

February 18, 2019

By Hand Delivery

Ms. Lora W. Johnson, CMC, LMMC
Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112

**In Re: Establishing a Docket and Opening a Rulemaking Proceeding to Consider
Revising the Council's Rules to Allow Release of Whole-Building Data to
Building Owners
CNO Docket No. UD-18-04**

Dear Ms. Johnson:

Please find enclosed for your further handling an original and three copies of Entergy New Orleans, LLC's ("ENO") Comments Regarding Draft Processes for the Release of Whole-Building Aggregated Data, which is submitted pursuant to Council Resolution R-18-539, and is being filed in the above-referenced docket. Please file an original and two copies into the record and return a date-stamped copy to our courier.

Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink that reads "Timothy S. Cragin".

Timothy S. Cragin

TSC\rdm

Enclosures

cc: Official Service List (UD-18-04 via electronic mail)



BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS

IN RE: ESTABLISHING A DOCKET)
AND OPENING A RULEMAKING)
PROCEEDING TO CONSIDER)
REVISING THE COUNCIL’S RULES) DOCKET NO. UD-18-04
TO ALLOW RELEASE OF WHOLE-)
BUILDING DATA TO BUILDING)
OWNERS)

**ENTERGY NEW ORLEANS, LLC’S COMMENTS REGARDING DRAFT
PROCESSES FOR THE RELEASE OF WHOLE-BUILDING AGGREGATED DATA**

Pursuant to Resolution No. R-18-539, Entergy New Orleans, LLC (“Entergy New Orleans” or “ENO”) respectfully submits these comments regarding the draft processes for the release of whole-building aggregated data to the Council of the City of New Orleans (“Council”). Resolution No. R-18-539 required:

“ENO to file, within 60 days of adoption of this Resolution, for Council review and approval:

- a. Draft processes for the release of whole-building data, including, but not limited to, the processes for ENO’s customers to request the release of the data, for verification of the building owner’s identity, verification of the specific meters attached to the building, notification to customers whose accounts are aggregated in the whole-building data, and for the customer of any account to which an involved meter is attached to challenge the appropriateness of the release of the data either because there are special circumstances where they believe the Council’s rules would not sufficiently protect their privacy or because they believe the building owner or building owner’s designated agent is using the data for improper purposes.
- b. Further information regarding the costs and benefits anticipated to ratepayers of releasing aggregated whole-building data upon request to a limited number of building owners prior to the full implementation of AMI on the ENO system.”

ENO appreciates this opportunity to file the instant comments with the Council and looks forward to continuing to work collaboratively with the parties in this docket. To that end, ENO is in the process of developing an innovative approach to solving the issue of a pre-AMI solution to whole building data aggregation. In its last status conference with the parties, ENO previewed the new innovative approach of using an automated process to potentially provide a solution, and all parties agreed that it is an option worth pursuing. Accordingly, in addition to the instant filing, ENO will supplement this filing with more information regarding the innovative solution within 30 days.

I. Processes

ENO proposes the following processes:

1. Process by which the owner will request the data.

ENO will post an application form on the Energy Smart website (www.energysmartnola.info). The application form will request information including, but not limited to:

- The name and email address of the owner;
- The name and email address of the owner's designee (optional);
- The address of the building; and
- The meter numbers for meters attached to the building.

Interested building owners will be able to fill out and submit the form through the website.

2. Process for verifying the building owner's identity

Once an application is submitted, ENO will access the Orleans Parish Assessor's website (<http://nolaassessor.com/>) to verify the building owner's identity. If the owner listed on the Assessor's website does not match the owner listed on the application, ENO will use the contact information for the owner listed on the application to resolve any issues.

3. Process for verifying meters attached to the owner's building

After verification of ownership of the building, and that the building owner's request meets the requirements established by the Council for disclosure of aggregated usage data, ENO will verify the meter numbers listed on the application form. ENO will use an internal system, Automated Route Control System ("ARCS") to verify the listed meter numbers. ARCS is software that records the readings of meters in a sequential manner. The ARCS software records the address, building or tenant name, and proximity of the timestamps on the meter readings and will be used to confirm the meters that are attached to a given building. If the list of meters provided by the owner and the list of meters determined to be in the building by use of the ARCS system do not match, ENO will contact the owner to try to reconcile the discrepancy.

Due to the remote reading capability of Advanced Meter Infrastructure ("AMI") equipment, ENO will not be able to use the ARC system to verify the new AMI meters attached to buildings. For buildings that have already been switched to AMI meters when an owner requests the data, ENO will use the Geographical Information System ("GIS") that will accompany AMI deployment to verify the meters that are attached to buildings. For all other buildings, as the buildings are transferred to AMI meters, ENO will match the AMI meter number to the pre-AMI meter number so that the building's data will be aggregated in a consistent manner.

4. Process for notification of customers whose data is being aggregated

After verification of the meter numbers, customers/tenants of the building will be notified that their data will be aggregated and provided to the owner or designee. A letter ("notification letter") detailing the purpose for the release of the data, the process of the data aggregation and transmission, and the process for challenging the appropriateness of the release of the data will be sent to the name and address associated with the meter number.

5. Process for a tenant to challenge the release of data

Per Council Resolution No. R-18-539, customers of an account to which an involved meter is attached will have the opportunity to challenge the appropriateness of the release of the data if “there are special circumstances where they believe the Council’s rules would not sufficiently protect their privacy or because they believe the building owner or building owner’s designated agent is using the data for improper purposes”. In the notification letter, customers will also be instructed to notify the Council Utilities Regulatory Office (“CURO”) within 14 days of receipt of the notification letter of their intent to challenge the release of the data. CURO will then instruct ENO to hold the release of the data until such time that all customer challenges have been resolved. If the release of the data is successfully challenged by a tenant, and it is determined by CURO that the data should not be released, CURO will notify ENO, which will, in turn, decline to provide the data. If the tenant’s challenge is unsuccessful, then upon notification from CURO, ENO will move forward with preparing the data for release.

In instances where customers believe that the aggregated data is being improperly used by the owner or designee, customers shall notify CURO of the situation. ENO will continue to provide the data until instructed by CURO to stop providing the data based upon a determination that there has been improper use of the data.

6. Process by which ENO will provide aggregated data to owners

ENO will request that owners or their designees establish a Portfolio Manager account. Once the account is established, owners will need to grant ENO access to the account. After all of the requirements to receive the data have been met, ENO will input the aggregated data directly into Portfolio Manager. Owners and designees will be able to retrieve their data from their Portfolio Manager account.

II. Process Automation

On a recent conference call with representatives of the Council's Advisors ("Advisors") and other stakeholders, ENO revealed that it is currently in the process of investigating the extent to which the aforementioned processes can be automated through the use of innovative internal process automation. On the conference call, there was no opposition expressed to ENO focusing on this automation as the primary solution. This automated solution, in theory, will be able to handle the majority of the processes, both pre-AMI and post-AMI deployment. As with any automated process, however, tests will need to be run to verify that the system is fully operational, as designed. ENO plans to make a more detailed filing within 30 days to provide more information on the cost and expected implementation timeframe of the automated solution.

III. Energy Advisor

ENO, the Advisors and other parties have also discussed the use of an Energy Advisor to help building owners achieve the most out of their aggregated usage data. Similar to process automation, no concerns were raised regarding the use of an Energy Advisor. The Energy Advisor's responsibilities would include building performance analysis and project opportunity recognition. ENO plans to include more information on this topic in its process automation filing, including how best to implement the use of an Energy Advisor.

IV. Conclusion

The Company appreciates the opportunity to supply these comments, as directed by Resolution No. R-18-539. Additionally, the Company looks forward to continued work with the Advisors and other stakeholders in creating a solution that will provide business owners the opportunity to receive aggregated whole-building usage data.

Respectfully submitted:

BY:

Handwritten signature of Timothy S. Cragin in blue ink, written over a horizontal line.

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**ATTORNEYS FOR
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CERTIFICATE OF SERVICE

Docket No. UD-18-04

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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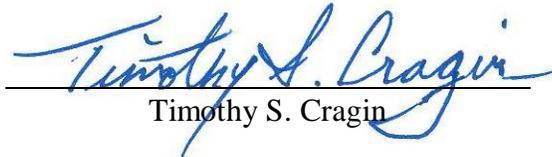
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New Orleans, Louisiana, this 18 day of February 2019.


Timothy S. Cragin