ENTERGY TEXAS INC. COMBUSTION RESIDUALS – DISPOSAL BIG CAJUN II, UNIT 3

Fly Ash is vacuum conveyed to a silo where the ash contractor takes delivery for sale. Third party trucks are loaded from the silo by the contractor, weighed and released from the site for delivery. Some fly ash is trucked to the on-site impoundment. The ash contractor excavates the hardened fly ash from the impoundment, grinds it and classifies it by aggregate size. The rocks are sold for use as an alternative to limestone.

Bottom Ash is loaded into trucks by the ash contractor and trucked to the bottom ash impoundment. This ash is then loaded into third party trucks for sale by the ash contractor and weighed prior to exit from the site for outside use.

(Data for Big Cajun provided by Louisiana Generating LLC.)

Sponsored by: Gerard L. Fontenot

SCHEDULE I-5.3 2013 TX RATE CASE PAGE 1 OF 1

ENTERGY TEXAS, INC. COMBUSTION RESIDUAL DISPOSAL COSTS FOR THE TWELVE MONTHS ENDED MARCH 31, 2013

NELSON COAL BIG CAJUN II UNIT 3 ENUES FLEX BASE NET REVENUES ENUES FLEX BASE NET REVENUES REVENUES FLEX BASE NET REVENUES SEIVED REMOVAL COST RECEIVED 5,808 0 5,808 507 10,6 0 0 0 949 18,3 7,8
TONS SOLD 1,413 0

NOTES

A) ASH REVENUES (NET OF ANY DISPOSAL COSTS) ARE CONSIDERED A REDUCTION TO INELIGIBLE FUEL EXPENSE (FERC ACCOUNT 501). THEREFORE, THESE REVENUES ARE ULTIMATELY TREATED AS A REDUCTION TO BASE RA
 B) ASH REVENUES AT NELSON ARE RECORDED UPON RECEIPT OF CASH FROM THE VENDOR. THEREFORE, RECOR MONTH, AS PRESENTED HERE, WILL NOT NECESSARILY COINCIDE WITH MONTH IN WHICH REVENUES WERE GEN C) THE TONS SOLD FOR BIG CAJUN 2 UNIT 3 ARE BASED ON ACTUAL SALES FOR THE MONTH.

Sponsor: Gerard L. Fontenot, Margaret L. McCloskey

Amounts may not add or tie other schedules due to rounding.

SCHEDULE I-6 2013 TX RATE CASE PAGE 1 OF 1

ENTERGY TEXAS, INC. NATURAL GAS DELIVERY SYSTEM JULY 2011 – MARCH 2013

Plant	Operator of Pipeline	Maximum MMBtu/day Pipeline Capacity	Maximum Capacity Compared to Plant Needs at Full Load
Lewis Creek	Kinder Morgan Tejas Pipeline	130,000	100%
	Kinder Morgan Texas Pipeline	130,000	100%
	TETCO Pipeline	220,000	169%
	Copano Pipeline	90,000	70%
Sabine	Kinder Morgan Tejas Pipeline	150,000	32%
	Kinder Morgan Texas Pipeline	210,000	45%
	Centana Pipeline Co. (9 mile header)	150,000	32%
	Centana Pipeline Co. (14 mile header)	140,000	31%
	Enbridge Pipeline	200,000	44%
	TETCO Pipeline	130,000	28%
	Texoma Gas Pipeline	150,000	32%

ENTERGY TEXAS, INC. NATURAL GAS STORAGE DESCRIPTION JULY 2011 – MARCH 2013

The Spindletop Gas Storage facility is located in Beaumont, Texas, approximately fourteen miles from Sabine Station. The facility is owned by ETI and operated under contract by PB Energy Storage Services. The facility, which consists of two underground salt dome caverns, is able to provide transportation and/or gas storage service to the Company's Sabine and Lewis Creek generating plants, both of which are located in Texas. The volume of gas that can be stored, as well as the rate of injection and withdrawal from storage, is a function of cavern pressure. The absolute pressure range necessary to maintain the structural integrity of the facility is 1,100 – 3,100 psi. The minimum pressure necessary to minimize cavern "creep" (*i.e.*, an increase in the rate of cavern closure that occurs at low cavern pressures) is 2,000 psi. The normal operating pressure range of the facility is 2,677 – 2,800 psi. The upper end of the normal operating range allows flexibility needed for daily swing, as well as one of the Lewis Creek units, for four days at a 70 percent capacity factor. The lower end of the normal operating range ensures sufficient cavern pressure to be able to operate these units to meet the peak load on the fifth day. The following table describes the various "critical points" that are used for planning purposes in managing storage cavern, based on cavern pressure:

Description	Estimated Pressure (psig)
Absolute maximum inventory pressure	3,100
Maximum operating pressure	2,900
Target operating pressure range	2,750 - 2,800
Minimum inventory pressure required to operate Sabine Station and one unit at Lewis Creek at 70 percent capacity factor for four days	2,677
Minimum pressure required to operate Sabine Station and one unit at Lewis Creek across the peak for one day	2,200
Minimum pressure required to minimize cavern closure or shrinkage	2,000
Absolute minimum level necessary to maintain structural integrity of the storage	
cavern	1,100

Gas injections are accomplished by means of four electric compressors capable of injecting, subject to cavern pressure constraints, up to 240,000 MMBtu per day into storage. The maximum withdrawal rate from the storage facility, subject to cavern pressure constraints, is 560,000 MMBtu per day, with delivery capability to Sabine Station and/or interconnecting pipelines for deliveries to Lewis Creek or for third parties. The actual amounts that can be injected or withdrawn are subject to, and may be limited by, operational constraints of either the storage facility or the interconnecting pipelines, or both.

Chart 1, attached, shows the overall facility encompassing the storage site, interconnecting pipelines, and Sabine Station. Chart 2 shows the layout of the storage site itself.

The Spindletop Gas Storage and Pipeline Facility Operations & Maintenance Agreement between EGSI and PB Energy Storage Services, Inc. is provided as a workpaper to Schedule I-4.



SCHEDULE I-7 2013 TX RATE CASE PAGE 3 OF 6



SCHEDULE I-7 2013 TX RATE CASE PAGE 4 OF 6

ENTERGY TEXAS, INC. SPINDLETOP GAS STORAGE INVENTORY COSTS JULY 2011 – MARCH 2013

BEGINNING BALANCE	<mark>11-Jul</mark> 42,139,304	11-Aug 43,045,082	11-Sep 42,769,595	<u>11-Oct</u> 42,126,919	<u>11-Nov</u> 41,766,667	<u>11-Dec</u> 42,021,309	<u>12-Jan</u> 42,136,021	<u>12-Feb</u> 42,816,099	<u>12-Mar</u> 42,450,066
MONTHLY INJECTIONS GAS STOCK COST	891,046	0	0	0	245,141	111,648	663,251	0	401,528
TRANSPORTATION & ELEC.	14,732	0	0	0	9,500	3,063	16,842	0	32,348
TRANSPORTATION TAXES	0	0	0	0	1	1	(15)	0	10
TOTAL INJECTIONS	905,778	0	0	0	254,642	114,712	680,078	0	433,886
MONTHLY WITHDRAWALS					ſ	¢	c		c
GAS STOCK COST	0	276,683	616,249	345,445	0	0	Ð	388,461	D
TRANSPORTATION & ELEC.	0	(1,196)	26,389	14,792	0	0	0	(22,451)	0
TRANSPORTATION TAXES	0	0	38	15	0	0	0	e	0
TOTAL WITHDRAWALS	0	275,487	642,676	360,252	0	0	0	366,033	0
ENDING BALANCE	43,045,082	42,769,595	42,126,919	41,766,667	42,021,309	42,136,021	42,816,099	42,450,066	42,883,952
BEGINNING MMBTU BAI ANCE	10,405,820	10,619,844	10,553,483	10,394,897	10,306,000	10,376,121	10,413,201	10,658,507	10,554,764
MMBTUS INJECTED	214,024	0	0	0	70,121	37,080	245,306	0	167,073
MMBTUS WITHDRAWN	0	66,361	158,586	88,897	0	0	0	103,743	0
ENDING MMBTU BAI ANCE	10,619,844	10,553,483	10,394,897	10,306,000	10,376,121	10,413,201	10,658,507	10,554,764	10,721,837

Because the company is not proposing a change to its Fixed Fuel Factor, rate year data is not applicable. Amounts may not add or tie to other schedules due to rounding.

SCHEDULE I-7 2013 TX RATE CASE PAGE 5 OF 6

ENTERGY TEXAS, INC. SPINDLETOP GAS STORAGE INVENTORY COSTS JULY 2011 – MARCH 2013

BEGINNING BALANCE	<u>12-Apr</u> 42,883,952	<u>12-May</u> 42,746,960	<u>12-Jun</u> 42,931,357	<u>12-Jul</u> 42,450,034	12-Aug 42,688,177	<u>12-Sep</u> 41,564,618	<u>12-Oct</u> 41,322,899	<u>12-Nov</u> 41,033,298	<u>12-Dec</u> 41,798,108
MONTHLY INJECTIONS	c	175.997	C	231.258	0	0	0	758,596	407,617
	0	8,400	0	6,892	0	0	0	6,192	21,136
TRANSPORTATION TAXES	0	0	0	E	0	0	0	22	0
TOTAL INJECTIONS	0	184,397	0	238,143	0	0	0	764,810	428,753
MONTHLY WITHDRAWALS									
GAS STOCK COST	118,8 44	0	461,231	0	1,068,689	231,708	278,975	0	0
TRANSPORTATION & ELEC.	18,148	0	20,068	0	54,859	10,013	17,517	0	0
TRANSPORTATION TAXES	0	0	24	0	11	(2)	(6,891)	0	0
TOTAL WITHDRAWALS	136,992	o	481,323	0	1,123,559	241,719	289,601	0	0
ENDING BALANCE	42,746,960	42,931,357	42,450,034	42,688,177	41,564,618	41,322,899	41,033,298	41,798,108	42,226,861
BEGINNING MMBTU BALANCE	10,721,837	10,674,221	10,756,539	10,635,940	10,728,828	10,446,770	10,386,010	10,347,123	10,569,194
MMBTUS INJECTED	0	82,318	0	92,888	0	0	0	222,071	128,797
MMBTUS WITHDRAWN	47,616	0	120,599	0	282,058	60,760	38,887	0	0
ENDING MMBTU BALANCE	10,674,221	10,756,539	10,635,940	10,728,828	10,446,770	10,386,010	10,347,123	10,569,194	10,697,991

Because the company is not proposing a change to its Fixed Fuel Factor, rate year data is not applicable. Amounts may not add or tie to other schedules due to rounding.

ENTERGY TEXAS, INC. SPINDLETOP GAS STORAGE INVENTORY COSTS JULY 2011 – MARCH 2013

	<u>13-Jan</u>	<u>13-Feb</u>	<u>13-Mar</u>	<u>Totals</u>
BEGINNING BALANCE	42,226,861	41,580,131	41,934,599	42,139,304
MONTHLY INJECTIONS				
GAS STOCK COST	0	339,866	0	4,225,948
TRANSPORTATION & ELEC.	0	14,489	0	133,594
TRANSPORTATION TAXES	0	113	0	125
TOTAL INJECTIONS	0	354,468	0	4,359,667
MONTHLY WITHDRAWALS				
GAS STOCK COST	624,599	0	84,526	4,495,430
TRANSPORTATION & ELEC.	22,109	0	3,603	163,851
TRANSPORTATION TAXES	22	0	3	(6,777)
TOTAL WITHDRAWALS	646,730	0	88,132	4,652,504
ENDING BALANCE	41,580,131	41,934,599	41,846,467	41,846,467
BEGINNING MMBTU BALANCE	10,697,991	10,537,495	10,627,321	10,405,820
MMBTUS INJECTED	0	89,826	0	1,349,504
MMBTUS WITHDRAWN	160,496	0	22,340	1,150,343
ENDING MMBTU BALANCE	10,537,495	10,627,321	10,604,981	10,604,981

Because the company is not proposing a change to its Fixed Fuel Factor, rate year data is not applicable. Amounts may not add or tie to other schedules due to rounding.

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ENTERGY TEXAS, INC. FUEL PROPERTIES JULY 2011 - MARCH 2013

The Spindletop Gas Storage facility, located in Beaumont, Texas, is owned by ETI. The facility consists of two underground salt dome caverns and associated operating equipment and facilities, as well as a pipeline header and interconnecting pipeline to Sabine Station. The operations expenses associated with operating equipment and facilities are included in eligible fuel expense. The Company is seeking inclusion of invested capital in rate base.

ETI is a co-owner of the Nelson 6 coal plant, which is also co-owned and operated by its affiliate, Entergy Gulf States Louisiana, L.L.C. ("EGSL"). Southern Gulf Railway, Inc., a wholly owned subsidiary of EGSL, owns the railspur into Nelson Station, and has contracted with Timber Rock Railroad, a non-affiliated entity, for its operation and maintenance. ETI is not seeking recovery of expenses for direct payments to Southern Gulf Railway. ETI seeks only recovery of operations expenses related to Timber Rock Railroad's operations over Southern Gulf Railway.

Varibus Corporation, a wholly owned subsidiary of EGSL, owns and operates natural gas pipelines capable of delivering gas into the Nelson and Willow Glen power plants in Louisiana. ETI made no payments to Varibus Corporation during the Reconciliation Period.

Neither ETI nor any of its affiliates owns any nuclear fuel production properties.

Sponsored by: M.P. Considine; M.H. Thiry; R.S. Trushenski

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EMPLOYEE ORGANIZATIONAL CHARTS JULY 2011 – MARCH 2013

The following table represents the organization chart in March 2013.

NAME	DEPARTMENT	JOB TITLE
John Hurstell	System Planning	VP, System Planning
Walz, Anthony P	Planning Analysis	Director, Planning Analysis
DeGeorge, Charles	Supply Planning & Analysis	Mgr, Supply Planning & Analysis
Monk, Gregory A	Supply Planning & Analysis	Sr. Lead Analyst
Williamson, Jamie	Supply Planning & Analysis	Analyst I
Seaman, Mark	Supply Planning & Analysis	Analyst I
Eldridge, Brent	Supply Planning & Analysis	Analyst II
Marciano, Christopher	Supply Planning & Analysis	Sr. Lead Analyst
Cooper, Robert R	Generation Planning & Models	Mgr, Generation Planning & Models
Meyer, Anastasia	Generation Planning & Models	Analyst III
Lau, Alex	Generation Planning & Models	Sr. Planning Team Leader
Mills, Roger Q	Generation Planning & Models	Sr. Planning Team Leader
Balledos, Jose M.	Generation Planning & Models	Sr. Analyst
Tuvilla, Reggie	Generation Planning & Models	Analyst I
Alvis, Jonathon	Generation Planning & Models	Analyst I
Peveto, Michael L	Generation Planning & Models	Sr. Analyst
Salato, Victoria	Generation Planning & Models	Analyst II
Algeo, Heather N.	Generation Planning & Models	Analyst III
Phong Nguyen	Financial Analysis	Mgr, Financial Analysis
Rao, Vishwa	Financial Analysis	Analyst I
Sims, Elizabeth	Financial Analysis	Sr. Analyst
Nacher, Heather	Financial Analysis	Analyst III
Lanning, Richard J.	Planning Analysis	Sr. Planning Team Leader
Chen, Qing	Planning Analysis	Sr. Planning Team Leader
Thiry, Michelle H.	Energy Management	Director, EMO
Ralston, Alan B.	Operations Planning	Director, Operations Planning
Jaycox, Devon S.	Operations Planning	Mgr., Operations Planning

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EMPLOYEE ORGANIZATIONAL CHARTS JULY 2011 – MARCH 2013

District of the second structure of the second structure District of the second structure Brodeur, Mark M. Operations Planning Charles, Gary M. Operations Planning Cox, Bruce M. Operations Support Straw, Earnest L. Operations Support Stephens, Nathaniel Operations Support Sampler, John L. Operations Support O'Brien, Andrew J. Power Transaction & Dispatch Martinez, Michael J. Power Transactions & Dispatch	ung ing	Sr. Analyst Sr Analyst Sr Staff Engineer
ael J.	ning ning	Sr. Analyst Sr Staff Engineer Sr. Analyst
A. L. anticl ael J.	ning	Sr Staff Engineer
L. aniel ael J.		Sr Analyst
aniel ael J.	ort	ol. Allalyst
anicl C. ael J.	ort	Superintendent
ael J.	ort	Superintendent
ael J.	ing	Sr. Analyst
ael J.	on & Dispatch	Director, Power Transactions & Dispatch
	ons & Dispatch	Power Scheduler
	Power Transactions & Dispatch	Sr. Lead System Dispatcher
Starkey, Nicolas C Power Transactions & Dispatch	ons & Dispatch	Sr. Lead System Dispatcher
Norman, Guy W Power Transactions & Dispatch	ons & Dispatch	Sr. Lead System Dispatcher
Avocato, Vincent R. Power Transactions & Dispatch	ons & Dispatch	Sr. System Dispatcher
Bagley, Scott Power Transactions & Dispatch	ons & Dispatch	Sr. System Dispatcher
Benoit, Terri F. Power Transactions & Dispatch	ons & Dispatch	Sr. Lead System Dispatcher
Snyder, David Power Transactions & Dispatch	ons & Dispatch	Sr. Lead System Dispatcher
Plant, Plant L. Power Transactions & Dispatch t	ons & Dispatch t	Sr. Lead System Dispatcher
Wallace, Billy R Power Transactions & Dispatch	ons & Dispatch	Manager, Dispatcher Training & Development
Johnson, David R Power Transactions & Dispatch	ons & Dispatch	System Dispatcher II
le	Operations Reliability & Compliance	Sr. Lead System Dispatcher
Kelley, Donald A. Power Transactions & Dispatch	ons & Dispatch	Sr. Lead System Dispatcher
R.	Operations Reliability & Compliance	Sr. Lead System Dispatcher
	Operations Reliability & Compliance	Sr. Lead System Dispatcher
Mcllvoy, Karen Gas & Oil Supply	y	Mgr., Gas & Oil Supply
Hogsett, Jeffery S. Gas & Oil Supply	ly	Fuels Supply & Trade Rep Sr. Staff
er J.	y	Fuels Supply & Trade Rep Sr. Staff
Clausen, Brad Gas & Oil Supply	ly	Sr. Fuels Supply & Trade Rep
, J.	[y	Fuels Supply & Trade Rep Sr. Staff
Sommers, David M. Gas & Oil Supply	[y	Sr. Staff Fuels Supply & Trade Rep
Branner, Garrett K. Gas & Oil Supply	Ŋ	Fuels Supply & Trade Rep

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EMPLOYEE ORGANIZATIONAL CHARTS JULY 2011 – MARCH 2013

Analyst III	Performance & Project Management	Phelps, April S.
Analyst II	Performance & Project Management	DeCuir, Mary
Administrator, Coal Transportation	Coal Supply	Gray, Daniel B.
Fuels Specialist III	Coal Supply	Hill, Rachel D
Sr. Fuel Specialist	Coal Supply	. Ochoa, Daniel
Mgr., Solid Fuel Supply	Coal Supply	Trushenski, Ryan
Wholesale Executive	Asset Operations	Zurita, John
Analyst III	Asset Operations	Johnson, Rachelle
Dir., Asset Operations	Asset Operations	Barrett, Stuart O.
Project Mgr., Tactical Supply Plan	Power Delivery & Technical Services	Maddux, Mark A
Sr. Engineer	Power Delivery & Technical Services	Webber, Kenisha K
Sr. Engineer	Power Delivery & Technical Services	Wilson, Jeff
Staff Engineer	Power Delivery & Technical Services	Silva, Enrique M.
Dir., Power Delivery & Technical Services	Power Delivery & Technical Services	Kellough, Lee L.
Sr. Power Scheduler	Power Marketing	Tucker, Stacey L
Sr. Power Trader	Power Marketing	Storms, Ralph L.
Sr. Power Trader	Power Marketing	Kaough, Grady L.
Sr. Power Trader	Power Marketing	Francis, Robert N.
Mgr., Power Marketing	Power Marketing	Cornish, Kyler L.
Fuels Supply & Trade Rep	Gas & Oil Supply	Schroff, Helen

Sponsored by: Michelle H. Thiry

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ENTERGY TEXAS, INC. EMPLOYEE ETHICS JUNE 2011 – MARCH 2013

FOSSIL FUEL AND PURCHASED POWER:

Fossil fuel and purchased power procurement is performed for the Company by the Energy Management Organization ("EMO") and the System Planning and Operations Department ("SPO") of Entergy Services, Inc. The practices of EMO and SPO comply with the Entergy Corporation "Code of Entegrity: Guidelines for Business Ethics & Compliance," last updated March 2013, and the "Code of Business Conduct and Ethics for Employees," last updated December 2009.

SCHEDULE I-10 2013 TX RATE CASE PAGE 2 OF 44

CODE OF BUSINESS CONDUCT AND ETHICS FOR EMPLOYEES

The Board of Directors (the "Board") of Entergy Corporation has adopted the following Code of Business Conduct and Ethics ("Code") for all employees of Entergy Corporation or any corporation, partnership, trade or business in which Entergy Corporation has a direct or indirect majority ownership interest (collectively, the "Company"). This Code is intended to focus employees on ethical risks, provide guidance to employees to help them recognize and deal with ethical issues, and help foster and further the Company's culture of honesty and accountability. Also, this Code should be read in conjunction with the Code of Entegrity and the Company's policies.

Each employee must comply with the letter and spirit of this Code.

This Code does not create any employment contract or any other contractual obligation between an employee and the Company.

1. Conflict of Interests

An employee shall not allow his or her private interest to interfere with the interests of the Company as a whole. A "conflict of interests" occurs when an employee takes actions or has interests that make it difficult to perform his or her duties as an employee objectively and effectively. Conflicts of interests may also arise when an employee, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position as an employee of the Company. Employees must avoid, and may not have, conflicts of interests with the Company.

2. Corporate Opportunities

Employees are expected to advance the Company's legitimate interests when the opportunity to do so arises. Employees are prohibited from: (a) taking for themselves personally opportunities that are discovered through the use of corporate property, information or the employee's position; (b) using the Company's property or information, or the employee's position, for personal gain; and (c) competing with the Company, directly or indirectly, for business opportunities.

3. Confidentiality

Employees must maintain the confidentiality of information entrusted to them by the Company or its customers, and any other confidential information about the Company that comes to them, from whatever source, in their capacity as an employee, except when disclosure is authorized or required by laws or regulations. Confidential information includes all non-public information that might be material to investors, of use to competitors, or harmful to the Company or its customers, if disclosed.

4. Protection and Proper Use of Company Assets

SCHEDULE I-10 2013 TX RATE CASE PAGE 3 OF 44

CODE OF BUSINESS CONDUCT AND ETHICS FOR EMPLOYEES

Employees shall protect Company assets. Employees must not use Company time, supplies, equipment, tools, buildings or other assets for unauthorized personal benefit.

5. Fair Dealing

Employees shall deal fairly with the Company's other employees and its customers, suppliers and competitors. No employee may take unfair advantage of the Company's other employees or its customers, suppliers and competitors, including through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practices.

6. Compliance with Laws, Rules and Regulations

Employees shall comply with all laws, rules and regulations applicable to the Company, including securities laws and Company policies governing trading of securities.

7. <u>Special Provisions Relating to Principal Executive Officer and Senior</u> <u>Financial Officers</u>

The principal executive officer and those responsible for the preparation, evaluation and dissemination of financial information hold an important and elevated role in corporate governance. Therefore, the Company expects that such personnel adhere to and advocate the following principles and responsibilities governing professional and ethical conduct.

To the best of their knowledge and ability, such personnel shall:

- Act with honesty and integrity, ethically handling actual or apparent conflicts of interest in personal and professional relationships.
- Provide full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission and in public communications made by the Company.
- Comply with applicable laws, rules and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies.
- Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated.
- Respect the confidentiality of information acquired in the course of work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of work shall not be used for personal advantage.

SCHEDULE I-10 2013 TX RATE CASE PAGE 4 OF 44

CODE OF BUSINESS CONDUCT AND ETHICS FOR EMPLOYEES

- Share knowledge and maintain skills important and relevant to constituents' needs.
- Proactively promote ethical behavior as a responsible colleague among peers in the work environment and community.

8. Waivers of the Code

Any waiver of this Code for an executive officer of the Company can be made only by the Board, or, if the Board so chooses, by a committee of independent directors, and must be promptly disclosed to the Company's shareholders.

9. Failure to Comply; Compliance Procedures

A failure by any employee to comply with the laws or regulations governing the Company's business, this Code or any other Company policy or requirement applicable to employees may result in disciplinary action up to and including termination, and, if warranted, legal proceedings. Known, suspected or potential violations of any such laws or regulations or this Code shall be reported according to the procedures provided in the Entergy Code of Entegrity and other applicable Entergy policies.

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CODE -----ENTEGRITY





THE POWER OF PEOPLE®

^{03/2013} Sponsored by: M.H. Thiry

2013 ETI Rate Case

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Message from Leo Denault

Dear Colleagues,

26 3

Change is inevitable. Whether it is a change in the company's leadership, a change in the way we provide value to our customers or our changing workforce, we experience it all the time. But, one thing at Entergy will always be steadfast and that is our commitment to acting with integrity.

Our expectation has been, and will always be, that we will behave lawfully in every aspect of our business. However, behaving lawfully is the starting point, not the destination. While there may often seem to be more than one "correct"

answer within the law, adding a standard of fairness and ethics can help fill in those gaps. The Code of Entegrity helps us to face such challenges. When you're lost in a situation where the right course of action isn't clear or easy, let the Code of Entegrity be your guide.

The Code will direct you toward conducting business ethically and fairly. And, if you're having trouble understanding all the rules and regulations that govern our complex and highly-regulated industry, the Code can help with that too.

You can also seek guidance from your management team, the Ethics and Compliance department or the Entergy Ethics Line. We do not tolerate retaliation for asking a question or raising a concern.

Follow the Code every day and you will always be headed in the right direction.

Stay safe,

LUU DUNAAN

8.8%

Entergy's Road Map to Integrity:

Steer a straight path: Carry out ethical responsibilities

Shift out of neutral: Don't be afraid to point something out or ask a question Be a courteous driver: Respect the workplace

Share the road: Deal fairly with customers, suppliers and competitors

Stop at all red lights: Obey the law Don't hand the keys to a stranger:

Protect company property and information

Use caution when changing lanes:

Understand the relationship between personal, company and outside-party interests

The Road Map to Integrity is an overview of the ethical guidelines contained within. There are also blue Q&A boxes to further explain and reinforce guidance. The Ethics and Compliance SharePoint site, system and business-unit policies, and computer-based training courses are also available to help you.

2.



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Sponsored by: Case Thiry

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Policy Index

Topic Index

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ON THE ROAD TO INTEGRITY



A. INTRODUCTION AND APPLICABILITY

Building a culture of integrity is more than a final destination. It's the collective journey employees take each day during the course of conducting business and making decisions. In that sense, we are each in the driver's seat needing to operate ethically and within the law.

Even the best drivers need the right tools to guide them through challenging, as well as basic, situations. Here is the Code of Entegrity, your driver's manual and guide to day-to-day ethical decision making.

The Code of Entegrity applies to everyone

who works for, or represents, Entergy or any of the subsidiaries or affiliates in which Entergy has a direct or indirect majority ownership interest ("Entergy" or "company"). This includes all Entergy employees, regardless of their level in the organization, from the CEO on down.

The Code of Entegrity is Entergy's "umbrella" policy and incorporates by reference various system policies that deal with specific compliance topics in greater detail.



B. ROADMAP TO INTEGRITY

Two of Entergy's core values are *Treat People with Respect* and *Above All, Act with Integrity*. By following the Roadmap to Integrity, we can help maintain those values. The Roadmap to Integrity is an overview of ethical guidelines found in this Code. For a quick reminder of the Code's key components, keep this roadmap handy.

1. Steer a straight path: *Carry out ethical responsibilities.* When we drive on the highway, we accept personal responsibility to abide by the driver's manual and protect ourselves and others. When representing Entergy, we have an obligation to follow the letter and spirit of this Code and Entergy's system policies and, in every event, to behave according to the highest ethical and legal standards.

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2. Shift out of neutral: *Don't be afraid to point something out or ask a question.* Drivers must be proactive and aware of what is happening around them to maintain safe driving conditions. As Entergy workers, it is our responsibility to remain alert to possible violations of the law or Entergy policies, and to report them to the Ethics Line.

3. Be a courteous driver: Respect the workplace. Just as drivers have a responsibility to care for their passengers, Entergy employees have a responsibility to be civil and respectful to co-workers during workplace interactions.

4. Share the road: *Deal fairly with customers, suppliers and competitors.* The road is shared by many motorists – motorcycle, truck, bus and car drivers – and we have to interact with each of them in a fair and legal manner. Entergy employees work alongside various parties in the marketplace. We must respect the rights of our competitors and compete lawfully. We must act in good faith when dealing with vendors and suppliers. And we must listen to our customers and strive to meet and exceed their quality and service expectations.

5. Stop at all red lights: *Obey the law.* Abiding by the laws that regulate the movement of traffic is an absolute necessity. Each Entergy worker has a duty to follow the letter and spirit of applicable laws, regulations, rules and regulatory orders of every jurisdiction in which we operate.

6. Don't hand the keys to a stranger: *Protect company property and information.* Motorists protect their property by locking the doors and securing the keys. At Entergy, we must also protect our assets, whether in the form of personal property, real estate, information, records or electronic files.

7. Use caution when changing lanes: Understand the relationship between personal, company and outsideparty interests. In the workplace and outside of it, some interactions must be avoided. On the road, vehicles are at times barred from changing lanes and trucks are restricted to one lane. As Entergy workers, we have an obligation to avoid certain interactions that create conflicts of interest with our duty to act in the best interest of Entergy.

C. IMPORTANT NOTICES AND DISCLAIMERS

The Code is not a Human Resources handbook. It does not address or reference many policies relating to important personnel issues such as benefits, time off or employment rights. For help with such issues, contact your Human Resources representative or consult the appropriate system policy on the myEntergy.

This Code replaces all prior versions of the Code of Entegrity. In the event that there are differences between a printed and online version, the online version is the current statement of the Code. The online version can be found on the myEntergy (Policies & Forms >

Code of Entegrity). If the myEntergy is not available, a copy can be provided by supervisors, Human Resources representatives or the Ethics and Compliance department.

The description of policies. practices or procedures contained in this Code or a referenced policy, or as told to you by a company representative, does not create any terms and conditions of an employment contract. This Code does not constitute or create any contractual obligation between you and the company. All Entergy employment is at will and can be ended by either party, at any time, without prior notice, except as provided in a collective bargaining agreement or other authorized express written employment contract between an employee, personally, and Entergy.

Foreword

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STEER A STRAIGHT PATH: Carry Out Ethical Responsibilities



Difficulty in building and ease of losing a reputation has been recognized from Socrates ("Regard your good name as the richest jewel you can possibly be possessed of - for credit is like fire; when once you have kindled it you may easily preserve it, but if you once extinguish it, you will find it an arduous task to rekindle it again") to Warren Buffet ("It takes 20 years to build a reputation and 5 minutes to ruin it").

A. SHARED RESPONSIBILITIES

Entergy's corporate reputation is created and maintained by the actions of our employees and representatives. We have a shared responsibility to uphold Entergy's reputation for good and fair corporate behavior. We also must follow the letter and the spirit of applicable laws, including statutes, regulations, rules and regulatory orders of every jurisdiction in which Entergy operates.

We cannot assist others – either at the company or third parties – in breaking the law. We must conduct ourselves in accordance with this Code, as well as its underlying policies. What Entergy cannot do directly or indirectly, it will not do through another party. Consultants and agents shall not be retained to do anything illegal or improper. Entergy expects its suppliers, contractors and consultants to behave in a manner consistent with this Code when doing work for Entergy.

If there is a conflict between an applicable law and this Code or any internal policy, the law takes precedence and must be followed. If it appears that the Code or an internal policy can be interpreted to differ from an applicable law, contact the Ethics and Compliance department or the Legal Services department for guidance. If immediate action is necessary, the more restrictive guidance must be followed. Not only is Entergy subject to the laws of the United States, but we are also covered by the laws of the countries within which we do business. In some

circumstances, that will mean that the company is subject to different rules in different places. Additionally, laws may be in conflict. In such circumstances, contact Entergy's Legal Services department with any questions before taking action (myEntergy > Our Company > Legal).

Section One

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B. EMPLOYEE RESPONSIBILITIES

Above all, act with integrity. Follow the letter and spirit of Entergy's Code and system policies, and always observe the highest ethical and legal standards.

As employees, it is part of our job and our ethical responsibility to Entergy to:

- Know the Code and system policies related to our work and stay informed of any revisions
- Help Entergy enforce the Code and system policies, including prompt reporting of known or suspected wrongdoing (as explained in Entergy's <u>Reporting Violations Policy</u>)
- Cooperate with investigations and provide forthright responses
- Acknowledge compliance with the Code upon hiring and annually thereafter (applies to non-bargaining unit employees)
- Complete all required compliance training
- Cooperate fully with all compliance auditing and monitoring requirements
- Understand and follow business unit policies applicable to our work



For questions or concerns, please see the "Help Lines and myEntergy Links" and the "Reporting Violations" sections.

Because Entergy is committed to ethical and honorable actions by all employees, violation of any provision of Entergy's Code or any system policy may result in disciplinary action, regardless of whether the underlying policy or policies contain specific disciplinary provisions. This could include termination of employment.

No delay or failure by the company to enforce this Code or any system policy will constitute a waiver by the company of its right to do so in the future.

C. SUPERVISOR RESPONSIBILITIES

Supervisors have a special obligation to lead by example and to provide direction, guidance and encouragement to those whom they lead. Supervisors must:

- Create and maintain an atmosphere that promotes ethical behavior, supports the company's compliance system and helps to prevent violations
- Work with the Ethics and Compliance department to make sure that applicable employees, and any consultants, vendors and agents for which the supervisor is responsible, are aware of the Code and system policies and ensure they take required compliance training
- Encourage others to ask questions and seek advice if faced with ethical issues
- Require employees to promptly report known, suspected or potential violations of this Code or system policies in accordance with the Reporting Violations Policy
- Promptly take action in response to compliance issues raised by employees, consultants, vendors or agents
- Take appropriate and timely action, through reporting, discipline or other appropriate measures, to address known or suspected violations by employees

Section One

D. RESPONSIBILITIES UNDER THE COMPLIANCE PROGRAM

Entergy's compliance program includes:

- The Code of Entegrity.
- Entergy system policies.
- Business Unit policies.
- All other rules, regulations, guidelines, procedures, and general standards of attendance, work performance, safety, civility and ethics.
- All other general standards of expected conduct, regardless of whether they are written or unwritten.

Violation of Entergy's compliance program could lead to criminal charges, civil charges or government investigations. Again, it is important to understand that any violations of Entergy's compliance program will also subject employees to disciplinary action, which may include termination of employment.

E. EMPLOYMENT AT WILL

Absent an applicable collective bargaining agreement or a written contract of employment, our employment with the company is at will. As an at-will employee, each employee, or the company, may end employment at any time, with or without cause and with or without notice.



Section One

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SHIFT OUT OF NEUTRAL: Don't Be Afraid to Point Something Out or Ask a Question

A. ADDRESSING QUESTIONS / CONCERNS

This Code addresses many topics, and our system polices go into even greater detail on many different areas. But we need to recognize that this Code and Entergy's compliance system cannot specifically address or cover all situations. And even when a topic is addressed, the facts may be such that the proper response is not obvious.

The "Ethical Decision Making Model" shown below gives some tips to consider when facing an ethical predicament. But perhaps even more important is the need to ask questions. When it comes to ethics and compliance, hesitance is not the right approach. See the "Help Lines and myEntergy Links" below for where to go for help. When in doubt, call the Ethics Line at 1-888-257-ETHIC (3844).

Consider the United States

Military Academy. Their "Cadet Honor Code" is simple – "A cadet will not lie, cheat, steal, or tolerate those who do." The West Pointers have "Three Rules of Thumb" to consider in following their code:

1. Does this action attempt to deceive anyone or allow anyone to be deceived?

2. Does this action gain or allow gain of a privilege or advantage to which I or someone else would not otherwise be entitled?

3. Would I be unsatisfied by the outcome if I were on the receiving end of this action?

If the answer is yes to any of these questions, we're probably better off seeking guidance first.

B. ETHICAL DECISION MAKING MODEL

There are various methods for solving ethical questions or problems. Give these steps a try.

- Gather the facts and identify the issue(s)
- Use available resources (including the Code of Entegrity, system policies, computer-based training modules, *Inside Entergy* articles and the Ethics and Compliance department)
- Find out which laws, regulations, company values or policies apply
- · Consider the options and their consequences

Before making a decision, ask yourself the following questions:

- Is my decision consistent with the values of fairness, honesty and integrity?
- Does my decision reflect the letter and spirit of the laws and principles that support Entergy's compliance system?
- Am I worried that my decision will be discovered?
- Would I be comfortable if my decision was reported in the news?
- What would I tell a child to do?

Section Two

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C. HELP LINES AND MYENTERGY LINKS

Concerns about your compliance obligations or reporting procedures can be raised with supervisors, human resources representatives or the Ethics and Compliance department. The Help Lines and myEntergy Links below list other resources.

- Affiliate Transactions and FERC Compliance Phone: 1-501-377-3601 myEntergy > Policies & Forms > FERC Compliance
- Code of Entegrity myEntergy > Policies & Forms > Code of Entegrity
- Corporate Security 24-Hour Help Line Phone: 1-888-257-3844
 myEntergy > Our Company > HR&A > myWorksite > Corporate Security
- Ethics and Compliance Phone: 1-504-576-6178 myEntergy > Our Company > Ethics and Compliance
- Ethics Line Phone: 1-888-257-3844 myEntergy > Quick Links > A to Z Listing > Ethics Line Website: <u>https://www.compliance-helpline.com/entergyethicsline.jsp.</u>
- 6. Human Resources Phone: 1-504-576-5868 myEntergy > Our Company > HR&A
- Information Technology Phone: 1-800-224-3939 myEntergy > Our Company > IT
- Internal Audit Services Phone: 1-504-576-4195 myEntergy > Our Company > Internal Audit
- 9. Legal Services Phone: 1-504-576-4214 myEntergy > Our Company > Legal
- 10. Nuclear Employee Concerns Phone: 1-601-368-5000 myEntergy > Our Company > Nuclear > Departments > Emp. Concerns
- 11. Office of Corporate Risk Oversight Phone: 1-281-297-5430 myEntergy > Quick Links > A to Z Listing > Office of Corporate Risk Oversight
- 12. Safety and Environment Phone: 1-504-576-6344 myEntergy > Our Company > Safety/Environment
- 13. System Policies Phone: 1-504-576-6178 myEntergy > Policies & Forms > System Policies

If ever unclear on where to turn for help, please call the toll free Ethics Line at 1-888-257-ETHIC (3844). The Ethics Line is also accessible via the myEntergy at **myEntergy > Quick Links > A to Z Listing > Ethics Line** or online at https://www.compliance-helpline.com/entergyethicsline.jsp.

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D. THE ENTERGY ETHICS LINE

The Ethics Line is staffed 24 hours per day by an outside company to better maintain confidentiality. Two ways to contact the Ethics Line are available to Entergy employees and representatives - via phone (1-888-257-ETHIC or 1-888-257-3844) and by using a secure website that has the same level of confidentiality. The link to the Entergy Ethics Line website is <u>https://www.compliance-helpline.com/entergyethicsline.jsp.</u> It is accessible from any computer with access to the Internet. The link is also found at myEntergy > Quick Links > A to Z Listing > Ethics Line.

A person contacting the Ethics Line does not have to identify himself or herself, but please understand that anonymity might make it harder to investigate or resolve a concern. Once a concern has been submitted, a case number and a personal identification number are provided for follow-up.

All matters reported to the Entergy Ethics Line will be appropriately investigated. Entergy recognizes that a key deterrent to unethical and unlawful behavior is an effective reporting system that allows employees to report their concerns without fear of reprisal and ensures appropriate and timely follow-up.





Mike, a lineman, thinks one of his colleagues is taking home company supplies for personal use, and wants to call the Ethics Line. If he gives his name, will it be noted in his personnel file?

No. Just calling the Ethics Line with a good-faith concern is not recorded in one's personnel file maintained by Human Resources and Administration.



E. REPORTING VIOLATIONS

All of us who work for Entergy must remain alert to possible violations of law or Entergy policies. If we become aware of such a violation, we have a duty to report it, even if reporting it seems like a difficult thing to do. Reporting violations takes courage but, in the end, it helps our employees, our customers, our shareholders – everyone who has an interest in Entergy's success.

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Page 16 of 44 Employees, agents and contractors must report known, suspected or potential violations of law or Entergy policies pursuant to the <u>Reporting Violations Policy</u> found at **myEntergy > Policies & Forms > System Policies > Reporting Violations.**

Employees, agents and contractors shall immediately report known, suspected or potential violations of environmental or safety laws or regulations in accordance with the <u>Safety</u>, <u>Health & Environmental</u> <u>Functional Procedure</u> at **myEntergy > Our Company > Safety/Environment > SH&E Policy/Gov Docs** or via the Entergy Ethics Line (1-888-257-3844) or https://www.compliance-helpline.com/entergyethicsline.jsp.

Nuclear employees, agents and contractors shall immediately report known, suspected or potential violations of the law or company policies via nuclear site protocols as defined by nuclear business unit policies (immediate supervisor, Corrective Action Process, Open Door Policy or Employee Concerns Program), or via the **Ethics Line at 1-888-257-ETHIC or 1-888-257-3844**, or online at https://www.compliance-helpline.com/entergyethicsline.jsp. Employees, agents and contractors also have the right, protected by law, to report nuclear safety concerns directly to the Nuclear Regulatory Commission.

Non-nuclear employees, agents and contractors shall immediately report known, suspected or potential violations of the law or company policies by following the procedures described below; if in doubt, the Ethics Line at 1-888-257-ETHIC or 1-888-257-3844, or https://www.compliance-helpline.com/entergyethicsline.jsp should be used to report.

- If violence is occurring or if imminent danger to the safety or security of person(s) or property exists, individuals shall immediately call law enforcement/911 and, as soon as possible thereafter, report the matter to the Ethics Line. If workplace violence or security concerns do not involve imminent danger, report the matter to the Ethics Line.
- Known, suspected or potential violations of law, including but not limited to harassment, discrimination, fraud and financial reporting concerns, shall be reported to the Ethics Line.
- All other known, suspected or potential violations of Entergy's policies shall be reported through one of the following methods: the employee's supervisory chain, a Director within Human Resources, a Human Resources representative in the employee's business unit or the Ethics Line.

Anyone having a reasonable belief of the existence of a known, suspected or potential violation of the law, the Code or any system policy is obligated to report the violation, even if he or she is not involved in the violation in any way.

Section Two

F. ZERO TOLERANCE FOR RETALIATION

Entergy does not tolerate retaliation and will take appropriate action to correct any known retaliation. This may include disciplinary action against the retaliator.

Company policy requires an employee to contact the Ethics Line if the employee feels that she or he is being retaliated against for making a good-faith report, based on reasonable belief of wrongdoing, or participating in an investigation of a complaint.

Any employee who feels she or he is being retaliated against for making a good-faith complaint or report, based on reasonable belief of a violation of the law, the Code of Entegrity or a system policy, must immediately contact the Ethics Line at 1-888-257-3844 or https://www. compliance-helpline.com/entergyethicsline.jsp. Entergy cannot remedy the situation if it is not reported.

Sometimes a report of a violation turns out to be wrong – there was no violation. But this must not prevent us from making a good-faith report. If we have reasonable belief that a violation has occurred, Entergy policy prohibits us from being disciplined for raising the concern.

> Eddie, an engineer, used to have good working relationships with his co-workers. However, because his co-workers suspect that Eddie reported one of them for cheating on their time sheet, they now jokingly call him "traitor" and make other unkind remarks about him. Did Eddie do the right thing by calling the Ethics Line? What should he do now? Can anyone be held responsible for his co-workers' behavior?

Eddie did the right thing. Because he had reasonable belief of improper time reporting, he was obligated to report it. And because he now believes he is being retallated against for making a good-faith report, he should immediately call the Ethics Line. Entergy cannot remedy the situation if it is not reported. If retaliation has occurred, the retaliator will be held accountable. If supervisory personnel were aware of the retaliation and did nothing, then they can also be held accountable for their inaction.

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Amy, an administrative services specialist at a generating plant, saw someone viewing pornographic material on a computer. She wants to report it, but is concerned about using the Entergy Ethics Line. What will ensure that the information she reports will be handled with discretion?

The Entergy Ethics Line is staffed 24-hours per day by an outside professional service that is experienced in handling employee concerns and other matters related to the workplace. This service ensures the information is forwarded to Entergy investigators in a confidential manner. Amy can even remain anonymous if she desires.

WRONG

Section Two

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BE A COURTEOUS DRIVER: Respect the Workplace

A. DISCRIMINATION AND HARASSMENT

Entergy seeks to maintain a work environment that respects the dignity and worth of each individual and is free from harassment and discrimination based on any protected characteristics or protected activities. Protected characteristics include race, color, sex, religion, pregnancy condition, national origin, age (40 and over), sexual orientation, gender identity and/or expression, veteran's status, marital status, qualified disability, genetic information (which includes family medical history) or any characteristic protected by law. Protected activities include, for example, filing a claim with the Equal Employment Opportunity Commission or another governmental entity.

Examples of prohibited conduct when based on a protected characteristic or a protected activity include, but are not limited to, the following:

- · Denying equal employment opportunities.
- Making, transmitting, intentionally accessing, displaying or circulating offensive or derogatory statements, comments, jokes, slurs, gestures, pictures, e-mails or links.
- Creating an offensive, hostile or intimidating working environment.
- Engaging in unwelcome flirtation, sexual advances, requests for sexual favors, propositions, touching and other verbal or physical conduct of a sexual nature.

Entergy's policy is intended to extend further than the law in order to maintain a work environment that is inclusive and respects the dignity and worth of each individual. It prohibits abusive conduct that Entergy determines is inappropriate, which can include intimidation, coercion or bullying, regardless of whether such conduct is unlawful or based on a protected characteristic or protected activity. Please refer to the <u>Discrimination and Harassment Prevention Policy</u> for details. What is the general
 criteria for what is considered "over the line" regarding the posting of jokes, pictures, etc. in one's work area, from a harassment perspective?

A good general guide is not to post jokes or pictures that could be offensive to someone else. If in doubt, err on the side of caution and do not post it. Also, if you know or suspect that someone is violating the rules related to harassment, report the issue to the Ethics Line at 1-888-257-3844 (ETHIC).



Known, suspected, or potential violations of the Discrimination and Harassment Prevention Policy must be reported to the Ethics Line at 1-888-257-ETHIC or 1-888-257-3844, or <u>https://www.compliance-helpline.</u> <u>com/entergyethicsline.jsp.</u> Retaliation is strictly prohibited.

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B. DRUGS AND ALCOHOL

Employees and contractors reporting to work are required to be fit for duty. Reporting to work in an intoxicated or impaired state is prohibited.

The use, possession, manufacture, distribution, dispensation, transportation, promotion or sale of illegal drugs while on company premises is prohibited. Illegal drugs include drugs that are not used or possessed in accordance with a valid prescription or are not used as authorized by law.

The use, possession or sale of alcoholic beverages on company premises is also prohibited without prior authorization.

An employee/contractor who is taking prescribed drugs or over-the-counter drugs that affect his or her ability to perform some or all job duties or to perform job duties safely must advise his or her supervisor, or the human resources department, about:

- The particular side-effects of the medication affecting his or her ability to perform existing job duties or on-the-job safety.
- The particular job duties affected.
- Worker's safety concerns, if any.



 Karen wants to serve an
 alcoholic beverage at an after-hours, on-site company retirement party. Can she?

Not without prior authorization from the officer who has functional responsibility over the site or location. where the party will be held. Such approval must be documented on the Drugs and Alcohol Policy's Attachment I (Request for Authorization of Alcoholic Beverages at a Company Workplace) and forwarded to the appropriate Human Resources Director or Vice President. Be advised that alcoholic beverages are always prohibited within certain Entergy facilities. For more information, refer to the Drugs and Alcohol Policy.

The company reserves the right to subject employees to drug and alcohol screens (i.e., test for drugs or alcohol), as allowed by law.

The company Employee Assistance Program (EAP) is available for employees to use on a confidential basis. Any employee who has a problem with alcohol or drug use is encouraged to seek assistance from the EAP.

Section Three

C. HEALTH AND SAFETY

All of us are expected to:

- Maintain safe and healthy working conditions.
- Comply with the safety standards of our jobs.

Marissa works as a clerk in an office: Her co-worker, Jerry, has a weapons permit

issued by the state.

Jerry claims that if he

wanted to, he could bring his pistol into

their office work area

so long as he keeps it in his briefcase. Is

Absolutely not. This Code and the

Workplace Violence and Weapons Policy

briefcases or other personal effects in a

work area.

prohibit the possession

of weapons in holsters,

this true?

• Report actual or potential safety or health hazards immediately.

If imminent danger exists, call 911 immediately. Then, report the matter to the **Ethics Line at** 1-888-257-ETHIC (3844) or

https://www.compliance-helpline.com/entergyethicsline.jsp as soon as practicable.

If there are unsafe or unhealthy working conditions or hazards not involving imminent danger, immediately report the matter to the Ethics Line or as described in the <u>Reporting Violations Policy</u>.

D. WEAPONS AND WORKPLACE VIOLENCE

Entergy is committed to a work environment free from violence and threats of violence. Any direct or implied threat or act that would create fear, hostility, intimidation or concern of harm in another person is forbidden.

If violence is occurring or imminent danger exists, do not place yourself in harm's way. Call law enforcement (911) immediately. Then, as soon as practicable, make a report to the **Ethics Line at 1-888-257-ETHIC (3844)** or https://www.compliance-helpline.com/entergyethicsline.jsp.

If there's no imminent danger, but direct or implied threats are occurring or other workplace violence issues exist, contact the Ethics Line.

Weapons (including, but not limited to, firearms and explosives) are prohibited in the workplace unless authorized by company policy.

Section Three

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William, a storekeeper, witnessed a co-worker getting trash in his eye while doing some clean-up work in the warehouse. The job called for wearing safety glasses, but William's co-worker didn't wear any. The co-worker was alright, and there was no personal injury. Since no one was hurt, is this something William should report?

Yes, all occupational incidents must be reported to determine what happened, how it happened and what's necessary to prevent similar occurrences in the future.



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SHARE THE ROAD: Deal Fairly with Customers, Suppliers and Competitors

A. BRIBES AND KICKBACKS

We must never give, offer, authorize, promise, or ask for any form of bribe or kickback. Similarly, employees, agents and suppliers may never ask for bribes and kickbacks from an Entergy customer, agent or supplier.

B. CONTRACTS / LETTERS OF INTENT / CAPITAL ACQUISITIONS

Any of us who intends to enter into any contract, letter of agreement or other intentionally binding document must first have the document reviewed and approved by authorized parties. We must also comply with other requirements of corporate authorization policies. Agreements may only be executed after the signer has confirmed his or her authority and after appropriate legal and other approvals have been received.

It is company policy that "letters of intent" and similar preliminary agreements are limited, carefully controlled and subject to prior legal review. Capital transactions should be made only after the responsible business unit has evaluated each proposed transaction and after they have been approved and reviewed by authorized parties.



Section Four

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C. ECONOMIC ESPIONAGE

It is the company's policy to compete in the marketplace lawfully and fairly. This includes respecting the rights of our competitors. It also includes abiding by the law while competing. Therefore, none of us may steal, unlawfully possess or unlawfully use material, products, intellectual property or proprietary information of any supplier, customer, business partner or competitor. We also may not acquire or use such property if we know it has been stolen or illegally obtained.

We must not engage in economic espionage. Economic espionage involves obtaining another entity's confidential or proprietary information by "improper means." Improper means includes unethical or criminal acts such as burglary, wire-tapping, misrepresentation, deception, searching a competitor's office waste and bribing employees of other businesses (e.g., janitorial services) to collect the information.

D. GOVERNMENT CONTRACTS

It is the company's policy, and each employee's obligation, to comply with the laws and regulations that apply to government contracting. For example, the company is subject to special regulations governing procurement and contracts. It is also necessary to adhere to the terms and conditions of any contract with, or grants from, federal, state or local governments. Affected employees must familiarize themselves with applicable rules and regulations. Consult the <u>Government Contracts</u>. Policy for additional information.

E. IT PROCUREMENT AND SERVICING

The procurement and servicing of information technology (hardware, software, data privacy, network usage, Internet, etc.) should be coordinated with the Information Technology department. Only such authorized company personnel are trained and designated to handle these matters.

Brian needs a laptop computer to work remotely and he can get a good deal at the local electronics store. Can he buy one and expense it?

No. Entergy has negotiated with selected, designated suppliers and developed configurations for a set of standard solutions to achieve savings in acquisition, installation and maintenance costs. Deviations from these standards would ultimately result in higher costs. Consult <u>IT's PC Acquisition Policy</u> at **myEntergy** > **Our Company** > **IT** for more information on PC/desktop acquisitions. Consult the Procurement Policy for requirements to maintain purchase orders and receipts.



Section Four

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F. PROCUREMENT

It is Entergy's policy to select suppliers based on merit and on overall business need. This assures that Entergy obtains necessary products and services at fair value, conducts itself with high business standards and complies with legal requirements. Entergy also strives to ensure that diverse suppliers, such as those primarily owned, operated and managed by women, ethnic minorities and veterans are given equal access to bid for and participate in Entergy business.

The Supply Chain organization oversees the procurement process and assures that Entergy's interests are protected when products and services are purchased for the company. Only Supply Chain is authorized to commit to suppliers. Exceptions to using Supply Chain are detailed in Entergy's Procurement Policy.

Denise, who orders materials for her work area, needs a list of diverse suppliers that have already been approved by Entergy. Where can she find such a list?

The Supplier Diversity department verifies and maintains a directory of diverse suppliers, including certifications that validate their ownership. Denise should consult with the Supplier Diversity department to obtain a list of existing diverse suppliers.



Section Four
STOP AT ALL RED LIGHTS: Obey the Law

A. AFFILIATE INTERACTIONS

Entergy is subject to rules that govern interactions between certain Entergy affiliates and certain Entergy business functions. Some of these rules, called "affiliate rules," help ensure that any control utilities have over critical functions is not used to give an unfair benefit to affiliated, competitive-market companies or functions and does not unfairly disadvantage non-affiliated market participants or customers.

In general, the restrictions in the affiliate rules apply to interactions between (1) Entergy affiliates and functions that serve regulated customers or that operate critical facilities, such as transmission systems (referred to here as "Regulated Functions"), and (2) Entergy affiliates and functions that participate in competitive energy markets (referred to here as "Market Functions"). In general:



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- Regulated Functions may not provide an unfair competitive advantage or undue preferential treatment to Market Functions.
- Regulated Functions may not allow the inappropriate transfer of non-public information to Market Functions.
- Regulated Functions may not subsidize Market Functions.
- Regulated Functions and Market Functions may not cause customers to believe they must use the service of a Market Function to receive service from a Regulated Function.

It must be determined whether particular interactions with Entergy affiliates and functions comply with laws and regulations before entering into the interaction. The company has policies and compliance plans that provide guidance in this area, including the <u>Affiliate Interactions Policy</u>. If questions arise, contact the Legal Services department or the FERC Compliance group.

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B. ANTIBOYCOTT

Entergy will comply with government antiboycott regulations prohibiting participation in international boycotts of countries friendly to the United States, and will follow all reporting-to-the-government requirements. We must not provide information that might assist a boycott violating these laws and regulations.



C. ANTITRUST AND FAIR TRADE PRACTICES

Antitrust laws are based on the belief that vigorous, free and open competition helps to ensure that the American consumer will obtain the best product at the lowest price. The purpose of antitrust laws is to prevent activities that unreasonably restrain free competition.

We must avoid conduct that violates or appears to violate antitrust and fair trade practice laws such as:

- Engaging in unfair pricing practices.
- · Engaging in unfair marketing practices.
- Misrepresenting the products and services of Entergy or its competitors.

Federal and state antitrust authorities (and private plaintiffs) will be particularly sensitive to business activities that appear to fix prices between competitors, fix costs between competitors, restrict output or divide markets.

D. CONTRACTING FOR LEGAL OR ACCOUNTING SERVICES

Only in-house attorneys within Entergy's Legal Services department may retain and manage outside legal counsel. Only Entergy's General Tax Counsel may hire and manage outside tax counsel and advisors or hire accounting firms to do tax work.

E. ENVIRONMENT

Entergy must comply with environmental laws, regulations and orders including those that restrict hazardous and toxic materials, air and water emissions and waste disposal.

Whether we work in a plant, the field or an office, Entergy expects us to be environmentally conscious. We must follow proper environmental procedures in our daily work. Immediately report any actual, suspected or potential environmental compliance issues via the Ethics Line.



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F. EXPORT CONTROLS

Export control laws regulate the export of certain goods and services from the United States to foreign nationals (i.e., non-U.S. citizens or individuals lacking "green cards"). An export isn't limited to the transfer of physical goods and services. It also includes sharing controlled technology and software source code with U.S.-based foreign nationals. This is known as a "deemed export."

If you're a supervisor, you must notify the Human Resources and Legal Services departments before hiring a foreign national employee or before altering the job or work location of a current foreign national employee. In such cases, a "deemed export" compliance review may be required. A review may also be needed when the visa for a current foreign national employee is renewed.

G. FEDERAL ENERGY REGULATORY COMMISSION

Entergy is subject to the jurisdiction of the Federal Energy Regulatory Commission, or FERC. Among other responsibilities, the FERC:

- Regulates the transmission and wholesale sales of electricity in interstate commerce.
- Through its designated electric reliability organization (the North American Electric Reliability Corporation or NERC), ensures the reliability of high voltage interstate transmission systems.
- · Monitors and investigates energy markets.
- Administers accounting and financial reporting regulations for regulated companies.
- Licenses hydroelectric projects.

The FERC and NERC have issued numerous regulations and standards that Entergy employees and representatives must follow. FERC can assess a civil penalty of up to \$1 million for each day of violation of certain of the regulations. Entergy employees and representatives must comply with FERC and NERC requirements. If an employee suspects a violation or potential violation of a requirement has occurred, it is imperative that the problem be promptly identified. Each employee is expected and encouraged by Entergy to self-police and internally report violations or potential violations of FERC or NERC regulations as soon as possible.

Nancy is a systems analyst who routinely accesses secured areas containing critical cyber assets per the NERC reliability standards. She had to undergo background screenings and take required training in order to obtain her secured-area access card. John, a co-worker, does not have an access card, and requires an escort if going into a secured area. John asked Nancy if he could borrow her electronic access card to visit a friend in a secured area. It's okay to do that since they're all Entergy employees, right?

No, it's not okay and it could result in a policy or regulatory violation both for Nancy and John. Not all employees are allowed to access all areas of Entergy facilities. Some areas are restricted to comply with certain laws and regulations and require authorization before access is granted. If John needs to visit someone in a secured area, he should follow appropriate procedures. Nancy should not lend her access card, password, access code or keys to anyone.

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Andrew, a customer service representative, has a close college friend, Amanda, who works as

 a financial analyst. They often talk, and during a conversation, Amanda mentioned to Andrew
 that earnings projections for the quarter were going to be different than expected. That night
 Andrew passed that information on to his brother. Andrew has now learned that his brother
 traded in some Entergy stock options as a result of Andrew's comments. Even though Andrew
 didn't personally buy any stock and his brother is not a big-time investor, Andrew is worried.
 He didn't mean to do anything wrong. What should Andrew do?

Andrew should immediately report this situation to the Ethics Line. Any situation that
potentially involves insider trading, or someone violating insider trading laws or company
guidelines, must be reported immediately to the Ethics Line (1-888-257-3844 or
www.compliance-helpline.com/entergyethicsline.jsp). Remember, it is far better to report
a situation as soon as it is discovered than to pretend it doesn't exist or hope that it will
go undetected.

H. FOREIGN CORRUPT PRACTICES ACT

We must comply with the Foreign Corrupt Practices Act ("FCPA") and similar U.S. and foreign laws. The FCPA prohibits payments or gifts of any value to foreign government or political officials. The FCPA also requires the company to maintain accurate books and records and a system of internal accounting controls documenting domestic and international assets and transactions. Any of us who conducts Entergy business outside of the United States or with foreign officials must understand and abide by the provisions of the FCPA. If there are any questions, contact the Legal Services department.

I. GOVERNMENT INVESTIGATIONS AND INTERACTIONS

All government requests for inspections, investigative interviews or documents should be referred to the Legal Services department for review and further instruction. Additionally, except to the extent that interaction with governmental agencies is part of an employee's job function, the employee should contact the Legal Services department before contacting a governmental agency about the company's business.

J. INSIDER TRADING

"Insider trading" means using confidential information about Entergy, or any other company gained in the course of doing work for Entergy, for an unfair advantage in the buying or selling of shares or other securities. Insider trading is both illegal and unethical, and is strictly prohibited. Insider trading includes "tipping" to provide confidential information to someone else who then trades on it.

Entergy directors, officers, employees and other persons may not trade in Entergy securities while in possession of material nonpublic information. This includes any information that may influence an investor's decision to buy, sell or hold the securities of a company. It also includes information that alters the overall mix of information publicly available about a company.

Directors, officers and employees are prohibited from entering into hedging or monetization transactions (e.g., puts, calls, selling short) involving Entergy stock.

Due to their positions or job functions, Board of Directors members, executive officers and certain restricted employees are prohibited from trading in Entergy securities except during certain specified "window" periods. Entergy will notify those persons of the "window" periods.

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David made a personal financial contribution to a political candidate whose campaign supports policies that are favorable to Entergy and its employees. Can David be reimbursed for his contribution?

No. Contributions made in the name of another are strictly prohibited by law. Thus, it is illegal for a corporation to reimburse or compensate an employee in any fashion for making a personal contribution to a federal, state or local candidate, party or political committee.

K. NUCLEAR

Entergy and its employees must comply with all laws, regulations, licensing requirements, commitments and orders related to nuclear power plant operations. Employees are urged to report any concerns they may have related to nuclear plant operations without fear of retaliation or discrimination of any kind.

L. POLITICAL CONTRIBUTIONS

All of us are encouraged to be involved in the political process and may contribute to the cause or candidate of our choice. But we must do so using our own time, money and resources. Laws prohibit the company from directly supporting political parties and campaigns. Other laws allow Entergy to make contributions to certain federal, state or local political associations or organizations (not parties and campaigns), but only after the General Counsel and executive management have reviewed and approved those contributions.

M. SAFETY

As Entergy workers, we must perform our jobs in a manner that complies with occupational safety and health laws and regulations.

N. SERVICE OF PROCESS

The company has appointed agents to receive petitions, subpoenas, administrative orders and other legal notices. Only employees or representatives who have been appointed to receive service of legal documents are authorized to do so. Direct the person attempting to deliver the legal documents to an Entergy-appointed agent. If unsure, contact the Legal Services department. In the event an employee is nonetheless served with, or otherwise presented with, legal documents, the employee must immediately notify the Legal Services department.

Nathan, a lineman, observed an equipment operator digging a trench with a small excavator to install some conduit. Nathan knew it was an area that already contained underground conduit and if the excavator struck existing conduit, then an unsafe situation could occur. He noticed that the operator's crew was not using a probe or other means to inspect for pre-existing conduit. What should Nathan do?

Nathan must intervene by stopping and questioning any unsafe actions, practices and conditions observed, which includes notifying an available supervisor or site safety contact person. Nathan should also intervene if a co-worker is in danger of injuring himself or others, provided it is safe to intervene.

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DON'T HAND THE KEYS TO A STRANGER:

Protect Company Property and Information

A. ACCOUNTING AND BUSINESS RECORDS

We each have a responsibility to prepare all records in a prompt, complete and accurate manner. These records include vouchers, reimbursement requests, bills, timesheets, performance and payroll reports, benefit enrollment forms and all other company books and records. Records must not be false, misleading, artificial or incomplete.

Entergy requires compliance with generally accepted accounting principles and its internal system of accounting and auditing controls. Accurate, reliable information and records are critical to meeting the financial, legal and management obligations of the company, and they are necessary to fairly reflect the company's transactions. We must comply with all laws, rules, regulations and company policies so that financial reports and records are accurate.

B. COMMUNICATIONS

Two of Entergy's core values are "act with integrity" and "treat people with respect." Employees should consider these values in all communications. For example, don't include material that is inappropriate, untrue or disparaging to outside parties or to Entergy. A good question to ask is, "Would I want this message published in the news and attributed to me?" Also, take extra care when sending *sensitive* content in electronic messages because further distribution is virtually impossible to control. If there is a need to limit the further distribution of messages, let the recipients know.

C. COMPANY PROPERTY

The misuse or theft of company property affects the company's profitability and, ultimately, all of our jobs. Company property includes but is not limited to:

- Entergy credit and procurement cards, tools, materials, supplies, equipment, software, trade secrets and contractor services.
- Trademarks or inventions made using company facilities or resources and copyrighted works created as an assigned employment duty or by using company facilities or resources.
- Entergy information.

 Emily, a paralegal, has to fill out a timesheet every two weeks. As long as she enters all the hours she works, does it really matter what codes she charges to?

Yes. Using the correct codes helps the company to ensure that the work Emily performs is charged to the right legal entities, work projects and customers. It also helps to ensure that business records and reports accurately reflect the cost of her work, which benefits Entergy's investors (including employees). If Emily is unsure about whether she is using the appropriate project codes, she should contact her supervisor or her budget analyst.

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We are all responsible for protecting company property from theft, fraud, unauthorized access and use, damage and destruction. Unauthorized or improper use of company material, time, equipment, credit cards, procurement cards, or other property is prohibited. Also, we must not offer company property, company loans or unpaid company services to persons outside the company without prior written approval of senior management. All company property must be returned to the company at the termination of employment. Always report any theft or vandalism of company property.

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D. COMPANY INFORMATION AND CONFIDENTIAL INFORMATION

It is part of our jobs to prevent the misuse, theft or improper disclosure of company information. Information that is used to provide customer service, carry out company operations and report accurate data is an essential company asset and must be protected.

We must take care in handling, discussing or transmitting sensitive or confidential information. We must protect such information against disclosure, either accidental or intentional, to parties, both inside and outside of the company, who do not have a legitimate business "need to know." This obligation continues even after we leave Entergy. If unsure about what constitutes confidential information, ask a supervisor or call the Ethics Line at 1-888-257-ETHIC (3844). Unauthorized disclosure of personal information belonging to customers, employees, vendors and other individuals must be reported to the Ethics Line immediately.

Disclosure of financial information could influence the actions of shareholders and potential investors and could possibly violate securities laws. Only designated spokespersons may release information of this nature.

Entergy regulated subsidiaries are prohibited from disclosing certain information to Entergy competitive subsidiaries. There are also restrictions on sharing of certain information between transmission and marketing functions. See the Affiliate Interactions section for more information.

The Code and this section are not intended to, and shall not restrict an employee's rights under any federal, state or local labor or employment law, or regulation, to discuss his or her salary, wages, hours, or other terms and conditions of employment with nonemployees or with other employees.

Unrestricted Rights

Nothing in this Code is intended to restrict an employee's rights under any federal, state or local labor or employment law, or regulation, except to the extent such rights are clearly waived by the express terms of a current collective bargaining agreement. These employee rights include, but are not limited to the right to engage in protected concerted activity for mutual aid and protection, and the right to engage in protected concerted activity relating to wages, hours and other terms of employment, such as the right to discuss his or her wages, benefits and employment conditions with others.

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Absolutely not. Entergy employees are required to protect and maintain the confidentiality of all projects designated confidential by the company.

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E. CORPORATE RISK CONTROLS

The Corporate Risk Control Standards establish Entergy's framework for analyzing and managing risk associated with major capital and wholesale commodity exposure. The Standards define the roles and responsibilities of all employees who are involved in risk transactions, including the Corporate Risk Committees, in order to improve decision making with regard to major capital investments as well as fuel, revenue and procurement contracts as required by the <u>Approval</u> <u>Authority Policy</u>.

F. CUSTOMER INFORMATION

It is part of our jobs to protect confidential and proprietary customer information, such as social security numbers, credit information and bank account information.

Customer information that is confidential or proprietary must be protected. Regulated customer information may not be released to competitive affiliates without our customer's consent or except where authorized by laws and regulations. None of us may use or access customer information except for legitimate business purposes, in accordance with laws and the company's <u>Privacy Policy</u>. Customer information may not be used or accessed for personal reasons. 2013 TX RATE CASE Page 31 of 44

 Robert, who works in
 customer billing, obviously has access to customer data. Can he share information about a customer's energy use with a friend of his?

No. Customer information is confidential and can only be used for valid Entergy business purposes. The Protection of Information Policy specifies that employees may not use, access, distribute or otherwise copy company-owned information, data, records or files for personal use. gain or advantage, or allow others to do so. For more information, refer to the policy.

Joni, a human resources representative, has access to Entergy employee data, such as home addresses. Can she share employee information with a friend of hers who is pursuing legal action against an employee?

No. Employee information is confidential and can only be used by Entergy for valid Entergy business purposes. The <u>Protection of</u> <u>Information Policy</u> specifies that employees may not use, access, distribute or otherwise copy companyowned information, data, records or files for personal use, gain or advantage, or allow others to do so. For more information, refer to the policy.

G. EMPLOYEE RECORDS

The company's employee records are considered confidential and shall be used and maintained in a manner consistent with applicable laws and regulations. Employee records are company-owned and include personnel files and their contents, performance evaluations, salary levels, medical data and other information pertaining to individual employees and their employment with the company. Employee records may be accessed by and/or disclosed to individuals having a legitimate business reason to review the information contained in those records. These individuals include, but are not limited to, persons involved in hiring and/or promotion decisions; persons involved in the company's succession planning process; persons involved in investigating allegations of employee misconduct; and persons involved in making disciplinary recommendations or decisions.

The Code and this provision is not intended to prohibit an employee from discussing his or her salary, wages, hours, and other terms and conditions of employment with nonemployees, or with other employees, pursuant to the employee's rights under any federal, state or local labor or employment law or regulation.

Section Six

H. MEDIA / CORPORATE COMMUNICATION

Entergy must speak with one voice. Therefore, only designated persons may speak on behalf of Entergy. All media inquiries (from both traditional journalists and online social media sources) should be directed to the Corporate Communications department whose personnel are trained to handle such inquiries and to serve as company spokespersons. Release of company information, statements about company position or requests for interviews should be coordinated by Corporate Communications and must comply with the <u>Disclosure and Public Communication</u> Policy.

Various groups and individuals throughout the company may wish to participate in social media communities. The <u>Internet and Social</u> <u>Media Policy</u> provides requirements for those employees authorized to speak on behalf of Entergy in the social media environment and requirements on the establishment of company-sponsored social media sites. Further, Entergy recognizes that some employees may wish to participate in various forms of social media on their personal time



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and using personal communications resources. The <u>Internet and Social Media Policy</u> provides expectations and requirements on responsible use of social media by employees as such use relates to Entergy.

I. RECORDS MANAGEMENT AND RETENTION

Properly maintaining records – in electronic and hard-copy format – is important. Entergy's <u>Records</u> <u>Management and Retention Policy</u> describes the procedures for maintaining records for required periods and destroying them when they are no longer needed. A record may not be kept longer than its assigned retention period unless the record is on hold due to pending or anticipated litigation. From time to time, the Legal Services department may notify us that we have documents related to pending or anticipated litigation, governmental audit or investigation. Be sure to comply with the notification and preserve the records. Contact the Legal Services department immediately upon learning that litigation or any government investigation involving Entergy is anticipated, commenced or pending.

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Use Caution When Changing Lanes: Understand the Relationship Between Personal, Company and Outside-Party Interests

A. COPYRIGHT, TRADEMARK AND PATENT INFRINGEMENT

In the United States, copyright laws protect "original works of authorship" from unauthorized use, duplication or distribution. This applies to works such as computer software, printed articles from publications, TV and radio programs, works on videotapes or CD-ROMs, music performances, photographs, training materials, manuals, documentation, certain databases and World Wide Web pages. We may not use, reproduce, access, modify, download, distribute (which may include e-mailing) or otherwise copy any copyrighted, trademarked or patented works of others without written approval from the owner. We also may not allow others to use company resources to do so. Unauthorized duplication, use or distribution of such materials could have legal consequences.

Entergy maintains a license with the Copyright Clearance Center ("CCC"). The license authorizes employees to make photocopies of millions of registered works contained in the Copyright Clearance Center's database, and permits unlimited copies to be distributed to Entergy employees for internal use only. The license does not permit distribution outside of Entergy.

For advice or assistance concerning copyright law, contact the Legal Services department. Steven, a project manager, would like to use
 a copy of a magazine article as a handout in a presentation he plans to make. Is it okay to do this?

It depends on whether Entergy has been granted the right to use the article. Entergy has obtained a repertory license from the Copyright Clearance Center ("CCC") permitting it to make photocoples of portions of millions of registered articles in its database. This license permits unlimited copies to be distributed to Entergy employees for internal use only. It does not permit distribution outside of Entergy. Steven may check to determine whether a certain use falls under the CCC license by accessing www.copyright. com. For all other copyrighted works, and for use outside of the scope permitted by the CCC license, Entergy must obtain permission from copyright holders, or their licensing representatives, prior to reproduction, duplication or distribution. Contact a member of the Legal Services department or refer to the Protection of Information Policy for

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further guidance.

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B. CONFLICTS OF INTERESTS

We are expected to devote our time and best efforts to Entergy during regular work hours and whatever additional time may properly be required. We must avoid activities that cause our personal interests to interfere with our responsibilities to Entergy. These could include situations involving outside employment or service on outside boards. A conflict can also arise when we take action or have interests that make it difficult to perform company work objectively and effectively.

A conflict of interests exists when our responsibilities to Entergy and our personal interests are at odds. For example:

- An employee, or an immediate family member (including spouse), has a significant financial interest in an outside organization that competes with or has a business relationship with Entergy.
- In the course of an employee's normal Entergy responsibilities, the employee interacts with an immediate family member who is representing an outside organization that engages in business with Entergy, such as a supplier.
- An employee diverts a business opportunity from the company to another business.



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Timely disclose all actual, potential, and perceived conflicts of interests. The <u>Conflicts of Interests Policy</u> requires that employees make a disclosure to determine if an actual conflict of interests does exist or could exist. If it does, the situation must not occur, unless steps can be taken to eliminate the conflict. Employees must fully and accurately provide sufficient facts to make the determination. See the <u>Conflicts of Interests</u> <u>Policy</u> for the <u>Request for Conflict of Interests</u> <u>Determination</u> form that needs to be completed.

C. GIFTS AND ENTERTAINMENT (BUSINESS COURTESIES)

Business courtesies are gifts or favors given or received in the course of a business relationship, such as a business relationship with a customer, supplier or contractor. While business courtesies may help build business connections and generate goodwill, they can also create conflicts of interests. Neither an employee, nor a member of the employee's family, may accept anything from an existing or potential supplier, customer or contractor of Entergy that could be construed as an attempt to influence the employee's business judgment. Employees must decline any business courtesies that could give the appearance of granting an unfair advantage or doing anything that is unethical, unlawful or against Entergy policies.

Doug, a troubleman, has ownership in an outside business that seeks to do business with Entergy, What does Doug need to do to ensure management knows and to find out if this is okay?

Doug must complete a <u>Request for Conflict of</u> <u>Interests Determination form</u>, found on the system policy home page under the <u>Conflicts of Interests</u> <u>Policy</u>. This form is a tool used to document and resolve potential or actual conflicts of interests. For more information, refer to the policy.

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YIELD

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 Lou, a procurement
 specialist, wants to attend a sporting event and knows that one of his vendors has box seats. The value is under \$200. Can Lou ask the vendor for a seat?

A:

No. Entergy employees may not solicit a business courtesy under any circumstance whatsoever. An employee may not ask a vendor to take the employee to lunch, or ask a customer to provide tickets for an entertainment event, even if the value is less than \$200. As employees, we may never request a business courtesy and NEVER accept cash or cash equivalents. We may accept articles of nominal value (\$200 or less) on an infrequent basis, such as occasional meals or entertainment provided by an existing or potential customer or supplier. However, even such nominal items cannot be accepted if they are an attempt to get us to grant an unfair advantage or to motivate us to do anything that is unethical or unlawful. Otherwise, an employee may accept a business courtesy only if it is allowed by the <u>Business Courtesies Policy</u> and if a request for a conflict of interests determination is made that results in a finding (by an officer) that the business courtesy is acceptable (that is, it does not create a conflict of interests).

When in a position to offer gifts and entertainment to customers or vendors, use common sense and good judgment. Do not create circumstances that are inappropriate or give the appearance of impropriety. Also, do not provide business courtesies that are illegal, that violate the rules of the recipient's organization or that are offered for something in return.

Consult the <u>Political Activity - Contributions</u>, <u>Lobbying</u> and <u>Elective Office Policy</u> for requirements related to providing any business courtesy to any government official.



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Decline These Business Courtesies

• Anything that could give the appearance of granting an unfair advantage or doing anything that is unethical, unlawful or against Entergy policies.

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- Anything illegal, unethical or offered in exchange for something in return.
- Cash or cash equivalents.

May Accept These Business Courtesies With No Approval

- Articles valued at \$200 or less, such as meals or entertainment.
 - > Must include value to both the employee and any immediate family member.
 - > Must include cumulative value of courtesies received close in time from same person/organization.
- A business courtesy received as a result of a contest or random drawing where the Entergy employee has no greater chance of winning than anyone else.

May Accept These Business Courtesies If Specific Approval Is Granted

• Articles valued at greater than \$200.



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