- the appropriate one to use for purposes of determining the River Bend
   decommissioning revenue requirement.
- 3

4

C. Fund Administrative Costs

5 Q27. HOW DID THE COMPANY DEVELOP ADMINISTRATIVE FEES FOR
6 PURPOSES OF CALCULATING THE REVENUE REQUIREMENT IN
7 SCHEDULE M-2?

8 A. The administrative fees used in Schedule M-2 are based on the current
9 trustee and manager fee schedules in place for the River Bend
10 decommissioning funds included as Attachment 3 to Schedule M-1.

11 Bank of New York Mellon is the trustee for all nuclear 12 decommissioning trust assets in the Entergy system. The trustee fees are 13 calculated quarterly at the rate of one basis point (0.01%) applied to the 14 aggregate market value of all decommissioning trust assets in the Entergy 15 system. Once calculated, the quarterly fees are allocated proportionately 16 among all trust funds based on market value. There are certain annual 17 trust administration fees that are charged directly to each individual trust 18 account without regard to market value. Investment management fees are 19 also calculated on a total Entergy system basis using a declining fee 20 structure. The total management fee is allocated pro rata (based on 21 market value of investments) to all investment accounts that use the same 22 investment manager.

Page 24 of 27

#### Entergy Texas, Inc. Direct Testimony of Monique C. Hoffmeister 2013 Rate Case

1 Because the revenue requirement calculation is specific to ETI's 2 retail jurisdiction, the Company modified the current declining fee 3 structures for investment manager fees. This was done so that the 4 manager fees used to calculate the revenue requirement in Schedule M-2 5 recognize the benefits achieved with the declining fee structures quicker 6 than if the actual breakpoints were used. The breakpoints can be thought 7 of as the point, or asset market value, where the fee declines, or breaks, 8 down to the next lowest level. Consider the hypothetical example whereby 9 a 1.0% fee applicable to a market value range of \$0 to \$50 million reduces 10 down to 0.75% when the market value is between \$50 million and 11 \$100 million. The breakpoint is \$50 million and the fee applicable to the 12 assets valued above \$50 million would be 0.75%. The fee applicable to 13 the assets valued between \$0 and \$50 million would be 1.0%.

14 For the River Bend fee calculation, the equity manager fees for the 15 TQ Fund were calculated by first dividing the actual breakpoints by five, 16 because five Entergy funds use that equity manager. Similar calculations 17 were made for the fixed income manager fees in order to recognize the 18 benefits of the declining fee schedules quicker. The breakpoints can be 19 seen in the modified fee structure described above and included as 20 Attachment 7 to Schedule M-1. The asset based trustee fee for the River 21 Bend Funds is a flat one basis point (0.01%). Additionally, there are 22 specific administrative trustee fees such as tax preparation fees and

Entergy Texas, Inc. Direct Testimony of Monique C. Hoffmeister 2013 Rate Case

1		performance reporting fees. The administrative fees can be seen on
2		Attachment 7 to Schedule M-1.
3		
4		III. COMPLIANCE WITH INVESTMENT GUIDELINES
5	Q28.	YOU HAVE DISCUSSED TRUSTEE AND INVESTMENT MANAGER
6		FEES ABOVE. DO THE TOTAL TRUSTEE AND INVESTMENT
7		MANAGER FEES PAID ON AN ANNUAL BASIS EXCEED 0.7% OF THE
8		ENTIRE PORTFOLIO'S AVERAGE ANNUAL BALANCE?
9	A.	No, they do not.
10		
11	Q29.	IS ANY MORE THAN 5.0% OF THE SECURITIES IN THE RIVER BEND
12		DECOMMISSIONING FUND ISSUED BY ONE ENTITY?
13	A.	No, no single entity's securities constitute more than 5.0% of the fund.
14		
15	Q30.	DOES THE RIVER BEND DECOMMISSIONING TRUST HOLD AT
16		LEAST 20 DIFFERENT ISSUES OF SECURITIES?
17	A.	Yes, it does.
18		
19	Q31.	HAS THE RIVER BEND DECOMMISSIONING TRUST BEEN
20		STRUCTURED FOR OPTIMUM TAX EFFICIENCY?
21	A.	Yes. As I have noted previously, all of the funds are considered "qualified"
22		under the U.S. tax laws.

1 Q32. DOES THE RIVER BEND DECOMMISSIONING TRUST INCLUDE ANY 2 PROHIBITED DERIVATIVE SECURITIES AS DEFINED IN THE PUC'S 3 SUBSTANTIVE RULES? 4 Α. No. 5 6 Q33. DOES THE RIVER BEND DECOMMISSIONING TRUST BORROW TO 7 PURCHASE SECURITIES ON MARGIN? 8 Α. No. 9 10 Q34. DOES THE RIVER BEND DECOMMISSIONING FUND COMPLY WITH 11 EQUITY LIMITS SPECIFIED IN THE SUBSTANTIVE RULES? 12 Α. As I mentioned previously, the current equity component of the fund 13 exceeds the 60% equity limit (at 61%) due to market fluctuations. Future 14 contributions to the fund will be invested in debt securities as is necessary 15 to reduce the allocation of the equity investments below the cap. The 16 Fund will be closely monitored and, if necessary, rebalanced to maintain 17 compliance. 18 19 Q35. DOES THE RIVER BEND DECOMMISSIONING TRUST INVEST IN ANY 20 **ENTERGY SECURITIES?** 21 Α. No.

Entergy Texas, Inc. Direct Testimony of Monique C. Hoffmeister 2013 Rate Case

- 1 Q36. DOES THE RIVER BEND DECOMMISSIONING TRUST INVEST IN ANY 2 DEBT SECURITIES THAT HAVE A BOND RATING BELOW 3 **INVESTMENT GRADE?** 4 Α. No. 5 6 Q37. DOES AT LEAST 70% OF THE AGGREGATE MARKET VALUE OF THE 7 RIVER BEND DECOMMISSIONING TRUST EQUITIES HAVE A 8 QUALITY RANKING FROM A MAJOR RATING SERVICE? 9 Yes, they do. Α. 10 11 Q38. DOES THE OVERALL EQUITY PORTFOLIO OF THE RIVER BEND 12 DECOMMISSIONING TRUST HAVE A WEIGHTED AVERAGE QUALITY RATING EQUIVALENT TO THE COMPOSITE RATING OF THE 13 14 STANDARD AND POOR'S 500 INDEX ASSUMING EQUAL RATING OF EACH RANKED SECURITY IN THE INDEX? 15
- 16 A. Yes.
- 17

18 Q39. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

19 A. Yes, at this time.

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Exhibit MCH-1 2013 TX Rate Case Page 1 of 2

# RIVER BEND DECOMMISSIONING FUNDS - PUCT ESTIMATED PORTFOLIO LIQUIDATION VALUES DECEMBER 31, 2013

	River Bend Qualified PUCT
	(In Thousands)
March 31, 2013 Liquidation Values (A)	\$ 136,305
April - December Planned Contributions:	
April	94
Мау	94
June	94
July	94
August	94
September	94
October	94
November	94
December	94
Total Remaining 2013 contributions	\$ 845
Subtotal	\$ 137,149
Estimated Net Earnings from April 1, 2013	
through December 31, 2013: (B)	5,425
Estimated Net Fees: (B)	(\$69)
Estimated December 31, 2013 Liquidation Value	\$ 142,505

(A) See page 2 of WP-3/M-2 for calculation of estimated March 31, 2013 liquidation values.(B) See WP-4/M-2 for calculations of estimated net earnings and estimated net fees.

Amounts may not add or agree with other workpapers due to rounding.

#### Exhibit MCH-1 2013 TX Rate Case Page 2 of 2

#### RIVER BEND DECOMMISSIONING FUNDS - PUCT ESTIMATED PORTFOLIO LIQUIDATION VALUES MARCH 31, 2013

		iver Bend Qualified
Description		PUCT
Cash & Equivalents	(In \$	Thousands) 829
Treasuries		30,793
Taxable Bonds		17,349
Tax Exempt Municipal Bonds		6,370
Equity		86,903
Accrued Income		549
Market Value (2)	\$	142,793
Less: Estimated Accrued Taxes, and Fees (3)		(6,488)
Estimated March 31, 2013 Liquidation Value	\$	136,305

(1) All balances reflect actual assets held in the River Bend PUCT accounts at 3/31/13. In Sept. 2012 the PUCT Non-Qualified funds were contributed to the Qualified trust.

(2) Trustee statements reflect taxes on accrued income and fees paid as of 3/31/13 and do not reflect accrued fees.

(3) See WP-4/M-2 for calculation of estimated taxes on income and unrealized gain or loss at 3/31/13 along with estimated accrued fees, net of tax.

Exhibit MCH-2 2013 TX Rate Case Page 1 of 1 through 1 of 1 (Public Version)

This exhibit contains information that is confidential and will be provided under the terms of the Protective Order (Confidentiality Disclosure Agreement) entered in this case. This page has been intentionally left blank.

Exhibit MCH-3 2013 TX Rate Case Pages 1 of 2 through 2 of 2 (Public Version)

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Exhibit MCH-4 2013 TX Rate Case Pages 1 of 5 through 5 of 5 (Public Version)

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# **DOCKET NO. 41791**

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

# DIRECT TESTIMONY

OF

**REGINALD T. JACKSON** 

ON BEHALF OF

ENTERGY TEXAS, INC.

SEPTEMBER 2013

1

## ENTERGY TEXAS, INC. DIRECT TESTIMONY OF REGINALD T. JACKSON 2013 RATE CASE

# TABLE OF CONTENTS

I.	Intro	ductior	1	1	
	Α.	Qua	lifications	1	
	В.	Purp	oose of Testimony	2	
	C.	Orga	anization of Testimony	3	
11.	Description of Supply Chain Class of Service and Necessity of Services Provided				
	A.	Dese	cription and Necessity	3	
	В.	Sup	ply Chain Class Charges	10	
111.	Rea	sonable	eness of Costs	15	
	A.	Tren	id Analysis	18	
		1.	Budget Planning	18	
		2.	Cost Trends	20	
		3.	Staffing Trends	21	
		4.	Cost Control and Improvement Initiatives	22	
	В.	Price	e Charged to ETI	25	
IV.	ETI	Capital	Additions	32	
V.	Con	clusion		36	

<u>Page</u>

# <u>EXHIBITS</u>

Exhibit RTJ-1	Families and Functions/Functions and Classes
Exhibit RTJ-2	Entergy Companies' Procurement Policy
Exhibit RTJ-3	Entergy Companies' Approval Authority Policy
Exhibit RTJ-4	McKinsey & Co. Global Purchasing Excellence Assessment (Confidential)
Exhibit RTJ-5	Materials Logistics Utility Benchmarking Study (Confidential)
Exhibit RTJ-6	Supply Chain Productivity
Exhibit RTJ-7	Capital Additions
Exhibit RTJ-A	Affiliate Billings – by Witness, Class, and Department
Exhibit RTJ-B	Affiliate Billings – by Witness, Class, and Project
Exhibit RTJ-C	Affiliate Billings – by Witness, Class, Department, and Project
Exhibit RTJ-D	Affiliate Billings – Pro Forma Summary, by Witness, Class and Pro Forma

1		I. <u>INTRODUCTION</u>		
2		A. <u>Qualifications</u>		
3	Q1.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.		
4	Α.	My name is Reginald T. Jackson. My business address is 639 Loyola		
5		Avenue, New Orleans, Louisiana, 70113.		
6				
7	Q2.	BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?		
8	Α.	I am employed by Entergy Services, Inc. ("ESI") as the Director of		
9		Corporate Sourcing and Supply Chain Support for the Entergy		
10		Companies. <sup>1</sup> My job responsibilities are primarily focused on procuring		
11		goods and services for the Entergy Companies' corporate functions and		
12		providing business support to the overall Supply Chain Organization. The		
13		key activities of the Corporate Sourcing and Supply Chain Support key are		
14		described in more detail in section II of my testimony.		
15				
16	Q3.	PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND		
17		PROFESSIONAL QUALIFICATIONS.		
18	A.	I received a B.S. in Accounting from Xavier University in New Orleans,		

- 19
- Louisiana and a MBA from Loyola University in New Orleans, Louisiana.

<sup>&</sup>lt;sup>1</sup> I use the term "Entergy Companies" to mean Entergy Corporation and its subsidiaries, including Entergy Texas, Inc. ("ETI"), ESI, and the other Entergy Operating Companies ("EOCs"). Each of these subsidiaries is a separate legal entity. The six EOCs are: Entergy Arkansas, Inc. ("EAI"); ETI; Entergy Gulf States Louisiana, L.L.C. ("EGSL"); Entergy Louisiana, LLC ("ELL"); Entergy Mississippi, Inc. ("EMI"); and Entergy New Orleans, Inc. ("ENOI").

1 Additionally, I am a Certified Public Accountant, a Certified Internal Auditor, and a Certified Information Systems Auditor. I also participated in 2 3 Entergy's Executive Training Program that was administered by the University of Pennsylvania's Wharton School of Business and the 4 5 University of Maryland's Robert H. Smith School of Business. I have 24 years of professional/business experience at the Entergy Companies and 6 7 in similar capacities with KPMG Accounting Firm. At ESI, I have held the 8 following positions: Director of Corporate Sourcing and Supply Chain 9 Support (present-2008), Manager of Legal Entity Management 10 Internal Audit Manager (2002-1997), (2007-2002).and various 11 supervisory/staff audit positions (1997-1991).

12

13

#### B. <u>Purpose of Testimony</u>

#### 14 Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

15 Α. I am sponsoring the class of affiliate services known as Supply Chain 16 (also known as Materials, Purchasing and Contracts) services and its 17 associated costs. I demonstrate that this class of services and its associated costs are necessary and reasonable and that the prices 18 19 charged for this service to ETI are no higher than the prices charged to 20 other affiliates for the same or similar service and represent the actual 21 cost of the services. As shown by Exhibit RTJ-1 attached hereto, this 22 class supports the materials management and procurement functions and

1		is part of the Corporate Support family. I also sponsor certain capital
2		additions related to the Supply Chain Organization.
3		
4	Q5.	DO YOU SPONSOR ANY EXHIBITS IN THIS FILING?
5	A.	Yes. I sponsor the exhibits listed in the Table of Contents for this
6		testimony.
7		
8		C. Organization of Testimony
9	Q6.	HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?
10	A.	In Section II.A, I describe the Supply Chain class of service and the
11		necessity of those services during the test year (the 12 months ending
12		March 31, 2013). In Section II.B, I discuss the test-year affiliate charges
13		for Supply Chain services. In Section III, I discuss the reasonableness of
14		the costs of the Supply Chain Class and the associated cost allocation
15		methodology. In Section IV, I discuss Supply Chain capital additions for
16		ETI since June 2011 and, in Section V, I conclude my testimony
17		
18 19		II. <u>DESCRIPTION OF SUPPLY CHAIN CLASS OF SERVICE AND</u> <u>NECESSITY OF SERVICES PROVIDED</u>
20		A. <u>Description and Necessity</u>
21	Q7.	WHAT IS MEANT BY THE TERM "SUPPLY CHAIN"?
22	Α.	Supply Chain services include all activities and processes to plan, specify
23		and provide products and services to support company operations.

•

- Supply Chain performs five major services: Procurement; Inventory
   Management; Repair, Testing and Disposal of Equipment and Materials;
   Supplier Diversity; and Business Support.
- 4
- 5 Q8. PLEASE DESCRIBE THE SERVICES PROVIDED BY THE SUPPLY6 CHAIN CLASS.
- 7 A. Supply Chain provides the following services:

Procure goods and services through strategic and tactical supply
 networks at the lowest reasonable cost. This also includes the
 negotiation, award, and administration of purchase orders and
 contracts. During the test year, Supply Chain purchased
 \$1.9 billion of materials and services, of which \$173 million were for
 ETI directly.

Manage and deliver material inventories to line crews. This
 includes maintaining optimal inventory levels while balancing
 internal customers' requirements.

Repair/test meters and transformers. Test safety equipment and
rubber goods.

• Dispose and sell scrap or surplus equipment and materials.

Expand procurement and economic growth opportunities for
 diverse suppliers (*e.g.*, minority, women, HUBZone, veteran, and
 disabled veteran owned businesses). The Historically Underutilized
 Business Zones ("HUBZone") is a Small Business Act certification

- that helps small businesses in urban and rural communities gain
   preferential access to federal procurement opportunities.
- The Supply Chain Support group provides administrative support to 3 the Supply Chain Organization. This support primarily includes: 4 managing process improvement projects (including the Six Sigma 5 Program), maintaining Supply Chain's information technology 6 systems, performing market analyses, executing test plans to 7 ensure compliance with policies/regulations, monitoring key 8 performance metrics, and developing the strategic plan. The Six 9 Sigma Program is described in more detail in the Cost Control and 10 Improvement Initiative Section of my testimony. 11
- All Supply Chain activities are governed by the Entergy Companies'
   Procurement Policy (see Exhibit RTJ-2). This policy outlines all
   requirements, company-wide, as they relate to the acquisition of material
   and services

16

17 Q9. PLEASE DESCRIBE THE ENTERGY COMPANIES' PROCUREMENT
18 POLICY ATTACHED AS EXHIBIT RTJ-2.

Procurement Policy establishes the 19 Α. The Entergy Companies' requirements for the procurement of all materials, goods and services for 20 use by the Entergy Companies, except for those items specifically 21 excluded from the policy (per Attachment II to the policy), or approved by 22 the Vice President, Chief Supply Officer ("CSO"). Approval Authority for 23

Page 6 of 36

#### Entergy Texas, Inc. Direct Testimony of Reginald T. Jackson 2013 Rate Case

1 Requisitions (the approval to expend funds) is governed by the Entergy Companies Approval Authority Policy (see Exhibit RTJ-3). 2 The 3 Procurement Policy as a whole applies to all of the Entergy Companies' 4 employees, regardless of business unit, except where noted in the policy. 5 The policy is designed to create a uniform, streamlined process for 6 procurement that is more consistent, efficient, manageable, and verifiable 7 than having different procurement practices among the various business 8 units, thereby enabling ESI and the business units to control spending for 9 materials, goods and services and conduct procurement in an economical 10 manner.

11

### 12 Q10. PLEASE DESCRIBE THE SUPPLY CHAIN ORGANIZATION.

13 Α. Supply Chain consists of the following departments, each reporting to the 14 CSO: Generation Sourcing (excluding nuclear), T&D Sourcing, Corporate 15 Sourcing, Supplier Diversity, Supply Chain Operations, and Supply Chain 16 Support. This organizational structure provides the advantages of 17 standardizing operating policies and processes, improving efficiencies, 18 and allowing the implementation of procurement "best practices" Entergy-19 wide. Supply Chain services are not duplicated within ETI or any other 20 ESI organization.

During the test year, Supply Chain had a total of 163 employees, consisting of 98 ESI employees, 14 ETI employees, and 51 employees of the other Entergy Operating Companies. The 98 ESI employees primarily

1 include management, Supply Chain Support, Sourcing, Supplier Diversity, 2 and Investment Recovery specialists. 3 This organizational structure allows Supply Chain to provide greater 4 levels of service to the Operating Companies, with fewer resources. 5 leading to lower direct costs. 6 7 Q11. WHY ARE THE SUPPLY CHAIN SERVICES DESCRIBED ABOVE 8 NECESSARY? 9 Α. Generation Sourcing services are necessary to support fossil plant 10 operations in order to serve the specialized need for component parts and 11 services driven by the size, design and complexity of the Entergy 12 Companies' fossil power plants. The procurement of these parts and 13 services requires a group of individuals who are skilled and experienced in 14 the business of obtaining such specialized components and services.

15T&D Sourcing services enable ETI to receive transmission and16distribution-related supplies in order to provide service to customers17effectively, efficiently and reliably. The Supply Chain group procures18materials and services including transformers, conductors, poles,19substation equipment and appurtenances, aerial distribution materials,20meters, distribution hardware, and construction and maintenance services21in support of T&D.

The Corporate Sourcing function acquires goods and services that are used throughout the Entergy Companies in their day-to-day operations

Page 8 of 36

as utility service companies. Examples include, but are not limited to,
 computers, telecommunication services, building maintenance and
 repairs, building renovations, mail services, software, and professional
 services. Additionally, this group leverages common goods and services
 to obtain the best price for all the affiliates. Therefore, ETI's prices for
 these goods and services are better when leveraged with the purchasing
 power of the other Entergy Companies.

8 The primary objective of Supplier Diversity is to expand 9 procurement by the Entergy Companies of goods and services from 10 diverse suppliers, which contributes to the area's overall economic 11 development. Business development activities include pre-gualification of 12 diverse suppliers; outreach, including participation in trade shows. seminars, and advertisements; general and specific vendor training and 13 14 assistance; external agency interface; second-tier spend analysis; and 15 review and issue resolution. This function also supports the Entergy 16 Companies' pledge to advance business opportunities for small, small-17 disadvantaged, women-owned, veteran-owned, disabled veteran-owned 18 and HUBZone-owned businesses through both direct and indirect 19 procurement initiatives in accordance with Section 8(d) of the Small 20 Business Act, U.S. Code of Federal Regulations (10 CFR 41) under Public 21 Law 95-507, and in conjunction with an area-wide contract with the U.S. 22 General Services Administration, Public Utilities Division (Contract 23 No. GS00P-96-BSD-002).

1 The Supply Chain Operations group is responsible for the 2 management and operation of the transformer repair shops, meter repairs, 3 management of the four central material distribution warehouses, rubber 4 goods testing and investment recovery for materials. This function is 5 necessary as the capabilities it provides exist nowhere else within the 6 Entergy Companies.

The Investment Recovery group, which is a department within 7 Supply Chain Operations, is responsible for the disposition of the surplus, 8 scrap, and obsolete material and equipment of Entergy Operations Inc., 9 10 ESI, and the Entergy Operating Companies, including ETI. Examples of the items commonly sold by this group include vehicles, construction 11 12 equipment, trailers, computers, scrap electrical wire, power plant parts and equipment, and obsolete inventory. All proceeds are credited directly 13 back "above the line" to the operating company or service company that 14 withdrew the material or equipment out of service. Having a single group 15 responsible for asset sales for all operating companies provides 16 economies of scale and leveraging. 17

18 The Supply Chain Support group provides administrative support to 19 the Supply Chain Organization. This support primarily includes: 20 managing process improvement projects including the Six Sigma 21 Program, maintaining Supply Chain's information technology systems, 22 performing market analyses, executing test plans to ensure compliance 23 with policies/regulations, monitoring key performance metrics, and

developing the strategic plan. The Six Sigma Program is described in
 more detail in the Cost Control and Improvement Initiative Section of my
 testimony.

4

5 Q12. PLEASE DESCRIBE THE TYPES OF CHARGES IN THE SUPPLY
6 CHAIN CLASS FROM OTHER ENTERGY OPERATING COMPANIES.

7 Α. Charges from other Entergy Operating Companies fall into two categories: 8 Loaned Labor and Material Transfers. Loaned Labor occurs when a Business Unit employee from one operating company does work for 9 another operating company. The cost of the employee during that period 10 11 is captured as Loaned Labor and charged directly to the benefiting 12 Operating Company. Material Transfers occur when material in one Operating Company's inventory is transferred to another Operating 13 14 Company for use. The movement of this material is captured as a Material Transfer transaction within the two Operating Companies' 15 general ledgers. 16

- 17
- 18

#### B. Supply Chain Class Charges

19 Q13. WHAT IS THE NET REQUESTED AMOUNT FOR THE SUPPLY CHAIN20 CLASS OF SERVICES?

A. The following table summarizes this information for the Supply Chain
Class. The table shows for each class the following information:

Total Billings	Dollar amount of total Test Year billings from ESI to all the Entergy Companies, plus the dollar amount of all other affiliate charges that originated from any Entergy company. This is the amount from Column (C) of the cost exhibits RTJ-A, RTJ-B, and RTJ-C.
Total ETI Adjusted Amount	ETI's adjusted amount for electric cost of service after pro forma adjustments and exclusions.

**% Direct Billed** The percentage of the ETI adjusted test year amount that was billed 100% to ETI.

**<sup>%</sup> Allocated** The percentage of the ETI adjusted test year amount that was allocated to ETI.

		Total ETI Adjusted		
Class	Total Billings	Amount	% Direct	% Allocated
Supply Chain	\$19,677,863	\$1,048,563	15%	85%

## TABLE 1

1 Q14. PLEASE DESCRIBE THE EXHIBITS THAT SUPPORT THE 2 INFORMATION INCLUDED IN TABLE 1.

3 Α. Attached to my testimony are exhibits showing the calculation of the Total ETI Adjusted amount for the Supply Chain Class. In my Exhibit RTJ-A, 4 5 the information is shown broken down by the departments comprising the 6 class. My Exhibit RTJ-B shows the same information broken down by 7 project code and the billing method assigned to each project code. My 8 Exhibit RTJ-C shows the information by class, department and project 9 code. For each exhibit, the amounts in the columns represent the 10 following information:

Column (A) – Support	Dollar amount of total Test Year billings and charges from ESI to all Entergy Business Units, plus the dollar amount of all other affiliate charges to ETI that originated from any Entergy Business Unit.	
Column (B) – Service Company Recipient	Dollar amount that was included in the service company recipient allocation. Service company recipient charges are the cost of services that ESI provides to itself, which in turn are charged to affiliates that receive those services. The service company recipient allocation process is described in the testimony of Company witness Stephanie B. Tumminello.	
Column (C) – Total	Represents the sum of Columns (A) and (B).	
Column (D) – All Other Business Units	That portion of Column (C) that was billed and charged to Business Units other than ETI.	
Column (E) – ETI per Books	Represents the difference between Columns (C) and (D).	
Column (F) – Exclusions	Represents amounts that are excluded from ETI electric cost of service. The exclusions are described in the testimony of Company witness Tumminello.	
Column (G) – Pro Forma Amount	Pro Forma Amounts include adjustments for known and measurable changes, and corrections.	
Column (H) – Total ETI Adjusted	ETI adjusted amount requested for recovery in this case for this class (Column (E) plus Columns (F) and (G)).	

In her testimony, Company witness Tumminello describes the
 calculations that take the dollars of support services in Column A to the
 Total ETI Adjusted Amount shown on Column H.

- 1 Q15. ARE THERE ANY PRO FORMA ADJUSTMENTS TO THIS CLASS?
- A. Yes. The pro forma adjustments for the Supply Chain Class are shown on
  Exhibit RTJ-D, which also indicates the Company witnesses who sponsor
- 4 those pro forma adjustments.
- 5
- 6 Q16. WHAT ARE THE MAJOR COST COMPONENTS OF THE CHARGES
- 7 FOR THE SUPPLY CHAIN CLASS?
- 8 A. As shown on Exhibit RTJ-A, the Total ETI Adjusted billings for the Supply
- 9 Chain Class during the test year were \$1,048,563. This includes charges
- 10 from ESI, Entergy Arkansas, Inc. ("EAI") and Entergy Louisiana, LLC
- 11 ("ELL"). The major cost components of those costs are as follows:

Supply Chain Affiliate Cost Component	<u>Cost \$</u>	<u>% of Total</u>
Payroll and Employee Costs	862,572	82%
Service Company Recipient	80,546	8%
Office and Employee Expenses	45,773	4%
Outside Services	45,708	4%
Other	13,964	1%
Total	1,048,563	<u>*100%</u>
*Does not sum due to rounding.		

## Table 2

12 Q17. WHAT IS THE SIGNIFICANCE OF THESE COST CATEGORIES?

- 13 A. The four major components of the Supply Chain Class are: (1) Payroll and
- 14 Employee Costs; (2) Service Company Recipient; (3) Office and

Page 14 of 36

#### Entergy Texas, Inc. Direct Testimony of Reginald T. Jackson 2013 Rate Case

1 Employee Expenses; and (4) Outside Services. As Table 2 shows, 82% 2 of the costs are for payroll and employee benefits. Company witness 3 Jennifer A. Raeder discusses the reasonableness and necessity of these 4 costs in her direct testimony. In addition, 8% of the costs are for Service 5 Company Recipient costs, which represent costs that ESI provides to 6 itself, which are then spread to all affiliates that receive ESI services. 7 Company witness Tumminello explains this shared services process. 8 Another 4% of the costs are in the Office and Employee Expenses 9 category, which includes expenses such as maintaining workspaces, 10 office supplies, education, training and travel. Company witness 11 Thomas C. Plauché addresses processes for controlling these types of 12 costs. Finally, 4% of the costs are in the Outside Services category, which 13 includes two contractors that were hired to augment the staff in the 14 Investment Recovery and Meter Repair & Disposal departments.

15

16 Q18. ON WHAT BASIS ARE COSTS IN THE CLASS OF SERVICE YOU ARE17 SPONSORING ALLOCATED?

A. Each class is made up of one or more project codes. As Company
witness Tumminello explains, only one billing method is assigned to each
project code. Any organization performing tasks within a specific project
code will bill to that project code, but the billing method for that project
code remains the same. A billing method is selected based on cost
causation. This assures that the price billed to ETI for the services is no

1		higher than the amount charged other affiliates for the same or similar
2		services and represents the actual costs of the service.
3		
4	Q19.	DO YOU DISCUSS THE BILLING METHODS USED TO CHARGE ETI
5		FOR COSTS ASSOCIATED WITH THE CLASS OF SERVICE YOU ARE
6		SPONSORING?
7	A.	Yes, in Section III.B. below.
8		
9		III. REASONABLENESS OF COSTS
10	Q20.	ARE THE COSTS OF THE SUPPLY CHAIN CLASS OF SERVICE
11		REASONABLE?
12	A.	Yes. As compared to the 2011 rate case Docket No. 39896, total Supply
13		Chain procurement spend volumes have increased (\$1.33 billion in the
14		2011 case versus \$1.9 billion in the current test year). This increased
15		volume has nevertheless been supported with a reduction in staff (175 full-
16		time equivalent staff in the 2011 rate case versus 163 in this test year) due
17		to improved processes and systems.
18		It should be noted that centralization of this function, on a system-
19		wide basis, provides greater leverage and buying power in the
20		procurement of materials and services than could be achieved by a stand-
21		alone company. Consolidation of procurement activities provides
22		economies of scale by avoiding duplication of efforts among affiliate
23		companies and lower costs through leveraged buying. The result is lower

materials and services costs to each operating company, including ETI.
 Supply Chain provides greater standardization across all of the Entergy
 Operating Companies. This standardization makes possible a smoother
 day-to-day operation as well as rapid response to major storms or
 emergencies.

6 The costs of these services are reasonable considering both the volume and quality of service afforded to ETI. Experienced, well-trained 7 8 supply management professionals are on staff. Company witness Raeder 9 addresses the reasonableness of the Entergy Companies' compensation 10 program. The Supply Chain Organization implements supply strategies to 11 reduce the cost of the materials and services, while maintaining or 12 improving the level of service to the transmission and distribution, fossil 13 and corporate groups.

14

15 Q21. WHAT OTHER EVIDENCE DO YOU HAVE THAT SHOWS THE 16 REASONABLENESS OF THE SUPPLY CHAIN CLASS OF SERVICES? 17 Α. McKinsey & Company, a globally recognized executive management 18 consulting firm, conducted the Global Purchasing Excellence ("GPE") 19 assessment for the Supply Chain Organization measuring the "purchasing 20 health" of our procurement organization. The assessment was performed 21 in 2010 and is attached in Confidential Exhibit RTJ-4. The GPE feedback 22 suggests that the Supply Chain Organization has stronger purchasing practices than most utilities, and is on the verge of becoming 1<sup>st</sup> guartile 23

across industries. In the assessment, the Supply Chain Organization
 demonstrated clear strengths in three areas: Strategic Alignment and
 Posture, Organizational Structure, and Mindsets & Aspirations.

4 PwC, a globally recognized audit, tax and consulting firm, 5 conducted a benchmarking study of leading electric and gas utilities' 6 material planning and distribution programs. The study focused on the 7 following major activities: material planning and analysis, material storage and distribution to consumer work activities, and Transportation of material 8 9 between locations. Overall, the Entergy Companies scored well 10 compared to the other utilities that participated in the study. The Entergy 11 Companies rated above average in 8 of the 12 categories analyzed. The 12 assessment was performed in 2013 and is attached in Confidential 13 Exhibit RTJ-5.

14

15 Q22. IS THERE ANY MORE GENERAL BENCHMARKING SUPPORT IN THE16 COMPANY'S FILING?

A. Yes. Although it does not apply explicitly to my class, Company witnesses
Michelle P. Bourg and Tumminello address benchmarking studies that
apply to ETI's costs. Ms. Bourg addresses benchmarking applicable to
ETI total company non-production O&M costs, and Ms. Tumminello
addresses benchmarking that applies at the service company (ESI) level.
1 Q23. IS THERE OTHER EVIDENCE THAT SPEAKS TO THE 2 EFFECTIVENESS OF THE OVERALL SUPPLY CHAIN CLASS OF 3 SERVICE?

4 Yes. In addition to the benefits the Supply Chain Organization provides Α. 5 that have been detailed above, this organization also tracks and reports 6 productivity savings and cost avoidance. Productivity is defined as dollar 7 savings delivered to the operating companies through procurement initiated supplier price reductions and through investment recovery 8 disposal activities. Cost avoidance refers to incidents where expenses 9 10 would otherwise be paid on the part of the Entergy Companies are 11 avoided as a result of Supply Chain involvement. For example, equipment 12 repairs are classified as cost avoidance. As shown in Exhibit RTJ-6, the 13 Supply Chain Organization produced \$21 million in productivity savings 14 and \$16.4 million of cost avoidance system-wide for the Entergy Operating 15 Companies during 2012. The direct impact to ETI was \$2.5 million in 16 productivity savings and \$2.3 million in cost avoidance.

- 17
- 18

19

A. Trend Analysis

1. <u>Budget Planning</u>

20 Q24. DOES SUPPLY CHAIN HAVE IN PLACE A BUDGETING PROCESS TO21 CONTROL COSTS?

A. Yes. Budgets are created during the May to September timeframe each
year for the upcoming calendar year. Costs are determined through both

Page 19 of 36

## Entergy Texas, Inc. Direct Testimony of Reginald T. Jackson 2013 Rate Case

trend analysis of the previous year's activities, as well as direct input from
the Supply Chain Lead Team. This data is analyzed against identified
budget targets provided by the Entergy Performance Management Group.
The budget is then reconciled to the targets. These reconciled numbers
are loaded into the Entergy Companies Budget System.

6

# 7 Q25. IS COMPLIANCE WITH THE BUDGET MONITORED?

8 Α. Yes. Supply Chain's Functional Coordinator monitors the budget as an ongoing process, through the use of Entergy Companies' Financial 9 Reporting systems, including a monthly Management Reporting Package 10 and the Present Estimate Reporting Process. Variances are brought to 11 the attention of Supply Chain Management with responsibility over the 12 area(s) affected, who then addresses the variance. Overall Budget is 13 14 reviewed with the Supply Chain Lead Team on a monthly basis. The Overall Budget is reviewed with the Entergy Companies' Senior 15 Management on a quarterly basis. Additionally, the Overall Budget and 16 estimates of future spending are reviewed monthly with the Entergy 17 Financial Organization, and month-to-month estimates are entered into 18 19 the Entergy Companies' financial system.

1	Q26.	ARE SUPPLY CHAIN EMPLOYEES HELD ACCOUNTABLE FOR
2		DEVIATIONS FROM THE BUDGET?
3	A.	Yes. Employee performance evaluations are linked to meeting annual
4		budget targets for capital and O&M spending.
5		
6		2. <u>Cost Trends</u>
7	Q27.	WHAT WERE THE ACTUAL ETI CHARGES FOR SUPPLY CHAIN
8		SERVICES FOR THE LAST THREE CALENDAR YEARS AND THE
9		TEST YEAR?
10	Α.	The following table shows the total O&M charges billed to ETI for services
11		provided by the Supply Chain Organization for the years 2010-2012 and
12		the Test Year. These charges have been adjusted to remove the MISO
13		and ITC-related affiliate costs that the Company is removing from the
14		requested cost of service (as explained by Company witness Considine),
15		as well as the nuclear and gas department codes (as explained by
16		Company witness Tumminello).
		Class 2010 2011 2012 Test Year

Class	2010	2011	2012	Test Year
SUPPLY CHAIN	\$ 1,613,374	\$ 1,229,843	\$1,242,590	\$1,071,863

The decrease from 2010 to the test year was attributable to labor shifting
from O&M to Balance Sheet due to major storms in the Entergy
Companies' service area.

1		During major storms, Supply Chain mobilizes into storm job roles
2	and d	irects labor away from normal operating business towards specific
3	storm	activities in the affected area. Examples include resources such as
4	Supply	y Chain Procurement and Contract Sourcing Specialists. Hurricane
5	Isaac	and the 2012 Arkansas ice storm shifted O&M labor from normal
6	projec	t codes that allocate portions to ETI to project codes that direct bill
7	other	Entergy Operating Companies. The result is lower than normal
8	O&M	being billed to ETI. No major storms occurred in the Entergy
9	Comp	anies service area during 2010.
10		
11		, 3. <u>Staffing Trends</u>

12 Q28. PLEASE DESCRIBE THE NUMBER OF ESI PERSONNEL WHO
 13 PERFORMED SERVICES FOR THE SUPPLY CHAIN CLASS IN THE
 14 YEARS 2010-2012 AND THE TEST YEAR.

A. The number of ESI personnel performing services in the Supply Chain
Class has decreased, as detailed in the following chart:

Year	Employees
2010	103
2011	102
2012	100
Test Year	98

17 The 2010, 2011 and 2012 figures are year-end (December 31)
18 headcounts. The Test Year figure is the headcount as of March 31, 2013.

1		This headcount has steadily decreased since 2010. The number of ESI
2		employees allows Supply Chain to provide an effective and efficient level
3		of service to its internal customers.
4		
5		4. <u>Cost Control and Improvement Initiatives</u>
6	Q29.	SEPARATE FROM THE BUDGETING PROCESS, DOES SUPPLY
7		CHAIN UNDERTAKE OTHER INITIATIVES TO CONTROL COSTS OR
8		IMPROVE ITS SERVICES?
9	A.	Yes. Through the ECI/Six Sigma process, Supply Chain continues to look
10		for opportunities to reduce costs and improve the delivery and quality of its
11		services. Under the current organization, the Project Management Office
12		has responsibility to work with the balance of Supply Chain personnel to
13		identify these opportunities and develop and implement plans to realize
14		these improvements. In addition, Supply Chain continues to pursue its "e-
15		Strategy," described below, to improve its services and decrease its costs.
16		
17	Q30.	PLEASE DESCRIBE THE SIX SIGMA PROGRAM.
18	A.	Six Sigma emphasizes setting extremely high objectives, collecting data,
19		and analyzing results to a fine degree as a way to reduce defects in the
20		delivery of products and services. The philosophy behind Six Sigma is
21		that if you measure how many defects there are in a process, you can
22		figure out how to systematically eliminate them and get as close to optimal
23		performance as possible. In order for a company to achieve Six Sigma, it

Page 23 of 36

#### Entergy Texas, Inc. Direct Testimony of Reginald T. Jackson 2013 Rate Case

cannot produce more than 3.4 defects per million opportunities, where an
 opportunity is defined as a chance for nonconformance.

There are two Six Sigma processes: Six Sigma DMAIC and Six Sigma DFSS, each term derived from the major steps in the process. Six Sigma DMAIC is a process that defines, measures, analyzes, improves, and controls existing processes that fall below the Six Sigma specification. Six Sigma DFSS (Design for Six Sigma) defines, conceptualizes, designs, optimizes and verifies new processes or products that are trying to achieve Six Sigma quality.

10

11 Q31. PLEASE DESCRIBE THE SUPPLY CHAIN "E-STRATEGY."

A. Supply Chain's e-Strategy covers numerous initiatives to utilize electronic
 commerce to enable a decrease in costs through direct customer-supplier
 interaction and virtualization of business processes using an electronic
 medium. The benefits of implementation of the e-Strategy include: lower
 material and services costs, shorter acquisition time and order fulfillment,
 lower procurement process costs, improved inventory practices, and the
 enabling of Strategic Sourcing.

19 The following are some tools that Supply Chain implemented as20 part of its e-Strategy:

Electronic Invoice Presentment and Payment is a web-based
 solution that facilitates the submission of contracts, purchase
 orders, and invoices. The aforementioned documents are

- transmitted electronically; thus creating a more efficient process
   allowing the Entergy Companies to realize/capture more prompt
   payment discounts offered by suppliers.
- Electronic Request for Information/Proposal ("eRFX") is a platform
  that encompasses multiple tools that create a more efficient
  procurement process by reducing sourcing cycle time, reducing
  costs of manual transmission of sourcing documents, facilitating the
  delivery and tracking of all sourcing documentation (providing a
  comprehensive audit trail throughout the process), and improving
  negotiation strategy development and execution.
- Inventory Planning System is an automated decision support tool
   for inventory planning that was largely a manual static process.
   The primary benefits are improved inventory turnover, more
   consistent material service levels, and improved inventory
   forecasts.
- e-Catalog is an electronic catalog that streamlines the acquisition of
   non-inventoried materials such as office supplies.
- Documentum is an electronic contract repository, which allows for
   the storage of all contract documents in a centralized location. It
   also reduces the effort required to retrieve contract documents.

1	Q32.	PLEASE PROVIDE ADDITIONAL EXAMPLES OF RECENT INITIATIVES
2		TO CONTROL OR REDUCE COSTS FOR SUPPLY CHAIN SERVICES.
3	Α.	The Supplier Registration project entailed streamlining and automating
4		several steps in the supplier registration process. The supplier registration
5		process entails collecting and evaluating pertinent suppliers' safety
6		data/documents, insurance certificates, and diversity certificates (where
7		applicable). The project resulted in supply chain savings of \$56,000
8		annually.
9		
10		B. Price Charged to ETI
11	Q33.	WHAT IS THE TEST YEAR AMOUNT OF AFFILIATE CHARGES FOR
12		SUPPLY CHAIN SERVICES?
13	Α.	The total expenses charged by ESI and other affiliates for this class of
14		service is \$19,677,863, as shown in Exhibits RTJ-A, RTJ-B, and RTJ-C
15		and as discussed in Section II of my testimony. After pro forma
16		adjustments and exclusions, the Total ETI Adjusted amount is \$1,048,563.
17		
18	Q34.	WHAT ARE THE PREDOMINANT BILLING METHODS USED FOR
19		SUPPLY CHAIN SERVICES?
20	Α.	There were nine predominant billing methods for the Supply Chain class
21		of services. For the test year, these nine billing methods were used for
22		92% of the total ETI Adjusted costs associated with the Supply Chain

- 1 class. These nine billing methods and their percentages are described in
- 2 the following table:

Billing Method	Description	% of Charges
SCPSPXNC	Supply Chain Procurement	24%
LBRSUPCN	Supply Chain – Supervision and Support	15%
SCFSPALL	Supply Chain - Transfers, Issues, and Returns for Fossil	15%
DIRECTTX	100% to ETI	8%
DIRECT	DIRECT CHARGE TO ETI (Loaned Labor and Resources)	7%
SCPSPALL	Supply Chain Total Spending	9%
LOADTXLG	Responsibility Ratio for EGSL and ETI	6%
SCDSPALL	Supply Chain - Transfers, Issues, and Returns for Distribution	5%
SCMATXNU	Supply Chain Transactions in Asset Suite excluding Nuclear	4%

3 In those cases where ETI was billed directly (that is, Billing Methods 4 "DIRECTTX" and "DIRECT"), the work was specifically related to ETI's 5 service territory. In those cases where the SCPSPXNC, LBRSUPCN, 6 SCFSPALL, SCPSPALL, LOADTXLG, SCDSPALL, and SCMATXNU 7 billing methods were selected, they were selected because they 8 reasonably reflect the cost drivers for services provided by the Supply 9 Chain group for the function or activities supported. The standard activity 10 measure for a Supply Chain function is the transaction intensity required 11 to provide service (e.g., the number of material issues or the number of 12 purchase orders created). All of these billing methods are based on these 13 transactions or a subset of these transactions. It is reasonable to base

1		billing methods on these transactions as they properly reflect the level of
2		Supply Chain services demand and associated costs. Therefore, these
3		are appropriate billing methods based on level of effort expended.
4		The price charged to ETI as a result of the application of these
5		billing methods is no higher than the price charged to other affiliates for
6		the same or similar service and represents the actual cost of the services.
7		As described in more detail in Company witness Tumminello's testimony,
8		this results because only one billing method is applied to any given project
9		code and the costs are billed to the regulated affiliates at cost, without
10		a mark-up.
11		
12	Q35.	PLEASE PROVIDE EXAMPLES OF THE SERVICES TO WHICH EACH
12 13	Q35.	PLEASE PROVIDE EXAMPLES OF THE SERVICES TO WHICH EACH OF THE NINE BILLING METHODS ABOVE WOULD APPLY.
	Q35. A.	
13		OF THE NINE BILLING METHODS ABOVE WOULD APPLY.
13 14		OF THE NINE BILLING METHODS ABOVE WOULD APPLY. The following are examples:
13 14 15		OF THE NINE BILLING METHODS ABOVE WOULD APPLY. The following are examples: <u>SCPSPXNC (Supply Chain Total Spending for Each Business Unit)</u>
13 14 15 16		OF THE NINE BILLING METHODS ABOVE WOULD APPLY. The following are examples: <u>SCPSPXNC (Supply Chain Total Spending for Each Business Unit)</u> – An example of a project to which this billing method would be applied is
13 14 15 16 17		OF THE NINE BILLING METHODS ABOVE WOULD APPLY. The following are examples: <u>SCPSPXNC (Supply Chain Total Spending for Each Business Unit)</u> – An example of a project to which this billing method would be applied is Project Code F3PCH86010 (Purchasing and Contracts Support). This
13 14 15 16 17 18		OF THE NINE BILLING METHODS ABOVE WOULD APPLY. The following are examples: <u>SCPSPXNC (Supply Chain Total Spending for Each Business Unit)</u> – An example of a project to which this billing method would be applied is Project Code F3PCH86010 (Purchasing and Contracts Support). This billing method is appropriate for that project code because the costs
13 14 15 16 17 18 19		OF THE NINE BILLING METHODS ABOVE WOULD APPLY. The following are examples: <u>SCPSPXNC (Supply Chain Total Spending for Each Business Unit)</u> – An example of a project to which this billing method would be applied is Project Code F3PCH86010 (Purchasing and Contracts Support). This billing method is appropriate for that project code because the costs associated with the project code are driven by the acquisition of goods

Page 28 of 36

1	LBRSUPCN (Administrative Support for Supply Chain Activities) –
2	An example of a project to which this billing method would be applied is
3	Project Code F5PCZSDEPT (Supply Chain Supervision & Support). This
4	billing method is appropriate for that project because the billing method is
5	isolating the total Supply Chain activities related to administrative support
6	for other projects performed and owned by Supply Chain. The allocation
7	for LBRSUPCN is based on total ESI labor dollars billed to each company
8	by ESI for the Supply Chain function.
9	SCFSPALL (Fossil Plant Spending) - An example of a project to

10 which this billing method would be applied is Project Code F3PCW36555 11 (Purchasing and Contracts Support). This billing method is appropriate for that project code because the billing method is isolating the Supply Chain 12 13 total spending of the fossil plants and then allocating the Supply Chain procurement costs based on that spending ratio. The billing method 14 15 SCFSPALL has been specifically designed for this purpose and is therefore appropriate for the Supply Chain purchasing and contracts 16 17 support of the Fossil Organization.

18 <u>SCPSPALL (Composite Allocation Method)</u> – An example of a 19 project to which this billing method would be applied is Project Code 20 F3PCFCPO01 (Chief Procurement Officer). The overall purpose of this 21 project is to capture and manage costs associated with providing 22 guidance, direction and supervision for the Materials, Purchasing & 23 Contracts (MP&C) groups reporting to the Chief Procurement Officer in

Page 29 of 36

## Entergy Texas, Inc. Direct Testimony of Reginald T. Jackson 2013 Rate Case

the Supply Chain Organization. The costs are driven by the requirement to supervise, manage and plan for the current and future activities of the Supply Chain organization. As such, a composite method based on supply chain transactions, stockroom count, and supply chain spending is a reasonable approximation of the proportion of costs each entity should receive. Therefore, billing method SCPSPALL, which directs costs based on supply chain's procurement spending was chosen.

8 DIRECT – An example of a project to which this billing method 9 would be applied is Project Code F5PCMATCOM (Materials Testing and 10 Compliance). The overall purpose of this project is to capture time and 11 expenses associated with the repair and testing of rubber goods and 12 insulated hot sticks. This billing method is appropriate for that project 13 code because 100% of the costs captured in the project code were 14 incurred to provide services solely to ETI rubber goods testing and where 15 such services were provided by other Entergy Operating Companies.

16 <u>DIRECTTX</u> - An example of a project to which this billing method 17 would be applied is Project Code F3PPZW9612 (Fossil ETI CIP V4 18 Compliance). The overall purpose of this project is to capture time and 19 expenses associated with implementing the Critical Infrastructure 20 Protection Standards at ETI's fossil plants. This billing method is 21 appropriate for that project code because 100% of the costs captured in 22 the project code were incurred to provide services solely to ETI's fossil 23 plants.

Page 30 of 36

1	LOADTXLG (Responsibility Ratio for EGSL and ETI) – An example
2	of a project to which this billing method would be applied is Project Code
3	F3PCWE0027 (MP&C Plant Operation). This billing method is appropriate
4	for that project code because the billing method is isolating the fossil
5	plants within EGSL and ETI and then allocating the Supply Chain
6	procurement and material management costs based on the Companies'
7	split of load (responsibility ratio). Load is a good cost driver since each
8	company's interest is proportional to the share of load capacity.
9	SCDSPALL (Distribution Organization Spending) – An example of a
10	project to which this billing method would be applied is Project Code
11	F5PPSUPDIS (Supply Chain Distribution Procurement). This billing
12	method is appropriate for that project code because the billing method is
13	isolating the Supply Chain total spending of the Distribution Organization
14	and then allocating the Supply Chain procurement costs based on that
15	spending ratio. The billing method SCDSPALL has been specifically
16	designed for this purpose and is therefore appropriate for the Supply
17	Chain purchasing and contracts support of the Distribution Organization.
18	SCMATXNU (Materials and Contracts Management System) – An
19	example of a project to which this billing method would be applied is

example of a project to which this billing method would be applied is
 Project Code F3PCMCMSOM. The overall purpose of this project is to
 capture operating costs associated with the Asset Suite system, which is
 used to facilitate purchases of materials and services as well as inventory
 management.

Q36. YOU HAVE ADDRESSED THE BILLING METHODS USED TO BILL 92%
 OF THE COSTS TO ETI ASSOCIATED WITH THE SUPPLY CHAIN
 CLASS OF SERVICE. PLEASE SUMMARIZE HOW THE REMAINING
 COSTS ARE BILLED TO ETI.

5 A. The remaining costs are billed pursuant to a number of other project 6 codes and billing methods. These project codes and billing methods are 7 provided in Exhibit RTJ-C, discussed earlier. The reader may reference 8 this exhibit and then refer to the specific project code summary contained 9 in Company witness Tumminello's exhibits for a description of the 10 particular billing method used and the cost drivers for the activities 11 captured in the particular project code.

12

Q37. HAVE YOU DETERMINED THAT THE COSTS REFLECTED IN THE
REMAINING 8% OF COSTS ASSOCIATED WITH THE SUPPLY CHAIN
CLASS OF SERVICE HAVE BEEN BILLED TO ETI APPROPRIATELY?

Yes. I have reviewed each of the project codes and the associated billing 16 Α. methods used to bill the remaining 8% of Total ETI Adjusted costs 17 18 associated with this class and they are reasonable. The costs associated 19 with the remaining billing methods are consistent with and reflect the services captured in each respective project code. The unit cost to ETI as 20 a result of the application of these billing methods is no higher than the 21 unit cost to other affiliates for the same or similar service and represents 22 23 the actual cost of service.