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ENERGY TEXAS, INC.'S STATEMENT §
OF INTENT AND APPLICATION FOR §
AUTHORITY TO CHANGE RATES §

PUBLIC UTILITY COMMISSION
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**OFFICE OF PUBLIC UTILITY COUNSEL'S
SIXTH REQUEST FOR INFORMATION TO
ENERGY TEXAS, INC.**

The Office of Public Utility Counsel (OPUC) propounds this Sixth Request for Information (RFI) to Entergy Texas, Inc. (Entergy). Under P.U.C. Procedural Rules 22.141-145, OPUC requests that Entergy, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

Definitions

As used in this introduction and in these questions,

(1) "Entergy," "ETI," the "Company," and "Applicant" refer to Entergy Texas, Inc. and its affiliates;

(2) "You", "yours" and "your" refer to Entergy (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.

(3) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports,

studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

6. If any question appears confusing, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.
9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.

12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
14. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.
15. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.


Claim of Privilege

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

June 27, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

SOAH Docket No. 473-18-3733
PUC Docket No. 48371

I certify that today, June 27, 2018, a true copy of the Office of Public Utility Counsel's Sixth Request for Information to Entergy Texas, Inc. was served on all parties of record via United States First-Class Mail, hand-delivery or facsimile.


Laurie Barker

SOAH Docket No. 473-18-3733
PUC Docket No. 48371
OPUC's Sixth Request For Information To
Entergy Texas, Inc.

- 6-1. [Reference Spindletop] Provide a copy of each portion of the Jurisdictional Separation Plan as approved by the PUCT that addressed the ownership of Spindletop as well as the continued usage by other EOCs of the plants served by Spindletop.
- 6-2. [Reference ADFIT] Provide the amount of any excess ADFIT that is not currently being used as an offset to rate base. For this portion, identify the interest rate, if any, that will be accruing on the amount and the basis that supports the Company's proposed treatment of this portion of excess ADFIT.
- 6-3. [Post Test Year Adjustment] Provide a schedule that reflects anticipated changes in revenue and expenses that are related to the proposed inclusion of plant subsequent to the test year end that are in addition to the depreciation, property taxes and federal income taxes on return.
- 6-4. [Unprotected Excess ADFIT] Provide a schedule that reflects the impacts by rate class of an amortization of the unprotected Excess ADFIT over a five-year period. Be sure to show the rate classes' relative rates of return under this paradigm as opposed to a separate rate rider with a two-year amortization.
- 6-5. [Unprotected Excess ADFIT] Provide a schedule that details the changes in cash flow to ETI with a five-year amortization of the unprotected excess ADFIT when compared to the proposed two-year amortization.
- 6-6. [Unprotected Excess ADFIT] Provide a revenue requirements computation without taking into consideration the amortization of excess ADFIT resulting from the TCJA of 2017. Be sure to include the impact to federal income tax expense related to the change in tax rate from 35% to 21%.
- 6-7. [Unprotected Excess ADFIT] Provide an explanation of the treatment being proposed and/or approved with respect to the amortization of unprotected excess ADFIT in Entergy's other operating jurisdictions. To the extent that there are docketed cases before the regulatory authorities, identify the dockets and provide copies of any orders that have been issued.
- 6-8. [Spindletop] Provide a schedule that details the usages from Spindletop by month for each of the last five years through the most current date available. Include in your response the monthly plant output by plant for each plant served by Spindletop during this same time period.
- 6-9. With respect to the costs included in the proposed FERC Rider, please provide the annual base revenue requirements incurred for the 12 month end of test year period (as included in column h of Schedule Q-1). Provide these amounts by FERC account with a description of the cost.
- 6-10. Please provide the amount in 6-9 above by customer class.