



Control Number: 48745



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DOCKET NO. 48745

COMPLIANCE FILING OF ENTERGY §
TEXAS, INC. RELATING TO §
PARTICIPATION IN SMART METER §
TEXAS AND CHANGES TO ITS §
ADVANCED METERING SYSTEM §

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OF TEXAS
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**MISSION:DATA COALITION'S FIRST REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC. (ETI)**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, Mission:data Coalition (Mission:data) 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 78712.

Date: December 21, 2018

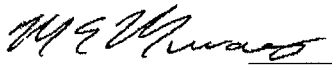
Respectfully submitted,



Michael Murray, President
Mission:data Coalition
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(510) 910 2281

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all parties on December 21, 2018 by U.S. First-Class Mail, hand delivery or electronic mail.

By: 

Michael Murray

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TEXAS, INC. RELATING TO	§	
PARTICIPATION IN SMART METER	§	OF TEXAS
TEXAS AND CHANGES TO ITS	§	
ADVANCED METERING SYSTEM	§	

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.

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Mission:data 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) Mission:data requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

**MISSION:DATA COALITION'S FIRST REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC. (ETI)**

QUESTIONS M:d1-1 THROUGH M:d1-7

M:d 1-1

See ETI's response to Staff 2-1(c), "The GBC [Green Button Connect] standard protects a customer's information by removing from view the customer's account number, address, and name."

- (a) Please confirm or deny Entergy's knowledge of "RetailCustomer" as part of the GBC standard.
- (b) Please provide all information as to how ETI will support RetailCustomer and what customer information will be provided by GBC, aside from usage data.
- (c) Please explain how multi-site customers, such as retail stores, are to use GBC if there is no location information to associate energy usage with a particular site.
- (d) If ETI only provides usage information via GBC, please explain how customers are to share monthly bill costs with Competitive Service Providers (CSPs) to receive assistance in managing utility costs.

M:d 1-2

Please see ETI's addendum #1 to Staff 2-1.

- (a) Addendum #1 describes the user initiating a GBC authorization on ETI's website (Bates page 8). Please explain how ETI will comply with RFC6749 Section 1.3.1 ("OAuth") that allows initiating a GBC authorization from the CSP's website. For more information, see <https://tools.ietf.org/html/rfc6749#section-1.3.1>.

- (b) Can a customer authorize multiple CSPs simultaneously?
- (c) Please provide detail on the customer experience if the customer has 10 or more meters.

M:d 1-3

- (a) Will ETI seek certification for its GBC system from the Green Button Alliance?
- (b) If the answer to (a) is no, how does ETI propose to substantiate its claims to the Commission that its implementation adheres to the GBC standard?

M:d 1-4

- (a) Please provide the requirements for customers to create an online account at ETI's website.
- (b) Are customers required to receive bills electronically as a condition of creating an online account?
- (c) How can customers without an online account utilize GBC?

M:d 1-5. If, for some reason, ETI's GBC system fails to provide the previous day's interval usage data to an authorized CSP, what is ETI's approach to provide technical support and to remedy the situation?

M:d 1-6.

- (a) What uptime percentages will ETI meet for its GBC system, as calculated on a monthly basis?

- (b) What contractual requirement does ETI have with its vendor about GBC system uptime?
- (c) What process does ETI propose for remedies should its GBC system uptime fall below expectations? Please provide detail.

M:d 1-7.

- (a) Please provide copies of all Letters of Authorization, account information request forms, or any other documents ETI uses today for customers of any type to request that account, billing or usage information be transferred to a third party.
- (b) For the processes disclosed in (a), please describe in detail how the resulting information is transferred from ETI to the third party.