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

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PUBLIC UTILITY BOARD OF TEXAS
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APPLICATION OF ENTERGY TEXAS,
INC. FOR AUTHORITY TO CHANGE
RATES

§ BEFORE THE STATE OFFICE OF
§
§ ADMINISTRATIVE PROCEEDINGS

CITIES' RESPONSE TO ETI'S SECOND RFI

The Cities of Anahuac, Beaumont, Bridge City, Cleveland, Conroe, Dayton, Groves, Houston, Huntsville, Liberty, Montgomery, Navasota, Nederland, Oak Ridge North, Orange, Pinehurst, Port Arthur, Port Neches, Roman Forest, Shenandoah, Splendora, Sour Lake, Vidor, and West Orange ("Cities") hereby file their responses to Entergy Texas, Inc.'s ("ETI") Second Request for Information ("RFI") to Cities. Cities' responses to the RFIs are attached hereto and numbered as they were numbered in ETI's Request. Cities' response is timely filed pursuant to P.U.C. Proc. R. 22.144(c) and SOAH Order No. 2. All parties to the above captioned proceeding may treat these responses as if they were filed under oath.

Respectfully submitted,
LAWTON LAW FIRM, P.C.



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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record in this proceeding on this the 9th day of August, 2018, in accordance with TAC § 22.74.

A handwritten signature in black ink, appearing to read "Molly Mayhall Vandervoort". The signature is written in a cursive style with a horizontal line at the end.

Molly Mayhall Vandervoort

Responding Party: Cities
Requesting Party: ETI
Prepared by: David Garrett
Sponsoring Witness: David Garrett

Docket No.: 48371
Question No.: ETI-CITIES 2-1

REQUEST:

ETI-CITIES 2-1 Referring to footnote 3 of Exhibit DJG-5 to the Direct Testimony of David J. Garrett, please state the page and line source of the 15% contingency factor. If this contingency factor should have been 10%, please confirm whether any other parts of Mr. Garrett's testimony, exhibits, or recommendations are affected by the use of a different factor and provide any necessary corrections.

RESPONSE:

The contingency factor stated in Footnote 3 of Exhibit DJG-5 should be "10%" instead of "15%". There are no parts of Mr. Garrett's recommendations that are affected by the use of a contingency factor other than the 10% contingency factor proposed by Mr. McHone. This was a typographical error limited to the footnote in question and did not affect Mr. Garrett's substantive analysis.

Responding Party: Cities
Requesting Party: ETI
Prepared by: David Garrett
Sponsoring Witness: David Garrett

Docket No.: 48371
Question No.: ETI-CITIES 2-2

REQUEST:

ETI-CITIES 2-2 Referring to Exhibit DJG-5 to the Direct Testimony of David J. Garrett, please explain the source and/or calculation of the dollar amounts listed under "Proposed Removal Cost" and "Contingency Factor" for the Sabine Unit. Please explain the difference between those dollar amounts and the amounts listed on page 14 of Exhibit SCM-5 to the Direct Testimony of Sean C. McHone.

RESPONSE:

Mr. Garrett separated the costs of system production and system repair from the total Sabine removal costs proposed by Mr. McHone. Mr. McHone's total proposed removal cost for Sabine is \$11,679,829, which includes \$76,434 in System Production and \$17,982 in System Repair. Referring to Exhibit DJG-5, the proposed removal costs of \$11,585,413 and \$76,434 and \$17,982 for Sabine, System Production, and System repair respectively, equate to the total proposed removal cost for Sabine of \$11,679,829. These numbers also correspond with the amounts listed in Exhibit DAW-2, Appendix D at page 114. The total proposed contingency cost for Sabine is \$4,863,495, which is allocated between Sabine, System Production, and System Repair based on the amounts of the proposed removal costs discussed above (the formulas for this allocation can be seen in the Excel version of DJG-5).