



Control Number: 34800



Item Number: 123

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

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

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BEFORE THE  
STATE OF ADMINISTRATION  
HEARINGS

**RESPONSE OF ENTERGY GULF STATES, INC.  
TO COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION**

Now comes, Entergy Gulf States, Inc. ("Entergy Gulf States" or "the Company") and files its Response to Commission Staff of the Public Utility Commission of Texas ("Staff's") Fourth Request for Information. The responses to such requests are attached hereto and are numbered as in the request. An additional copy is available for inspection at the Company's office in Austin, Texas.

Entergy Gulf States believes the foregoing responses are correct and complete as of the time of the responses, but the Company will supplement, correct or complete the responses if it becomes aware that the responses are no longer true and complete, and the circumstances are such that failure to amend the answer is in substance misleading. The parties may treat these responses as if they were filed under oath.


Respectfully submitted,

**L. Richard Westerburg, Jr.** *LRW*  
L. Richard Westerburg, Jr.  
Steve Neinast  
Entergy Services, Inc.  
919 Congress Avenue, Suite 701  
Austin, Texas 78701  
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**Attachments: STAFF AG 04: 1, 2, 4, 6, 7, 9, 10, 11, 12 and 13**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Gulf States, Inc. to Commission Staff of the Public Utility Commission of Texas' Fourth Request for Information has been sent by either hand delivery, facsimile, overnight delivery, or U.S. Mail to all parties on the attached service list on this the 7th day of November, 2007.

L. Richard Westerburg, Jr.   
L. Richard Westerburg, Jr.

EGSI 07 TX Rate Case  
Docket No 34800

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TEXAS ROSE

ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Staff

Prepared By: Janet Canzoneri  
Sponsoring Witness: Philip Stern  
Beginning Sequence No. TH32  
Ending Sequence No. TH32

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Question No.: Staff AG 4-1

Part No.:

Addendum:

Question:

Please provide a list of internal and external audits performed for EGSI January 2006 by its internal and external auditors.

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Response:

From 2006 to the present, Internal Audit Services performed the following internal audits for EGSI:

- Audit of Louisiana Generating Coal Allocation.
- Storm Costs (Payroll, Employee Expenses and IQ Navigator) Audit – Hurricanes Katrina and Rita.

From 2006 to the present, the following external audits were performed for EGSI:

- Deloitte and Touche's 2006 and 2007 Audit of the Financial Statements and Controls that is included in the Form 10-K.
- PricewaterhouseCoopers performed a series of audits of Hurricanes Katrina and Rita costs. The reports are: Summary of Hurricane Costs Through March 31, 2006, Summary of Hurricane Costs Through May 31, 2006, Summary of Hurricane Costs Through March 31, 2007 and Summary of Hurricane Costs Through June 30, 2007.
- See also Rate Filing Schedule S (Deloitte and Touche Test Year Review).

ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Staff

Prepared By: Phillip Stern  
Sponsoring Witness: Phillip Stern  
Beginning Sequence No. TH 68  
Ending Sequence No. TH108

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Question No.: Staff AG 4-2

Part No.:

Addendum:

Question:

Please provide copies of the audit committee minutes from January 2006 through the present.

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Response:

The Company objects to this request on grounds that the responsive materials are protected ("confidential") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Confidential materials will be provided pursuant to the terms of the protective order in this docket.

Based on discussion and agreement between EGSi counsel and Staff counsel, EGSi is providing the attached redacted copies of Entergy Corporation audit committee minutes from January 2006 through the present.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO PARAGRAPH  
4 OF DOCKET NO. 34800 PROTECTIVE ORDER**

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101, 552.104 and/or 552.110. EGSI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for EGSI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

L. Richard Westerburg, Jr.  
Entergy Services, Inc.



ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests

of Requesting Party: Staff

Prepared By: Janie Tucker  
Sponsoring Witness: J. David Wright/Lee  
Canova

Beginning Sequence No. TH33  
Ending Sequence No. TH35

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Question No.: Staff AG 4-4

Part No.:

Addendum:

Question:

Does the Company's requested cost of service include procurement card purchases? If so, please list those purchases by FERC account and amount as well as provide the location of each in the rate filing package. Each item should detail the amount that was directly billed to EGSI and the amount that was allocated from an affiliate.

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Response:

Yes.

See the attached schedule for the total EGSI electric direct incurred (that is, EGSI-incurred, as distinct from affiliate-incurred) procurement card activity for the test year. This does not reflect proforma adjustments of these costs, since such adjustments are not captured at this level of detail.

With regard to affiliate-incurred procurement card costs, based on discussions and agreement between EGSI counsel and Staff counsel, EGSI will provide this affiliate-related information on or before December 3, 2007.

**ENTERGY GULF STATES, INC.**  
**Direct Incurred P-Card Activity by FERC Account**  
**For the Test Year Ended 3/31/07**

**Response to Staff 4-4**  
**Docket 34800**

PRODUCT	ACCOUNT	Total
E	107000	263,433.35
	152000	245,139.15
	163000	1,330,924.76
	174101	12,918.01
	174200	206,532.64
	184001	110,981.40
	184100	(270,869.35)
	186000	76.32
	186013	9,205.03
	228100	12,154.96
	228400	60.75
	408105	222.86
	500000	93,318.17
	502000	176,308.91
	505000	1,246,751.94
	506000	973,057.35
	507000	11,907.41
	510000	2,670.09
	511000	119,201.83
	512000	606,515.94
	513000	357,860.92
	514000	158,071.33
	517000	148,394.16
	519000	3,310.09
	520000	54,829.60
	524000	36,105.24
	525000	1,277.64
	528000	23,294.60
	529000	27,028.73
	531000	2,589.00
	532000	47,940.55
	560000	10,579.90
	561000	5,626.37
	566000	9,552.19
	567000	25,105.90
	568000	203,250.77
	570000	127,812.14
	571000	2,200.47
	580000	564,623.51
	581000	8,279.62
	582000	197.71
	585000	307.51
	586000	11,870.13
	588000	9,208.57
	589000	9,043.13
	590000	69,806.82
	591000	1,232.65
	592000	6,307.75
	593000	39,868.34
	595000	(461.24)
	596000	2,105.51
	597000	77.63

**ENTERGY GULF STATES, INC.**  
**Direct Incurred P-Card Activity by FERC Account**  
**For the Test Year Ended 3/31/07**

**Response to Staff 4-4**  
**Docket 34800**

PRODUCT	ACCOUNT	Total
	598000	16,642.51
	901000	10.06
	902000	3,009.30
	903001	11,011.33
	903002	27,448.73
	907000	10,681.28
	908000	13,287.45
	909000	890.21
	910000	450.00
	912000	664.21
	921000	17,141.50
	923000	18,952.69
	928000	71,359.49
	930200	20,799.13
	931000	188.31
	935000	29,920.06
	154PAS	594.87
	184A03	2,910.09
	184A07	187.96
	184A11	407,070.46
	184A19	52,360.61
	184EST	15,762.00
	242U68	29,491.07
<b>E Total</b>		<b>7,868,642.08</b>

ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Staff

Prepared By: Steve Bridges/Cindy Layne  
Sponsoring Witness: J. David Wright  
Beginning Sequence No. TH59  
Ending Sequence No. TH60

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Question No.: Staff AG 4-6

Part No.:

Addendum:

Question:

Does the Company's requested cost of service include any amounts for moving allowances, signing bonuses, or severance packages? If so, please specify by type, amount and FERC account.

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Response:

See the attached spreadsheet 1 for moving allowance amounts. The signing bonuses included are \$3,000 in account 500 and \$10,000 in account 580. No severance package costs are requested.

EGSI Electric - Relocation Expense for the 12 Months ended 3/31/07

Resource	Resource Desc	Account	Account Desc	Total	Less 30% Unregulated	Test Year	LA	TX
113	Misc Relocation Exp	500000	Oper Supervision & Engineerin	190,828		190,828		
		506000	Misc Steam Power Expenses	(128)		(128)		
		517000	Operation, Supervision & Engr	333,896	(100,169)	233,727		
		560000	Oper Super & Engineering	54,362		54,362		
		561000	Load Dispatching	48,488		48,488		
		580000	Operation Supervision&Enginee	14,053		14,053	6,828	7,224
		901000	Supervision	20,818		20,818	10,116	10,703
		907000	Supervision	9,049		9,049		9,049
		921000	Office Supplies And Expenses	44,161		44,161		
113 Total				715,527		615,358		

ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Staff

Prepared By: Scott Curren  
Sponsoring Witness: Richard Ferguson  
Beginning Sequence No. TH38  
Ending Sequence No. TH38

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Question No.: Staff AG 4-7

Part No.:

Addendum:

Question:

Has the Company experienced any reductions in force since the end of the test year? If yes, please describe and quantify.

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Response:

We interpret "the Company" to mean EGSI. With that understanding, there have been no reductions in force.

ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Staff

Prepared By: Steve Bridges  
Sponsoring Witness: J. David Wright  
Beginning Sequence No. TH61  
Ending Sequence No. TH61

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Question No.: Staff AG 4-9

Part No.:

Addendum:

Question:

List the types of compensated absences that EGSI accrues and provide the amount for each type that is included in the test year.

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Response:

Vacation pay, holiday pay and sick time are recorded in account 18400G and then loaded out to all accounts as part of the payroll loader process. The amounts charged to expense during the test year are as follows:

Vacation pay \$3,507,567  
Holiday pay \$1,619,555  
Sick Time \$467,553

ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Staff

Prepared By: Steve Bridges  
Sponsoring Witness: J. David Wright  
Beginning Sequence No. TH62  
Ending Sequence No. TH63

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Question No.: Staff AG 4-10

Part No.:

Addendum:

Question:

Reference WP/P AJ 27.35. Please list the components of the "Benefits" along with the percentage of each component so that the total of the percentages equals 33.82% as shown on this work paper.

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Response:

Please see the attached schedule.



ENTERGY GULF STATES, INC  
DOCKET NO. 34800 STAFF AG 4-10  
EGSI DIRECT ACCOUNT 926 - BENEFITS  
4/1/06 - 3/31/07

Resource Description	Resource	Acct	LE	Prod Ln	Year	Sum Total Amt
Group Medical/Dental Insurance	013	926000	G0000	E	4/1/06-3/31/07	785,082
Pension Plan Svc Costs(FAS87)	014	926000	G0000	E	4/1/06-3/31/07	405,168
Benefits Alloc - Standard Rate	018	926000	G0000	E	4/1/06-3/31/07	14,254,654
Benefits Alloc - Variable Rate	019	926000	G0000	E	4/1/06-3/31/07	4,340,295
Educational Reimbursement	023	926000	G0000	E	4/1/06-3/31/07	1,152
Post Retirement Plan Payments	236	926000	G0000	E	4/1/06-3/31/07	1,173,856
Service Company Billings	410	926000	G0000	E	4/1/06-3/31/07	29,194,455
Supplemental Pension Pay	871	926000	G0000	E	4/1/06-3/31/07	2,478
Non-Productive Loader	890	926000	G0000	E	4/1/06-3/31/07	3
Balance Sheet Default	901	926000	G0000	E	4/1/06-3/31/07	0
Co-Owner Credits	990	926000	G0000	E	4/1/06-3/31/07	(1,566,520)
Total Account 926						<u>48,590,622</u>
Less:						
ESI BILLINGS						<u>29,194,455</u>
Adjusted Account 926						<u>19,396,167</u>
Electric O&M Payroll						<u>57,344,931</u>
Benefits %						<u>33.82%</u>

ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Staff

Prepared By: Steve Bridges  
Sponsoring Witness: J. David Wright  
Beginning Sequence No. TH64  
Ending Sequence No. TH65

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Question No.: Staff AG 4-11

Part No.:

Addendum:

Question:

Reference WP/P AJ 27.51. Please list the components of the "Benefits" along with the percentage of each component so that the total of the percentages equals 49.44% as shown on this work paper.

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Response:

Please see the attached schedule.

ENTERGY GULF STATES, INC  
DOCKET NO. 34800 STAFF AG 4-11  
ESI ACCOUNT 926 - BENEFITS  
4/1/06 - 3/31/07

Resource Description	Resource	Acct	LE	Prod Ln	Year	Sum Total Amt
Group Medical/Dental Insurance	013	926000	G0000	E	4/1/06-3/31/07	785,082
Pension Plan Svc Costs(FAS87)	014	926000	G0000	E	4/1/06-3/31/07	405,168
Benefits Alloc - Standard Rate	018	926000	G0000	E	4/1/06-3/31/07	14,254,654
Benefits Alloc - Variable Rate	019	926000	G0000	E	4/1/06-3/31/07	4,340,295
Educational Reimbursement	023	926000	G0000	E	4/1/06-3/31/07	1,152
Post Retirement Plan Payments	236	926000	G0000	E	4/1/06-3/31/07	1,173,856
Service Company Billings	410	926000	G0000	E	4/1/06-3/31/07	29,194,455
Supplmental Pension Pay	871	926000	G0000	E	4/1/06-3/31/07	2,478
Non-Productive Loader	890	926000	G0000	E	4/1/06-3/31/07	3
Balance Sheet Default	901	926000	G0000	E	4/1/06-3/31/07	0
Co-Owner Credits	990	926000	G0000	E	4/1/06-3/31/07	(1,566,520)
Total Account 926						<u>48,590,622</u>
ESI Account 926						29,194,455
Electric O&M Payroll						<u>59,056,214</u>
Benefits %						<u>49.44%</u>

ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Staff

Prepared By: Steve Bridges  
Sponsoring Witness: J. David Wright  
Beginning Sequence No. TH66  
Ending Sequence No. TH67

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Question No.: Staff AG 4-12

Part No.:

Addendum:

Question:

Reference WP/P AJ 27.69. Please list the components of the "Benefits" along with the percentage of each component so that the total of the percentages equals 49.08% as shown on this work paper.

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Response:

Please see the attached schedule.

ENTERGY GULF STATES, INC  
DOCKET NO. 34800 STAFF AG 4-12  
NUCLEAR ACCOUNT 926 - BENEFITS  
4/1/06 - 3/31/07

Resource Description	Resource	Acct	LE	Prod Ln	Year	Sum Total Amt
Benefits Alloc - Standard Rate	018	926000	G0000	E	4/1/06-3/31/07	1,921
Benefits Alloc - Variable Rate	019	926000	G0000	E	4/1/06-3/31/07	31
Service Company Billings	410	926000	G0000	E	4/1/06-3/31/07	16,800,213
ESI Cascade Billings	450	926000	G0000	E	4/1/06-3/31/07	2,282,719
Total Account 926						<u>19,084,884</u>
Adjustment						-
Electric O&M Payroll						<u>38,886,385</u>
Benefits %						<u>49.08%</u>

ENTERGY GULF STATES, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
Docket No. 34800 - 2007 Texas Rate Case

Response of: Entergy Gulf States, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Staff

Prepared By: Roy L. Austin  
Sponsoring Witness: Patricia A. Galbraith  
Beginning Sequence No. TH122  
Ending Sequence No. TH122

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Question No.: Staff AG 4-13

Part No.:

Addendum:

Question:

Page 52 of Patricia Galbraith's testimony indicates that the Texas Comptroller is currently conducting a use tax audit of EGSi for the periods 2004-2004. Please provide the status of that audit and update the RFI response as changes occur.

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Response:

The auditor from the Texas Comptroller's Beaumont audit office is conducting a use tax audit of EGSi for the periods covering calendar years 2000 through 2004. The auditor has developed the audit sample and invoice population. Invoices requested by the auditor have been copied and presented for the auditor's review and inspection. The auditor reviewed a portion of the invoices during the weeks of October 15<sup>th</sup> and 22<sup>nd</sup>. The auditor is next scheduled to return to review additional invoices during the weeks of November 26<sup>th</sup> and December 3<sup>rd</sup>.