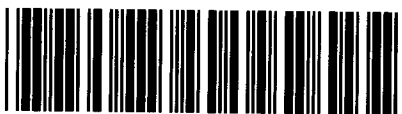




Control Number: 41791



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Addendum StartPage: 0

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

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

CITIES' FOURTH REQUEST FOR INFORMATION

Pursuant to §22.144 of the Commission's Procedural Rules, the Cities of Anahuac, Beaumont, Bridge City, Cleveland, Conroe, Dayton, Groves, Houston, Huntsville, Liberty, Montgomery, Navasota, Nederland, Oak Ridge North, Orange, Pine Forest, Pinehurst, Port Arthur, Port Neches, Rose City, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor, and West Orange ("Cities"), request that Entergy Texas, Inc. ("ETI" or "Company"), by and through its attorneys of record, provide all information requested on the attached Exhibit "A" within fifteen (15) calendar days of receipt thereof pursuant to PUC Proc. R. 22.144 and SOAH Order No. 3.

Pursuant to P.U.C. Proc. R. 22.144(c)(2), Cities further request 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. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. 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). 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. Cities further request that each item of information be made available as it is completed, rather than upon compilation of all information requested.

All information responsive to the requests on the attached Exhibit "A" should be sent to the following via overnight courier, on a piecemeal basis as individual items become available:

E-mail:
dlawton@ecpi.com
stephenmack@gmail.com
mayhalllaw@gmail.com

Physical Delivery:
Daniel J. Lawton
12600 Hill Country Blvd., Suite R-275
Austin, Texas 78738
(512) 322-0019
(855) 298-7978 – fax

DEFINITIONS AND INSTRUCTIONS

A. "ETI," "the Company" or "you" refers to Entergy Texas, Inc., and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. 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, but you if necessary, into reasonably useable 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.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Cities specifically request 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 and/or Word Perfect and be produced with your response to these requests.

D. The terms "and" and "or" shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."

F. "Any" shall be construed to include "all" and "all" shall be construed to include "any."

G. 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 legal, 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.

H. The term "including," or one of its inflections, means and refers to "including but not limited to."

I. 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.

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

K. 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.

L. Pursuant to P.U.C. Proc. R. 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. 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.

Respectfully submitted,
LAWTON LAW FIRM, P.C.



Daniel J. Lawton 00791082

Stephen Mack 24041374

Molly Mayhall Vandervoort 24048265

12600 Hill Country Blvd., Suite R-275

Austin, Texas 78738

(512) 322-0019

(855) 298-7978 - Fax

ATTORNEY FOR CITIES

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record in this proceeding on this 5th day of December, 2013, by e-mail; First Class, U.S. Mail; hand delivery; or facsimile.


Molly Mayhall Vandervoort

ATTACHMENT A

SOAH DOCKET NO. 473-14-0366

PUCT DOCKET NO. 41791

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

CITIES' FOURTH REQUEST FOR INFORMATION

- 4-1. See the response to Staff data requests 6-48 and 6-49. Please provide a detailed explanation of the increased cost level in this account for the test year compared to prior years.
- 4-2. Please provide copies of journal entries to Injuries and Damages Expense for the test year. These journal entries should identify the offsetting accounts charged.
- 4-3. Please provide an explanation of any adjusting journal entries made to Injuries and Damages Expense made during the test year.
- 4-4. Please provide an analysis of the Injuries and Damages Expense account activity by month for each month after the test year through the latest available date showing expense accruals, adjusting entries, other account entries including a description, and the total expense for the year.
- 4-5. Please provide copies of journal entries to Injuries and Damages Expense for each month after the test year through the latest available date. These journal entries should identify the offsetting accounts charged.
- 4-6. Please provide an explanation of any adjusting journal entries made to Injuries and Damages Expense which were made during any month following the test year.
- 4-7. Please provide an analysis of the Injuries and Damages Reserve account for each month of the test year showing accruals for the reserve, payments charged to the reserve, adjusting entries, and the ending balance for the reserve account.
- 4-8. Please provide copies of journal entries made to Injuries and Damages Reserve account during the test year together with an explanation of any adjusting entries. These journal entries should identify the offsetting accounts charged.

- 4-9. Please provide an analysis of the Injuries and Damages Reserve account for each month following the test year showing accruals for the reserve, payments charged to the reserve, adjusting entries, and the ending balance for the reserve account.
- 4-10. Please provide copies of journal entries made to Injuries and Damages Reserve account following the test year together with an explanation of any adjusting entries. These journal entries should identify the offsetting accounts charged.
- 4-11. Please provide copies of adjusting journal entries made to Injuries and Damages Reserve account following the test year together with an explanation of these entries. These journal entries should identify the offsetting accounts charged.
- 4-12. Please provide an analysis of the Injuries and Damages Reserve account activity for each year 2008 through 2012 showing accruals for the reserve, payments charged to the reserve, adjusting entries, and the ending balance for the reserve account.
- 4-13. Please provide a narrative description of any changes under consideration for ETI or ESI pension benefits within the next two years. Provide copies of any internal or external communications related to any possible pension benefit changes including, but not limited to, letters, memoranda, and email.
- 4-14. Please quantify all savings expected to be achieved from the programs outlined in the response to Cities 4-13, stating which of the savings are considered to be annually recurring and which are considered one-time savings. Please provide any documentation available to verify the Company's assertions. Quantify both the overall savings and the savings allocated to ETI.
- 4-15. Please quantify all costs which will result from the programs outlined in the response to Cities 4-13 above, stating which of the costs are considered to be annually recurring and which are considered one-time costs. Quantify both the overall costs and the costs allocated to ETI. Please provide any documentation available to verify the Company's assertions.
- 4-16. Please identify any market gains realized by the Company's qualified pension fund since the last actuarial report was prepared which will begin amortization in 2014. Please quantify the impact those gains may have on ETI's 2014 pension expense. Please include work papers supporting the response to this question.
- 4-17. Please provide the total amounts spent (whether capitalized or expensed) for each employee benefit included in the G-2 Schedules excluding pensions for each year 2008 through 2012 and for the test year separately identifying amounts directly incurred by ETI and amounts allocated to ETI.

- 4-18. Please provide the total amount spent for each employee benefit in the test year and also the amount of each benefit expensed, and identify amounts directly incurred by ETI and amounts allocated to ETI.
- 4-19. Please provide the total pro forma cost for each employee benefit included in the revenue requirement and also the amount of each benefit expensed, and identify amounts directly incurred by ETI and amounts allocated to ETI.
- 4-20. For each month following the test year, please provide the total amount spent for each employee benefit and the amount expensed for each benefit, identifying amounts directly incurred by ETI and amounts allocated to ETI.
- 4-21. Please provide estimates of the cost of each employee benefit for 2014 including a description of the basis for the estimate and copies of documents and calculations supporting the estimate. Please separately identify amounts which will be directly incurred by ETI and amounts which will be allocated to ETI.
- 4-22. Please provide the amount of the prepaid pension asset in rate base on both a total company and Texas retail basis.
- 4-23. Please provide the amount of the amortization of the prepaid pension asset included in the revenue requirement together with work papers showing the calculation of the pro forma amount and its allocation.
- 4-24. Please provide an analysis of the prepaid pension asset beginning with the pro forma amount from ETI's most recent rate case through the latest period included in rate base for this docket. Please include in this analysis the increases and the decreases to the asset balances and provide work papers showing the calculation of those amounts.