



Control Number: 48745



Item Number: 9

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DOCKET NO. 48745

COMPLIANCE FILING OF ENTERGY	§	PUBLIC UTILITY COMMISSION
TEXAS, INC. IN RESPONSE TO	§	
ORDERING PARAGRAPH 6 OF THE	§	OF TEXAS
FINAL ORDER IN DOCKET NO. 47416	§	

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-8**

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.

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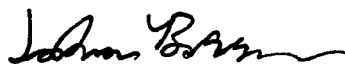
Dated: November 1, 2018

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on November 1, 2018 in accordance with 16 TAC § 22.74.



Joshua Adam Barron

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-8**

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.

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-8**

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.

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TO ENTERGY TEXAS, INC. (ETI)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-8**

- STAFF 2-1** Please provide an overview of Green Button Connect My data ("GBC") that describes:
- a) the steps a customer must take in order to authorize a competitive service provider ("CSP") direct access to their meter data through ETI's Customer Engagement Portal ("CEP");
 - b) the process a customer must take to terminate a data sharing agreement with a CSP; and
 - c) a description of how the GBC standard protects a customer's information.
- STAFF 2-2** Please provide all information ETI will require from a CSP prior to permitting a CSP to access ETI's CEP to obtain customer meter data authorized by a customer.
- STAFF 2-3** Please confirm or deny that ETI plans to inform a customer that if they authorize access to their electricity information they should contact the CSP to understand how the CSP will use, collect, store, share, and/or disclose their information to others.
- STAFF 2-4** Does ETI have terms and conditions that CSPs must agree to in order to access customer data from the CEP? If not, why not?
- STAFF 2-5** If the answer to STAFF 2-4 is affirmative, please provide the terms and conditions.
- STAFF 2-6** Does ETI plan to require CSPs to have privacy policies in place in terms of how they will utilize customer information before CSPs are allowed to access customer data from the CEP?
- STAFF 2-7** Refer to the SMT 2.0 Business Requirements approved in the final order of Docket No. 47472.¹ Please list and explain all similar requirements that ETI plans to implement in its CEP.
- STAFF 2-8** Please list and explain all requirements that ETI plans for its CEP in addition to those listed in the company's response to STAFF 2-6 and not listed in ETI's Attachment A to its compliance filing.

¹ See *Commission Staff's Petition to Determine Requirements for Smart Meter Texas*, Docket No. 47472, Ordering Paragraph No. 1 (Jul. 12, 2018).