

Control Number: 43958



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PUC DOCKET NO. 43958

APPLICATION OF ENTERGY TEXAS, INC. FOR APPROVAL OF AN	§	BEFORE THE RECEIVED 2015 MAY 22 PM 4: 04
AMENDMENT TO CERTIFICATE OF CONVENIENCE AND NECESSITY	§ §	PUBLIC UTILITY COMMISSION FILING CLERK
AND FOR PUBLIC INTEREST DETERMINATION FOR PURCHASE	§ §	FILING CLERK "SSION
OF UNIT 1, UNION POWER STATION	8	OF TEXAS

RESPONSE OF ENTERGY TEXAS, INC. TO OPUC'S EIGHTH REQUEST FOR INFORMATION OPUC 8:3

Entergy Texas, Inc. ("Entergy Texas" or "the Company") files its Response to OPUC's Eighth 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,

Paula Cyr

Paula Cyr Wajiha Rizvi Entergy Services, Inc. 919 Congress Avenue, Suite 701 Austin, Texas 78701 (512) 487-3957 telephone (512) 487-3958 facsimile

Attachments: **OPUC 8:3**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to OPUC's Eighth 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 22nd day of May, 2015.

Paula Cyr Paula Cyr

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ENTERGY TEXAS, INC. PUBLIC UTILITY COMMISSION OF TEXAS DOCKET NO. 43958

Response of: Entergy Texas, Inc.

to the Eighth Set of Data Requests

of Requesting Party: Office of Public Utility

Counsel

Prepared By: Alex Lau

Sponsoring Witness: Anthony P. Walz

Beginning Sequence No.

Ending Sequence No.

Question No.: OPUC 8-3

Part No.:

Addendum:

Question:

Reference page 20 of the rebuttal testimony of ETI witness Walz, provide documentation of SPO's verification of the reasonableness of the generation dispatch, production costs, and market prices produced by the AURORA model.

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.

ESI reviewed the generation dispatch of Entergy owned resources produced by the AURORA model and verified that the dispatch was reasonable based on how the units have run in the past and how they were expected to run in MISO.

The following is a comparison of AURORA projected output by fuel type compared with actuals. The comparison shows that the AURORA projections are reasonably aligned with actual operations.



<u>DESIGNATION OF PROTECTED MATERIALS PURSUANT TO PARAGRAPH</u> 4 OF DOCKET NO. 43958 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.

<u>Paula Cyr</u> Entergy Services, Inc.