estimated annual operation and maintenance costs included in ETI's AMS surcharge to develop, implement, operate, and maintain ETI's web portal are reasonable. Such costs shall be subject to reconciliation under 16 TAC § 25.130(k)(6).
>
> 82. ETI's AMS surcharge models include approximately $0.5 million in estimated costs for administering its web-based customer interface.
>
> 83. The issue of whether ETI should participate in Smart Meter Texas, make subsequent modifications to its web-based customer interface, and the manner in which ETI will address issues of third-party access to AMS data, will be deferred to a future proceeding.

Consistent with the Company's testimony and Commission's final order in Docket No. 47416, the CEP will make a customer's meter usage data available to that customer pursuant to GBD standards.

The Green Button initiative, which has resulted in both GBD and GBC, is detailed on the United States Department of Energy website as follows:[10]

> The Green Button initiative is an industry-led effort that responds to a White House call-to-action to provide utility customers with easy and secure access to their energy usage information in a consumer-friendly and computer-friendly format. Customers are able to securely download their own detailed energy usage with a simple click of a literal "Green Button" on electric utilities' websites. . . .
>
> With their own data in hand, consumers can take advantage of a growing array of online services to help them manage energy use and save on their bills. Voluntary adoption of a consensus industry standard by utilities and companies across the country both enables and incentivizes software developers and other entrepreneurs to build innovative applications, products and services which will help consumers manager energy use . . . .
>
> Adoption of the Green Button data standard will also benefit utilities that receive numerous requests for data, are administering energy efficiency programs, are looking for avenues for greater customer engagement, and in many other ways. . . .
>
> The Green Button initiative was officially launched in January 2012. To date, a total over 50 utilities and electricity suppliers have signed on to the initiative. In total, these commitments ensure that over 60 million homes and businesses will be able to securely access their own energy information in a standard format. This number will continue to grow as utilities nation-wide voluntarily make energy data more available to their customers in this common, machine-readable format. . . .
>
> Green Button is based on the Energy Services Provider Interface (ESPI) data standard released by the North American Energy Standards Board (NAESB) in the fall of 2011. The data standards development process was facilitated by the Smart Grid Interoperability Panel, a public private partnership that is facilitated by the National Institute of Standards and Technology (NIST).
>
> The ESPI standard consists of two components: 1) a common XML format for energy usage information and 2) a data exchange protocol which allows for the automatic transfer of data from a utility to a third party based on customer

[10] *See* https://www.energy.gov/data/green-button (last visited October 2, 2018).

> authorization. All of the utilities that have committed to Green Button will implement the common XML data format in an easy to download manner. . . .
>
> The Green Button data standard is flexible enough to handle different types of energy data and time interval usage, and applications are being developed for both residential and commercial customers. The data can be provided in 15-minute, hourly, daily, or monthly intervals depending on what a utility decides to make available and what level of detail they are able to provide. . . .
>
> Many utilities are implementing *Green Button Download My Data* which means that the utility customer can download their own energy consumption data directly to their own computer, and if they so choose, upload their own data to a third party application. *Green Button Connect My Data* is a new capability which allows utility customers to automate the secure transfer their own energy usage data to authorized third parties, based on affirmative (opt-in) customer consent and control. . . .
>
> Green Button is consistent with current privacy and security practices, since customers have to first authenticate themselves on a utility portal with a login and password before they see and download their own information.

As part of its CEP, ETI will implement GBD consistent with the format and data standards identified above. By using GBD on the CEP to enable customer access to their AMS data, ETI will meet the applicable requirements of the Commission rules regarding the customer interface. Although development and deployment of the CEP is continuing, ETI has not identified any changes that are needed at this point.

IV. Whether and to what extent ETI should provide third-party direct access to customer AMS data?

As indicated in the introduction above, 16 TAC §§ 25.130(j) provides a number of requirements for third-party access to authorized AMS data. For example, 16 TAC §§ 25.130(j)(1) requires that "An electric utility shall provide a customer, the customer's REP, and other entities authorized by the customer read-only access to the customer's advanced meter data, including meter data used to calculate charges for service, historical load data, and any other proprietary customer information. The access shall be convenient and secure, and the data shall be made available no later than the day after it was created."

ETI witness Hugh Vernon Pierce explained in his direct testimony in Docket No. 47416 that "[w]ith respect to third-party direct access to customer AMS data, the Company is still

exploring the various methods by which such access might be feasible (*e.g.,* Green Button Connect My Data), as well as studying the related privacy and data security aspects of providing third-party direct access. I understand that these issues have been the subject of considerable study and testing in the ERCOT market, which as discussed above, differs considerably from ETI's retail operating environment, and ETI requests that it similarly be afforded time to study the implications of third-party direct access with respect to its AMS deployment and associated development of its customer web portal."

The Commission's final order in Docket No. 47416 addressed third-party access issues as follows in Finding of Fact 82: "the manner in which ETI will address issues of third-party access to AMS data, will be deferred to a future proceeding." As noted above, Ordering Paragraph 6 of the Commission final order in Docket No. 47416 directed ETI to initiate a proceeding to address the third-party access issue.

Since the time of the Commission's final order in Docket No. 47416, ETI has continued to analyze the issue and has concluded that the use of GBC to enable third-party access to authorized customer data is reasonable and feasible. Accordingly, ETI is addressing third-party access issues through the implementation of GBC. As explained above, GBC allows utility customers to automate the secure transfer of their own energy usage data to authorized third parties, based on affirmative (opt-in) customer consent and control. GBC can enable automated transfers of Green Button data from a utility to a third party, but such transfers will happen only if a customer has granted explicit permission. ETI will implement GBC consistent with the format and data standards identified in Section IV above.

In sum, ETI's CEP is designed to satisfy the requirements of 16 TAC §§ 25.130(j), comply with industry security standards, and afford customers with a convenient method by which they can both access and share their meter data.

V. Conclusion

For the many reasons enumerated above, and as further supported by the affidavit included as Attachment C to this report, participation by ETI in SMT should not be required by the Commission. Participation would impose a significant cost on ETI and its customers, and it is not needed for ETI, which already has a web-based interface for retail customers that is being

enhanced (the CEP) to meet the Commission's requirements with regard to AMS data access. Apart from the unnecessary costs, technical workarounds would need to be developed to enable ETI to participate in SMT, and concerns regarding customer confusion would need to be addressed.

ETI's implementation of Green Button Download My Data reasonably addresses the applicable requirements regarding customer access to AMS data, and ETI's implementation of Green Button Connect My Data reasonably addresses the applicable requirements for third-party access to authorized customer data. In doing so, ETI's CEP will provide ETI customers with the same third-party data access functionality as SMT at a far lower cost and while avoiding unnecessary confusion and technical challenges.

Capability	Description
Alerts	There are thresholds that the customer can set for various metrics, such as usage and cost in a month, and they are alerted when those thresholds are exceeded.
Appliance vendors and others where required	Based on Energy Efficiency offerings ETI will be recommending Energy Star rated appliances.
Bill Compare (w/i premise)	This compares customer accounts at the same location. A customer will be able to compare their house to their shop over the same time period.
Bill Compare (with neighbors)	This compares a customer's house to similar houses in their general area. It will advise the customer if they are an efficient user or not compared to similar houses close by.
Bill Presentment	This will show the customer the various line items on the monthly bill.
Bill Projection	This projects the monthly bill based on parameters such as the customer's electricity rate, weather, and days left in the billing period.
Contractor Market Signup/Edit/Bidding	This dovetails with the appliances where ETI has recommended contractors to install equipment or where ETI has planned to launch an offering and needs contractors to provide a bid.
Contractor Portal	Entry point for contractors to become part of ETI's offering.
Customer Support Tools	Provides a central location for customers to contact for different activities in which they are participating or would like to participate (i.e. FAQs, videos).
Dashboard	At a glance view of customer-related information to provide key highlights about their energy usage and offerings.
Dashboard/ Widgets	Widgets are small information tiles that provide easy access to customer data and ETI offerings. The dashboard is composed of widgets.
Detail of Measures	Explains units of measure: kWh, kW, CCF, etc.
Disaggregation	This breaks down the customer's usage by type: Lighting, Heating/Cooling, etc.
Energy Action Plan	Set of recommended activities a customer will perform to meet their energy goals.
Energy Inputs - Consumer/Short Form	Questionnaire that a customer completes to provide better data for CEP to make better recommendations.
Energy Inputs - Pro/Field Tools	Questionnaire that a contractor completes to provide better data for the CEP to make better recommendations.
Energy Tips	Recommendation that the CEP provides to the customer to become more efficient in their energy usage.
Global preference mgmt. system	Central location that allows the customer to manage their preferences for all of their communications.
Green Button Download	National standard that allows customers to download their energy usage data.
Home Utility Report	Summary Report for a user's consumption to similar premises and provides recommendations and information about programs that may help them.

Capability	Description
Home/business premise data services	Additional data sources that enrich the quality of personalized recommendations (sq. ft., age and shape of house etc....).
Job Scheduling/Management	Part of the Contractor Portal used by ETI and contractors to manage contractor work schedule.
Landing/Welcome Page	The first screen a customer will see when accessing the CEP.
Manage Marketplaces	Administration screen to manage the entire marketplace within the platform equipment, rebate, and contractor marketplace.
Managing multiple accounts per premise	Allows customers to select multiple account to compare against each other.
Marketing Platform (Research/Targeting)	Leverages existing functionality around engaging customers with surveys and action items to measure the customers' involvement in managing their energy usage.
Monthly billing & usage	Will be displayed on multiple pages in different formats.
My Account	This is the legacy My Account Online (existing transactional type features) that will be paired with the CEP in a seamless experience.
My Goal	Allows the customer to set and track progress of energy goals.
On Demand Read (ODR)	This will allow the customer retrieve an on demand read near real time.
Pages / Content Management	This is an administrative feature that allows ETI to manage the content and layout of the site.
Personalized email instrument	Channel to provide the customer with information about their profile through email.
Personalized IVR instrument	Channel to provide the customer with information about their profile through IVR.
Personalized paper instrument	Channel to provide the customer with information about their profile through a mailer.
Personalized SMS/phone instrument	Channel to provide the customer with information about their profile through text.
Rebate Marketplace	Centralized platform to manage all rebates that may be provided by ETI to the customer.
Admin Reporting	Management tools ETI may use to view site traffic and other metrics.
Roles and Users	Gives ETI the ability to assign user profiles.
Single Sign On (SSO)	ETI is integrating SSO with other tools and plan to have a SSO that will allow the customer access any ETI solution requiriung a log on in a seamless experience.
Timeline	Activity log for any changes made on the platform associated with the customer account.
Usage / Cost Presentment	Usage presentment displays interval and register data based on actual consumption. Cost presentment is based on rate & various riders and their cost. This is presented at a summary level, while details are within the bill presentment.
Weather service	ETI will present a weather overlay, so the customer can view how the temperature may impact usage.

Capability	Description
Green Button Connect	National standard that allows customers to grant third party access to their data.
Peak Notification Email	This is a voluntary behavioral demand response notification where ETI reaches out to customers in targeted geographical areas on "peak events or high priced days" and requests customers engage in electricity conservation. ETI would also provide education to the customer on how to do this. This is completely voluntary, and ETI will not be offering incentives to participate.
Rate Compare	A tool where one rate can be compared to other available rates.

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Lewisville, TX 75067
O (214) 222-4135

October 1, 2018

Mr. Everett Britt
Duggins Wren Mann & Romero, LLP
600 Congress Avenue, 19th Floor
Austin, Texas 78767

Dear Mr. Britt:

As you requested, this letter identifies the estimated costs that Entergy Texas would incur to participate in the Smart Meter Texas™ ("SMT") portal that is currently provided under the Joint Development and Operations Agreement ("JDOA") dated December 31, 2008. Oncor, CenterPoint Energy, AEP Texas, and TNMP own and manage SMT as a joint venture that is governed by the JDOA.

Under the terms of the JDOA, cost sharing is based on each party's pro-rata share, which is calculated each June 30 by dividing the number of a party's customers whose accounts will be presented in SMT by the total customer accounts presented in SMT. Assuming that Entergy has approximately 475,000 customers with advanced meters that could be presented through SMT, Entergy's pro rata share would be approximately 6.06 percent.

Under the JDOA, Entergy Texas would be required to reimburse all existing JDOA parties an amount equal to the new party's pro rata share for all project costs previously paid by JDOA parties. We estimate that for Entergy Texas to join the JDOA at the end of 2018, the one-time cost would be approximately $7.7 million.

Entergy Texas would also be responsible for its pro-rata share of annual ongoing SMT-related costs, which are currently expected to average less than $10 million per year. Assuming a pro-rata share of 6.06 percent, Entergy Texas' share of those annual costs would be approximately $600,000 per year.

Please let me know if you need any additional information.

Sincerely,

Bobby Roberts
On behalf of the SMT Management Committee

AFFIDAVIT OF RODNEY W. GRIFFITH

THE STATE OF Louisiana §
§
Parish OF Orleans §

BEFORE ME, the undersigned authority, on this day personally appeared Rodney W. Griffith, who is personally known by me, and first being duly sworn, on oath deposed as follows:

1. "My name is Rodney W. Griffith. I am over 17 years of age, of sound mind, and capable of making this affidavit. I have personal knowledge of the matters set forth in this application. I am currently employed by Entergy Services, Inc. as Director, AMI Implementation. I am qualified and authorized to represent the following on behalf of Entergy Texas, Inc.
2. All information provided, statements made, and matters set forth in the preceding report and attachments thereto are true and correct to the best of my knowledge.
3. Certain information has been redacted from the preceding report because it contains commercially sensitive pricing information that is maintained confidentially by ETI, is not made available for public disclosure, and even within ETI, is only made available for review by those employees whose job duties require knowledge of the pricing information. Accordingly, this pricing information should be maintained as highly sensitive information in this case because it is commercially sensitive financial information and public disclosure of the information could lead to an unreasonable risk of competitive harm to ETI and its suppliers."

Rodney W. Griffith

Rodney W. Griffith.

SUBSCRIBED AND SWORN TO BEFORE ME by the said Rodney W. Griffith this 4 day of October 2018.

Notary Public in and for
the State of Louisiana

Dana Dallas Atchison-La. Bar No. 25977
Notary Public for the State of Louisiana
My commission expires upon death