



Control Number: 37744



Item Number: 403

Addendum StartPage: 0

**SOAH DOCKET NO. 473-10-1962
DOCKET NO. 37744**

APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES AND RECONCILE FUEL COSTS	§ § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**RESPONSE OF ENTERGY TEXAS, INC.
TO OFFICE OF PUBLIC UTILITY COUNSEL'S SEVENTH REQUEST FOR
INFORMATION: OPUC 7: 1, 3, 4, 5, 7, 8, 9, 10, 11, 12 and 13**

Now comes, Entergy Texas, Inc. ("Entergy Texas" or "the Company") and files its Response to Office of Public Utility Counsel ("OPUC") Seventh Request for Information. The response to such request is attached hereto and is numbered as in the request. An additional copy is available for inspection at the Company's office in Austin, Texas.

Entergy Texas believes the foregoing response is correct and complete as of the time of the response, but the Company will supplement, correct or complete the response if it becomes aware that the response is no longer true and complete, and the circumstance is such that failure to amend the answer is in substance misleading. The parties may treat this response as if it were filed under oath.

Respectfully submitted,

Steve Neinast 
Steve Neinast
Entergy Services, Inc.
919 Congress Avenue, Suite 701
Austin, Texas 78701
(512) 487-3957 telephone
(512) 487-3958 facsimile


Attachments: OPUC 7: 1, 3, 4, 5, 7, 8, 9, 10, 11, 12 and 13

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403

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to OPUC's Seventh Request for Information has been sent by either hand delivery, facsimile, overnight delivery, or U.S. Mail to all parties in this docket on this the 23rd day March, 2010.

Steve Neinast 
Steve Neinast

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: William R. Morgan
Sponsoring Witness: Dolores S. Stokes
Beginning Sequence No. LR5252

Ending Sequence No. LR5252

Question No.: OPUC 7-1

Part No.:

Addendum:

Question:

- a. Explain why project F3PPSPCDSK costs cannot be directly charged to the operating company and jurisdiction utilizing the service.
 - b. Provide all documentation supporting your response.
-

Response:

- a. Project Code F3PPSPCDSK captures costs associated with the Customer Service Center function's specialty desks. These desks address issues such as financial assistance, permits, apartment managers, builders, web technical assistance, and lighting. These specialty desks are served by employees who act on behalf of all of the Entergy Operating Companies. The customer service representatives who receive calls at these desks do not record the Operating Company at issue for each call received, and it would be impractical for them to do so. Thus, the charges incurred for this project are appropriately allocated to all of the Operating Companies using billing method CUSTCALL.
- b. See Project Summary for project code in Exhibit SBN-E.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Kevin Schulz
Sponsoring Witness: Mark F. McCulla
Beginning Sequence No. LR5253

Ending Sequence No. LR5253

Question No.: OPUC 7-3

Part No.:

Addendum:

Question:

Please provide the test year SERC dues invoices for project F3PPT11141.

Response:

The table below provides a listing of the cost of SERC dues for the Test Year that totals \$260,089.68. Project Code F3PPT11141 captures costs associated with the ETI portion of the annual SERC dues and bills 100% to ETI resulting in ETI receiving the entire \$260,089.68 of the costs related to the payment of these SERC dues during the Test Year.

SERC Dues for Test Year (7-1-08 to 6-30-09)

Accounting Period	Year	GL Business Unit Desc	Project	Project Desc	Monetary Amt	Name 1
3	2009	Entergy Services Inc.	F3PPT11141	Entergy Texas - SERC Dues & Expense	68,230.95	NORTH AMERICAN ELECTRIC
5	2009	Entergy Services Inc.	F3PPT11141	Entergy Texas - SERC Dues & Expense	68,230.95	NORTH AMERICAN ELECTRIC
9	2008	Entergy Services Inc.	F3PPT11141	Entergy Texas - SERC Dues & Expense	55,396.83	NORTH AMERICAN ELECTRIC
12	2008	Entergy Services Inc.	F3PPT11141	Entergy Texas - SERC Dues & Expense	68,230.95	NORTH AMERICAN ELECTRIC
Total					260,089.68	

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Cameron Warren
Sponsoring Witness: Mark F. McCulla
Beginning Sequence No. U5254
Ending Sequence No. U5255

Question No.: OPUC 7-4

Part No.:

Addendum:

Question:

- a. Please explain the term "Available Flowgate Capacity" in project F3PPTDS86.
 - b. Please explain when and how ETI utilized AFC capacity during the test year.
 - c. Please explain the relationship between AFC and ETI's share of system peak load.
 - d. Provide all documentation supporting your responses to (a) – (c) above.
-

Response:

a. – c.

The term "Available Flowgate Capacity" (AFC) refers to the methodology in which Entergy calculates the availability of transmission. The AFC process determines ATC by monitoring the impact of Transmission Service Requests ("TSRs") on certain specified flowgates. A flowgate represents a constrained transmission facility that exceeds 100% of its rating during a power transfer. A flowgate can be either: (1) a single transmission facility (monitored element); or (2) a set of transmission facilities that includes monitored elements and contingent elements.

The AFC process generates a base case model that simulates anticipated system conditions. The base system conditions include projected load, generation dispatch, system configuration/outages, and base flow transactions. RFCalc produces power flow models representing the two distinct time periods: (1) hourly models in the Operating and Planning Horizons for Hour 1 to Hour 168; (2) daily models in the Planning Horizon for Day 8 to Day 31. An off-line planning model process using PSS/E produces monthly power flow models for Month 2 to Month 18 of the Study Horizon. WebTrans is a software application developed by OATI used to process TSRs and to calculate AFC values, and

serves as the interface to web OASIS. As individual TSRs are received, webTrans applies the applicable Response Factors to determine the impact new requests will have on the relevant flowgates and approves or denies the request based on that impact. The ICT determines the final status of each TSR based on the information provided by webTrans.

Although the AFC process will monitor approximately 300-500 flowgates, webTrans will use a more limited set of flowgates to evaluate individual service requests. When evaluating individual service requests, webTrans will only consider those flowgates that are: (1) "significantly impacted" by the request at issue, *i.e.*, those flowgates with a Response Factor equal to or greater than 3%; and (2) the Most Limiting Flowgates. Thus, to determine which flowgates should be evaluated for a particular source-sink combination, RFCalc / off-line study horizon process will: (1) ignore all flowgates with a Response Factor of less than the Response Factor cutoff of 3%; and (2) will select from the remaining flowgates the fifteen flowgates with the lowest effective ATC values. The list of flowgates used to evaluate a particular service request will be redetermined during each resynchronization.

As individual transmission requests are submitted over OASIS, webTrans will apply the appropriate Response Factors to each request in order to evaluate the impact of the request on the most-limiting, significantly-affected flowgates. The amount of capacity requested will be multiplied by the Response Factor for a particular flowgate. The product of the requested capacity and the Response Factor will represent the additional loading impact of the new service on the flowgate and will be subtracted from the AFC value for that flowgate. As discussed above, this process will be applied to the Most Limiting Flowgates. If the AFC for all the flowgates remains positive or equal to zero after being reduced to account for the new transaction, the request will be approved. If the AFC value on any of the flowgates becomes negative or otherwise exceeds the rated capability of the facilities in question, then the request will be denied, unless service of a lower priority may be preempted. The preempting of service with a lower priority will be conducted pursuant to governing FERC policies.

- d. Please see Attachment C to the Entergy OATT - Methodology to Assess Available Transmission Capability. Attachment C can be found at the following web link:
http://www.oatioasis.com/EES/EESdocs/ATTACHMENT_C.pdf
Terms used in this response are defined in that document.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Rex Shannon
Sponsoring Witness: W. Wayne Garrison
Beginning Sequence No. LR5256
Ending Sequence No. LR5256

Question No.: OPUC 7-5

Part No.:

Addendum:

Question:

- a. Please explain the functions of the Fossil Virtual Resource Center under project F3PPWE0309.
 - b. Please explain how ETI's retail ratepayers benefit from these project expenditures.
 - c. Please provide all documentation supporting your responses to (a) and (b) above.
-

Response:

- a. The Fossil Virtual Resource Center ("VRC") was organized in 2004 and is part of the Resource Management & Training Group. The goal of the VRC is to reduce contractor costs and/or overtime by utilization of a flexible workforce designed to rotate out of "home" fossil power plants to work at other Entergy facilities on an as-needed basis due to system operational needs. In addition to using existing employees, the VRC allows the use of retired employees to achieve the VRC goals.
- b. ETI's retail rate payers benefit from reduced contractor costs. The ETI cost savings resulting from the VRC in the year 2008 were approximately \$1.2 million. These savings benefited ETI's retail ratepayers by reducing fossil plant contractor costs or overtime.
- c. See Wayne Garrison's Direct Testimony, pages 14 -15. In addition, see the Project Summary that was provided in the rate case filing for Project Code F3PPWE0309 for Fossil Plant Operations affiliate billings to ETI for these services.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Kyle Shook/Rex Shannon
Sponsoring Witness: W. Wayne Garrison
Beginning Sequence No. LR5257

Ending Sequence No. LR5258

Question No.: OPUC 7-7

Part No.:

Addendum:

Question:

- a. Please explain why ETI is being charged for director Northwest Region and director Southwest region expenses in projects F3PPWE0313 and F3PPWE0427.
 - b. Is ETI located in the Southwest region or Northwest region? Explain your response.
 - c. Please identify all other Energy operating companies that are located in the multiple fossil support regions.
 - d. Provide all documentation supporting your responses to (a)-(c) above.
 - e. Please explain why the costs incurred under these projects are ongoing.
-

Response:

- a. Fossil Operations had a Regional Realignment at the end of May 2008. The reason for the realignment was to support the January 1, 2008 jurisdictional split of Entergy Gulf States, Inc. along the Texas-Louisiana state lines into two new, separate corporations: Entergy Texas, Inc. which continues the former EGSI operations with Texas; and Entergy Gulf States Louisiana, L.L.C. which continues the former EGSI operations in Louisiana. See item c.

Costs incurred under Project Code F3PPWE0313 – Director Southwest Region – included costs that supported the EGSI plants which included the current ETI and EGSL plants separated from EGSI. The Southwest Region was eliminated and replaced with the Northwest Region due to the fossil reorganization at the end of May 2008. Therefore, charges were incurred in both Project Codes in the Tests Year.

- b. ETI's generating fossil units are located in the Northwest Region.
Note that the Nelson 6 coal unit in which ETI owns 29.75 percent of the unit is located in the Entergy Gulf States Louisiana, L.L.C. Operating Company system, or the fossil Central Region. See item c.
- c. Prior to the May 2008 Regional Realignment, the following were the Fossil Operations regions with a list of the Energy Operating Companies located in the multiple fossil/hydro support regions:

Southwest Region	Northern Region	Southeast Region
Entergy Gulf States Louisiana, LLC.	Entergy Arkansas, Inc.	Entergy Louisiana, LLC
Entergy Texas, Inc.	Entergy Mississippi, Inc.	Entergy New Orleans, Inc

After the May 2008 Regional Realignment, the following are the Fossil Operations regions with a list of the Energy Operating Companies located in the multiple fossil/hydro support regions:

Northwest Region	Central Region	Southeast Region
Entergy Arkansas, Inc	Entergy Gulf States Louisiana, LLC	Entergy Louisiana, LLC
Entergy Texas, Inc.	Entergy Mississippi, Inc.	Entergy New Orleans, Inc.

- d. See Wayne Garrison's Direct Testimony, Exhibit WWG-1, Fossil Operations Organization Chart dated June 2008, page 2 of 2 (Bates 8-284) which shows the regions, Entergy Operating Companies in each region, and fossil/hydro units in each Operating Company. In addition, see Wayne Garrison's Direct Testimony, Exhibit WWG-2, Fossil Generating Unit Information, page 2 of 2 (Bates 8-286) for list of ETI's fossil units, and operators and owners of the units.
- e. Costs incurred under Project Code F3PPWE0313 will discontinue because the Director of the Southwest region no longer exists as a result of the Regional Realignment; however, the costs that were incurred under this project code continue to be applicable to the Northwest and Central Regions. Costs under Project Code F3PPWE0427 will continue to be incurred to capture and manage costs associated with the Director of the Northwest Region oversight of the fossil/hydro power generating plants in the Northwest Region.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Kyle Shook/Rex Shannon
Sponsoring Witness: W. Wayne Garrison
Beginning Sequence No. LR5259

Ending Sequence No. LR5260

Question No.: OPUC 7-8

Part No.:

Addendum:

Question:

- a. Please explain the specific services received by ETI during the test year under projects F3PPWEOSFD, F3PPWEOSGE, F3PPWEOSWG and F3PPWEOSWS.
 - b. Please prove all documentation supporting your response.
-

Response:

- a. Fossil Operations outsourced or outsources portions of the power plant maintenance and engineering work through the Operating Companies' Alliance agreements with Fluor Enterprises, Inc., General Electric International, Inc. ("GE"), Washington Group International, Inc. ("Washington Group"), and Siemens Power Generation, Inc. ("SPG").

Fluor Enterprises provided craft labor and supervision, primarily to support power plant maintenance outages and construction projects. This alliance agreement was discontinued at the end of 2007 and was replaced with a General Service Agreement ("GSA") with a new contractor. GE and SPG agreements provided services for their respective turbine/generator sets within the Entergy System, including ETI. The GE Alliance Agreement continues and was in effect during the Test Year. The SPG Alliance agreement was terminated in July 2007. The Washington Group provided Fossil Operations ready access to an extensive technical resource pool for individual plant projects, as well as System-wide Fossil Operations projects. This group is typically utilized to supplement the existing engineering staff on plant projects and studies. This alliance agreement expired in May 2008, and Entergy entered into a new agreement with the Washington Group.

Fossil Operations decision to outsource a portion of maintenance and engineering work was driven in part by the objective to economically match internal staffing levels to routine base-load maintenance and engineering work, while supplementing the existing staff with contract labor for major support during peak work-load periods.

The following Fossil Operations Affiliate Billings are for the administration of the agreements. Cost by the alliance contractors for various projects at the fossil plants was charged directly to the plants requesting the services.

Project Code	Description	Fossil Operations Affiliate Billings
F3PPWEOSFD	Alliance-Flour Daniel Admin.	\$23,754
F3PPWEOSGE	Alliance-General Electric Admin.	\$4,826
F3PPWEOSWG	Alliance-Washington Group	\$1,156
F3PPWEOSWS	Alliance-Siemens Westinghouse	\$122

Charges incurred for Fluor and Siemens Westinghouse Alliance were for Test Year administration costs for activities associated with closing out these alliance contracts.

- b. See Project Summaries for these project codes in Exhibit SBN-E and Wayne Garrison's Direct Testimony, page 69 of 91.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Kyle Shook
Sponsoring Witness: W. Wayne Garrison
Beginning Sequence No. LR5261

Ending Sequence No. LR5261

Question No.: OPUC 7-9

Part No.:

Addendum:

Question:

- a. Please explain in detail the differences in services rendered to ETI under project F3PPWEOGGN and project F3PPWEOSGN during the test year.
 - b. Provide all documentation supporting your response.
-

Response:

- a. Costs charged to ETI associated with Project Code F3PPWEOGGN-Engineering and Tech Support are for support services provided by the Fossil Technical Services-Plant Support Beaumont (Sabine) Field Office. Costs charged to this code are for engineering and technical support services provided to the ETI plants (Lewis Creek, Sabine, and Nelson 6). Costs are billed 100% to ETI based on the billing method: DIRECTTX.

Costs charged to ETI associated with Project Code F3PPWEOSGN-General System Eng-Tech Support are for support services provided by the fossil headquarters ESI support groups under the management of the VP, Technical Services. These support services are system-wide in nature and benefit all operating companies. ETI's costs for this project code are based on the Billing Method CAPAOPCO System Capacity, which bills costs to the operating companies based on the power level, in kilowatts, that could be achieved if all non-nuclear generating units were operating at maximum capability simultaneously. Plant capacity is a reasonable basis for allocating costs associated with generation.

- b. See the organization chart in Company witness Wayne Garrison's Direct Testimony, Exhibit WWG-1, page 2 of 2 and the Project Summaries for these project codes in Exhibit SBN-E. In addition, see Mr. Garrison's Direct Testimony, starting on page 41 of 91 for services provided by the above technical/engineering support groups.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Kyle Shook
Sponsoring Witness: W. Wayne Garrison
Beginning Sequence No. LR5262

Ending Sequence No. LR5262

Question No.: OPUC 7-10

Part No.:

Addendum:

Question:

- a. Please explain the differences in services rendered to ETI during the test year under projects F3PPWET009 and F3PPWE0427.
 - b. Please provide all documentation supporting your response.
-

Response:

- a. Project Code F3PPWET009 Dir. Northwest Region – Fossil, captures costs associated with activities that benefit ETI only. The overall purpose of this project is to capture and manage costs associated with the direct oversight of the power generating plants in Fossil Operations - ETI, Inc. This project bills costs directly to ETI under the billing method DIRECTTX, which allocates cost 100% to ETI.

Project Code F3PPWE0427 Dir. Northwest Region-EAI & EG_TX captures costs associated with activities that benefit both ETI and EAI. Costs are billed under the billing method CAPANWES, which allocates costs based on EAI and ETI system capacity (System Capacity-Northwest).

- b. See Company witness Wayne Garrison's Direct Testimony, Exhibit WWG-1, page 2 of 2 and the Project Summaries for these project codes in Exhibit SBN-E. In addition, see Mr. Garrison's Direct Testimony starting on page 36 of 91 for a description of the services provided by the Northwest Region Director.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Nancy Meunier
Sponsoring Witness: Steven C. McNeal
Beginning Sequence No. LR5263

Ending Sequence No. LR5264

Question No.: OPUC 7-11

Part No.:

Addendum:

Question:

- a. Please specifically identify the Entergy employees receiving insurance under project F3PPZZ115P during the test year.
 - b. Please provide all documentation supporting your response.
-

Response:

- a. Project F3PPZZ115P captures insurance premium expense for employee crime coverage, e.g., loss from employee theft, forgery, and theft from savings plans and employee benefit plans, which covers all employees. During the test year, ESI allocated \$2,850 to ETI for ESI's crime insurance premium expense.
- b. See attached ESI crime insurance premium invoice.

Regions Insurance


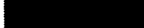
1500 Riverfront Drive
Little Rock, AR 72202
Phone: 501-661-4800 Fax: 501-748-3845

Entergy Services, Inc.

639 Loyola Avenue
New Orleans, LA 70113-3125

INVOICE #		415594	Page 1
ACCOUNT NO.	OP	DATE	
ENTER-9	E6	11/25/2008	
POLICY #			
CR09100039			
COMPANY			
St Paul Fire and Marine Insurance Company			
PRODUCER			
Eric Herget			
EFFECTIVE		EXPIRATION	
12/1/2008		12/1/2009	

Eff Date	Policy Number	Description	Item #	Amount
12/01/08	CR09100039	Crime Policy (\$10mm Limit) (Surplus Lines tax not applicable)	9B6781	\$30,000.00

REMIT TO:
Regions Bank Wiring Instructions
FEIN# 71-0621654
Producer License #2480
Wiring Info:
Routing number: 
Account number: 
Payment address:
Regions Insurance, Dept 1325
P. O. Box 2121
Memphis, TN 38159

THANK YOU!	TOTAL	\$30,000.00
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ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Lee Barnett/Heather
LeBlanc
Sponsoring Witness: Stephanie
B.Neyland/Phillip B. Gillam
Beginning Sequence No. *LR5265*
Ending Sequence No. *LR5265*

Question No.: OPUC 7-12

Part No.:

Addendum:

Question:

- a. What portion of project F4PCW90341 costs were charged to ETI's wholesale jurisdiction during the test year?
 - b. Provide all documentation supporting your response.
-

Response:

- a. None of Project F4PCW90341 expenses have been charged to a wholesale jurisdiction in this case.
- b. See MFR Schedule P for the jurisdictions and classes included in the cost of service.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 37744 - 2009 ETI Rate Case

Response of: Entergy Texas, Inc.
to the Seventh Set of Data Requests

of Requesting Party: Office of Public Utility
Counsel

Prepared By: Maria Chighizola/Will
Morgan

Sponsoring Witness: Stephanie Neyland/
Dolores S. Stokes

Beginning Sequence No. LR5266

Ending Sequence No. LR5266

Question No.: OPUC 7-13

Part No.:

Addendum:

Question:

- a. Please explain the \$6,902 billing to ETI for project F5PCCSS06L when the project scope states that "no costs will bill out on this project"
 - b. Please provide complete scope of work information for this project.
-

Response:

- a. Billings in connection with Project Code F5PCCSS06L were directly billed to ETI using the loaned resource billing process. These services were provided directly to the Customer Service Operations functions at ETI by Customer Service personnel of Entergy Arkansas, Inc. The loaned resource billing process bills affiliates directly and does not distribute costs based on an allocation factor or billing method. The loaned resource billings can include a Project Code, but do not flow through the project billing process. Instead, the Business Unit identity of the department receiving the services determines the Business Unit billed. For further information on the loaned resource billing process, please refer to Exhibit SBN-15, Affiliate Billing Process Discussion, in the direct testimony of Company witness Stephanie B. Neyland. Please specifically refer to the Loaned Resource Billings section of this exhibit. The Scope of Work section of the project summary states that "No costs will bill out on this project. Therefore, no billing method or scope statement is required." because it is referring to the fact that there were no ESI charges billed to ETI through the service company billing process for this project.
- b. See the Project Summary for this project code in Exhibit SBN-E.