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BEFORE THE

PUBLIC UTILITY COMMISSION
OF TEXAS

PLAN TO DISTRIBUTE IN-HOME MONITORS TO LOW-INCOME CUSTOMERS

November 25, 2014

I. Introduction

This document describes the plan to distribute in-home monitors to eligible low-income customers pursuant to the following Final Orders of the Public Utility Commission of Texas (“PUCT” or “Commission”): Docket No. 35718, *Oncor Electric Delivery Company LLC's Request For Approval of Advanced Metering System (AMS) Deployment Plan and Request For Advanced Metering System (AMS) Surcharge*; Docket No. 35639, *Application of CenterPoint Energy Houston Electric, LLC For Approval of Deployment Plan and Request For Surcharge For an Advanced Metering System*; Docket No. 36928, *AEP Texas Central Company and AEP Texas North Company's Request For Approval of Advanced Metering System (AMS) Deployment Plan and Request For AMS Surcharges*; and Docket No. 38306, *Texas-New Mexico Power Company's Request For Approval of Advanced Metering System (AMS) Deployment and AMS Surcharge* (collectively “AMS Orders”).

Following input received from workshops and discussion with Commission Staff, parties to the AMS Orders, and other interested stakeholders and consistent with the AMS Orders, Oncor Electric Delivery Company LLC (“Oncor”); CenterPoint Energy Houston Electric, LLC (“CNP”); AEP Texas Central Company (“AEP TCC”); AEP Texas North Company (“AEP TNC”); and Texas-New Mexico Power Company (“TNMP”) (collectively, “TDUs”) have agreed to implement the following In-Home Monitor Implementation Plan (“Implementation Plan” or “Plan”). Pursuant to the AMS Orders, the goal of the Implementation Plan is to maximize the comprehensive and cost-effective distribution of in-home devices to the greatest number of eligible low-income customers. In addition, pursuant to the AMS Orders, the Implementation Plan requires that the in-home monitors be provided equitably across the entire service territories of the TDUs.

II. Implementation Plan

This Implementation Plan details the terms under which in-home devices will be distributed to low-income customers pursuant to the AMS Orders. Devices to be distributed pursuant to this Plan include both in-home displays (“IHDs”) and programmable communicating thermostats (“PCTs”). Under this Plan, each TDU will offer the program described below.

The following terms and conditions shall apply to the Plan:

A. General Terms and Conditions

Plan Expenditures

1. In the AMS Orders, the PUCT approved expenditures, with the exception of TNMP, for the distribution of in-home devices to low-income customers in the following amounts:
 - Oncor - \$10,000,000;
 - CNP - \$7,500,000;
 - AEP TCC - \$800,000;
 - AEP TNC - \$200,000; and
 - TNMP - \$125,000.

In Docket No. 38306, TNMP agreed that it will make in-home devices available to low-income customers. Subsequently, TNMP decided to expend up to \$125,000 for in-home devices for low-income customers.

2. At least ninety percent (90%) of the Plan expenditures will be spent to reimburse retail electric providers (REPs) for costs incurred in providing in-home devices pursuant to the Plan, including the costs of devices, marketing, education, fulfillment, installation costs, technical support, and administration.
3. Up to ten percent (10%) of the Plan expenditures will go towards the TDUs' administrative costs for administering the Plan.
4. Each TDU will spend the Plan expenditures identified in paragraph 2 only to reimburse REPs for the distribution of in-home devices to low-income customers who reside in its service territory.
5. The Plan expenditures will be administered on a “first come, first served” basis, except that for the first 90 days a participating REP's reimbursement will be limited to a

maximum of the greater of 5% of the fund in each TDU area or a proportion of the fund available up to its residential ESI-ID percentage share of the residential ESI IDs for that TDU area per its last POLR filing pursuant to Project No. 42201, whichever is greater.

Plan Eligibility

6. Only a “low-income customer,” as defined in PUCT SUBST. R. 25.5, is eligible to participate in the Plan. To receive a device, the low-income customer must be enrolled in the PUCT’s “Low Income Telephone and Electric Discount Program” (also known as the “LITE-Up Texas” Program) at the time the customer is authorized to receive an in-home device.

Plan Administration

7. The TDUs will begin administering the program on January 1, 2015.
8. Any PUCT-certificated REP may participate in the program, subject to program requirements.
9. A customer is eligible to receive both an IHD and a PCT from the current REP of Record.

B. REP Distribution Program

10. The program is open to any PUCT-certificated REP that wishes to participate, meets the program requirements, and has signed the necessary confidentiality agreement with the Texas Health and Human Services Commission (“HHSC”). The TDUs will each provide a point of contact for REPs interested in participating in the program. Under the program, a REP identifies its existing, eligible low-income customers, markets to those customers, and provides in-home devices to the customers who request devices. The REP may receive reimbursement under the program in an amount not to exceed \$250 per device with an additional twenty-five percent for administrative costs up to a total reimbursement cap of \$300 per device. For PCTs, an additional \$125 will be reimbursed to cover the REP’s cost of installation. To receive reimbursement, the REP must meet the program reimbursement requirements. In addition, the device must meet the Minimum Device Requirements specified in Appendix A attached hereto and have passed validation testing, if the device will connect to the meter, with the respective TDU.

11. If the customer elects to receive an IHD, the IHD will be delivered to the customer along with documents on the use, functionality, and benefits of the device. If the customer elects to receive a PCT, the REP will provide for professional installation of the PCT at the customer's premises, as well as documents on the use, functionality, and benefits of the device.

Program Reimbursement Requirements

12. To qualify for reimbursement from a TDU, a REP must provide an affidavit, using the form attached hereto in Appendix B, signed by an owner, partner, officer, or manager of the REP, attesting to compliance with the following program requirements for each customer that the REP provided a device to:

- (A) The REP did not require a customer to enter into a contract or subscribe to a specific rate plan as a condition of receiving an in-home device.
- (B) The REP marketed only to existing customers.
- (C) The REP offered and provided devices to qualifying eligible customers in a non-discriminatory manner.
- (D) Each customer to whom the REP provided a device affirmatively consented to receive the device.
- (E) Upon receipt of a customer's affirmative consent to receive a device, the REP confirmed that the customer at that time was on the PUCT's "LITE Up Texas" program list of enrollees.
- (F) The REP provided information on the use, functionality, and benefits of the device or devices.
- (G) If a PCT was provided to the customer, the REP provided for installation of the device.
- (H) The REP provided full ownership of the device or devices to the customer.
- (I) The REP provided the device or devices to the customer at no cost to the customer.
- (J) If the customer moves out or switches away from the REP after receiving an in-home device through the Plan, the REP will not disable non-REP specific functionality on the device.

- (K) The device or devices that the REP provided to the customer meet the Minimum Device Requirements outlined in Appendix A attached hereto and have passed validation testing with the respective TDU, if the device will connect to the meter.
- (L) The requested reimbursement amount for any device in the invoice is no more than the amount the REP paid for the device and the total amount of requested reimbursement does not exceed the reimbursement cap of \$250 per device plus any additional administrative costs (capped at 25%) for a total reimbursement cap of \$300 per device, plus \$125 per device for professional installation of each PCT delivered.
- (M) The REP did not request reimbursement for any device provided to a customer for which it has previously received reimbursement.
- (N) The REP did not request reimbursement beyond its designated proportion in paragraph 5 within the first 90 days of the program's operation.

Invoicing by REPs

13. No later than the 15th day of each month, the REP will submit a separate invoice to the individuals designated in paragraph 10 for each TDU in whose territory the REP delivered qualified in-home devices to eligible low-income customers during the preceding calendar month. Each invoice will contain the following:
 - (A) the number and type of in-home device or devices each customer received;
 - (B) the zip code for each eligible, low-income customer receiving a device;
 - (C) the amount the REP paid for each in-home device, installation costs, and administrative costs; and
 - (D) the affidavit described in paragraph 12 above and attached hereto as Appendix B.
14. REPs may receive reimbursement under the program in an amount not to exceed \$250 per device with an additional twenty-five percent for administrative costs up to a total reimbursement cap of \$300. For PCTs, an additional \$125 will be reimbursed to cover the cost of installation.
15. TDUs will maintain on a confidential basis the invoices submitted by REPs for at least two years following the date the final order in its final reconciliation becomes final and not subject to appeal.

Reimbursement to REPs

16. If the REP has completed the accounts payable process with the TDU and the TDU determines the invoice submitted by the REP is mathematically accurate and contains all of the items described in paragraphs 13 and 14, then the TDU will provide reimbursement directly to the REP in the amount authorized within 30 days of receipt. The TDU has 14 days to notify the REP of any deficiencies.

Reporting

17. Beginning June 30, 2015 and on the last day of each six-month period thereafter until the program is either modified by the Commission or a TDU's expenditure of its designated funds ends, each TDU will file a report in the project. The first reporting period will include information from January through April 30, 2015 and the subsequent periods will include six months of data (i.e. May through October and November through April). The report will include the number of devices in that TDU's service territory that were distributed by zip code, the amount of spending associated therewith, the amount of funds remaining available under the program, and a list of REPs that have submitted invoices ("participating REPs").
18. A TDU shall notify participating REPs upon the TDU's reimbursement of 75% and 90% of the TDU's designated funds available under the program.
19. Upon reimbursement of 90% of the TDU's designated funds available under the program, the TDU shall notify participating REPs that the final invoice period for that TDU ends 45 days from the date the notice is provided. A participating REP shall submit any outstanding invoices for reimbursement under the plan by the 15th day of the month following the month in which the final invoice period ends.

Appendix A

In-Home Monitor Device Requirements

In-Home Display (IHD) Requirements

The Minimum Required Features in the IHDs are:

- Must be compatible with the ZigBee communications technology deployed by the TDUs (*i.e.*, the device must not interfere with the TDU's standard meter).
- If the device will communicate with the TDU's meter, it must be ZigBee (IEEE 802.15.4) Smart Energy Profile version 1.x certified and has passed validation testing with the respective TDU.
- If the device will communicate with the TDU's meter, it must be capable of being provisioned by the REP or low-income customer without interaction with the SMT support desk.
- Must be capable of receiving and displaying consumer electricity usage data in near real time.
- Must come with sufficient supporting documentation and associated technical support to reasonably enable successful customer adoption.
- Must meet all applicable state and federal regulations for product safety.

The Optional Preferred Features for IHDs include:

- Compliant with the Americans with Disabilities Act.
- Displays information in English and Spanish.
- Easy for customers to operate.
- Easy to read font size.
- Easy for customers to understand display information regarding kilowatt-hour (kWh) usage and price.

Programmable Communicating Thermostat (PCT) Requirements

The Minimum Required Features in the PCTs are:

- Must be able to program specific temperature settings for at least three distinct time periods (*e.g.*, morning, afternoon, evening or wake, away, and sleep) and for at least five days of the week.
- Must be compatible with the ZigBee communications technology deployed by the TDUs (*i.e.*, the device must not interfere with the TDU's standard meter).
- If the device will communicate with the TDU's meter, it must be ZigBee (IEEE 802.15.4) Smart Energy Profile version 1.x certified and has passed validation testing with the respective TDU.
- If the device will communicate with the TDU's meter, it must be capable of being provisioned by the REP or low-income customer without interaction with the Smart Meter Texas (SMT) support desk.

- If the device receives demand response (DR) signals and participates in DR programs, must allow the customer the ability to override individual DR events by either directly adjusting the PCT or by on-line adjustment.
- Must come with sufficient supporting documentation and associated technical support to reasonably enable successful customer adoption.
- Must meet all applicable state and federal regulations for product safety.

The Optional Preferred Features for PCTs include:

- Controllable by the customer through an internet connection or mobile device.
- Compliant with the Americans with Disabilities Act.
- Displays information in English and Spanish.
- Easy to read font size.
- Easy for customers to program and operate.

Appendix B

AFFIDAVIT OF
[ABC COMPANY, INC.]
RELATED TO
THE PROVISION OF IN-HOME MONITORS TO LOW-INCOME CUSTOMERS

STATE OF TEXAS §

COUNTY OF _____ §

BEFORE ME, the undersigned authority, on this day personally appeared _____, who, after having been duly sworn by me, stated under oath the following:

My name is _____. I am {Owner, Partner, SVP, VP, Director, Manager} of **ABC Company, Inc. (“RETAIL ELECTRIC PROVIDER”)**. I am over the age of 18 years old, am of sound mind, am fully competent and capable to make this Affidavit, and am authorized to make this affidavit on behalf of **RETAIL ELECTRIC PROVIDER**. The matters contained herein are within my personal knowledge and are true and correct to the best of my information, knowledge and belief.

Attachment A hereto is an invoice requesting reimbursement of costs incurred by **RETAIL ELECTRIC PROVIDER** related to providing in-home devices to low-income customers in the [Name of TDU] (“Utility”) service territory.

RETAIL ELECTRIC PROVIDER delivered _____ in-home devices to _____ low-income customers during the month of _____, 201_.

RETAIL ELECTRIC PROVIDER did not require any of the low-income customers receiving an in-home device or devices to enter into a contract or subscribe to a specific rate plan

as a condition of receiving such in-home device or devices.

RETAIL ELECTRIC PROVIDER marketed in-home devices only to its existing low-income customers.

RETAIL ELECTRIC PROVIDER offered and provided in-home devices to qualifying eligible low-income customers in a non-discriminatory manner.

RETAIL ELECTRIC PROVIDER received affirmative consent from each participating low-income customer to receive the in-home device or devices.

Upon receipt of a participating customer's affirmative consent to receive a device, **RETAIL ELECTRIC PROVIDER** confirmed that the customer was at that time on the Public Utility Commission of Texas' ("PUCT") "LITE Up Texas" program list of enrollees.

RETAIL ELECTRIC PROVIDER provided information to each participating low-income customer regarding the use, functionality, and benefits of the in-home device or devices.

RETAIL ELECTRIC PROVIDER provided for professional installation of all programmable communicating thermostats delivered to low-income customers.

RETAIL ELECTRIC PROVIDER provided full ownership of the in-home device or devices to each participating low-income customer receiving the device or devices.

RETAIL ELECTRIC PROVIDER provided the in-home device or devices to each participating low-income customer at no cost to the customer receiving the device or devices.

RETAIL ELECTRIC PROVIDER will not disable non-REP specific functionality on the in-home device or devices delivered to each participating low-income customer if the low-income customer moves out or switches away from **RETAIL ELECTRIC PROVIDER** after receiving the in-home device or devices from **RETAIL ELECTRIC PROVIDER**.

RETAIL ELECTRIC PROVIDER provided to participating low-income customers

only in-home devices that meet the Minimum Device Requirements outlined in Appendix A attached hereto and had passed validation testing with the Utility, if the device will connect to the Utility's meter.

RETAIL ELECTRIC PROVIDER has requested reimbursement from the Utility only for the actual costs of the in-home devices delivered to low-income customers during this period up to \$250 per device, plus an additional 25% of each device's actual cost for administrative expenses up to a total cap for the device and administrative costs of \$300, plus \$125 per device for professional installation of each programmable communicating thermostat delivered.

RETAIL ELECTRIC PROVIDER did not request reimbursement for any in-home device provided to a low-income customer for which **RETAIL ELECTRIC PROVIDER** had previously received reimbursement.

RETAIL ELECTRIC PROVIDER did not request reimbursement for costs in excess of the greater of 5% of the funds designated for the Utility for the program or **RETAIL ELECTRIC PROVIDER's** pro rata share of the funds designated based on **RETAIL ELECTRIC PROVIDER's** number of residential customers in the Utility's service area (as provided in **RETAIL ELECTRIC PROVIDER's** latest Provider of Last Resort filing in PUCT Project No. 42201) during the first ninety days of the program.

FURTHER AFFIANT SAYETH NOT. _____

SUBSCRIBED AND SWORN TO BEFORE ME by the said _____ on this _____ day of _____, 201__.

Notary Public, State of Texas