



Control Number: 41791



Item Number: 183

Addendum StartPage: 0

SOAH DOCKET NO. 473-14-0366
DOCKET NO. 41791

2013 NOV 26 PM 4:18

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

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STATE OFFICE OF
ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S TWENTY-SECOND REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 22-1 THROUGH STAFF 22-17

The Commission Staff of the Public Utility Commission of Texas (Staff) requests that Entergy Texas, Inc. (ETI) provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) 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. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

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DATED: November 26, 2013

Respectfully Submitted,

Joseph P. Younger
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney-Legal Division



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Public Utility Commission of Texas


1701 North Congress Avenue

P.O. Box 13326

Austin, Texas, 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on November 26, 2013 in accordance with Public Utility Commission of Texas Procedural Rule 22.74.



Davida Dwyer

**SOAH DOCKET NO. 473-14-0366
DOCKET NO. 41791**

**COMMISSION STAFF'S TWENTY-SECOND REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 22-1 THROUGH STAFF 22-17**

DEFINITIONS AND INSTRUCTIONS

“Applicant,” “ETI” and “you,” refers to Entergy Texas, Inc., its affiliates and any person acting or purporting to act on its behalf including without limitation: subsidiaries, attorneys, agents, advisors, investigators, representatives, employees or other persons.

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 including writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, electronic storage of any type, data on computer drives, e-mails, 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.

Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Staff 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 Office software and be produced with your response to these requests.

The terms “and” and “or” shall be construed as either disjunctive or conjunctive as necessary to make the request inclusive rather than exclusive.

“Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

“Any” shall be construed to include **“all”** and **“all”** shall be construed to include **“any.”**

The term **“concerning”** includes the following meanings: relating 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.

The term **“including”** means and refers to **“including but not limited to.”**

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.

The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

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

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.

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.

SOAH DOCKET NO. 473-14-0366
DOCKET NO. 41791

COMMISSION STAFF'S TWENTY-SECOND REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 22-1 THROUGH STAFF 22-17

Staff 22-1 Please refer to ETI's response to Staff's 13-1 regarding the Department of Justice anti-trust investigation. According to your response, "the investigation has concluded and this particular matter is winding down. This matter is representative of matters initiated by federal and state agencies on an ongoing and recurring basis. The costs billed to ETI for this project Code are reasonable and necessary affiliate charges in this docket for the same reasons addressed in Docket No. 39896."

1. Please provide all the costs specifically related to **F3PPINVDOJ** project for the last seven years (2007-2013). In addition, please provide the FERC accounts and adjusted amounts as requested in Docket 41791.

2010	1/2010-12/31/2010	\$ 223,217
2011	1/2011-12/31/2011	\$1,333,042
2012	1/2012-12/31/2012	\$ 944,343
2013	1/2013-09/31/2013	\$ 8,340

Docket 39896	\$1,039,664
Docket 41791	\$ 639,171

2. Please provide all the final documents executed by ETI and/or ESI that resolved the Department of Justice anti-trust investigation. In addition, please provide copies of any settlement agreement(s) executed regarding this investigation. Please also provide any judgments entered regarding this investigation.
3. Has ETI, ESI, or any other Entergy affiliate to ETI agreed to make any payment(s) regarding resolving this investigation? If so please provide the amount of the payment(s), to whom the payments are or will be made, and the supporting documentation.
4. Please provide a list of new cases with their respective dates similar to or related to F3PPINVDOJ that commenced in the test year or after the test year.

5. Please reconcile the following amounts and provide a detail explanation on ETI's response to Staff 13-1 and Staff 10-46 with FERC accounts:

FERC	5615	\$ 416	Staff 10-46
	566	\$ 173	Staff 10-46
	920	\$ 13,179	Staff 10-46
	921	\$ 603	Staff 10-46
	923	\$618,105	Staff 10-46
	926	\$ 4,514	Staff 10-46
	Total	\$636,990	

Staff 22-2 Please refer to AJ16B and ETI's response to Staff's 6-22 RFI regarding the \$7,000,000 adjustment to Taxes Other Than Income FERC account 408 related to FASB 5 reserves. Please justify the FASB 5 reserve adjustment in detail and provide all the documentation and calculations to support the adjustment in the test period. In addition, provide documentation to support this adjustment, reference prior orders of approval from the Public Utility Commission of Texas regarding this type of adjustment and where ETI has provided written testimony to support this FASB 5 contingency.

Note: When you add the AJ16B (\$2,303,802), \$7,000,000 and AJ03 \$1,950,821 the net amount reflected in Schedule G-9 line 48 is \$6,647,019.

Staff 22-3 Please refer to ETI's response to Staff 6-6 and 6-25 and 2012 Entergy Form 10K page 11. Under the paragraph "Other operations and maintenance expenses decrease from \$1,047 million for 2010 to \$906 million for 2011 primarily due to:

1. the write-off of \$64 million of capital costs in 2010, primarily for software that would not be utilized, and \$16 million of additional costs incurred in 2010 in connection with Entergy's decision to unwind the infrastructure created for the planned spin-off of its non-utility nuclear business;
2. a decrease of \$12 million in spending on tritium remediation work;
3. the write-off of \$10 million of capitalized engineering costs in 2010 associated with a potential uprate project."

Did ETI include in the test year any amortization, accretion and/or expense associated with any of the above topics? If yes, please justify in detail and provide all the supporting documentation and calculations to support your request. In addition, please reference (final order, FOF or FERC approval) where ETI obtained approval to recover this expense and provide the reference FERC account with the adjusted amount as requested in the current rate filing case.

Staff 22-4 Please refer to ETI's response to Staff's 13-5 attachments 1 & 2 regarding the **Jenkins v Entergy Corporation** issue project code **F5PCE13759**.

1. Please provide all the costs specifically related to F5PCE13759 project for the last seven years to justify the recurring costs (2007-2013). In addition, please provide the FERC accounts and adjusted amounts as requested in docket 41791.

2010	1/2010-12/31/2010	\$ 184,936	Staff 13-5 at 1&2
2011	1/2011-12/31/2011	\$ 191,681	Staff 13-5 at 1&2
2012	1/2012-12/31/2012	\$ 34,452	Staff 13-5 at 1&2
2013	1/2013-9/30/2013	\$ 6,849	Staff 13-5 at 1&2

Docket 39896	\$205,017	Staff 13-5 at 1&2
Docket 41791	\$ 18,784	Staff 13-5 at 1&2

FERC	4031AM	\$ 1,421	Staff 13-5 at 2
	408110	\$ 649	Staff 13-5 at 2
	920	\$ 12,024	Staff 13-5 at 2
	921	\$ 134	Staff 13-5 at 2
	926	\$ 4,376	Staff 13-5 at 2
	928	\$ 181	Staff 13-5 at 2
	Total	\$ 18,784	

2. Please provide all the final documents executed by ETI and/or ESI that resolved the Jenkins v Entergy issue associated with docket 39896 and 41791. In addition, please provide copies of any settlement agreement executed.
3. Please provide a list of new cases similar and related to F5PCE13759 that commenced in the test period and subsequent months.
4. Please reconcile and provide a detail explanation on ETI's response to Staff 13-5 Attachment 1 & 2 and Staff 10-46 on the following information:

FERC	920	\$ 12,024	Staff 13-5
	921	\$ 134	Staff 13-5
	923	\$ 239,343	Staff 13-5
	926	\$ 4,376	Staff 13-5
	928	\$ 181	Staff 13-5
	Total	\$ 256,058	

Staff 22-5 **Please justify (providing the purpose, why these are necessary expenses, what caused the creation of these projects, how these activities were handled prior to the creation of the project, and the reasonableness of the amounts requested) the following projects codes that ETI has classified as new. In addition, please reconcile and explain the difference in numbers between ETI's response to Staff 10-47 and 10-46. Also, please provide the respective FERC accounts with the adjusted amounts as requested in the rate filing.**

1. **F3PPTCGS11 Texas Docket Competitive Generation (Staff 13-5)**
2010 \$14,303 2011 \$292,185 2012 \$248,125
1/2013-9/30/2013 \$119,297
Docket 39896 \$161,951
Docket 41791 \$224,750

2. **F3PPEXPDCJ Jackson Data Center Remediation (Staff 13-9)**
2010 \$ 0 2011 \$0 2012 \$177,028
1/2013-9/30/2013 \$181,258
Docket 39896 \$0
Docket 41791 \$211,183

3. **F3PPWET306 SPO Western Region RFP (Staff 13-14 at 1)**
2010 \$0 2011 \$504,015 2012 \$688,791
1/2013-9/30/2013 \$89,534
Docket 39896 \$139,761
Docket 41791 \$506,404

4. **F3PPWET307 SPO2011WestnRegionRFP-IM&PropS (Stf 13-14 at 1)**
2010 \$0 2011 \$ 86,611 2012 \$234,829
1/2013-9/30/2013 \$ 2,030
Docket 39896 \$ 19,469
Docket 41791 \$219,059 FERC 923

5. F3PPZG2102 LW2 Spring Outage (2 Wks) (Staff 10-47 at 1)

FERC	506	\$20,076	Staff 10-46 Schedule
	512	\$64,333	Staff 10-46
	513	\$58,830	Staff 10-46
	514	\$10,847	Staff 10-46
	926	\$ 830	Staff 10-46
	Total	\$154,916	

2009	\$ 0	Staff 10-47
2010	\$ 0	Staff 10-47
2011	\$ 0	Staff 10-47
2012	\$ 0	Staff 10-47
1/2013-9/2013	\$ 0	Staff 10-47

Docket 41791	\$ 4,847	Staff 10-47
Docket 39896	\$ 0	Staff 10-47

6. F3PPZG2619 SB1 Pre Summer Run Outage (Staff 10-47)

FERC	506	\$ 1,403	Staff 10-46 Schedule
	512	\$209,105	Staff 10-46
	513	\$ 57,452	Staff 10-46
	514	\$ 473	Staff 10-46
	926	\$ 23,288	Staff 10-46
	Total	\$291,720	

2009	\$ 0	Staff 10-47
2010	\$ 0	Staff 10-47
2011	\$ 0	Staff 10-47
2012	\$ 15,806	Staff 10-47
1/2013-9/2013	\$ 0	Staff 10-47

Docket 41791	\$ 15,836	Staff 10-47
Docket 39896	\$ 0	Staff 10-47

7. F3PCPQMVS MAINFRAME (Staff 10-47)

FERC	514	\$ 3,506	Staff 10-46 Schedule
	920	\$ 19,844	Staff 10-46
	921	\$ 1,910	Staff 10-46
	923	\$ 583,384	Staff 10-46
	926	\$ 6,354	Staff 10-46
	931	\$ 604,056	Staff 10-46
	935	\$ 98,697	Staff 10-46
	Total	\$1,317,757	

2009	\$ 0	Staff 10-47
2010	\$ 0	Staff 10-47
2011	\$ 818,187	Staff 10-47
2012	\$ 785,425	Staff 10-47

1/2013-9/2013	\$ 603,518	Staff 10-47
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Docket 39896	\$ 421,867	Staff 10-47
Docket 41791	\$ 809,286	Staff 10-47

8. F3PPFACSIT ESI DATA Facilities (Staff 10-47)

FERC	921	\$122,292	Staff 10-46
	923	\$274,711	Staff 10-46
	931	\$ 540	Staff 10-46
	935	\$ 80,303	Staff 10-46
	Total	\$477,846	Staff 10-46

2009	\$ 0	Staff 10-47
2010	\$ 0	Staff 10-47
2011	\$ 383,799	Staff 10-47
2012	\$ 469,540	Staff 10-47

1/2013-9/2013	\$ 337,893	Staff 10-47
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Docket 39896	\$ 191,282	Staff 10-47
Docket 41791	\$ 459,935	Staff 10-47

9. F3PPETIMIS MISO Transition ETI costs (Staff 10-47)

FERC	500	\$ 37,364	Staff 10-46
	560	\$ 9,169	Staff 10-46
	905	\$ 5,450	Staff 10-46
	909	\$ -303	Staff 10-46
	920	\$ 333,980	Staff 10-46
	921	\$ 10,716	Staff 10-46
	923	\$ 1,199,806	Staff 10-46
	926	\$ 54,117	Staff 10-46
	9301	\$ 200,739	Staff 10-46
	9302	\$ 500,000	Staff 10-46
	Total	\$ 2,351,037	Staff 10-46
	2009	\$ 0	Staff 10-47
	2010	\$ 0	Staff 10-47
	2011	\$ 763,173	Staff 10-47
	2012	\$ 485,746	Staff 10-47

1/1/2013-9/2013 \$636,060 Staff 10-47

Docket	39896	\$ 0	Staff 10-47
Docket	41791	\$ 211,091	Staff 10-47

10. F3PPHCMPMO HCM Program –PMO (Staff 10-47)

FERC	514	\$ 0	Staff 10-46
	920	\$ 11,073	Staff 10-46
	921	\$ 890	Staff 10-46
	923	\$ 81,868	Staff 10-46
	926	\$ 3,675	Staff 10-46
	Total	\$ 97,505	Staff 10-46
	2009	\$ 0	Staff 10-47
	2010	\$ 0	Staff 10-47
	2011	\$ 0	Staff 10-47
	2012	\$ 29,537	Staff 10-47

1/12013-9/2013 \$602,133 Staff 10-47

Docket	39896	\$ 0	Staff 10-47
Docket	41791	\$ 99,480	Staff 10-47

11. F3PPHCMORG HCM – ORG and Processes (Staff 10-47)

FERC	500	\$ 2,700	Staff 10-46
	920	\$ 11,481	Staff 10-46
	921	\$ 157	Staff 10-46
	923	\$ 1	Staff 10-46
	926	\$ 4,480	Staff 10-46
	Total	\$ 18,818	

	2009	\$ 0	Staff 10-47
	2010	\$ 0	Staff 10-47
	2011	\$ 0	Staff 10-47
	2012	\$ 0	Staff 10-47

	1/1/2013-9/2013	\$ 155,556	Staff 10-47
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Docket 39896	\$ 0	Staff 10-47
Docket 41791	\$ 21,112	Staff 10-47

12. F3PPHCMOTR HCM – Other Empl Rltd Costs (Staff 10-47)

FERC	920	\$ 566	Staff 10-46
	926	\$ 177	Staff 10-46
	Total	\$ 743	

	2009	\$ 0	Staff 10-47
	2010	\$ 0	Staff 10-47
	2011	\$ 0	Staff 10-47
	2012	\$ 0	Staff 10-47

	1/12013-9//2013	\$ 6,329	Staff 10-47
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Docket 39896	\$ 0	Staff 10-47
Docket 41791	\$ 832	Staff 10-47

13. F3PPRTOICE O&M ICT Transition Costs (Staff 10-47)

FERC	560	\$ 64,471	Staff 10-46
	561	\$ (6)	Staff 10-46
	5612	\$ 7	Staff 10-46
	5613	\$ 0	Staff 10-46
	5691	\$ 1	Staff 10-46
	9200	\$ 450	Staff 10-46
	9260	\$ (6,717)	Staff 10-46
	Total	\$ 58,207	

1/2013-9/2013	\$ 79,000	Staff 10-47
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2009	\$ 0	Staff 10-47
2010	\$ 0	Staff 10-47
2011	\$ 0	Staff 10-47
2012	\$ 183,869	Staff 10-47

Docket 39896	\$ 0	Staff 10-47
Docket 41791	\$ 58,207	Staff 10-47

14. F3PPRTOLBC MISO LBA & Svcs Comm Setup (Staff 10-47)

FERC	500	\$ 20,271	Staff 10-46
	560	\$ 4,894	Staff 10-46
	920	\$ 5,440	Staff 10-46
	926	\$ (1,955)	Staff 10-46
	Total	\$ 28,649	

1/2013-9/2013	\$ 449,607	Staff 10-47
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2009	\$ 0	Staff 10-47
2010	\$ 0	Staff 10-47
2011	\$ 0	Staff 10-47
2012	\$ 2,210	Staff 10-47

Docket 39896	\$ 0	Staff 10-47
Docket 41791	\$ 28,649	Staff 10-47

15. F3PPTDERSD MISO Transition ALL OPCO (Staff 10-47)

FERC	500	\$ 292,661	Staff 10-46
	557	\$ 778	Staff 10-46
	560	\$ 102,511	Staff 10-46
	5612	\$ (898)	Staff 10-46
	566	\$ 849	Staff 10-46
	905	\$ 18	Staff 10-46
	920	\$ 300,446	Staff 10-46
	921	\$ 764	Staff 10-46
	923	\$ 71,731	Staff 10-46
	926	\$ (68,041)	Staff 10-46
	928	\$ 303	Staff 10-46
	Total	\$ 701,123	Staff 10-46

	2009	\$ 0	Staff 10-47
	2010	\$ 0	Staff 10-47
	2011	\$ 2,664,129	Staff 10-47
	2012	\$ 2,315,976	Staff 10-47

	1/2013-9/2013	\$ 2,289,408	Staff 10-47
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Docket 39896	\$ 0	Staff 10-47
Docket 41791	\$ 625,893	Staff 10-47

Staff 22-6 Please refer to Staff 6-30 and Schedule G-8. Please provide the vendor's name, description of service, term of contract and date of last service for all the 900 series FERC accounts with the annual contract of \$200,000 or greater. If ETI is not able to justify these FERC accounts as requested, please provide your response in writing. **In an effort to reconcile the amounts requested in the test year period, please provide the unadjusted and adjusted amounts by month with the respective FERC accounts by each vendor's name.**

Staff 22-7 Please refer to Staff 6-32 RFI, ETI's response and Staff 21-6. Please provide the historical level of ETI's annual FERC 900 series as provided in Staff 21-6 for the years 2010 through 2013 with similar information. In addition, please explain the increase or decrease from one year to the next.

Staff 22-8 Please refer to Staff 22-6. Please provide copies of all the supporting documents where the individual invoice (not internal documents) amounts exceed \$4,000.00 for the following FERC accounts: FERC accounts 908, 923, 928, 930 and 935.

Staff 22-9 Please refer to ETI's response to Staff 10-2. Please justify the following office supplies accounts in FERC 921 by defining the account, providing a copy of the re-occurring contract, provide complete copies of the invoices for the amounts identified and providing the adjusted total test year amount for each account.

1. F5PPETX011	\$32,806
2. Other Office & General	\$19,961
3. System Aircraft	\$18,960
4. System Aircraft Accr/other Chg	\$16,774
5. Transportation	\$ 7,169
6. Misc Relocation Exp	\$55,877
7. Employee mtgs/functions/awards	\$ 4,012
8. Other Employee Expenses	\$ 6,128
9. Business Meals/Entertainment	\$ 755

Staff 22-10 Please refer to Staff 22-9 and provide the annual amounts for the years 2010, 2011, 2012 and 2013. In addition, please explain in detail the increase or decrease from one year to the next. Please also provide the amount recoverable pursuant to the Commission's order in Docket No. 39896.

Staff 21-11 Please refer to ETI's response to Staff 6-15 regarding Human Capital Management (HCM) and the direct testimony of Ms. Sallie T. Rainer page 12 lines 1 through 4. Did ETI include any costs or savings in the test year for HCM? If yes, please identify all the FERC accounts and the adjusted amounts included in the test year and provide your justification.

Staff 22-12 Please refer to ETI's response to Staff 10-27 regarding monetary awards or "Impact Awards." ETI responded in part that "actual ESI billed impact awards to ETI is not captured in Entergy's accounting systems." Given that ETI has not provided the amounts associated with ESI billing to ETI for impact awards, please provide estimated amounts associated with ESI billing to ETI for impact awards. Are the ESI billings to ETI for impact awards four times, ten times, or some other amount greater than the amount directly incurred by ETI for similar FERC accounts?

- Staff 22-13** Please justify the impact awards identified in ETI's response to Staff 10-27 and provide the impact awards directly incurred or allocated to ETI for the years 2010, 2011, 2012 and 2013 with the job title positions that received them. If ETI cannot provide the impact awards amounts allocated by ESI to ETI, please state this in writing. In addition, please state if ETI can agree that the allocated amounts from ESI for the respective years were four times, ten times, or another amount greater than the amounts directly incurred by ETI for similar FERC accounts.
- Staff 22-14** Please refer to ETI's response to Staff 10-37 regarding lump sum payments directly incurred by ETI of \$7,963. ETI responded in part that "actual ESI lump sum payments to ETI is not captured in Entergy's accounting systems." Given that ETI has not provided the amounts associated with ESI billing to ETI in lump sum payments, please provide estimated amounts associated with ESI billing to ETI for lump sum payments. In addition, please state if ETI can agree that the allocated amounts from ESI during the test year were four times, ten times, or another amount greater than the amounts directly incurred by ETI for similar FERC accounts.
- Staff 22-15** Please justify the lump sum payments identified in ETI's response to Staff 10-37 and provide the lump sum payments directly incurred or allocated to ETI for the years 2010, 2011, 2012 and 2013 with the job title positions that received them. If ETI cannot provide the lump sum amounts allocated by ESI to ETI, please state this in writing. In addition, please state if ETI can agree that the allocated amounts from ESI for the respective years were four times, ten times, or another amount greater than the amounts directly incurred by ETI for similar FERC accounts.
- Staff 22-16** Please refer to Staff 21-5 (5) and provide similar information for all (ETI directly incurred or allocated to ETI) projects excluding any projects specifically identified by Staff in its RFIs 22-1 through 22-15 and 22-17 that are new projects and have only the year 2012 or later of historical cost. Please only provide the projects that for which ETI is requesting recovery in this rate case.
- Staff 22-17** Please refer to ETI's response to Staff's 13-12 regarding the following two projects SPO 2011 Western Region RFP and SB1/2 Bromine System Study. Please provide the test year and adjusted amounts, by FERC account, associated with each of these projects. Please also state where ETI provided testimony for these projects in the current rate filing package. If no testimony was provided, please justify in detail and provide all the costs included in cost of service and rate base for the two projects by FERC accounts. In addition, please provide an explanation on how these expenses for these projects are both reasonable and necessary.