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PROJECT NO. 32182

PROCEEDING TO REVIEW

INFRASTRUCTURE RELIABILITY,

EMERGENCY MANAGEMENT AND

HOMELAND SECURITY MATTERS

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PUBLIC UTILITY COMMISSION

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OF TEXAS

RESPONSES OF ENTERGY GULF STATES, INC. TO THE STAFF'S DRAFT EXECUTIVE SUMMARY ON METHODS TO IMPROVE INFRASTRUCTURE TO MINIMIZE LONG TERM OUTAGES AND RESTORATION COSTS

Entergy Gulf States, Inc. ("EGSI" or "the Company") files the following response to the Staff's Draft Executive Summary recommendations filed in this project on June 9, 2006. Given that the Staff has indicated that most of the recommendations will be further developed through the rulemaking process, EGSI is limiting its response to Question No. 7. EGSI will participate in the rulemaking process where the details of these recommendations will be developed.

7. Require each electric utility to identify and maintain records regarding each instance in which damage of transmission or distribution facilities occurred due to a weather event other than lightning. Require each electric utility to provide an annual report to the Commission that includes, for each such weather event, the date and type of weather event causing the damage, an identification and description of each facility damaged (by distribution feeder or transmission line, not by pole or structure), a description of the nature and extent of damage to each facility (feeder or line), the voltage of each facility damaged, and the approximate age (by 5-yr. increments) of each facility damaged. The first report is due February 15, 2008 for calendar year 2007.

EGSI believes clarification on the definition of a weather event that would require reporting will be critical for this process to be manageable. Additionally, EGSI seeks clarification on determining the age of facilities damaged. The average age of circuits are constantly being altered as poles are changed out on an as needed basis and facilities are added or amended to serve new loads.