

Control Number: 34800



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SOAH DOCKET NO. 473-08-0334
PUC DOCKET NO. 34800

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APPLICATION OF ENTERGY GULF §
STATES, INC. FOR AUTHORITY TO §
CHANGE RATES AND TO §
RECONCILE FUEL COSTS §

BEFORE THE CLERK
STATE OFFICE OF
ADMINISTRATIVE HEARINGS

**STATE OF TEXAS' FIFTEENTH SET OF REQUESTS FOR INFORMATION
TO ENTERGY GULF STATES, INC.**

The State of Texas ("State"), by and through the Office of the Attorney General, Consumer Protection and Public Health Division, Public Agency Representation Section ("PAR") requests Entergy Gulf States, Inc. ("EGSI" or "the Company") to provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to each question.

Definitions

As used in this introduction and in these questions,

- (1) "EGSI" or "the Company" refers to Entergy Gulf States, Inc. as well as its predecessors and successors in interest, including Entergy Texas, Inc.
- (2) "You," "yours," "your," and "Company's" refer collectively to EGSI, including its directors, officers, employees, consultants, agents and, unless privileged, their attorneys;
- (3) "Application" refers to the Application and supporting testimony, schedules and other documents submitted by EGSI and docketed as PUC Docket No. 34800;
- (4) "CGS tariff" refers to EGSI's proposed Competitive Generation Service tariff.
- (4) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, electronic mail (e-mail), computer storage device or any other media, including, but not limited to memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, drafts, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form;

- (5) "Commission" and "PUC" means the Public Utility Commission of Texas;
- (6) "Staff" means the professional staff of the PUC;

Instructions

In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may obtain it, and your attorneys and their investigators.

Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.

If you or any of your attorneys have possession, custody, or control [as defined by Tex. R. Civ. P. 192.7(b)] of the originals of any documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineations, receipt stamp, or notation.

If you or any of your attorneys do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, that are in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and identify the custodian of any copy or summary of the documents.

Claim of Privilege

If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Questions and Responses

The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions. If any question appears confusing, please request clarification from the undersigned counsel.

In providing your responses, please start each response on a separate page and identify, at the top of each page, the question being answered. As part of the response to each question, please state at the bottom of the answer the name and job position of each person who participated in any way, other than providing clerical assistance, in preparing the answer. If the question has sub-parts, please identify the person or persons who answered each sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer as soon as the change in circumstances or facts are known to you.

If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel as soon as possible to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks proprietary information, or on any other grounds, please contact the undersigned counsel as soon as possible.

If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or in electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

REQUEST FOR INFORMATION

RFI 15-1 : Please identify any costs that are included in the Company's application, including testimony, exhibit, and workpapers, that were incurred as a result of EGSI's, EOI's, or ESI's participation in any proceeding(s) under Louisiana Public Service Commission Docket No. U-29764. State for each cost the nature of the cost, the date(s) incurred, and the amount, and the allocation made of such cost between the Texas and Louisiana jurisdictions of EGSI.

Date: March 27, 2008.

Respectfully submitted,

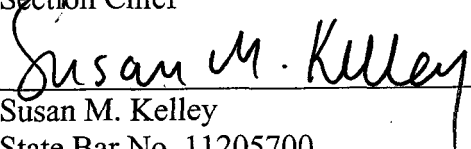
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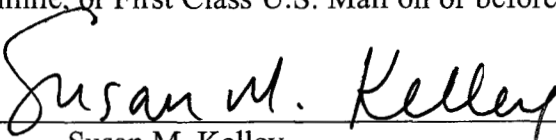
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of **State of Texas' Fifteenth Set of Requests For Information to Entergy Gulf States, Inc.** has been served upon all parties of record by hand delivery, facsimile, or First Class U.S. Mail on or before March 27, 2008.



Susan M. Kelley