

PUC PROJECT NO. 46206

RULEMAKING REGARDING § PUBLIC UTILITY COMMISSION
GOVERNANCE, PERFORMANCE, AND §
FUNDING OF SMART METER TEXAS § OF TEXAS

COMMENTS OF THE MISSION:DATA COALITION, INC.



1. Introduction

The Mission:data Coalition, Inc. (“Mission:data”) is pleased to provide these comments on the above-mentioned Public Utility Commission of Texas (“PUC”) Project 46206 regarding Smart Meter Texas. Mission:data is a coalition of more than 40 technology companies delivering consumer-focused energy services and solutions and representing over \$1 billion/year in energy management business across North America. Our members, and other entities not operating as retail energy providers (“REPs”), are typically referred to as “Third Parties.” Mission:data believes all consumers should have convenient, electronic access to the best available information about their own electricity use in order to support innovative new data-driven energy management services that can deliver significant energy savings cost-effectively.

Mission:data has a strong interest in the successful operation of Smart Meter Texas (“SMT”) and has been an active participant at the PUC and the Electric Reliability Council of Texas (“ERCOT”) on this topic. Mission:data participated in PUC Project 42786, Review of Advanced Metering Web Portals, and filed comments on October 8th, 2014 and April 1st, 2016. Our representative, Michael Murray, presented at the ERCOT Joint AMS/WMS workshops on July 23rd, 2015 and October 16th, 2015, regarding improvements

to SMT. Below, we provide comments on staff's straw proposal dated October 21st, 2016 (the "Straw Proposal").

2. Annual Commission reviews of SMT functionalities is a positive step forward but needs refinement.

Overall, Mission:data supports the Straw Proposal's concept of annual Commission reviews of SMT functionalities. The current process for any entity seeking to make an improvement or request a new feature of SMT is flawed because participating utilities ultimately have sole decision-making authority to accept or reject any proposed changes. Instead, a Third Party user of SMT should be able to make a case for a new feature in front of a neutral body – in this case, the Commission – about the costs and benefits of the proposed change, and the Commission should evaluate the proposal's merits on several criteria, such as its likelihood to increase customer use of SMT or to improve market operations. Mission:data therefore states its overall support for the Straw Proposal's Section (3).

However, there are several areas where refinement is needed, as shown in Appendix 1. First, subparagraph (iv) should be removed because the presumption should be that there is a need each year for improvements to SMT. An application to the Commission for a determination of need for changes to SMT is an excessive administrative step that is unwarranted. The history of changes to SMT suggests that progress has been slow, and the requests for changes will be numerous. Consumers' expectations for easy-to-use, modern websites are only growing and continued improvements are in all likelihood necessary to meet those changing expectations. Furthermore, the removal of subparagraph (iv) also does not limit the Commission's ability to reject frivolous change requests because the Commission can always decline a change request pursuant to subparagraph (e)(3)(A). Therefore, subparagraph (iv) should be struck.

3. Funding for SMT operations and ongoing improvements should come from base rates.

There are numerous problems with Section (f) of the Straw Proposal from Mission:data's perspective, each of which can be resolved by recovering costs for all SMT functions – new and existing – in base rates. The first problem is the distinction made in the definitions of End-Use Customer Functionality and Non-End-Use Customer Functionality. By attempting to separate the “bare minimum” end-use customer functionality from features that are believed to be somehow extraneous, the proposed rules would relegate SMT to a minimalist website with only one function, namely to allow customers to log in and view or download their energy usage, and nothing more. This artificial hindrance simply cannot be reconciled with other important objectives, such as improving SMT's performance and increasing the usage rates by customers. Further, the Straw Proposal's definitions in (c)(4) and (c)(5) fundamentally misunderstand how customers expect energy information services to operate. Modern consumers, who have access to seamless digital services in the rest of their lives, increasingly expect to experience immediate value from a new website they visit, or a new smartphone “app.” It is rare to find a customer sufficiently skilled and motivated to create an account at SMT and download their data into a spreadsheet for analysis because of the level of effort required. Indeed, this fact is reflected in SMT's current low usage statistics. Instead of downloading their own data from SMT for self-analysis, the vast majority of customers should be expected to interact with their electricity use data from inside a Third Party's website or mobile app. That means the user experience of sharing usage data with a Third Party becomes essential to realizing the customer value of SMT, yet improvements to that user experience would, under the Straw Proposal, have to be paid for by Third Parties. The result of adopting the Straw Proposal's rules would be a significant exodus of Third Parties from the state of Texas who would build their businesses elsewhere, a detriment to Texas consumers who would not be able to access cost-effective energy management services.

Another reason for rejecting the Straw Proposal's delineation of End-Use Customer Functionality and Non-End-Use Customer Functionality is that it is impossible in practice to make a clear distinction between the two. Certain features that would increase use of SMT, such as user experience and usability improvements, are of substantial value *both* to customers and Third Parties. In order to increase customer participation in accessing data, the most straightforward and simple approach may be through streamlining the authorization process and empowering Third Party service providers. As mentioned previously, consumers should not be expected to download and analyze their usage data themselves; SMT should be built and

managed with the expectation that customers' primary interaction with their usage data will be through a Third Party's website or mobile app. Therefore, creating an artificial separation between customer-facing and non-customer-facing features is counterproductive. Focusing SMT investment on strictly customer-facing features may actually just frustrate customers when what they really want to do is not use SMT at all, but a Third Party's website or mobile app.

Mission:data understands the need to contain SMT costs. Indeed, the costs of SMT to date have been substantial. But the Straw Proposal would do little to address the fundamental cost drivers of SMT, which is that information technology (IT) is complex and it is difficult for the Commission to assess the reasonableness of proposed costs. It is too often the case that cost estimates from utilities are automatically assumed to be reasonable, simply because it is difficult for the Commission to get information about alternatives. A better approach would be to make the opposite presumption: that cost estimates are unreasonably high and that participating utilities should have the burden to prove the reasonableness of costs. One method to ensure the reasonableness of cost estimates is for the Commission to require participating utilities to use an independent IT consultant to provide a professional opinion on cost estimates that exceed a certain threshold. An independent assessment, while costing some amount of money, could be cost-saving in the long term, particularly if proposed improvements to SMT are expensive. A "second opinion" on IT costs would also help the Commission assess the reasonableness of costs.

The Commission should reject the Straw Proposal's attempt to make Third Parties responsible for costs that are inextricably linked to the SMT platform as a whole and that should be recovered in base rates. Ultimately, the best way to avoid spending ratepayer funds on features of little value is for the Commission to thoughtfully consider all costs and benefits and make a decision on a case-by-case basis, per Section (e)(3)(A). The Commission always has the ability to review and approve proposed changes.

There are benefits to increasing data access that should be considered alongside the costs, such as increased customer participation in DR and EE programs, participation in markets, etc. Reasonable data access also eliminates unnecessary spending by customers or their Third Party providers in developing alternative data access processes, if SMT is not easily accessible. Those benefits would extend beyond participants in any of these energy management programs.

Therefore, benefits should be examined alongside costs. Mission:data proposes changes to subparagraph (e)(3)(B)(vii) so that the Commission considers benefits in decision-making to authorize spending on new SMT functionality.

4. Accountability measures and a Service Level Agreement should be included in rules amendments.

As Mission:data stated in its April 1st, 2016 comments in Project #42786, the historic performance of SMT is troubling, as is the lack of accountability. Mission:data hopes that future performance will be high, because of the benefits of AMI that SMT can help bring to consumers. But hope alone is insufficient in guaranteeing a high-performance system. Metrics, accountability and guarantees in the form of a service level agreement (“SLA”) are important elements to any web-based service today. Mission:data therefore proposes improved user guides in (e)(2)(A), mandatory confirmation times and resolution times by technical support staff in (e)(2)(B), and a SLA and monitoring requirement in (g).

5. Green Button Connect should be required of SMT and implemented as soon as practicable.

Absent from the definition of SMT “initial features” in the Straw Proposal at Section (e) is Green Button Connect (“GBC”), an industry standard. The states of California, Illinois and New York have ordered electric utilities to implement GBC, representing about 20 million meters across the U.S. For SMT to reach its potential, it must be up to date with regard to industry standard data transfer protocols and seek to reduce the number of idiosyncratic technical requirements that result in increased costs to Third Parties of entering the Texas market. Texas consumers will benefit from this requirement because adherence to a North American standard allows innovative companies from outside the state to begin operations in Texas with a minimum of IT costs, increasing the variety of software applications available to consumers.

Thank you for the opportunity to provide comments.

Respectfully submitted,

_____/s/_____

Michael Murray
Mission:data Coalition, Inc.
1060 16th St, Suite 20
Sacramento, CA 95814
michael@missiondata.org
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**RULEMAKING REGARDING § PUBLIC UTILITY COMMISSION
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TEXAS §**

MISSION:DATA COALITION APPENDIX 1

PROPOSED CHANGES TO STRAWMAN PROPOSAL OF 16 TAC §25.130(g) AND §25.134

Additions are marked **in bold**, and deletions are marked in ~~strikethrough~~.

§25.134. Smart Meter Texas.

(a) Purpose. This section establishes requirements for Smart Meter Texas. An electric utility’s use of SMT in accordance with this section fulfills the requirement of §25.130(j)(1) of this title (relating to Advanced Metering).

(b) Application. This section applies to an electric utility that uses SMT.

(c) Definitions. The following terms, when used in this section, have the following meanings unless the context indicates otherwise:

- (1) Advanced meter –As defined in §25.130 of this title.
- (2) Advanced Metering System (AMS) – As defined in §25.130 of this title.
- (3) Deployment Plan – As defined in §25.130 of this title.

1 ~~(4) End Use Customer Functionality~~ The minimum set of functionalities required to
2 support end use customer access to the 15-minute electric usage interval data
3 provided by SMT.

4 ~~(5) Non End Use Customer Functionality~~ Any functionality for SMT that is not
5 ~~End Use Customer Functionality~~.

6 (6) Participating Utility – An electric utility that uses SMT to provide access to end-
7 use customers' usage data.

8 (7) Smart Meter Texas (SMT) – The interoperable, web-based information system
9 named Smart Meter Texas that stores electric usage data recorded by advanced
10 meters in increments of 15-minute intervals or shorter; and provides secure **and**
11 **convenient** access to that data to customers, REPs of record, persons authorized
12 by customers to have access to that data, and the Electric Reliability Council of
13 Texas (ERCOT).

14
15 (d) Use of SMT by Electric Utilities

16 (1) Continued Use of SMT. A participating utility shall continue to use SMT unless
17 the commission orders otherwise.

18 (2) New Participating Utility. If an electric utility wants to begin using SMT, it must:
19 (A) obtain commission approval, which it may seek as part of a Request for
20 Approval of Deployment pursuant to §25.130 of this title or in a separate
21 application;

22 (B) become a party to the Joint Development and Operations Agreement for
23 SMT dated December 31, 2008 or superseding agreement; and

1 (C) meet all technical **and performance** requirements for use of SMT.

2

3 (e) SMT Functionalities.

4 (1) Initial Functionalities. The functionalities provided by SMT shall include the
5 functionalities described in this paragraph unless otherwise ordered by the
6 commission.

7 (A) Data Processing and Storage. After customer usage and master file data is
8 received by SMT, the data shall be delivered to the retail electric provider
9 (REP) of record and other authorized SMT user file transfer protocol
10 folders, and stored in a data warehouse for a period of three years.

11 (B) SMT Data Usage Reporting. Customer usage and master file data shall be
12 made available to authorized SMT users via application programming and
13 graphical user interfaces. Data shall be made available for download in
14 Green Button “Download My Data” format and comma separated value
15 file format.

16 (C) On-Demand Meter Read. SMT shall facilitate near real-time reads for an
17 authorized SMT user to obtain the most currently available meter reading
18 at a customer’s premises.

19 (D) Home Area Network (HAN) Services. SMT shall provide HAN device
20 addition, removal, messaging, and reporting.

21 (E) Electric Usage and HAN Agreement Services. SMT shall provide
22 **convenient and secure** functionality to enable a customer to provide

1 access to its usage data and HAN devices to a person authorized by the
2 customer.

3 (F) SMT Account Registration and Management. SMT shall provide
4 functionality for an authorized SMT user to create and manage an SMT
5 account.

6 (G) **Green Button Connect My Data.** SMT shall provide **Green Button**
7 **Connect My Data (“GBC”),** also known as **NAESB REQ.21 Energy**
8 **Service Provider Interface,** in its most current form. The JDOA shall
9 **attain certification of GBC by the Green Button Alliance, an**
10 **independent testing authority, within ninety (90) days of a new**
11 **version of GBC being issued. SMT shall follow the best practices of**
12 **the customer authorization process in GBC and seek to streamline the**
13 **customer experience and reduce the number of interactions required**
14 **by the customer as much as possible.**

15 (2) User Support.

16 (A) **User guides.** SMT user guides for end customers shall be posted on the
17 **home page of the SMT’s graphical user interface. All technical**
18 **documentation for REPs or third parties concerning SMT functionality**
19 **including, but not limited to, prerequisites, the in-home device API and the**
20 **SFTP interface shall be made available from the SMT home page to any user**
21 **without requiring login. All documentation per this paragraph (2)(A) shall be**
22 **posted on the SMT graphical user interface within 30 days of a change in**
23 **SMT functionalities.**

(B) Technical support. SMT shall host a ~~call~~ **support** center to provide all users technical support by phone, ~~and by email~~ **and a web-based interface** for all SMT functionalities. **The support center shall satisfy the response times and resolution times as indicated below.**

Priority Classification	Description of Error	Confirmation Time	Resolution Time
Level 1	Incorrect Results: An error that causes a loss of a major feature, file system corruption, data loss, or a crash of all SMT features.	1 business day	3 business days
Level 2	Major: An error that prevents normal operation of a critical feature of all SMT features.	2 business days	5 business days
Level 3	Degraded Operation: An Error that prevents operation of a specific non-essential function of any SMT feature and the condition is not critical to continued operation of any SMT features.	2 business days	30 days or as part of the next major release
Level 4	Minor: Errors with no immediate impact or consequence with the functionality of any SMT feature.	3 business days	As part of next major release

~~SMT user guides shall be posted on the home page of the SMT's graphical user interface and updated within 30 days of a change in SMT functionalities.~~

(3) Changes to Functionalities.

(A) Commission Approval. The commission must approve any additions, deletions, or other changes to SMT functionalities, excluding on-going process improvements to SMT related to defects, security protections, and usability **improvements** or the functional or non-functional items related

1 to hosting SMT. The commission will not approve the addition of or
2 change to an SMT functionality if the resulting functionality would be a
3 competitive energy service as defined by §25.341(3) of this title (relating
4 to Definitions).

5 (B) Review of Functionalities. On an annual basis, the commission shall
6 review the functionalities of SMT.

7 (i) Between June 1 and July 1, the Participating Utilities shall provide
8 public notice that includes notice to all participants in the listserv
9 required pursuant to subsection (i) of this section of the upcoming
10 proceeding to review SMT functionalities. The notice shall
11 include a copy or a link to a copy of the commission-approved
12 form to request a cost estimate from the Participating Utilities for a
13 proposed change to SMT functionalities, and the deadline for filing
14 the request in the commission project set up for this purpose. If the
15 commission has not approved a form for a person to request a cost
16 estimate of a proposed change to SMT functionalities, the change
17 request form in use by SMT at the effective date of this section
18 shall be used.

19 (ii) Not later than August 1, any affected entity that intends to propose
20 a change to SMT functionalities must file a completed form with
21 the information required to develop a cost estimate in the
22 commission project set up for this purpose. The information must
23 be provided on the form designated for this purpose pursuant to

1 clause (i) of this subparagraph. An entity must submit a
2 substantially completed form and must promptly respond to the
3 Participating Utilities' clarification requests.

4 (iii) Not later than September 15, the Participating Utilities shall file
5 cost estimates for proposed changes to SMT functionalities that
6 were submitted pursuant to clause (ii) of this subparagraph. The
7 Participating Utilities shall also provide an estimate of any
8 anticipated cost savings for each proposed change. The
9 Participating Utilities may propose an alternative change to a
10 proposed change, but any proposed alternative change must be
11 evaluated separately from the original proposed change.

12 ~~(iv) Not later than October 1, the Participating Utilities shall apply to~~
13 ~~the commission for a determination of the need for any changes to~~
14 ~~SMT functionalities.~~

15 (v) Not later than October 15, any affected entity proposing to change
16 SMT functionalities must file the associated cost estimate filed by
17 the Participating Utilities pursuant to clause (iii) of this
18 subparagraph and a completed commission-approved change
19 request form in the proceeding initiated pursuant to clause (iv) of
20 this subparagraph in order for the proposal to be considered by the
21 commission. If the commission has not approved a form to request
22 a change to SMT functionalities, the change request form in use by
23 SMT at the effective date of this section shall be used.

- 1 (vi) Not later than October 22, a motion to intervene in the proceeding
2 initiated pursuant to clause (iv) of this subparagraph must be filed.
- 3 (vii) The affected entity proposing a change to SMT functionalities must
4 include information in the change request form, or as an
5 attachment to the change request form, that addresses all the
6 following factors. The commission will consider the following
7 factors in order to determine whether the proposed change to SMT
8 functionalities should be adopted:
- 9 (I) whether the proposed change would be a competitive
10 energy service as defined by §25.341(3);
- 11 (II) the benefits of the proposed change **to Third Parties or**
12 **REPs;**
- 13 (III) the disadvantages of the proposed change;
- 14 (IV) the retail electric customers who would benefit from the
15 proposed change;
- 16 (V) the retail electric customers who would be disadvantaged
17 by the proposed change;
- 18 (VI) the initial and ongoing costs of implementing the proposed
19 change;
- 20 (VII) any cost savings associated with implementing the
21 proposed change;
- 22 (VIII) **impacts on customer usability that would affect usage**
23 **rates of SMT, such as the number of steps required to**

1 **grant third party access, or how quickly electric meter**
2 **data is transmitted after authorization;**

3 **(IX) whether the proposed change benefits a small number**
4 **of Third Parties or REPs or a large number; and**

5 ~~(VIII X)~~ any other materially relevant factors.

6
7 (f) Cost Recovery. A Participating Utility may recover its share of the reasonable, necessary,
8 and prudent operation and maintenance costs and capital costs of providing SMT as
9 approved by the commission and in accordance with this section.

10 (1) Cost Allocation between Utilities. Costs associated with End-Use Customer
11 Functionality shall be allocated among Participating Utilities based on the number
12 of advanced meters participating in SMT, unless otherwise ordered by the
13 commission.

14 (2) Base Rates.

15 (A) Costs associated with ~~End-Use Customer Functionality~~ **SMT** may be
16 included in base rates in a general base rate proceeding.

17 (B) ~~Costs associated with Non-End-Use Customer Functionality may not be~~
18 ~~included in base rates.~~

19 (C) SMT costs included in base rates shall only be recovered from customers
20 with AMS meters.

21 (D) SMT costs included in base rates shall be allocated among rate classes, or
22 among sub-divisions of rate classes to the extent necessary to comply with

1 subparagraph (C) of this paragraph, in proportion to the number of AMS
2 meters.

3 (E) SMT costs that are included in base rates for a rate class or a sub-division
4 of a rate class shall be included in the metering charge for that rate class or
5 that sub-division of a rate class.

6 (3) Distribution Cost Recovery Factor.

7 (A) Costs associated with ~~End-Use Customer Functionality~~ SMT that
8 otherwise comply with the requirements of §25.243 of this title (relating to
9 Distribution Cost Recovery Factor) may be included in a Distribution Cost
10 Recovery Factor under that section.

11 ~~(B) Notwithstanding any provision of §25.243 of this title, any costs~~
12 ~~associated with Non-End-Use Customer Functionality shall not be~~
13 ~~included in a Distribution Cost Recovery Factor.~~

14 ~~(4) Discretionary Service Charges.~~

15 ~~(A) Costs associated with Non-End-Use Customer Functionality may be~~
16 ~~included in discretionary service charges applicable to entities that elect to~~
17 ~~make use of the associated functions.~~

18 ~~(B) SMT related discretionary service charges shall be calculated using actual~~
19 ~~cost and usage information from a 12-month historical test period.~~

20 ~~(C) The Participating Utilities may upon their own motion, and shall upon~~
21 ~~request by the commission, submit a joint filing to determine the~~
22 ~~appropriate level of any SMT-related discretionary service charges.~~

1 ~~(D) Revenues associated with SMT related discretionary service charges shall~~
2 ~~be applied to offset AMS Surcharge related costs for those Participating~~
3 ~~Utilities that charge both an AMS Surcharge as well as SMT related~~
4 ~~discretionary service charges.~~

5 ~~(E) The Participating Utilities shall submit a joint filing under subparagraph~~
6 ~~(C) of this paragraph within 180 days of the date of adoption of this~~
7 ~~section.~~

8 ~~(5) **Categorization of Costs.** Absent an affirmative finding by the commission that~~
9 ~~particular costs are associated with End Use Customer Functionality, any costs~~
10 ~~associated with SMT shall be presumed to be associated with Non End Use~~
11 ~~Customer Functionality. A party that maintains that any particular costs are~~
12 ~~associated with End Use Customer Functionality shall bear the burden of proof to~~
13 ~~establish such association.~~

14 ~~(6) **Costs Associated With New Functionality.** Cost associated with the study or~~
15 ~~implementation of new functionality that is not proposed by the commission shall~~
16 ~~initially be funded by the entity or entities that requests the study or~~
17 ~~implementation of the new functionality.~~

18 ~~(A) If such functionality is ultimately approved by the commission for~~
19 ~~inclusion in SMT, the initial funding of the study or implementation costs~~
20 ~~shall be refunded to the entity or entities requesting the functionality and~~
21 ~~may be included in the Non End Use Customer Functionality cost~~
22 ~~category, but may not be included in the End Use Customer Functionality~~

1 ~~cost category, in any request for recovery of costs under this subsection,~~
2 ~~unless otherwise ordered by the commission.~~

3 ~~(B) If such functionality is not approved by the commission for inclusion in~~
4 ~~SMT, the initial funding of the study or implementation costs by the entity~~
5 ~~or entities requesting the functionality shall be forfeited, and none of the~~
6 ~~costs for the study or implementation, or any associated costs, shall be~~
7 ~~recovered from ratepayers or any entity other than the entity or entities~~
8 ~~requesting such functionality.~~

9
10 (g) Performance Standards. By October 1 following the effective date of this section, the
11 Participating Utilities shall apply to the commission for approval of performance
12 standards **and an operations monitoring platform** for SMT. Performance standards
13 **and an operations monitoring platform** shall be established that address the following
14 issues:

- 15 (1) ~~an~~ **a fixed schedule for** planned SMT outages duration and frequency **for**
16 **maintenance purposes, where such planned outages shall not last more than**
17 **6 hours per calendar month, unless otherwise approved by the Commission;**
- 18 (2) unplanned **SMT and API** outages duration and frequency, **where system**
19 **availability for end customers, REPs and third parties must not be less than**
20 **99.9% as calculated on a calendar month basis;**
- 21 (3) timing and completion rates for LSE file delivery to FTPS folders (**or subsequent**
22 **delivery mechanism as decided by the Commission**) and SMT portal by electric

1 utility, where energy usage data shall be made available no later than
2 **11:00pm on the day following the day when the energy was used;**

3 (4) timing of data availability via the SMT API, where energy usage data shall be
4 **made available no later than 11:00pm on the day following the day when the**
5 **energy was used;**

6 (5) SMT user support **confirmation and response resolution** times as fast or faster
7 **than those outlined in Section (e)(2)(B);**

8 (6) Escalation pathway describing the contacts of increasingly senior managers
9 **at the Participating Utilities that may be contacted if errors in SMT**
10 **functionalities are not resolved;**

11 (7) An operations monitoring platform with web-based public reporting
12 **including dashboards displaying the following minimum set of metrics: (i)**
13 **uptime of SMT functionalities over different time periods, (ii) support ticket**
14 **volumes, (iii) support ticket mean response time and mean resolution time;**
15 **(iv) the period of time between initial registration and completed integration**
16 **for third parties. Private metrics meant only for the Participating Utilities,**
17 **the Commission or any other entity pursuant to a non-disclosure agreement**
18 **shall include, but not be limited to, summaries of all escalated support**
19 **tickets, complaints issued by REPs, third parties or end customers, and**
20 **support tickets outstanding for more than 60 days. Participating Utilities**
21 **shall utilize a monitoring platform of an independent organization to the**
22 **greatest extent possible; and**

23 (6 8) other issues identified by the commission.

1 **Following approval of the performance standards and operations monitoring**
2 **platform plan by the Commission, the Commission may, at its own**
3 **discretion, take action to sanction any Participating Utility for failing to**
4 **satisfy any of their performance or reporting obligations under this Section**
5 **§25.134.**

6
7 (h) Reporting. All required reports shall be filed in a commission project set up for SMT
8 reports. Required reports include those listed below.

9 (1) Quarterly reports on SMT's operating performance shall be filed by the 45th
10 business day following the end of a calendar quarter. The reports shall include:

11 (A) SMT performance in comparison to commission approved performance
12 standards. If SMT performance does not meet the minimum standards
13 approved by the commission in a particular quarter, the Participating
14 Utilities shall provide a detailed explanation and ~~plans~~ **remedies**
15 **underway** to meet the performance standards **in this Section §24.130;**

16 (B) Timing and availability of operating day + 1 data by electric utility;

17 (C) Percentage of usage data delivered to SMT with missing or estimated
18 interval data by electric utility and by customer class for each operating
19 day;

20 (D) A detailed explanation when the sum total of the fifteen-minute interval
21 data does not equal the monthly usage data for the same billing period
22 within the acceptable range pursuant to the requirement in §25.214(d) of
23 this title by electric utility;

- 1 (E) The content of the reports formerly made to ERCOT's Advanced Metering
2 Working Group that include the content from the following reports:
- 3 (i) end to end file processing completeness;
- 4 (ii) SMT API and FTPS services availability;
- 5 (iii) SMT number of accounts by type;
- 6 (iv) SMT ODR details; and
- 7 (v) SMT energy services provider statistics.
- 8 (F) Any additional information requested by the commission.
- 9 (2) An annual report shall be filed by the 45th business day following the end of the
10 prior calendar year. The annual report shall include a summary of SMT operations
11 for the immediately previous year. The annual report shall also include:
- 12 (A) SMT performance in comparison to commission approved performance
13 standards. If SMT performance did not meet the minimum standards
14 approved by the commission in the prior calendar year, the Participating
15 Utilities shall provide a detailed explanation and plans to meet the
16 performance standards in the current year;
- 17 (B) The prior year's SMT expenditures broken out by category that includes a
18 comparison of actual and budgeted costs with an explanation of any
19 increase or decrease of more than ~~10~~ **three (3)** percent;
- 20 (C) A projected budget for the current year.
- 21
- 22 (i) Quarterly SMT Meetings. The Participating Utilities shall facilitate quarterly meetings in
23 Austin, Texas following the filing of the required quarterly reports. The Participating

1 Utilities shall maintain a listserv of all interested persons, **including third parties**
2 **registered at SMT**, and shall provide notice to all those on the listserv of upcoming
3 quarterly SMT meetings, and any deadlines associated with the Participating Utilities'
4 annual proceeding to review SMT functionalities at the commission. Any person
5 interested in proposing a modification to SMT functionalities is encouraged to first
6 present the proposal for discussion at the quarterly SMT meetings. The meetings shall be
7 scheduled to coincide, as close as is reasonably possible, with the required filing date of
8 the Participating Utilities' required quarterly reports.

9 (1) The Participating Utilities shall undertake the following functions at the quarterly
10 SMT meetings:

11 (A) present and explain the results of its filed reports;

12 (B) provide a status report on implementation of commission-approved
13 modifications to SMT;

14 (C) provide a status report and an implementation timeline for on-going
15 process improvements made or to be made to SMT related to defects,
16 security protections, and usability or the functional or non-functional items
17 related to hosting SMT;

18 (D) provide a forum for informal presentation and feedback on proposed
19 modifications to SMT that includes discussion on whether a proposed
20 modification is capable of being provided on a competitive basis in the
21 retail market and, therefore, not appropriate for consideration as a
22 modification to SMT functionality;

1 (E) provide timely responses to questions posed by interested persons relevant
2 to the operation and functionality of SMT.

3

4 (j) Unplanned SMT Outage Notifications. Unplanned outages or business process failures of
5 any SMT functionality will be noticed to the market.

6 (1) Notices shall be sent to the listserv ERCOT ~~designates~~ **designated** to receive
7 SMT notifications, the listserv maintained by the Participating Utilities pursuant
8 to subsection (i) of this section, **all SMT-registered third parties (via email)**,
9 and any other distribution lists as appropriate.

10 (2) Notices will be posted conspicuously on the SMT homepage.

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15 §25.130. Advanced Metering

16 (a)-(f) (No Change.)

17

18 (g) AMS Features.

19 (1) An AMS shall provide or support the following minimum system features in order
20 to obtain cost recovery through a surcharge pursuant to subsection (k) of this
21 section:

22 (A)-(I) (No Change.)

1 (J) capability to communicate with devices inside the premises including, but
2 not limited to, usage monitoring devices, load control devices, and
3 prepayment systems **through a home area network (HAN)**, based on
4 open standards and protocols that comply with nationally recognized non-
5 proprietary standards **such as ZigBee, Home-Plug, or the equivalent**; and

6 (K) (No Change.)

7 (2)-(6) (No Change.)

8 (h)-(l) (No change.)

9