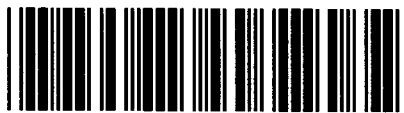




Control Number: 41791



Item Number: 75

Addendum StartPage: 0

PUC DOCKET NO. 41791

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

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**RESPONSE OF ENTERGY TEXAS, INC.  
TO TIEC'S FIRST REQUEST FOR INFORMATION:  
TIEC 1: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26,  
27, 28, 29, 30, 31, 32, 33**

Entergy Texas, Inc. ("Entergy Texas" or "the Company") files its Response to TIEC's First Request for Information. The response to such request is attached and is numbered as in the request. An additional copy is available for inspection at the Company's office in Austin, Texas.

Entergy Texas believes the foregoing response is correct and complete as of the time of the response, but the Company will supplement, correct or complete the response if it becomes aware that the response is no longer true and complete, and the circumstance is such that failure to amend the answer is in substance misleading. The parties may treat this response as if it were filed under oath.


Respectfully submitted,

**Steven H. Neinast** /wC  
Steven H. Neinast  
Entergy Services, Inc.  
919 Congress Avenue, Suite 840  
Austin, Texas 78701  
(512) 487-3957 telephone  
(512) 487-3958 facsimile

**Attachments: TIEC 1: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22,  
23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33**

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to TIEC's First Request for Information has been sent by either hand delivery, facsimile, overnight delivery, or U.S. Mail to the party that initiated this request in this docket on this the 5<sup>th</sup> day of November, 2013.

Steven H. Neinast   
Steven H. Neinast

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Robert R. Cooper  
Sponsoring Witness: Robert R. Cooper  
Beginning Sequence No. BB50

Ending Sequence No. BB53

---

Question No.: TIEC 1-1

Part No.:

Addendum:

Question:

Referring to COOPER WP\_RRC Testimony\_6\_HIGHLY SENSITIVE:

- a. Please explain why Brazos and ETEC are included in the Western Load and Capability Forecast and how this is relevant given that ETI asserts that it will not serve wholesale load after control over its transmission system is transferred to MISO.
  - b. Please provide a legible copy of page 14.
  - c. Referring to page 14, please explain why long-term network transmission service could not be obtained for the entirety of the contract and state how ETI will obtain network transmission service for the remaining duration of the contract.
- 

Response:

- a. The purpose of the analysis reflected in the referenced Western Load and Capability Forecast was not to assess the responsibility to serve wholesale load but to assess reliability in the Western region. The Western Load & Capability Forecast is a representation of the loads and resources physically located within the Western region. As such, these loads are represented in the forecast regardless of ETI's responsibility to serve.
- b. The Company objects to this request on grounds that some of the responsive materials are highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

See highly sensitive attachment.

- c. As of this time, long-term network transmission service has been obtained for the duration of this contract.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO PARAGRAPH  
4 OF DOCKET NO. 41791 PROTECTIVE ORDER**

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101, 552.104 and/or 552.110. ETI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Steve Neinast  
Enter Services, Inc.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.

to the First Set of Data Requests

of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Lisa Walther, Edgar Chase  
IV/ Shannon Breaux

Sponsoring Witness: Margaret L.  
McCloskey/Robert R. Cooper

Beginning Sequence No. BB54

Ending Sequence No. BB55

---

Question No.: TIEC 1-2

Part No.:

Addendum:

Question:

Please provide a schedule similar to Exhibit RRC-1 filed in Docket No. 39896 for the period July 2011 through October 2013.

---

Response:

The Company objects to this request on grounds that some of the responsive materials are highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Please see the attached highly sensitive CD for the period July 2011 through September 2013 based upon what was recorded to the general ledger. Data for October 2013 is not currently available.

Amounts for the period of April 2012 through March 2013 – Test Year in the current case – do not reflect adjustments of \$2,569,339 in additional costs included in the total Test Year purchased capacity costs (\$260,317,272) addressed in the Direct Testimony of Robert Cooper.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO PARAGRAPH  
4 OF DOCKET NO. 41791 PROTECTIVE ORDER**

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101, 552.104 and/or 552.110. ETI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Steve Neinast  
Enter Services, Inc.



ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Robert R. Cooper  
Sponsoring Witness: Robert R. Cooper  
Beginning Sequence No. BB56

Ending Sequence No. BB56

Question No.: TIEC 1-3

Part No.:

Addendum:

Question:

For each affiliate and third-party purchase listed in response to TIEC 1-2, please state the following:

- a. Monthly contract demand charge.
- b. Monthly contract demand.
- c. Start date.
- d. Expiration date.

Response:

For each affiliate and third-party purchase listed in response to TIEC 1-2, the Monthly contract demand charge, Monthly contract demand, Start date and Expiration date can be found in Schedule I-4 and associated work papers.

For the period requested in TIEC 1-2, summarized information for third-party contracts is provided in the table below. Additional information on affiliate transactions is provided in the Company's response to TIEC 1-2.

TIEC 1-3; Monthly Contract -	Part a. Demand	Part b.	Part c.	Part d.
Purchased From	Charge (\$/MW)	Demand (MW)	Start date	Expiration Date
ConocoPhillips-SRW	\$13 per KW/Year	100	6/1/2010	5/31/2013
Dow Pipeline	\$10 per KW/Year	50	4/1/2011	10/31/2013
Exelon-Frontier	\$11,260 per MW/Year	300	5/1/2011	12/31/2011
Exelon-Frontier	\$10,601 per MW/Year	300	1/1/2012	12/31/2012
Exelon-Frontier	\$10,711 per MW/Year	300	1/1/2013	10/31/2013
ETEC	\$45 per KW/Year	146 SCS/158 WCS	6/1/2009	10/31/2013
Calpine-Carville	\$58,080 per MW/Year	485*	6/1/2012	5/31/2013
Calpine-Carville	\$59,420 per MW/Year	485*	6/1/2013	10/31/2013
SRMPA	\$3.00 per KW-month	225	12/1/2011	10/31/2013
NRG	\$0.78 per KW-month	75	3/1/2011	2/28/2013
NRG	\$0.72 per KW-month	75	3/1/2013	10/31/2013

146 SCS = Apr - Sep

158 WCS = Oct-Mar

\*The Calpine-Carville contract is split 50/50 between ETI and EGSL through System Agreement Service Schedule MSS-4.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Robert R. Cooper  
Sponsoring Witness: Robert R. Cooper  
Beginning Sequence No. 6857

Ending Sequence No. 6858

---

Question No.: TIEC 1-4

Part No.:

Addendum:

Question:

For each affiliate and third-party contract that is scheduled to expire prior to the "Rate Year," please state how ETI plans to replace the capacity.

---

Response:

ETI cannot now make any projections regarding how it will replace the capacity of contracts that are scheduled to expire prior to the Rate Year or the cost of such replacement capacity. What is certain, however, is that ETI is currently short of capacity and it will remain short of capacity during the rate year. As such, ETI will have to replace all or a significant amount of the capacity purchase agreements that are expiring with replacement contracts and/or supplemental reserve equalization payments to Entergy operating companies that are long. The cost of such replacement contracts and supplemental reserves, and how they will compare to the prices of the expiring contracts, is subject to numerous complexities and uncertainties at this time.

Such complexities and uncertainties, some of which are identified below – including, but are not limited to the inherent volatility of purchased power costs – preclude ETI from forecasting future amounts and prices for capacity with reasonable certainty or with identifying and quantifying the attendant impacts of any such capacity arrangements.

It should be noted that ETI is a summer peaking utility, so that any short term replacement of capacity resources will be determined in the context of the summer 2014 market for power. Market prices are volatile, and it is premature to forecast the nature and cost of any replacement power for the summer of 2014.

Furthermore, on a stand-alone basis, ETI is in need of a longer term solution to its capacity short resource mix, so that it is possible that ETI will decide to move to close its short position by longer term purchases of power. For example, ETI must position itself to operate as a stand-alone utility, outside of the current Entergy System (System), as directed by the PUCT. Consequently, notwithstanding any short-term alternative to share in resources as part of the System, ETI should plan to replace any expiring capacity with capacity it owns or controls.

With these qualifications, ETI would expect to replace expiring capacity through a combination of the following alternatives that could be influenced by the factors noted:

- Schedule MSS-1 of the System Agreement: As stated in the testimony of Robert R. Cooper, Entergy plans and operates as a System, which includes the opportunity to share in the resources of other Entergy Operating Companies, the cost for which is uncertain. Current MSS-1 costs are greater than costs of certain expiring contracts and less than others. For reasons stated, any reliance on MSS-1 capacity should be viewed in the context of the PUCT's charge to position itself as a stand-alone utility.
- MISO's capacity auction: ETI's planned integration into MISO on December 19 offers this year-to-year alternative, the cost for which is expected to increase.
- Request for Proposal (RFP) once ETI integrates into MISO: Operation within MISO provides the alternative for the procurement of capacity-only resources. In view of projected increases in capacity costs available in the auction, ETI may pursue the procurement of longer term capacity through an RFP. The ultimate cost associated with such capacity is unknown.
- Traditional purchased power agreements (PPAs) for capacity and energy: ETI is receptive to the procurement of and reliable and economical capacity and energy through traditional PPAs.
- Construction of new generating resources: subject to projected capacity needs, the economical procurement of long-term capacity through the construction of new generation facilities remains an alternative.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Frances Grant  
Sponsoring Witness: Michael J. Goin  
Beginning Sequence No. BB59

Ending Sequence No. BB59

---

Question No.: TIEC 1-5

Part No.:

Addendum:

Question:

Please provide workpapers in native electronic (EXCEL or compatible) format showing the derivation of Reserve Equalization Payments under Schedule MSS-1:

- a. For the Reconciliation Period.
  - b. For the period July 2011 through October 2013.
- 

Response:

See Attachment 5 of the Intra-System Billings, for each month, provided in the Company's response to TIEC 1-6.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Frances Grant  
Sponsoring Witness: Michael J. Goin  
Beginning Sequence No. BB60  
Ending Sequence No. BB60

---

Question No.: TIEC 1-6

Part No.:

Addendum:

Question:

Please provide a copy of the Inter-System Billings in native electronic (EXCEL or compatible) format:

- a. For the Reconciliation Period.
  - b. For the period July 2011 through October 2013.
- 

Response:

Attached is the monthly Intra-System Billings (ISB) for the period July 2011 thru September 2013. The October 2013 ISB will be provided when finalized on or about November 26, 2013.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Frances Grant  
Sponsoring Witness: Michael J. Goin  
Beginning Sequence No. *BB61*

Ending Sequence No. *BB61*

---

Question No.: TIEC 1-7

Part No.:

Addendum:

Question:

Please provide the detailed calculations of ETI's responsibility ratio in native electronic (EXCEL or compatible) format:

- a. For the Reconciliation Period.
  - b. For the period July 2011 through October 2013.
- 

Response:

See Attachment 4 of the Intra-System Billings, for each month, provided in the Company's response to TIEC 1-6.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Robert R. Cooper  
Sponsoring Witness: Robert R. Cooper  
Beginning Sequence No. BB62

Ending Sequence No. BB62

---

Question No.: TIEC 1-8

Part No.:

Addendum:

Question:

Please provide the following:

- a. A copy of ETI's current projected firm and total peak load and energy sales forecast.
  - b. A schedule showing ETI's projected ten-year generation reserve margin.
- 

Response:

The most recent long-term Integrated Resource Plan is located at [http://www.entergy-neworleans.com/IRP/2012\\_IRP.aspx](http://www.entergy-neworleans.com/IRP/2012_IRP.aspx). For information requested in part a, please see pages 9, 10, and 11 of the "Data Supplement – Macro Inputs" under the "Data Supplements" section. For information requested in part b, please see page 164 of the "General Technical Supplement" under the "Technical Supplements" section.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Robert R. Cooper  
Sponsoring Witness: Robert R. Cooper  
Beginning Sequence No. *BB63*

Ending Sequence No. *BB63*

---

Question No.: TIEC 1-9

Part No.:

Addendum:

Question:

Please explain the basis for Mr. Cooper's statement on page 28 of his testimony that the Frontier and Carville capacity costs which the Company seeks to recover (as a special circumstances exception request) have not been previously recovered, either through current base rates or through any other recovery mechanism.

---

Response:

The capacity costs from the Carville contract and from the incremental portion of the Frontier contract were not included in the test year costs from ETI's last rate case on which ETI's current rates were set. Neither has there been any other mechanism approved to recover the capacity costs that have been incurred since the start of these contracts.



ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Robert R. Cooper  
Sponsoring Witness: Robert R. Cooper  
Beginning Sequence No. **BB64**

Ending Sequence No. **BB64**

---

Question No.: TIEC 1-10

Part No.:

Addendum:

Question:

Please explain the basis for recovering \$0 of capacity costs in those months in which the savings were negative, as discussed on page 32 of Mr. Cooper's testimony.

---

Response:

The purpose of the Special Circumstances request is to recover capacity costs that are not recovered through other mechanisms. The methodology for identifying incremental capacity costs that are not otherwise recovered through rates identifies a monthly offset of MSS-1 costs for the equivalent amount of capacity. In some months, the contract capacity costs are lower than the MSS-1 Reserve Equalization offset. In these months, there is no incremental capacity cost and therefore no cost recovery request.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Robert R. Cooper  
Sponsoring Witness: Robert R. Cooper  
Beginning Sequence No. BB65

Ending Sequence No. BB65

---

Question No.: TIEC 1-11

Part No.:

Addendum:

Question:

Please provide a complete set of electronic workpapers to Highly Sensitive  
Exhibit RRC-1.

---

Response:

Please see the Company's Errata No. 1 filed on November 5, 2013.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Robert R. Cooper  
Sponsoring Witness: Robert R. Cooper  
Beginning Sequence No. U4

Ending Sequence No. U4

---

Question No.: TIEC 1-12

Part No.:

Addendum:

Question:

In reference Highly Sensitive Exhibit RRC-1, please explain how ETI quantified the fuel savings associated with the Carville and Frontier "Step-Up" capacity, including but not limited to the following:

- a. The monthly PPA heat rate and capacity factor.
  - b. The source and monthly heat rate of replacement resources.
  - c. The monthly Henry Hub and delivered natural gas prices.
- 

Response:

As described in the direct testimony of Robert R. Cooper, the direct costs of the energy provided by the Carville and Frontier "Step-Up" capacity were based on actual billed costs for the contracts over the period identified in the Special Circumstances request. As also described in Mr. Cooper's testimony, the source and cost of the replacement energy was identified as the reduced sales to and/or increased purchases from the Entergy System Exchange based on the actual billed Exchange energy costs.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Dennis Roach  
Sponsoring Witness: Jay A. Lewis  
Beginning Sequence No. 125  
Ending Sequence No. 126

---

Question No.: TIEC 1-13

Part No.:

Addendum:

Question:

Referring to Exhibit JAL-4, Attachment B, please provide the following:

- a. An electronic native (working EXCEL or compatible) version of WP 4-1.
  - b. An electronic native (working EXCEL or compatible) version of WP 4-3.
  - c. An electronic native (working EXCEL or compatible) version of WP 4-4.
  - d. The Schedule 10 charges that existed during the test year.
  - e. The current known and measurable test year Schedule 10 charges.
  - f. The Schedule 7 charges that ETI would have incurred based on test year costs.
  - g. An explanation of Schedule 11 and the basis for the credits.
  - h. The Schedule 11 charges/credits that ETI would have incurred based on test year costs.
- 

Response:

- a. See the Testimony/Workpaper CDs provided with the filing package, including both native and pdf versions.
- b. See the Company's response to subpart a.
- c. See the Company's response to subpart a.
- d. None. Schedule 10 charges are strictly associated with MISO administration fees and will not be incurred until ETI is a member of MISO.

Question No.: TIEC 1-13

- e. See Attachment B, page 2 of 4, of Rider TCRF filed in this docket, lines 1 and 2.
- f. See Attachment B, page 2 of 4, of Rider TCRF filed in this docket, line 17, for the combined Schedule 7, 8 and 9 charges.
- g. Certain wholesale customers are charged for distribution substation service provided by the Company. The Schedule 11 credit shown on Attachment B, page 2 of 4, of Rider TCRF, line 9, credits this revenue to retail customers.
- h. See Attachment B, page 2 of 4, of Rider TCRF filed in this docket, line 9, for the Schedule 11 credit.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Dennis Roach  
Sponsoring Witness: Jay A. Lewis  
Beginning Sequence No. 127

Ending Sequence No. 127

---

Question No.: TIEC 1-14

Part No.:

Addendum:

Question:

Please provide a complete set of electronic (working EXCEL or compatible) workpapers to LEWIS WP\_JAL-4\_4.2 ITC Rev Req - HIGHLY SENSITIVE.

---

Response:

See the Testimony/Workpaper CDs provided with the Rate Filing Package, including both native and pdf versions. On October 29, 2013, ETI and ITC ("Applicants") jointly filed in Docket No. 41850 a pleading stating that they were declassifying information concerning each Applicant's Rate Mitigation Plan contribution levels. With one exception, these Rate Mitigation Plan contribution levels include the redacted figures contained in Schedule TCRF, which are now declassified. The one exception, however, can be determined given that the other figures in Schedule TCRF would no longer be redacted. Accordingly, the redacted figures in Rider TCRF are no longer confidential or redacted, and may be treated as public information. In addition, all but two documents that support Schedule TCRF are also no longer confidential or redacted, and may be treated as public information. Supporting document Exhibit JAL-4 WP 4.2 and the supporting Excel spreadsheet "HSPI\_Lewis\_Rate Effects\_Workpaper\_EAI ELL EGSL & ETI updated for ITC Rider revised 8 27 13.xls" remain protected as a Highly Sensitive Protected Material.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests

Prepared By: Patrick J. Cicio  
Sponsoring Witness: Patrick J. Cicio/Myra  
L. Talkington

of Requesting Party: Texas Industrial Energy  
Consumers

Beginning Sequence No. 628

Ending Sequence No. 619

---

Question No.: TIEC 1-15

Part No.:

Addendum:

Question:

Please state the rationale for and provide documents supporting a fuel charge based on avoided cost for SMS customers, including past Commission Orders.

---

Response:

The rationale is discussed in the direct testimony (pages 24-25) and rebuttal testimony (pages 9-17) of Mr. Patrick J. Cicio in Docket No. 41437. Copies of these pages are provided as attachments to this response.

1 not to the Company. Hybrid QFs, however, can limit any such penalties by adhering  
2 to MISO's real-time set points and putting the resulting energy.

3  
4 Q. WHEN DOES THE COMPANY PROPOSE TO ISSUE PAYMENTS TO QFs?

5 A. The Company proposes to issue avoided cost payments to QFs for energy delivered  
6 during a month after the Company has been paid by MISO for that energy. The  
7 Company anticipates receiving true-up charges or credits from MISO and proposes to  
8 account for those true-ups in subsequent billing periods. The Company believes that  
9 an initial payment followed by true-ups will more accurately reflect its avoided cost  
10 by aligning the schedule of receipts received by the Company from MISO with the  
11 schedule for issuing avoided cost payments by the Company to QFs.

12  
13 Q. WHICH OF THE COMPANY'S TARIFFS REQUIRE A CHANGE?

14 A. The affected tariff is ETI's Schedule LQF, Nonfirm Energy Purchased From Large  
15 Qualifying Facilities. The Company's proposed Schedule LQF, reflecting the  
16 changes discussed above, is attached as Exhibit PJC-2.

17  
18 Q. DO ANY OTHER COMPANY TARIFFS REQUIRE A CHANGE?

19 A. No. However, Schedule SMS, Standby and Maintenance Service, incorporates  
20 "system hourly avoided energy cost" in its pricing terms. The SMS tariff applies to  
21 customers that have their own on-site generation equipment and who contract for  
22 standby and maintenance service. While the Company does not propose any change  
23 to Schedule SMS, the Company does wish to clarify that, with its integration into the



1 MISO markets, there will no longer be a single avoided cost in each hour. Instead,  
2 that calculation will make use of the location specific settlement data provided by  
3 MISO. Specifically, the Company requests that the Commission issue an order  
4 adopting the clarification that "system hourly avoided energy cost" in the SMS tariff  
5 will be calculated for each customer using the MISO LMPs, as applicable, for the  
6 load zone that reflects the standby and/or maintenance energy consumed by the  
7 customer.

8

9 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

10 A. Yes.

1 detriment of the Company's retail customers, in order to mitigate against  
2 uncertainty and volatility that otherwise may be experienced by QFs.  
3 Although such QF concerns lack merit as I explained above, it is ETI's view  
4 that such concerns are outweighed by the interests of the Company's  
5 customers. It should not be the obligation of ETI's customers to insulate QFs  
6 from market volatility and risk.

7  
8 III. PROPER MEASURE OF AVOIDED COST FOR SCHEDULE SMS

9 Q12. WHAT IS THE COMPANY'S PROPOSAL FOR THE CALCULATION OF  
10 AVOIDED COST AS IT RELATES TO SCHEDULE SMS?

11 A. As I explained in my Direct Testimony, the Schedule Standby and  
12 Maintenance Service ("SMS") tariff applies to customers that have their own  
13 on-site generation equipment and who contract for standby and maintenance  
14 service. In other words, while these customers have their own on-site  
15 generation, at times (for instance, during the maintenance of their generating  
16 unit), the customer will need to take power from the Company. When this  
17 standby service is provided to the customer, the customer is charged for the  
18 energy taken. Schedule SMS incorporates "system hourly avoided energy  
19 cost" in its pricing terms. The Company does not propose any change to  
20 Schedule SMS. However, the Company does ask that the Commission clarify  
21 that, with ETI's integration into the MISO markets, the "system hourly avoided  
22 energy cost" will be consistent with the avoided cost that the Company has  
23 proposed with respect to Schedule LQF. Specifically, the Company requests

1       that the Commission issue an order clarifying that "system hourly avoided  
2       energy cost" for purposes of the SMS tariff will be calculated for each  
3       customer using the MISO-determined LMPs, as applicable, for the load zone  
4       that reflects the standby and/or maintenance energy consumed by the  
5       customer.

6  
7   Q13. IS THERE PRECEDENT FOR HANDLING THE CALCULATION OF  
8       AVOIDED COST, AS IT RELATES TO SCHEDULE SMS, IN THIS WAY?

9   A.   Yes. The Commission last modified the methodology of calculating ETI's  
10       avoided cost under its Schedule LQF in Docket No. 29035. In that  
11       proceeding, as in this one, ETI also requested an order from the Commission  
12       addressing the calculation of avoided cost under Schedule SMS, without  
13       proposing any changes to the tariff itself. In Docket No. 29035, in approving a  
14       settlement of the parties to that proceeding, the Commission ordered that the  
15       calculation of avoided cost under Schedule SMS "be consistent with the  
16       calculation of avoided cost pursuant to Proposed Schedule LQF." (Order at  
17       Ordering Paragraph No. 7 (Jan. 19, 2005).)

18  
19   Q14. CAN YOU BE MORE SPECIFIC ABOUT HOW AVOIDED COST WILL BE  
20       CALCULATED FOR SERVICE PROVIDED UNDER SCHEDULE SMS?

21   A.   Yes. As ETI explained in discovery, ETI will determine whether SMS  
22       customers should be charged the customer-specific CPNode LMP or the  
23       primary ETI Load Zone LMP based on how the QF is registered in the MISO

1 commercial model. Specifically, BTM QFs of 20MW or less will be charged  
2 the primary ETI Load Zone LMP and BTM QFs of more than 20MW will  
3 generally be charged the customer specific CPNode LMP for that individual  
4 QF. The only exception to this latter arrangement applies if the QF does not  
5 have a contract with ETI to be paid for QF put, then that QF will be modeled  
6 in the primary ETI Load Zone and charged the associated LMP. All hybrid  
7 QFs will be charged the primary ETI Load Zone LMP because, to the extent  
8 these QFs take service from ETI, they are considered a part of ETI's load.  
9

10 Q15. TIEC WITNESS POLLOCK ALLEGES THAT ETI'S PROPOSAL WOULD  
11 MAKE SCHEDULE SMS A DISCRIMINATORY RATE BECAUSE THE RATE  
12 CHARGED WOULD VARY DEPENDING ON THE SIZE AND LOCATION OF  
13 THE CUSTOMER AND WHETHER THE CUSTOMER'S BTM GENERATION  
14 IS AT A CPNODE. WILL YOU PLEASE ADDRESS THIS ALLEGATION?

15 A. To the extent that an SMS customer's load is registered with its own CPNode  
16 in the MISO commercial model, the avoided cost at that CPNode is the actual  
17 measure of the cost to serve that customer. While it is true that the LMP at  
18 any given CPNode at any given time may differ from the LMP at another  
19 CPNode, each is the measure of the cost to serve that customer at that time.  
20 Although I express no legal opinion, it is my understanding that, when rates  
21 for sales vary according to the cost of serving the customer, no prohibited  
22 discrimination has taken place. I believe my understanding is consistent with  
23 the Commission's rules as they apply to sales to QFs, which state in part:

1 Rates for sales that are based on accurate data and consistent  
2 system-wide costing principles shall not be considered to  
3 discriminate against any qualifying facility to the extent such  
4 rates apply to the electric utility's other customers with similar  
5 load or other cost-related characteristics. (Substantive Rule  
6 25.242(k)(1)(B).)  
7

8 Q16. TIEC WITNESS POLLOCK COMPLAINS THAT SMS CUSTOMERS WOULD  
9 BE SUBJECT TO VARIOUS MISO CHARGES AND ASSESSMENT THAT  
10 ARE NOT CURRENTLY APPLICABLE. WILL YOU PLEASE RESPOND?

11 A. ETI will make use of the location specific settlement data provided by MISO in  
12 determining the avoided cost as it relates to Schedule SMS service. This  
13 settlement data may include other market charges, including certain MISO  
14 administrative fees and revenue sufficiency guarantee ("RSG") charges.  
15 When the settlement data includes other market charges identified by MISO  
16 as being associated with the withdrawal of energy by an SMS customer,  
17 those charges will be reflected in the calculation of avoided cost. In other  
18 words, if charges identified by MISO are associated with the withdrawal of  
19 energy by an individual SMS customer, those charges are properly included  
20 in the calculation of the charge to that customer. The inferior alternative,  
21 which is suggested by TIEC witness Pollock's testimony, is to socialize the  
22 costs associated with the withdrawal of energy by that SMS customer to the  
23 rest of ETI's retail customers.

1 Q17. TIEC WITNESS POLLOCK RECOMMENDS SEVERAL CHANGES TO THE  
2 WORDING AND STRUCTURE OF THE SCHEDULE SMS TARIFF. IN  
3 WHAT PROCEEDING WAS THE WORDING AND STRUCTURE OF THE  
4 SCHEDULE SMS TARIFF APPROVED?

5 A. The current Schedule SMS tariff was designed and approved in ETI's most  
6 recent base rate proceeding, Docket No. 39896. This fact is acknowledged in  
7 TIEC witness Pollock's testimony in this proceeding. In fact, beginning on  
8 page 19 of his testimony, Mr. Pollock commences his description of the  
9 design of Schedule SMS in ETI's last base rate case, leading to his criticism  
10 that Schedule SMS was not properly designed in that base rate proceeding.  
11 His criticism of the design of the Schedule SMS tariff is particularly perplexing  
12 given that Mr. Pollock directly addressed this tariff with twelve pages of  
13 testimony in Docket No. 39896, where he expressly recognized that, within  
14 the Schedule SMS tariff, "fuel charges are priced at avoided energy cost as  
15 calculated under Schedule LQF,"<sup>5</sup> and went on to recommend several design  
16 changes to the tariff that were largely accepted by the Commission. I have  
17 attached the relevant portions of Mr. Pollock's testimony as Exhibit PJC-R-3.  
18 The ALJs in that proceeding wrote in the Proposal for Decision, "the ALJs  
19 recommend adoption of Mr. Pollock's suggested changes to Schedule SMS,

---

<sup>5</sup> Docket No. 39896, *Application of Entergy Texas, Inc. for Authority to Change Rates, Reconcile Fuel Costs, and Obtain Deferred Accounting Treatment*, Direct Testimony of Jeffry Pollock at 72 (Mar. 27, 2012).

1 with the exception of a \$6,000 customer charge."<sup>6</sup> The Commission adopted  
2 the PFD in this respect.  
3

4 Q18. WILL YOU PLEASE DESCRIBE SOME OF TIEC WITNESS POLLOCK'S  
5 SUGGESTED CHANGES TO THE WORDING AND STRUCTURE OF THE  
6 SCHEDULE SMS TARIFF?

7 A. On page 23, TIEC witness Pollock recommends that the portion of Schedule  
8 SMS that incorporates "system hourly avoided energy cost" in its pricing  
9 terms be changed to instead incorporate the "Fixed Fuel Factor charge  
10 applicable to Schedule LIPS customers." And, Mr. Pollock goes on to  
11 recommend other changes to the structure of the tariff should ETI's proposal  
12 regarding the calculation of avoided cost be approved. These suggested  
13 changes are unconnected with the modification of ETI's Schedule LQF  
14 avoided cost calculation and go far beyond a simple clarification of the  
15 avoided cost calculation that is incorporated by reference in the Schedule  
16 SMS tariff. Instead, these suggested changes would require substantial  
17 revision to the Schedule SMS tariff, revisions for which no notice has been  
18 given.

---

<sup>6</sup> Docket No. 39896, Proposal for Decision at 312 (Jul. 6, 2012).

1 Q19. ARE THE SPECIFICS OF TIEC WITNESS POLLOCK'S SUGGESTED  
2 CHANGES TO THE WORDING AND STRUCTURE OF THE SCHEDULE  
3 SMS TARIFF ADDRESSED IN THE COMPANY'S REBUTTAL TESTIMONY?

4 A. No. It is my understanding that changes to the wording and structure of the  
5 Schedule SMS tariff are beyond the scope of this proceeding. As I stated  
6 above, the primary purpose of this proceeding is to determine the proper  
7 measure of ETI's avoided cost once the Company integrates into the MISO  
8 markets. The Company has requested no change to the Schedule SMS tariff  
9 itself and, instead, asks the Commission only to clarify the meaning of the  
10 term "avoided energy cost," as that term appears in the Schedule SMS tariff,  
11 once the Company integrates into the MISO markets. The Company is not  
12 refusing to consider changes to the wording and structure of the Schedule  
13 SMS tariff. However, if it were determined that such changes were  
14 warranted, the Company would seek structural changes to the tariff in a  
15 separate proceeding filed under the Commission's rules governing tariff  
16 revisions or in the context of a base rate case, as was done when the  
17 Commission most recently approved the Schedule SMS tariff.



1 IV. RELATIONSHIP BETWEEN SCHEDULE CGS AND SCHEDULE LQF

2 Q20. TIEC WITNESS POLLOCK ADDRESSES ETI'S SCHEDULE CGS IN HIS  
3 TESTIMONY. WHAT IS THE RELATIONSHIP BETWEEN SCHEDULE CGS  
4 AND SCHEDULE LQF?

5 A. Schedule Competitive Generation Service ("CGS") relates to Schedule LQF in  
6 that the former refers to the latter. As the Commission recognized in its final  
7 order in Docket No. 38951:

8 CGS customers will pay fuel costs based on avoided cost for  
9 CGS-supplied energy. Specifically, ETI will purchase hourly  
10 CGS energy supplied by the CGS supplier from the CGS  
11 contract capacity at the system hourly avoided-energy-cost as  
12 determined under Rate Schedule LQF. ETI will charge the CGS  
13 customer at the same rate for that hourly CGS-supplied energy  
14 not to exceed the energy requirement of the CGS customer.  
15 (Finding of Fact No. 41.D.1.)  
16

17 The Schedule CGS tariff approved in the same docket tracks this language,  
18 as noted by Mr. Pollock.  
19

20 Q21. TIEC WITNESS POLLOCK RECOMMENDS THAT, REGARDLESS OF HOW  
21 AVOIDED COST IS DEFINED WHEN ETI BEGINS OPERATING IN MISO,  
22 THE COMMISSION SHOULD CLARIFY THAT THE CGS CUSTOMER  
23 SHOULD PAY THE SAME AVOIDED COST RATE AS A CGS SUPPLIER.  
24 HOW DO YOU RESPOND?

25 A. The Company is aware of the provision cited above from the Commission's  
26 order in Docket No. 38951. In that same order, the Commission approved a  
27 CGS tariff that recognized the prospect of changes needed to implement the  
28 program upon the Company's implementation into MISO:

1           The provisions of this Rider Schedule CGS reflect that  
2           ETI is not a member of a regional transmission  
3           organization, such as The Midwest Independent  
4           Transmission System Operator, Inc. (MISO), an  
5           independent system operator or other marketplace. If ETI  
6           joins a regional transmission organization or another  
7           marketplace, including MISO, it may be necessary or  
8           appropriate to include and/or take into account in ETI-  
9           Supplier Contracts principles, concepts, terms and  
10          conditions that relate to the ownership, operation, and use  
11          of, and the purchase and sale of products and services from,  
12          generation facilities in the applicable marketplace and that  
13          are not included in this Rider, including Appendix A (or in  
14          ETI's proposed form of ETI-Supplier Contract).<sup>7</sup>  
15

16          ETI is currently evaluating the implementation of the CGS program in MISO,  
17          including any changes to the current tariff that may be necessary for a  
18          successful program in MISO. ETI anticipates that its evaluation will result in a  
19          response to the issue raised by TIEC. Regardless, the scope of this  
20          proceeding does not and need not include a resolution to that issue.  
21

22    Q22. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

23    A.    Yes.

---

<sup>7</sup> See Docket No. 38951, *Application of Entergy Texas, Inc. for Approval of Competitive Generation Service Tariff (Issues Severed from Docket No. 37744)*, Order at Finding of Fact No. 53.G (Jul. 19, 2013).

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.

to the First Set of Data Requests

of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Patrick J. Cicio/ Donna J.

Rettstatt/William D. Tilley

Sponsoring Witness: Patrick J. Cicio/

Shawn B. Corkran

Beginning Sequence No. U20

Ending Sequence No. U22

Question No.: TIEC 1-16

Part No.:

Addendum:

Question:

For each SMS customer, please provide the following information in native (EXCEL or compatible) format:

- a. Actual fuel charges paid during the test year and the reconciliation period (by month).
- b. Hourly kWh purchases.
- c. The basis for the applicable nodal price (e.g., ETI Load Zone nodal price, CPNode).
- d. The fuel charges that would have been paid had ETI been in MISO during the test year.

Response:

- a. See the attached CD with spreadsheet titled TP-41791-00TIE001-X016\_a.xlsx
- b. See the attached CD with spreadsheet titled TP-41791-00TIE001-X016\_b.xlsx
- c. The Company objects to this request on grounds that some of the responsive materials are highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

See the attached highly sensitive table.

- d. The requested analysis does not exist.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO PARAGRAPH  
4 OF DOCKET NO. 41791 PROTECTIVE ORDER**

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101, 552.104 and/or 552.110. ETI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Steve Neinast  
Enter Services, Inc.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests

Prepared By: Ann Thibodeaux  
Sponsoring Witness: Patrick J. Cicio/Myra  
L. Talkington  
Beginning Sequence No. U23

of Requesting Party: Texas Industrial Energy  
Consumers

Ending Sequence No. U23

---

Question No.: TIEC 1-17

Part No.:

Addendum:

Question:

Please provide any analysis conducted by or for ETI quantifying the impact of applying nodal pricing in determining the SMS fuel charge for any specific SMS customer and the total for the SMS rate.

---

Response:

No such analysis exists.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests

Prepared By: Lisa Walther  
Sponsoring Witness: Margaret L.  
McCloskey

of Requesting Party: Texas Industrial Energy  
Consumers

Beginning Sequence No. 0204

Ending Sequence No. 0224

Question No.: TIEC 1-18

Part No.:

Addendum:

Question:

Please state how the fuel charges paid by SMS customers will be accounted for in ETI's fuel factor.

Response:

A fixed fuel factor (FFF) allocator is used to allocate the monthly recoverable fuel and net purchased power costs to the retail customers. The FFF allocator is calculated as follows:

Texas Retail Sales (FFF customers)	*	Retail Loss Factor
Texas System Sales	*	Total System Loss Factor

Total system sales include retail sales, sales to municipals, and any special rate customer sales who are not billed on the FFF, which would include SMS customers. Through the use of this FFF allocator, the monthly recoverable fuel and net purchased power costs is allocated to the retail customers in the same proportion of the retail usage to the total usage. Therefore, the fuel charges paid by SMS customers are not included in ETI's fuel factor.

The FFF, which is set semi-annually, is calculated based upon the last twelve months of historical retail recoverable fuel costs as calculated based upon the FFF allocator described above.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Charles John  
Sponsoring Witness: Patrick J. Cicio  
Beginning Sequence No. LR25

Ending Sequence No. LR26

---

Question No.: TIEC 1-19

Part No.:

Addendum:

Question:

Please provide a schedule in native electronic (working EXCEL or compatible) format showing the derivation of the hourly avoided cost under Schedule LQF for the Reconciliation Period.

---

Response:

The Company objects to this request on grounds that some of the responsive materials are highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

See the attached highly sensitive CD.

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Steve Neinast  
Enter Services, Inc.



ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Vance Blackwell  
Sponsoring Witness: Myra L. Talkington  
Beginning Sequence No. U27

Ending Sequence No. U27

Question No.: TIEC 1-20

Part No.:

Addendum:

Question:

Please provide workpapers in native electronic (working EXCEL or compatible) format showing the derivation of the following class allocation factors:

- a. Municipal Franchise Fees.
- b. Miscellaneous Gross Receipts Taxes.

Response:

- a. For Municipal Franchise Fees, see Schedule P-7.2, pg. 1, column (h), Inside City Energy MWh shown as percentages for each class.
- b. For Miscellaneous Gross Receipts Taxes, see Schedule Q-1, pg. 1, column (c). Percentages are calculated below.

Rate Class	Present Base Rate	
	Revenue	Percent
Residential Service	\$372,898,306	55.5650%
Small General Service	\$ 19,956,747	2.9737%
General Service	\$130,740,516	19.4815%
Large General Service	\$ 45,787,173	6.8227%
Large Industrial Power Service	\$ 92,488,997	13.7817%
Competitive Generation Service	\$ -	0.0000%
Lighting Service	\$ 9,230,506	1.3754%
Total Retail	\$671,102,245	100.0000%

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Chris E. Barrilleaux  
Sponsoring Witness: Chris E. Barrilleaux  
Beginning Sequence No. 1231

Ending Sequence No. 1234

---

Question No.: TIEC 1-21

Part No.:

Addendum:

Question:

Please provide a copy of each of the following publications referenced in Mr. Barrilleaux's testimony:

- a. Moody's Global Infrastructure Finance: Regulated Electric and Gas Utilities (August 2009).
- b. Standard & Poor's Global Credit Portal, RatingsDirect: Methodology and Assumptions: Liquidity Descriptors for Global Corporate Issuers (September 28, 2011).
- c. Standard and Poor's, Ratings Direct: S&P Takes Action on 23 U.S. After Revising Criteria For Recovery Ratings On Utility First Mortgage Bonds (Feb. 14, 2013).
- d. Standard & Poor's Ratings Services, RatingsDirect: Entergy Texas, Inc. (Jan. 25, 2013).
- e. S&P RatingsDirect: Criteria Methodology: Business Risk/Financial Risk Matrix Expanded (May 27, 2009).
- f. S&P Ratings Definitions (Aug. 24, 2009).
- g. Moody's Investors Service, Credit Opinion: Entergy Texas, Inc. (Dec. 26, 2012).
- h. Moody's Investors Service, Credit Opinion: Entergy Corporation (Dec. 21, 2012).
- i. S&P RatingsDirect: Assessing U.S. Vertically Integrated Utilities? Business Risk Drivers (Sept. 14, 2006).
- j. S&P RatingsDirect: Top Ten Credit Issues Facing U.S. Utilities (Jan. 29, 2007).
- k. Moody's; Infrastructure Finance, Regulated Electric and Gas Utilities (Aug. 2009).
- l. EEI, Industry Capital Expenditures (Jun. 28, 2012).

Question No.: TIEC 1-21

- m. Moody's Investors Service, High Capital Expenditures Adding to Rate Pressure for Utilities (Oct. 26, 2012).
  - n. Moody's Investors Service, Regulatory Support, Low Natural Gas Prices Maintains Stability (Feb. 6, 2013).
- 

Response:

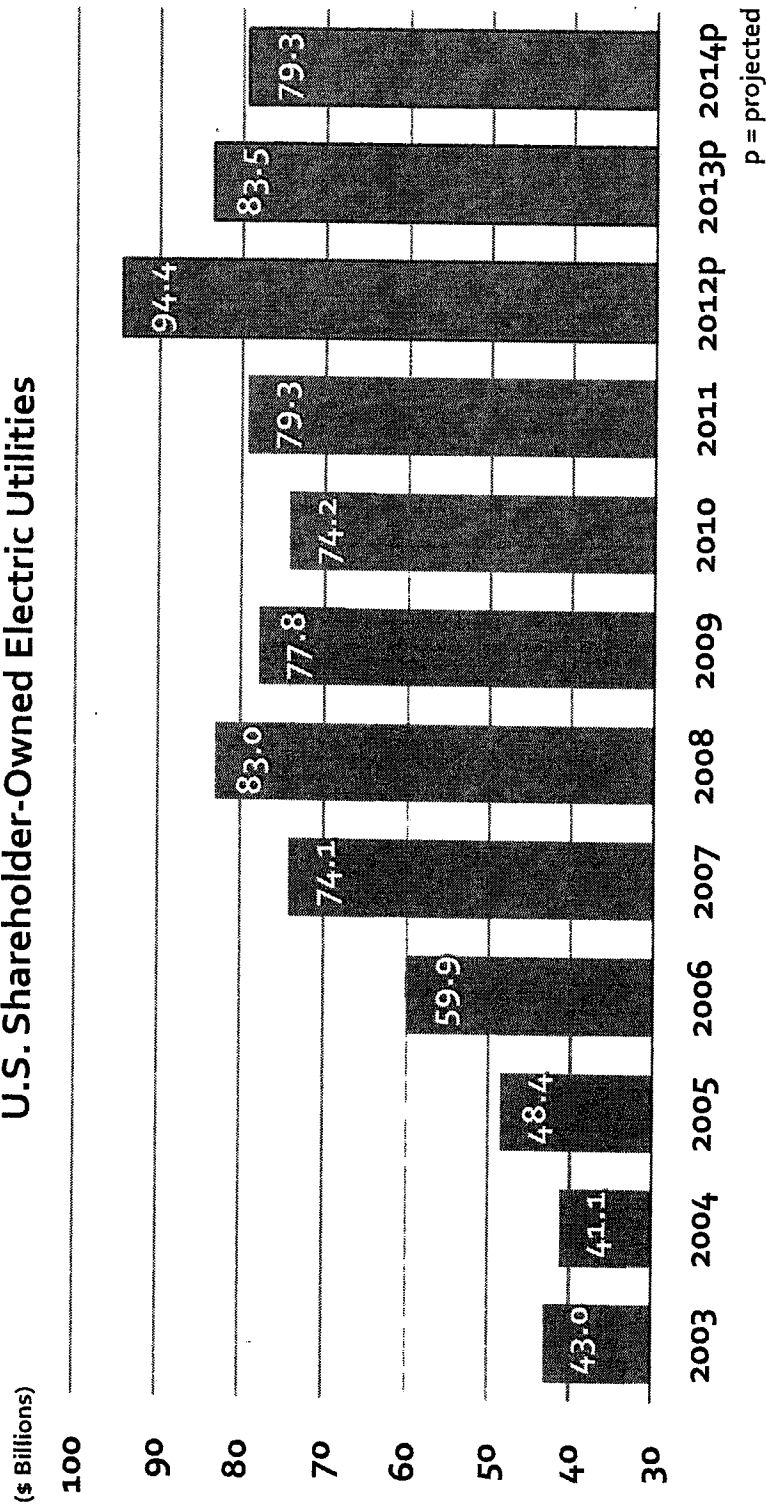
See the attached.

The Company objects to this request on grounds that some of the responsive materials are highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

See the attached highly sensitive CD.

# Industry Capital Expenditures

U.S. Shareholder-Owned Electric Utilities



Source: EEL Finance Department, company reports, SNL Financial (August 2012)

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4 OF DOCKET NO. 41791 PROTECTIVE ORDER**

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Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Steve Neinast  
Enter Services, Inc.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Chris E. Barrilleaux  
Sponsoring Witness: Chris E. Barrilleaux  
Beginning Sequence No. U28

Ending Sequence No. U30

---

Question No.: TIEC 1-22

Part No.:

Addendum:

Question:

Please provide documents supporting Mr. Barilleaux's testimony at page 27:

- a. Lines 5-9.
  - b. Lines 14-16.
- 

Response:

- a. See the Direct Testimony of Company witness Robert R. Cooper at Q45; Exhibit RRC-1; and the workpapers to Exhibit RRC-1, which are included in the Company's Errata No. 1.
- b. The Company objects to this request on grounds that some of the responsive materials are highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

See attached.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO PARAGRAPH  
4 OF DOCKET NO. 41791 PROTECTIVE ORDER**

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Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Steve Neinast  
Enter Services, Inc.

ENTERGY TEXAS, INC.  
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PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Heather G. LeBlanc  
Sponsoring Witness: Heather G. LeBlanc  
Beginning Sequence No. *TH5*  
Ending Sequence No. *TH5*

---

Question No.: TIEC 1-23

Part No.:

Addendum:

Question:

Please state what portion of ETI's claimed revenue requirement would have been allocated to ETEC but for the termination of ETEC's contract and provide supporting workpapers.

---

Response:

No such study has been prepared, therefore the Company does not know what portion of the claimed revenue requirement would have been allocated to ETEC.



ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Robert R. Cooper  
Sponsoring Witness: Robert R. Cooper  
Beginning Sequence No. *TH130*

Ending Sequence No. *TH130*

---

Question No.: TIEC 1-24

Part No.:

Addendum:

Question:

Please state the service start and end dates for each variation of the ETEC contract in effect since June 2009.

---

Response:

For the date signed and term date related to purchased power agreements (PPAs) that had an effect on costs incurred during the reconciliation period, including PPAs involving ETEC resources, see Schedule I-4.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
PUC DOCKET NO. 41791

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests

Prepared By: Becky Bowden  
Sponsoring Witness: Margaret L.  
McCloskey

of Requesting Party: Texas Industrial Energy  
Consumers

Beginning Sequence No. *TH131*  
Ending Sequence No. *TH131*

---

Question No.: TIEC 1-25

Part No.:

Addendum:

Question:

Please provide a working EXCEL model or workbook of the 2012 RPCE calculations that result in payments by ETI.

---

Response:

See the attached CD, which contains the 2013 RPCE calculations (based on a 12/31/12 test year) that result in payments by ETI to Entergy New Orleans, Inc. as shown on A.1 filed in FERC Docket No. ER13-1595.