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George Hoyt
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May 27, 2022

Hon. Ross Henderson
Administrative Law Judge
State Office of Administrative Hearings
300 West 15th Street
Austin, Texas 78701

Re: SOAH Docket No. 473-19-1841, PUC Docket No. 48745, *Compliance Filing of Entergy Texas, Inc., relating to Participation in Smart Meter Texas and Changes to its Advanced Metering Systems.*

Dear Judge Henderson:

During the prehearing conference held on January 23, 2019, parties requested to defer the adoption of a procedural schedule in order to discuss a resolution of this case. The parties further agreed to provide monthly status reports on resolution. In SOAH Order No. 2 memorializing the prehearing conference, parties were ordered to provide a status report by February 28, 2019, and the last day of each month thereafter until further ordered.

Pursuant to Order No. 2, the parties have been holding periodic discussions and working jointly on protocols that specify the functional and technical requirements of a solution that would resolve this matter. Pursuant to Order No. 3, the ALJ required ETI to provide a summary of any information provided to the Commission at the May 12, 2022 Open Meeting and to inform the ALJ of any subsequent action that the Commissioners required at that Open Meeting. Attached is ETI's Progress Report that was filed in Docket No. 48745 on May 10, 2022. The Progress Report provides more details on the activities in this proceeding to date. The Commissioners briefly discussed the Progress Report at the May 12 Open Meeting and did not require any further action.

The parties continue to circulate and discuss the settlement documents referenced in the Progress Report. The parties will provide their next status report or file the settlement package by the end of June 2022. Accordingly, the parties request the continued deferral of a procedural schedule in this case.

Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'George Hoyt', written over a horizontal line.

Assistant General Counsel
Entergy Texas, Inc.

cc: PUCT Filing Clerk

**SOAH DOCKET NO. 473-19-1841
PUCT DOCKET NO. 48745**

COMPLIANCE FILING OF ENTERGY TEXAS, INC. RELATING TO PARTICIPATION IN SMART METER TEXAS AND CHANGES TO ITS ADVANCED METERING SYSTEM	§ § § § §	STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**PROGRESS REPORT IN RESPONSE TO APRIL 21, 2022 OPEN MEETING
DISCUSSION**

Entergy Texas, Inc. (“ETI”) files this Progress Report in Response to the April 21, 2022 Open Meeting Discussion regarding this docket.

I. BACKGROUND

On December 14, 2017, the Commission issued a final order in Docket No. 47416 approving ETI’s application for approval of its AMS Deployment Plan consistent with the stipulation and settlement agreement of the parties.¹ Ordering Paragraph No. 6 required ETI to initiate a proceeding within 90 days of a final order in Docket No. 47472, which was associated with revised Smart Meter Texas business requirements.² The scope of the proceeding required by Ordering Paragraph No. 6 in Docket No. 47416 is to “address whether and to what extent ETI will participate in Smart Meter Texas; what change, if any, should be made to ETI’s web-based customer interface; and whether and to what extent ETI should provide third-party direct access to customer AMS data.” A final order was issued in Docket No. 47472 on July 12, 2018.

On October 9, 2018, ETI made a Compliance Filing addressing the issues identified in Order No. 6. In the report attached to ETI’s Compliance Filing, ETI reported that it was committed to

¹ *Application of Entergy Texas, Inc. for Approval of Advanced Metering System (AMS) Deployment Plan, AMS Surcharge, and Non-standard Metering Service*, Docket No. 47416 (Dec. 14, 2017).

² *Commission Staff’s Petition to Determine Requirements for Smart Meter Texas*, Docket No. 47472 (Jul. 12, 2018). ETI does not participate in and is not affiliated with Smart Meter Texas. Smart Meter Texas is operated by the ERCOT transmission and distribution utilities (“TDUs”).

implementing Green Button Connect My Data (“GBC”) as its third-party data sharing platform and presented evidence that ETI participating in SMT was neither cost-effective nor appropriate.

This matter was subsequently referred to the State Office of Administrative Hearings (“SOAH”). The Commission’s February 7, 2019 Preliminary Order identified the following four issues to be addressed: (1) whether ETI should be required to participate in SMT, and if so, how, if at all, should ETI’s participation differ from the participation of other transmission and distribution utilities currently participating in SMT; (2) if ETI is not required to participate in SMT, whether its web-based customer interface complies with PURA § 39.107 and 16 TAC § 25.130; (3) whether any additional changes should be made to ETI’s web-based customer interface to comply with Commission rules; and (4) whether ETI’s proposal to provide third-party direct access to its customers’ AMS data through Green Button Connect My Data is reasonable and in accordance with industry security standards and Commission rules.³

II. PROGRESS REPORT

During the January 23, 2019 prehearing conference at SOAH, the parties requested to defer adoption of a procedural schedule due to a consensus belief that resolution of this matter could best be accomplished through collaboration and settlement. Over the course of the last several years, ETI responded to numerous formal and informal requests for information (“RFIs”) and hosted numerous in-person and video conference meetings with the parties regarding the development and design of ETI’s third-party data access platform. Through those RFIs and meetings the parties have developed:

1. Terms and Conditions that would apply to customer and third-party use of the GBC platform.
2. Monthly reporting metrics so that the PUCT and parties can monitor performance

³ Note that 16 TAC § 25.130 was revised effective May 15, 2020.

of the Company's AMS web portal, including the GBC platform.

3. Detailed technical web portal and data-sharing protocols, which are in a format similar to the SMT business protocols.

Simultaneously, ETI and its web portal vendor have engaged in numerous meetings with the Green Button Alliance ("GBA"), which is the entity that tests to ensure compliance with the North American Energy Standards Board ("NAESB") Energy Service Provider Interface (the "Green Button Standards"),⁴ and the GBA's governing body, the OpenADE,⁵ to discuss the technical features, applicability, and testing requirements for the various "Function Blocks" that underlie the Green Button Standards, and which were revised effective January 2020. ETI also provided substantial assistance to the GBA in developing the "testing harness" through which testing for compliance with the Green Button Standards is conducted by the GBA.

ETI recently circulated the most recent revisions to a full set of settlement documents to the parties, including the collaboratively-developed Terms and Conditions, reporting metrics, and protocols described above. ETI is hopeful the parties will achieve consensus and that the documents described above may be presented to the Commission in the near future as part of a unanimous settlement agreement.

⁴ https://www.naesb.org/ESPI_Standards.asp.


⁵ <https://www.greenbuttonalliance.org/openade>.

Respectfully submitted,

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ATTORNEYS FOR ENTERGY TEXAS, INC.

By: 
George G. Hoyt

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all active parties of record in Commission Docket No. 48745 and SOAH Docket No. 473-19-1841 on May 10, 2022, by email, hand-delivery, first class mail, or overnight delivery.


George G. Hoyt