

Control Number: 48745



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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 §

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OF TEXAS FILING CLERK

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-7**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Entergy Texas, Inc. (ETI) by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

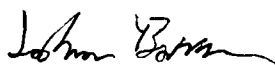
Dated: December 11, 2018

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on December 11, 2018 in accordance with 16 TAC § 22.74.



Joshua Adam Barron

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-7**

DEFINITIONS

- A. "ETI," or "you" refers to Entergy Texas, Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-7**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-7**

- STAFF 3-1** Please provide a complete list of all the meter data ETI plans to provide to a competitive service provider (CSP) authorized by the customer if the Commission approves the company's request to implement Green Button Connect My Data on its CEP. Confirm or deny that ETI plans to provide access to a customer's fifteen minute interval data to a CSP authorized by the customer.
- STAFF 3-2** Does ETI plan to limit the duration of customer authorization of CSP access to meter data consistent with the limits for residential and nonresidential customer authorization approved in Docket No. 47472?
- STAFF 3-3** If ETI's response to STAFF 3-2 is negative, please explain why ETI proposes limits to the duration of customer authorization of CSP access to meter data that differ from that approved in Docket No. 47472.
- STAFF 3-4** Refer to ETI's response to STAFF 2-7. Please provide the proposed time gap between Release 1 and Release 2.
- STAFF 3-5** Does ETI plan to provide customers with the ability to use Green Button Connect My Data to authorize CSP access to their data during Release 1?
- STAFF 3-6** If the answer to STAFF 3-5 is negative, please explain why that capability will not be offered during Release 1.
- STAFF 3-7** Please furnish a copy of the contract that includes the Statement of Work that ETI has entered into with its vendor to upgrade ETI's CEP to provide the Green Button Download My Data and Green Button Connect My Data functionality.