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SOAH DOCKET NO. 473-12-2979
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APPLICATION OF ENTERGY § BEFORE THE STATE OFFICE
TEXAS, INC. FOR AUTHORITY TO §
CHANGE RATES, RECONCILE FUEL § OF
COSTS, AND OBTAIN DEFERRED §
ACCOUNTING TREATMENT § ADMINISTRATIVE HEARINGS

ENTERGY TEXAS, INC.'S
FIRST REQUEST FOR INFORMATION TO STAFF

TO: Commission Staff of the Public Utility Commission of Texas by and through its attorneys of record, PUC Staff, 1701 North Congress Avenue, Austin, TX 78701.

Entergy Texas, Inc. (ETI or the Company) requests that Commission Staff of the Public Utility Commission of Texas (Staff) provide the following information and answer the following questions under oath within 10 days, or sooner if practicable. The answers should be provided in sufficient detail to present all relevant facts. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. For each response, please state the Request for Information and identify the individuals responsible for preparing and sponsoring the response by name and title.

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Respectfully submitted,

Steven H. Neinast
Assistant General Counsel
ENTERGY SERVICES, INC.
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By: 
John F. Williams
State Bar No. 21554100

ATTORNEYS FOR
ENTERGY TEXAS, INC.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served by facsimile or First Class U.S. Mail on all parties of record in this proceeding on April 6, 2012.


John F. Williams

INSTRUCTIONS

1. Reference to "Staff" or "your" means Staff and its agents, consultants, and all witnesses whose testimony Staff intends to present to the Public Utility Commission of Texas, and all persons acting or purporting to act for or on behalf of Staff.
2. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."
3. "Any" shall be construed to include "all" and "all" shall be construed to include "any."
4. The terms "document" and "documents" are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, records of personal conversations, minutes or summaries or other records of meetings and conferences, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing, and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made).
5. Words used in the plural shall be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
6. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
7. If any document is withheld under any claim or 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; the subject matter of the document; and the basis upon which the privilege is claimed.
8. If there is any question regarding the meaning or intent of a word or words in these requests, please contact counsel of record for Entergy Texas, Inc. for clarification.

FIRST REQUEST FOR INFORMATION TO STAFF

- 1-1. At page 37, lines 16-20 of the testimony of Staff witness Jolie Mathis, the witness concludes that “the depreciation reserve amortization [proposed by ETI] should be disallowed...” and that the “remaining life depreciation rate allows for any deficiency to be recovered over the remaining life of the accounts.” In connection with these statements, please provide the following information:
- a. Did witness Mathis include the unamortized balance of the depreciation reserve in her determination of the remaining accrual?
 - b. If the answer to a) is yes, please provide the calculations or other explanation demonstrating this to be the case;
 - c. If the answer to a) is no, does witness Mathis agree that the unamortized balance of the depreciation reserve should be included as part of the remaining accrual for the accounts in question, to provide for its inclusion in rate base and future recovery. Please explain the basis for your answer;
 - d. Please explain why witness Mathis’ depreciation expense calculation was not modified to reflect the reduced accumulated provision for depreciation for the accounts in question.