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

APPLICATION OF ENTERGY TEXAS, §
INC. FOR AUTHORITY TO CHANGE §
RATES AND RECONCILE FEE COSTS §

STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

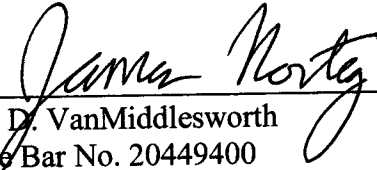
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**TEXAS INDUSTRIAL ENERGY CONSUMERS RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

Texas Industrial Energy Consumers (TIEC) files the following responses to the First Request for Information (RFI) to TIEC filed by Commission Staff of the Public Utility Commission of Texas (Staff). The request was filed at the Commission and received by TIEC on January 23, 2014. Accordingly, pursuant to the procedural schedule entered in this case, TIEC's response is timely filed. TIEC's responses to specific questions are set forth as follows, in the order of the questions asked. Pursuant to P.U.C. Proc. R. 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

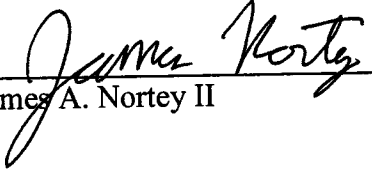
ANDREWS KURTH LLP


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ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, James A. Nortey II, Attorney for Texas Industrial Energy Consumers, hereby certify that a copy of TIEC's Response to Commission Staff's First Set of Request for Information was served on all parties of record in this proceeding on this 27th day of January, 2014 by hand-delivery, facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.


James A. Nortey II

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

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

**TEXAS INDUSTRIAL ENERGY CONSUMERS RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

Staff's RFI 1-1 Please provide working electronic copies with formulas and cell references intact of all of the exhibits to Mr. Pollock's direct testimony.

RESPONSE:

Working EXCEL workbooks of the exhibits to Mr. Pollock's direct testimony were provided with Mr. Pollock's workpapers on January 13, 2014.

Prepared by: Jeffry Pollock
Sponsored by: Jeffry Pollock

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**TEXAS INDUSTRIAL ENERGY CONSUMERS RESPONSE TO
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Staff's RFI 1-2 Please refer to the Direct Testimony of Jeffry Pollock, at Exhibit JP-1.
Please provide a narrative description of the methodology Mr. Pollock
followed to calculate the monthly values for ETEC represented on page
2, line 2.

RESPONSE:

The monthly ETEC loads were based on the amount of power that ETI was obligated to provide under the Partial Requirements Agreement with ETEC. The specific values were derived from the same values used by ETI as provided in Schedule O-1.4 filed in Docket No. 39896. This schedule is attached to Mr. Pollock's workpapers for Exhibit JP-1 (Wholesale A D39896).

Prepared by: Jeffry Pollock
Sponsored by: Jeffry Pollock

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**TEXAS INDUSTRIAL ENERGY CONSUMERS RESPONSE TO
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Staff's RFI 1-3 Please refer to the Direct Testimony of Jeffry Pollock, at Exhibit JP-1.
Please provide a citation to the monthly line loss factors Mr. Pollock
used to calculate the ETEC values on page 2 of Exhibit JP-1.

RESPONSE:

Mr. Pollock used the loss adjusted coincident peak demands as reflected in Schedule O-1.4 (Wholesale A) filed in Docket No. 39896. See TIEC's response to Staff's 1st Set of RFIs, question 1-2.

Prepared by: Jeffry Pollock
Sponsored by: Jeffry Pollock