



Control Number: 41791



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SOAH DOCKET NO. 473-14-0366  
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APPLICATION OF ENTERGY TEXAS, §  
INC. FOR AUTHORITY TO CHANGE §  
RATES AND RECONCILE FUEL §  
COSTS §

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ENTERGY TEXAS, INC.'S  
FIRST REQUEST FOR INFORMATION  
TO TEXAS INDUSTRIAL ENERGY CONSUMERS


TO: Texas Industrial Energy Consumers, by and through its attorneys of record, Rex D. VanMiddlesworth, Andrews Kurth LLP, 111 Congress Avenue, Suite 1700, Austin, TX 78701.

Entergy Texas, Inc. (ETI or the Company) requests that Texas Industrial Energy Consumers (TIEC) provide the following information and answer the following questions under oath within 4 business 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.

Respectfully submitted,

Steven H. Neinast  
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ENTERGY SERVICES, INC.  
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By:   
George Hoyt  
State Bar No. 24049270

ATTORNEYS FOR  
ENTERGY TEXAS, INC.

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served by facsimile, hand-delivery, overnight delivery, or 1st Class U.S. Mail on all parties of record in this proceeding on January 10, 2014.

  
George Hoyt

## INSTRUCTIONS

1. Reference to "TIEC" or "your" means TIEC and its agents, consultants, and all witnesses whose testimony TIEC intends to present to the Public Utility Commission of Texas, and all persons acting or purporting to act for or on behalf of TIEC.
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 band 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 TIEC**

- 1-1. For each witness presenting testimony for TIEC, to the extent not provided with his or her pre-filed testimony in this proceeding, please provide copies of all work papers and source documents (including, but not limited to: all tangible reports; physical models; compilations of data; a list of each RFI response directly relied upon; books; treatises or other publications; and all calculations in sufficient detail to permit the Company the opportunity to replicate the recommendations) provided to, reviewed by, or prepared by or for the witness in connection with the preparation of his/her testimony in this docket. To the extent that documents are available electronically, please provide a copy in native electronic format with all cells and formulae intact. You may identify, in lieu of production, any document responsive to this request that was included in ETI's rate filing package or Company-sponsored discovery response.
- 1-2 For each witness offering testimony on behalf of the TIEC in this docket, please identify and provide:
  - a. the identity of each publication or speech published or given by such person within the immediately preceding five years with the dates and places given and published;
  - b. an index of all proceedings in which such person submitted written testimony, has testified, or has been deposed in the preceding seven years, including the docket or cause number, date, subject matter, whether the witness's deposition was taken as part of the proceeding, whether the proceeding involved the presentation of written and/or live testimony, whether the testimony is publicly available, and where the testimony is publicly available. If the testimony is not publicly available, please provide of copy of the testimony; and
  - c. any testimony or written statement submitted in the preceding seven years wherein the witness took a position inconsistent with his or her position in this docket.