



Control Number: 48745



Item Number: 42

Addendum StartPage: 1

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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PUBLIC UTILITY COMMISSION

OF TEXAS

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FILED
CLERK

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-14**

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.

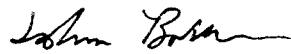
Dated: March 14, 2019

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
Managing Attorney

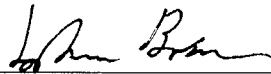


Joshua Adam Barron
State Bar No. 24087146
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7235
(512) 936-7268 (facsimile)
Joshua.Barron@puc.texas.gov

DOCKET NO. 48745

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on March 14, 2019 in accordance with 16 TAC § 22.74.



Joshua Adam Barron

DOCKET NO. 48745

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-14**

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.

DOCKET NO. 48745

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-14**

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.

QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-14

STAFF 4-1 See response to Staff RFI 3-2. Please provide a proposed list of all the meter data ETI plans to provide to a competitive service provider (CSP) authorized by the customer to view his/her premise data.

For the questions listed below, please refer to Docket No. 47472, *Commission Staff's Petition to Determine Requirements for Smart Meter Texas*, Attachment 1 to the Final Order, SMT 2.0 Business Requirements.

STAFF 4-2 Please refer to SMT 2.0 Business Requirements numbers 1-12 and 167-172, which relate to account management and administration. Please list and describe all of ETI's proposed requirements that relate to account management and administration. Please note all the similarities and disimilarities to the above mentioned SMT 2.0 Business Requirements. If ETI believes that a particular SMT 2.0 Business Requirement is not applicable, please explain why .

STAFF 4-3 Please refer to SMT 2.0 Business Requirements numbers 13-14, which relate to ad hoc data queries and numbers 123-127 and 189, which relate to batch queries. Please list and describe all of ETI's proposed requirements that relate to ad hoc data queries and batch queries. Please note noting the similarities and disimilarities to the above mentioned SMT 2.0 Business Requirements. If ETI believes that a particular SMT 2.0 Business Requirement is not applicable , please explain why .

STAFF 4-4 Please refer to SMT 2.0 Business Requirements numbers 15-50, 144-152 and 190, which relate to customer data management. Please list and describe all of ETI's proposed requirements that relate to customer data management. Please note the similarities and disimilarities to the above mentioned SMT 2.0 Business Requirements. If ETI believes that a particular SMT 2.0 Business Requirement is not applicable, please explain why .

STAFF 4-5 Please refer to SMT 2.0 Business Requirements numbers 51-65, which relate to web portal performance. Please list and describe all of ETI's proposed requirements that relate to web portal performance. Please note the similarities and disimilarities to the above mentioned SMT 2.0 Business Requirements. If ETI believes that a particular SMT 2.0 Business Requirement is not applicable , please explain why .

STAFF 4-6 Please refer to SMT 2.0 Business Requirements numbers 66-72, which relate to reporting. Please list and describe all of ETI's proposed requirements that relate to reporting. Please note the similarities and disimilarities to the above mentioned SMT 2.0 Business Requirements. If ETI believes that a particular SMT 2.0 Business Requirement is not applicable to ETI, please explain why .

STAFF 4-7 Please refer to SMT 2.0 Business Requirements numbers 73-111 and 176-187, which relate to CSP data access and registration. Please list and describe all of ETI's proposed requirements that relate to CSP data access and registration. Please note the similarities and disimilarities to the above mentioned SMT 2.0 Business Requirements. If ETI believes that a particular SMT 2.0 Business Requirement is not applicable , please explain why .

- STAFF 4-8** Please refer to SMT 2.0 Business Requirements numbers 153-158, which relate to general solutions. Please list and describe all of ETI's proposed requirements that relate to general solutions. Please note the similarities and disimilarities to the above mentioned SMT 2.0 Business Requirements. If ETI belives that a particular SMT 2.0 Business Requirement is not applicable , please explain why .
- STAFF 4-9** Please refer to SMT 2.0 Business Requirements numbers 159-166, which relate to help functionality. Please list and describe all of ETI's proposed requirements that relate to help functionality noting the similarities and disimilarities to the SMT 2.0 Business Requirements. If a particular SMT 2.0 Business Requirement is not applicable to ETI, please explain why it is not applicable.
- STAFF 4-10** Please refer to SMT 2.0 Business Requirements numbers 173-175, which relate to security management. Please list and describe all of ETI's proposed requirements that relate to security management noting the similarities and disimilarities to the SMT 2.0 Business Requirements. If a particular SMT 2.0 Business Requirement is not applicable to ETI, please explain why it is not applicable.
- STAFF 4-11** Please list and describe all of ETI's proposed requirements for Home Area Network functionality.
- STAFF 4-12** Please provide all of ETI's proposed terms and conditions for its Customer Engagement Portal (CEP).
- STAFF 4-13** Please describe how ETI will detect CSP "red-flag" behavior on its CEP. What action(s) does ETI plan to take once suspicious activity is confirmed?
- STAFF 4-14** Please describe the process for a customer to renew a data-sharing relationship with a CSP after the customer authorization expires.