

Control Number: 48745



Item Number: 38

Addendum StartPage: 0

DOCKET NO. 48745
SOAH DOCKET NO 473-19-1041

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

**MISSION:DATA COALITION'S SECOND 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.

RECEIVED
2019 FEB -8 PM 2:25
PUBLIC UTILITY COMMISSION
FILING CLERK

Date: February 8, 2019

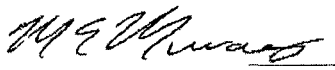
Respectfully submitted,



Michael Murray, President
Mission:data Coalition
1752 NW Market Street #1513
Seattle, WA 98107
michael@missiondata.io
(510) 910 2281

DOCKET NO. 48745
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all parties on February 8, 2019 by U.S. First-Class Mail, hand delivery or electronic mail.

By: 

Michael Murray

DOCKET NO. 48745

COMPLIANCE FILING OF ENTERGY	§	PUBLIC UTILITY COMMISSION
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 SECOND REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC. (ETI)**

QUESTIONS M:d 2-1 THROUGH M:d 2-5

M:d 2-1

See ETI's response to M:d 1-1(c), in which ETI states, "The usage data and meter account are on a one-to-one relationship, so a customer with multiple retail stores, for example, would have access to the usage data associated with each meter account." Suppose a retail customer has 10 locations in ETI's service territory, each with one meter. Please explain in detail how, given ETI's proposed Green Button Connect system, a customer-authorized Competitive Service Provider (CSP) will identify which of the 10 meters' usage is associated with a given premise. How does the CSP understand which meter is which?

M:d 2-2

See ETI's response to M:d 1-1(a), in which ETI states, "Further, ETI understands that adding a Green Button Retail Customer Schema certification is still a work-in-progress of the Green Button Alliance and that no standard has been adopted. Accordingly, ETI does not intend to implement a Green Button Retail Customer Schema at this time."

(a) Please describe in detail any functionality ETI intends to provide in its Green Button Connect system that extends or goes "above and beyond" the current-available certification tests provided by the Green Button Alliance.

(b) Please describe in detail any functionality ETI intends to provide in its Green Button Connect system that would fail any currently-available certification test provided by the Green Button Alliance.

M:d 2-3

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

- (a) What version of OAuth will ETI's Green Button Connect system support?
- (b) Please describe in detail what specific features of OAuth will and will not be present in ETI's Green Button Connect system.
- (c) Please describe in detail how the CSP is to receive an access token in the Authorization Code Grant pursuant to IETF RFC6749 Section 4. See <https://tools.ietf.org/html/rfc6749#section-4.1>.
- (d) Will ETI's Green Button Connect system support the CSP's ability to get a re-authorized access token if the original token is lost? If so, please explain in detail.
- (e) See ETI's addendum #1 to Staff 2-1 at Bates Page 12. To what website is the customer redirected after the customer clicks "submit"? The utility's website? The CSP's website?

M:d 2-4

Please see ETI's response to M:d1-7(a) and (b) concerning Letters of Authorization. Without conducting a special study, how many such authorizations did Entergy process on behalf of its customers:

- (a) in 2018?
- (b) in 2017?

M:d 2-5

Please see ETI's response to Staff 2-2 ("...ETI will work with its CEP vendor, which has implemented GBC for other utilities in the country.") Please provide a list of those utilities.