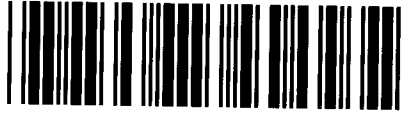




Control Number: 45084



Item Number: 9

Addendum StartPage: 0

DOCKET NO. 45084

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

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§

PUBLIC UTILITY COMMISSION

SEP 18 PM 2:33
PUBLIC UTILITY COMMISSION
FILING CLERK

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

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.

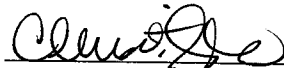
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: September 18, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

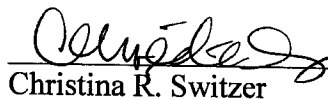
Stephen Mack
Managing Attorney-Legal Division



Christina R. Switzer
Attorney-Legal Division
State Bar No. 24066171
Jacob J. Lawler
State Bar No. 24076502
(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 September 18, 2015, in accordance with 16 Tex. Admin. Code § 22.74.



Christina R. Switzer

DOCKET NO. 45084

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

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.

DOCKET NO. 45084

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

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.

DOCKET NO. 45084

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

Staff 1-1 Please refer to the Company's application at Schedule VIII, TCRED [i.e., the transmission-related miscellaneous revenue credits component of the TCRF revenue requirement]. For each of the below "baseline factors" in the right column, please (a) explain the Company's calculation methodology, (b) provide citations to where all the information that was used in the calculations may be found in the Commission-adopted baseline values in Docket No. 41791, (c) provide the fully functioning electronic workpapers that support the development of each factor, and (d) provide a brief narrative explanation of the Company's justification for the use of that "baseline factor" in its TCRF calculation methodology.

450000	Forfeited Discounts	15.71%
451000	Miscellaneous Service Revenue	15.71%
454000	Rent From Electric Property	27.83%
456100	Miscellaneous Revenue	27.83%
456101	Side Lights	27.83%
456136	MISO Sch 7 Firm PTP - ST	98.28%
456137	MISO Sch 7 Firm PTP - LT	98.28%
456138	MISO Sch 8 Non-firm	98.28%
456139	MISO Sch 9 Network	98.28%
456142	MISO Sch 42 Int/AFUDC Amort	98.28%
456420	Affiliate service fee revenue	27.83%

Staff 1-2 Please refer to the Company's application at Schedule IX, ATC. Please comprehensively explain why, in contrast to the Company's proposed treatment of the line items in the Company's proposed TCRED component of TCRF, there are no "baseline factor" proportions applied to each of the amounts in the ATC line items in Schedule IX.

Staff 1-3 Please refer to the Company's application at Schedule VI, Adjusted Total Federal Income Taxes, Line 35. Please explain why Company's net change in Income Tax Expense on Schedule I, Line 18, Col. D does not reflect ETI's calculated \$1,460,262 from Schedule VI.

Staff 1-4 Please confirm that the Company's application at Schedule VI, Adjusted Total Federal Income Taxes, Line 35 properly calculated the change in income tax expense.