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

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ENTERGY TEXAS, INC.'S STATEMENT § BEFORE THE STATE OFFICE
OF INTENT AND APPLICATION FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

OFFICE OF PUBLIC UTILITY COUNSEL'S
FIRST REQUEST FOR INFORMATION TO
TEXAS INDUSTRIAL ENERGY CONSUMERS

The Office of Public Utility Counsel (OPUC) propounds this First Request for Information (RFI) to Texas Industrial Energy Consumers (TIEC). Under P.U.C. Procedural Rules 22.141-145, OPUC requests that TIEC, 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) "Texas Industrial Energy Consumers" and "TIEC" refer to Texas Industrial Energy Consumers and its affiliates;
- (2) "You", "yours" and "your" refer to TIEC (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,

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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.

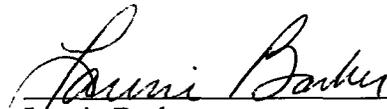
Claim of Privilege

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.

August 16, 2018

Respectfully submitted,

Tonya Baer
Public Counsel
State Bar No. 24026771



Laurie Barker
Special Counsel
State Bar No. 12128690

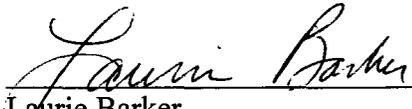
OFFICE OF PUBLIC UTILITY COUNSEL
1701 N. Congress Avenue, Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397
512/936-7500 (Telephone)
512/936-7525 (Facsimile)
laurie.barker@opuc.texas.gov
opuc_eservice@opuc.texas.gov (Service)

CERTIFICATE OF SERVICE

SOAH Docket No. 473-18-3733

PUC Docket No. 48371

I certify that today, August 16, 2018, a true copy of the Office of Public Utility Counsel's First Request for Information to Texas Industrial Energy Consumers was served on all parties of record via electronic delivery, United States First-Class Mail, hand-delivery or facsimile.



Laurie Barker

SOAH Docket No. 473-18-3733
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OPUC's First Request For Information To
Texas Industrial Energy Consumers

- 1-1.** Referencing Mr. Pollock's testimony at pages 29 – 31, please provide a comparison of how the Schedule TCJA unprotected storm-related excess ADIFT benefit will flow through to customer classes using Mr. Pollock's proposed refund allocator versus how the unprotected storm-related excess ADFIT benefit will flow through to the customer classes using ETI's refund allocator.

- 1-2.** Please provide any documents or workpapers (in native format) that Mr. Pollock may have been provided, reviewed, relied upon, or created pertaining to his proposed refund allocator for Schedule TCJA unprotected storm-related excess ADFIT.