



Control Number: 45084



Item Number: 36

Addendum StartPage: 0

DOCKET NO. 45084

RECEIVED

APPLICATION OF ENTERGY  
TEXAS, INC. FOR APPROVAL  
OF A TRANSMISSION COST  
RECOVERY FACTOR

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PUBLIC UTILITY COMMISSION  
OF TEXAS

2015 OCT 28 PM 2:15  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION  
TO ENTERGY TEXAS, INC. (ETI)  
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-6**

Pursuant to 16 Tex. Admin. Code § 22.144 (TAC) of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Entergy Texas, Inc. (ETI) by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

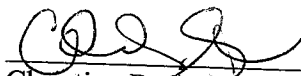
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: October 28, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director-Legal Division


Stephen Mack  
Managing Attorney-Legal Division



Christina R. Switzer  
Attorney-Legal Division  
State Bar No. 24066171  
(512) 936-7216  
(512) 936-7268 (facsimile)  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on October 28, 2015, in accordance with 16 Tex. Admin. Code § 22.74.

  
Christina R. Switzer

**DOCKET NO. 45084**

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION  
TO ENTERGY TEXAS, INC. (ETI)  
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

**DEFINITIONS**

- 1) "ETI", "the Company" or "you" refers to Entergy Texas, Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
  
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION  
TO ENTERGY TEXAS, INC. (ETI)  
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION  
TO ENTERGY TEXAS, INC. (ETI)  
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

- Staff 4-1** Please provide the dates ETI began providing transmission services under the following MISO tariff schedules:
- a) Schedule 01
  - b) Schedule 02
  - c) Schedule 07
  - d) Schedule 08
  - e) Schedule 09
  - f) Schedule 11
- Staff 4-2** Please provide the dates ETI began collecting revenues under the following MISO tariff schedules:
- a) Schedule 10
  - b) Schedule 41
  - c) Schedule 42-A
  - d) Schedule 42-B
  - e) Schedule 47
- Staff 4-3** Does ETI provide transmission services under MISO Schedule 02? Please explain.
- Staff 4-4** For each MISO tariff schedule under which ETI provides transmission services and collects transmission-related revenues, please provide the unadjusted actual historical revenues ETI received under that schedule (a) during the TCRF test period, and (b) during the Docket No. 41791 Test Year. Please provide citations to where the TY information may be found.
- Staff 4-5** Please itemize all tariffs and agreements under which ETI provides transmission services. For each tariff and agreement not already addressed in ETI's response to the above items, please provide ETI's (a) unadjusted actual historical test period revenues, and (b) unadjusted actual historical revenues from the Test Year in Docket No. 41791. Please provide citations to where the TY information may be found.
- Staff 4-6** Please identify and provide a brief narrative explanation of all the different types of transmission-related revenues ETI receives. Please include an explanation of all sources of revenue that are functionalized to transmission in the Company's cost of service study.

For each revenue line item, please tie the monthly revenues shown in the Company's Credits by Month workpapers to the amounts in the monthly MISO schedules provided in response to TIEC's first request for information.