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SOAH DOCKET NO. 473-19-1841  
PUC DOCKET NO. 48745

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

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BEFORE THE STATE OFFICE  
OF PUBLIC UTILITY COMMISSION  
ADMINISTRATIVE HEARINGS

OFFICE OF PUBLIC UTILITY COUNSEL'S FIRST REQUEST  
FOR INFORMATION TO ENTERGY TEXAS, INC.

The Office of Public Utility Counsel (OPUC) files and submits this First Request for Information to Entergy Texas, Inc. (Entergy) in the captioned proceeding.

Under Commission Procedural Rules 22.141-.145, 16 Tex. Admin. Code Ch. 22, OPUC requests that Entergy, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

**Definitions**

As used in this introduction and in these questions,

- (1) "Entergy", "ETI", and "Company" refer to Entergy Texas, Inc. and its affiliates;
- (2) "You", "yours" and "your" refer to Entergy (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
- (3) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of

consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.
6. If any question appears confusing, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.
9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.
12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
14. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

### **Claim of Privilege**

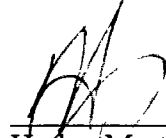
If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

**SOAH Docket No. 473-19-1841**  
**PUC Docket No. 48745**  
**OPUC's First Request For Information To Entergy**

- 1-1.** Does ETI currently have any customers who use a home area network (HAN) device that is connected to an ETI meter? If so, please provide the number of customers.
- 1-2.** Referencing the response to Staff RFI 1-1, please estimate the amount of ETI's advanced metering system (AMS) surcharge that is associated with:
  - a. adding HAN capability and software to advanced meters, and
  - b. designing a process to connect HAN devices to advanced meters.
- 1-3.** Does ETI's AMS have functionality to perform an on-demand read?
- 1-4.** Referencing the response to Staff RFI 4-4, SMT 2.0 Business Requirement number 190 ("24 months of usage data will be available in the CEP."), will ETI's proposed AMS store customer usage data for more than 24 months? If so, what is the length of time that customer usage data will be stored?
- 1-5.** Referencing the response to Staff RFI 4-6, please explain why ETI believes the reporting requirements in SMT 2.0 Business Requirement numbers 66 through 70 are not applicable to ETI or its proposed AMS.
- 1-6.** Referencing the response to Staff RFI 4-7, when will ETI determine its proposed requirements for CSP data access and registration in SMT 2.0 Business Requirement numbers 74, 79, 80, 83, 176, and 183?

April 17, 2019

Respectfully submitted,



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**CERTIFICATE OF SERVICE**  
SOAH Docket No. 473-19-1841  
PUC Docket No. 48745

I hereby certify that today, April 17, 2019, a true copy of the Office of Public Utility Counsel's First Request for Information to Entergy Texas, Inc. was served on all parties of record via hand delivery, facsimile, United States First-Class Mail, or electronic mail.



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Harley Martin