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

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PUBLIC UTILITIES COMMISSION  
STATE OF TEXAS

APPLICATION OF ENTERGY TEXAS, § BEFORE THE STATE OFFICE  
INC. FOR AUTHORITY TO CHANGE § OF  
RATES AND RECONCILE FUEL COSTS § ADMINISTRATIVE HEARINGS

**TEXAS INDUSTRIAL ENERGY CONSUMERS'  
EIGHTH REQUEST FOR INFORMATION**

Texas Industrial Energy Consumers ("TIEC") files the following requests for information ("RFIs") pursuant to P.U.C. Proc. R. 22.144. TIEC requests that Entergy Texas, Inc. ("ETI" or "the Company"), by and through its attorneys of record, provide all of the information requested on the attached Exhibit "A" within twenty (20) days of receipt thereof. All information responsive to the requests on the attached Exhibit "A" should be sent to the following persons via overnight courier, on a piecemeal basis as individual items become available:

Rex VanMiddlesworth  
Meghan Griffiths  
Andrews Kurth LLP  
111 Congress Avenue, Suite 1700  
Austin, Texas 78701  
(512) 320-9200  
rvanmiddlesworth@andrewskurth.com  
mgriffiths@andrewskurth.com

Jeffry Pollock  
J.Pollock, Inc.  
12655 Olive Blvd., Suite 335  
St. Louis, Mo. 63141  
(314) 878-5814  
jpollock@jpollockinc.com

## DEFINITIONS AND INSTRUCTIONS

- A. Pursuant to P.U.C. Proc. R. 22.144(c)(2), TIEC requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy.
- B. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced.
- C. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to P.U.C. Proc. R. 22.144(i).
- D. Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request.
- E. TIEC requests that each item of information be made available as it is completed, rather than upon compilation of all information requested.
- F. "ETI" refers to Entergy Texas, Inc., its parent, subsidiaries and affiliates, past or present; its employees, officers, directors, agents, consultants, attorneys, and all persons acting under contractual arrangements with or acting or purporting to act on behalf of ETI; any merged or consolidated predecessors or predecessor in interest; and any merged or consolidated successors in interest.
- G. "Entergy Operating Company" refers to the Entergy System Operating Companies, including Entergy Arkansas, Inc.; Entergy Gulf States Louisiana, L.L.C.; Entergy Louisiana, L.L.C.; Entergy Mississippi, Inc.; Entergy Texas, Inc.; and Entergy New Orleans, Inc.
- H. The terms "document" or "documents" are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. "Document" or "documents" shall also

include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

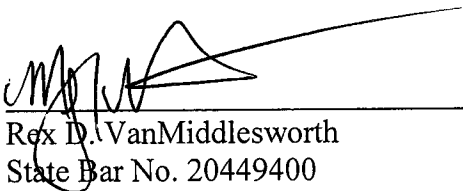
- I. Pursuant to Tex. R. Civ. P. 196.4, TIEC specifically requests that any electronic or magnetic data (which is included in the definition of "document") that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests.
- J. The terms "and" and "or" shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.
- K. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."
- L. "Any" shall be construed to include "all" and "all" shall be construed to include "any."
- M. The term "concerning," or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.
- N. The term "including," or one of its inflections, means and refers to "including but not limited to."
- O. "Relate to," "regarding," "concerning" and similar terms mean addressing, analyzing, referring, discussing, mentioning in any way, explaining, supporting, describing, forming the basis for, or being logically or causally connected in any way with the subject of these discovery requests.
- P. "Provide the basis," "state the basis," or "explain the basis" means provide all information on or describe every fact, statistic, inference, estimate, consideration, conclusion, study, and analysis known to ETI that was relied upon in support of the expressed contention, proposition, conclusion or statement.
- Q. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- R. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- S. Pursuant to P.U.C. Proc. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- T. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format,

please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

- U. If a data response is available in EXCEL format, provide the EXCEL version of the data response.
- V. If any document is withheld under any claim of privilege, please furnish a privilege log identifying each document for which a privilege is claimed, together with the following information: date and title of the document; the preparer or custodian of the information; to whom the document was sent and from whom it was received; subject matter of the document; and the basis upon which the privilege is claimed.

Respectfully submitted,

ANDREWS KURTH LLP



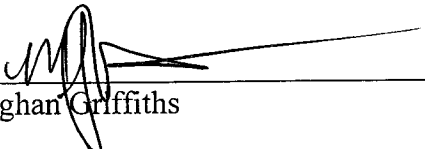
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Rex D. VanMiddlesworth  
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State Bar No. 24045983  
111 Congress Avenue, Suite 1700  
Austin, Texas 78701  
(512) 320-9200  
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ATTORNEYS FOR TEXAS INDUSTRIAL  
ENERGY CONSUMERS

### CERTIFICATE OF SERVICE

I, Meghan Griffiths, Attorney for TIEC, hereby certify that a copy of TIEC's Eighth Request for Information was served on all parties of record in this proceeding on this 3rd day of May, 2010 by hand-delivery, facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.



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Meghan Griffiths

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

**APPLICATION OF ENTERGY TEXAS, INC. § BEFORE THE STATE OFFICE  
FOR AUTHORITY TO CHANGE RATES AND § OF  
TO RECONCILE FUEL COSTS § ADMINISTRATIVE HEARINGS**

**TEXAS INDUSTRIAL ENERGY CONSUMERS'  
EIGHTH REQUEST FOR INFORMATION**

- TIEC 8-1 Please provide the same information as requested in TIEC 1-5 except provide the information by Entergy Operating Company for all QFs in the Entergy service territory. With respect to part d, the data should reflect the actual puts made by QFs to their respective Entergy Operating Company.
- TIEC 8-2 Please provide all documents and communications, including e-mails, regarding ETI's decision to provide wholesale service to Brazos Electric Cooperative (Brazos) and East Texas Electric Cooperative (ETEC).
- TIEC 8-3 Please state whether ETI plans to serve additional wholesale customers (besides Brazos and ETEC) or has been in discussions relating to serving any additional wholesale customers, and if so, provide:
- a. All documents and communications, including e-mails, regarding plans or discussions to serve the additional wholesale customers.
  - b. The date on which service is anticipated to commence.
  - c. The amount of the capacity sale.
- TIEC 8-4 Please provide any analysis conducted by or for ETI in the past five years that demonstrates that the revenues from wholesale customers will offset the incremental costs to serve wholesale customers.
- TIEC 8-5 Referring to ETI's response to TIEC 3-4 and TIEC 3-5, ETI made a reference to its response to OPUC 9-6. However, this response only provides the balance sheet, income statement and the cash flow statement used to derive the financial credit metrics referenced at pages 11, 12, 15, and 16. On an electronic spreadsheet with all formulas intact, please provide copies of the exact calculations of the ratios shown on the above page references and copies of all support documents and calculations.
- TIEC 8-6 Referring to ETI's response to TIEC 3-10, please provide copies of detailed schedules and support documents and explain how the pro forma adjustments to the long-term debt of \$699,146,000 were calculated.