



Control Number: 41791



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

2013 DEC 23 AM 9:05
PUBLIC UTILITY COMMISSION
FILING CLERK

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-EIGHTH SET OF
REQUESTS FOR INFORMATION TO ENTERGY TEXAS, INC.
QUESTIONS NOS. STAFF 28-1 THROUGH STAFF 28-6

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.

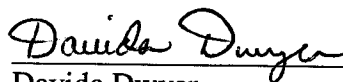
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

DATED: December 23, 2013

Respectfully Submitted,

Joseph P. Younger
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney-Legal Division



Davida Dwyer
Attorney-Legal Division
State Bar No. 24052120
Kristi J. Denney
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State Bar No. 24045661
Adrian Eissler
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(512) 936-7256
(512) 936 7268 (facsimile)
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 December 23, 2013 in accordance with P.U.C. PROC. R. 22.74.



Davida Dwyer

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**COMMISSION STAFF'S TWENTY-EIGHTH SET OF
REQUESTS FOR INFORMATION TO ENTERGY TEXAS, INC.
QUESTIONS NOS. STAFF 28-1 THROUGH STAFF 28-6**

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.

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Staff 28-1 Please provide the amount of rate case expenses, for which ETI is seeking recovery in this proceeding, that are attributable to the following topics:

- A) ETI's special circumstances request
- B) ETI's requested TCRF rider
- C) ETI's requested return on equity
- D) ETI's requested nuclear decommissioning expense

If ETI is unable to provide an exact amount, please provide ETI's reasonable estimate of the requested rate case expenses attributable to the topics above, and please also provide a detailed explanation of how this estimate was calculated.

Staff 28-2 Please refer to the Direct Testimony of ETI Witness, Jay Lewis, regarding "MISO-related costs and revenues," beginning at page 36, and refer to Staff RFIs 27-1 through 27-6. Please provide the overall net effect (consisting of both projected costs and projected revenues) of ETI transitioning into and operating as a member of MISO. Please reconcile this overall net effect with ETI's MISO-related requests in this pending application. Within the past 12 months, has Entergy (ETI, ESI, or another Entergy affiliate) provided to another retail regulator an estimate of the overall net effects of any Entergy operating company joining MISO? If so, when and to what regulator? If so, please provide the estimate provided to the other retail regulator(s).

Staff 28-3 Please refer to Staff RFI 22-6. Please provide invoices from the following entities for the following time periods:

A) Duggins Wren Mann & Romero	4/2012 \$406,102	3/2013 \$288,914
B) First American Title	12/2012 \$3,500	
C) Midwest Independent Trans	2/2013 \$15,000	
D) SAIC	4/2012 \$206,821	3/2012 \$234,510
E) Stockwell Sievert Viccellio	11/2012 \$8,622	12/2012 \$55,463
F) Stratus Energy Group	8/2012 \$3,465	9/2012 \$3,465

Staff 28-4 Please provide the engagement letters and/or contracts applicable to the services provided, for which ETI is seeking recovery in this proceeding, by the following entities:

- A) Duggins Wren Mann & Romero
- B) First American Title
- C) Midwest Independent Trans
- D) SAIC
- E) Stockwell Sievert Viccellio
- F) Stratus Energy Group

Staff 28-5 Please provide a detailed justification explaining the differences between the FERC Account 923 expenses that were approved by the Commission in Docket No. 39896 and ETI's requested FERC Account 923 expenses in this proceeding for the following entities:

- A) Duggins Wren Mann & Romero
- B) First American Title
- C) Midwest Independent Trans
- D) SAIC
- E) Stockwell Sievert Viccellio
- F) Stratus Energy Group

Staff 28-6 Please refer to Project F3PPEXPDCJ (Jackson Data Center Remediation) and Staff RFI 22-5. Please provide the amounts for this project that were allocated to ETI, with FERC accounts, for which ETI is seeking recovery in this proceeding. Were any amounts for this project directly incurred by ETI? If so, please provide the directly incurred amounts, with FERC accounts, for which ETI is seeking recovery in this proceeding.