



Control Number: 48371



Item Number: 192

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DOCKET NO. 48371
SOAH DOCKET NO. 473-18-3733

RECEIVED

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

PUBLIC UTILITY COMMISSION
2018 JUL 11 PM 1:50
OF TEXAS UTILITY COMMISSION
FILING CLERK

**RESPONSE OF ENERGY TEXAS, INC.
TO STAFF'S FIRST REQUEST FOR INFORMATION:
STAFF 1: 1-70 ADDENDUM 1**

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

Courtney Nicholson
Courtney Nicholson
Entergy Services, Inc.
919 Congress Avenue, Suite 701
Austin, Texas 78701
(512) 487-3944 telephone
(512) 487-3958 facsimile

Attachments: STAFF 1: 70 Addendum 1

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to STAFF's First Request for Information has been sent by either hand delivery, email, facsimile, overnight delivery, or U.S. Mail to the party that initiated this request in this docket on this the 10th day of July 2018.

Courtney Nicholson
Courtney Nicholson

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ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 48371

Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Erin D. Erwin
Sponsoring Witness: Kristine T. Jackson
Beginning Sequence No. LR1944
Ending Sequence No. LR1945

Question No.: STAFF 1-70

Part No.:

Addendum: 1

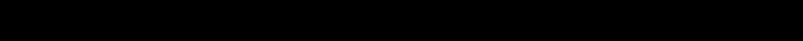
Other

Question:

Please refer to the testimony of Kristine Jackson at page 12. What is the balance of the regulatory liability recorded pursuant to the deferred accounting order issued in Project No. 47945? Please update the response to this request monthly during the pendency of this docket.

Response:

Information included in the response contains 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.

 Note that ETI believes that this amount should not be refunded to customers for several reasons, including ETI’s historic and current under-earning, the magnitude of its recent and planned investments, the resulting need for cash and improvement to its credit metrics, and the requirement that the rates ultimately set in this case be just and reasonable. Please see the Direct Testimony of Sallie T. Rainer at 21-22.

Addendum 1:

Information included in the response contains 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 highly sensitive attachment.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO
PARAGRAPH 4 OF DOCKET NO. 48371 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.

Courtney Nicholson
Entergy Services, Inc.