



Control Number: 48371



Item Number: 420

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

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BEFORE THE STATE OFFICE  
PUBLIC UTILITY COMMISSION  
OF  
ADMINISTRATIVE HEARINGS

FILING CLERK

**ENTERGY TEXAS, INC.'S JOINT MOTION TO ADMIT EVIDENCE  
AND REMAND PROCEEDING**

Entergy Texas, Inc. ("ETI") and the parties have entered an Unopposed Stipulation and Settlement Agreement ("Stipulation") resolving all issues in this proceeding.<sup>1</sup> Accordingly, ETI submits this Joint Motion to Admit Evidence and Remand Proceeding ("Motion") on behalf of all parties in this proceeding. The Stipulation is being filed concurrently with this Motion.

**I. Joint Motion to Admit Evidence**

ETI respectfully requests that the documents identified in Exhibit A to this Motion be admitted as evidence in this matter. Exhibit A includes, among other evidence, the pre-filed testimony of all the parties and testimony from ETI and Staff ("Staff") of the Public Utility Commission of Texas ("Commission") in support of the Stipulation.

**II. Joint Motion to Remand Proceeding**

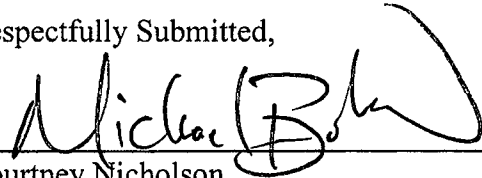
Included as Attachment C to the Stipulation is a Proposed Order that resolves all issues in this proceeding. ETI requests that the Administrative Law Judges ("ALJs"), after acting on the Agreed Motion for Interim Rates filed concurrently with this motion, enter an order dismissing this proceeding from the State Office of Administrative Hearings ("SOAH") docket and remanding it to the Commission for consideration of the Proposed Order.

<sup>1</sup> The signatories to the Stipulation include the following parties to this proceeding: ETI; Staff of the Public Utility Commission of Texas; Office of Public Utility Counsel; Texas Industrial Energy Consumers; Walmart, Inc.; the United States Department of Energy; and E.I. du Pont de Nemours and Company. 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, Sour Lake, Splendora, Vidor, and West Orange ("Cities") and Lela M. Sharpe do not oppose the Stipulation.

### III. Conclusion

ETI requests that the ALJs grant this Motion and enter an order admitting into evidence the documents identified in Exhibit A, dismissing the proceeding from the SOAH docket, and remanding the proceeding to the Commission for consideration of the Proposed Order included as Attachment C to the Stipulation.

Respectfully Submitted,



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*Attorneys for Entergy Texas, Inc.*

### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties of record this 5th day of October, 2018.



Sarah K. Merrick

ETI:

1	Entergy Texas, Inc.'s Statement of Intent and Application for Authority to Change Rates	05/15/2018
2	Rate Filing Package – Public Schedules and Schedule Workpapers	07/09/2018
3	Rate Filing Package – Highly Sensitive Protected Schedules and Schedule Workpapers	07/09/2018
4	Entergy Texas Inc.'s Petition for Review of Municipal Ordinances and Motion to Consolidate (consolidated with Dkt. 48371 on June 29, 2018)	06/29/2018
5	Entergy Texas Inc.'s Second Petition for Review of Municipal Ordinances and Motion to Consolidate (Appeal of Actions of the Cities of China, Kountze, Luberton and Montgomery; consolidated with Dkt. 48371 on July 20, 2018)	07/20/2018
6	Entergy Texas Inc.'s Third Petition for Review of Municipal Ordinances and Motion to Consolidate (Appeal of Actions of the Cities of Bevil Oaks, Franklin, Midway, North Cleveland, Taylor Landing and Woodbranch; consolidated with Dkt. 48371 on August 15, 2018)	8/15/2018
7	Entergy Texas, Inc.'s Proof of Notice by Mail and Proof of Publication	07/06/2018
8	Direct Testimony and Exhibits of Sallie Rainer	05/15/2018
9	Rebuttal Testimony and Exhibits of Sallie Rainer	08/16/2018
10	Direct Testimony and Exhibits of Jess K. Totten	05/15/2018
11	Rebuttal Testimony and Exhibits of Jess K. Totten	08/16/2018
12	Direct Testimony and Exhibits of Ellen Lapson	05/15/2018
13	Rebuttal Testimony and Exhibits of Ellen Lapson	08/16/2018
14	Direct Testimony and Exhibits of Robert B. Hevert	05/15/2018
14A	Highly Sensitive Protected Workpapers to the Direct Testimony of Robert B. Hevert	05/15/2018
15	Rebuttal Testimony and Exhibits of Robert B. Hevert	08/16/2018
16	Direct Testimony and Exhibits of Rory L. Roberts	05/15/2018

17	Rebuttal Testimony and Exhibits of Rory L. Roberts	08/16/2018
18	Direct Testimony of James Warren	05/15/2018
19	Direct Testimony and Exhibits of Abigail B. Weaver	05/15/2018
19A	Highly Sensitive Protected Portions of the Direct Testimony of Abigail B. Weaver	05/15/2018
20	Direct Testimony and Exhibits of Kham Vongkhamchanh	05/15/2018
20A	Exhibit KV-3 (HSPM) to the Direct Testimony and Exhibits of Kham Vongkhamchanh	05/15/2018
20B	Exhibit KV-4 (HSPM) to the Direct Testimony and Exhibits of Kham Vongkhamchanh	05/15/2018
20C	Highly Sensitive Protected Workpapers to the Direct Testimony of Kham Vongkhamchanh	05/15/2018
21	Direct Testimony and Exhibits of David A. Richard	05/15/2018
21A	Exhibit DAR-1 (HSPM) to the Direct Testimony and Exhibits of David A. Richard	05/15/2018
21B	Exhibit DAR-3 (HSPM) to the Direct Testimony and Exhibits of David A. Richard	05/15/2018
22	Direct Testimony and Exhibits of Christopher K. Burke	05/15/2018
22A	Exhibit CKB-4 (HSPM) to the Direct Testimony and Exhibits of Christopher K. Burke	05/15/2018
22B	Exhibit CKB-6 (HSPM) to the Direct Testimony and Exhibits of Christopher K. Burke	05/15/2018
23	Direct Testimony of Patrick J. Stack	05/15/2018
23A	Highly Sensitive Protected Workpapers to the Direct Testimony of Patrick J. Stack	05/15/2018
24	Rebuttal Testimony and Exhibits of Patrick J. Stack	08/16/2018
25	Direct Testimony and Exhibits of Michelle H. Thiry	05/15/2018
26	Rebuttal Testimony and Exhibits of Michelle H. Thiry	08/16/2018
26A	Exhibit MHT-R-1 (HSPM) to the Rebuttal Testimony and Exhibits of Michelle H. Thiry	08/16/2018
27	Direct Testimony and Exhibits of Anastasia R. Meyer	05/15/2018
27A	Exhibit ARM-1 (HSPM) to the Direct Testimony and Exhibits of Anastasia R. Meyer	05/15/2018

27B	Exhibit ARM-2 (HSPM) to the Direct Testimony and Exhibits of Anastasia R. Meyer	05/15/2018
27C	Exhibit ARM-3 (HSPM) to the Direct Testimony and Exhibits of Anastasia R. Meyer	05/15/2018
27D	Exhibit ARM-4 (HSPM) to the Direct Testimony and Exhibits of Anastasia R. Meyer	05/15/2018
28	Rebuttal Testimony and Exhibits of Anastasia R. Meyer	08/16/2018
28A	Exhibit ARM-R-4 (HSPM) to the Rebuttal Testimony and Exhibits of Anastasia R. Meyer	08/16/2018
29	Direct Testimony and Exhibits of Kristine T. Jackson	05/15/2018
29A	Exhibit KTJ-2 (HSPM) to the Direct Testimony and Exhibits of Kristine T. Jackson	05/15/2018
30	Rebuttal Testimony and Exhibits of Kristine T. Jackson	08/16/2018
31	Direct Testimony and Exhibits of Barbara P. Heard	05/15/2018
32	Direct Testimony and Exhibits of Dawn D. Renton	05/15/2018
32A	Exhibit DDR-1 (HSPM) to the Direct Testimony and Exhibits of Dawn D. Renton	05/15/2018
32B	Exhibit DDR-2 (HSPM) to the Direct Testimony and Exhibits of Dawn D. Renton	05/15/2018
32C	Exhibit DDR-3 (HSPM) to the Direct Testimony and Exhibits of Dawn D. Renton	05/15/2018
32D	Exhibit DDR-4 (HSPM) to the Direct Testimony and Exhibits of Dawn D. Renton	05/15/2018
32E	Exhibit DDR-10 (HSPM) to the Direct Testimony and Exhibits of Dawn D. Renton	05/15/2018
32F	Exhibit DDR-11 (HSPM) to the Direct Testimony and Exhibits of Dawn D. Renton	05/15/2018
32G	Exhibit DDR-12 (HSPM) to the Direct Testimony and Exhibits of Dawn D. Renton	05/15/2018
33	Direct Testimony and Exhibits of Jennifer A. Raeder	05/15/2018
33A	Highly Sensitive Protected Portions of the Direct Testimony of Jennifer A. Raeder	05/15/2018
33B	Exhibit JAR-2 (HSPM) to the Direct Testimony and Exhibits of Jennifer A. Raeder	05/15/2018
33C	Exhibit JAR-5 (HSPM) to the Direct Testimony and Exhibits of Jennifer A. Raeder	05/15/2018

33D	Highly Sensitive Protected Workpapers to the Direct Testimony of Jennifer A. Raeder	05/15/2018
34	Rebuttal Testimony and Exhibits of Jennifer A. Raeder	08/16/2018
35	Direct Testimony and Exhibits of Shawn B. Corkran	05/15/2018
35A	Exhibit SBC-1 (HSPM) to the Direct Testimony and Exhibits of Shawn B. Corkran	05/15/2018
36	Direct Testimony and Exhibits of Daniel T. Falstad	05/15/2018
37	Direct Testimony of Shannon L. Stafford	05/15/2018
38	Direct Testimony and Exhibits of Bryan C. Bennett	05/15/2018
39	Direct Testimony and Exhibits of Jay Joyce	05/15/2018
39A	Highly Sensitive Protected Workpapers to the Direct Testimony of Jay Joyce	05/15/2018
40	Direct Testimony and Exhibits of Gregory S. Wilson	05/15/2018
41	Direct Testimony and Exhibits of Sean C. McHone	05/15/2018
42	Rebuttal Testimony and Exhibits of Sean C. McHone	08/16/2018
43	Direct Testimony and Exhibits of Dane A. Watson	05/15/2018
43A	Exhibit DAW-2 (HSPM) to the Direct Testimony and Exhibits of Dane A. Watson	05/15/2018
43B	Highly Sensitive Protected Workpapers to the Direct Testimony of Dane A. Watson	05/15/2018
44	Rebuttal Testimony and Exhibits of Dane A. Watson	08/16/2018
44A	Exhibit DAW-R-5 (HSPM) to the Rebuttal Testimony and Exhibits of Dane A. Watson	08/16/2018
45	Direct Testimony and Exhibits of Joshua B. Thomas	05/15/2018
45A	Exhibit JBT-4 (HSPM) to the Direct Testimony and Exhibits of Joshua B. Thomas	05/15/2018
46	Rebuttal Testimony and Exhibits of Joshua B. Thomas	08/16/2018
47	Direct Testimony and Exhibits of William A. Cloutier, Jr.	05/15/2018
48	Direct Testimony and Exhibits of Monique C. Hoffmeister	05/15/2018

48A	Exhibit MCH-2 (HSPM) to the Direct Testimony and Exhibits of Monique C. Hoffmeister	05/15/2018
48B	Exhibit MCH-3 (HSPM) to the Direct Testimony and Exhibits of Monique C. Hoffmeister	05/15/2018
48C	Exhibit MCH-4 (HSPM) to the Direct Testimony and Exhibits of Monique C. Hoffmeister	05/15/2018
48D	Exhibit MCH-5 (HSPM) to the Direct Testimony and Exhibits of Monique C. Hoffmeister	05/15/2018
48E	Highly Sensitive Protected Workpapers to the Direct Testimony of Monique C. Hoffmeister	05/15/2018
49	Direct Testimony and Exhibits of Kristin Sasser	05/15/2018
50	Rebuttal Testimony and Exhibits of Kristin Sasser	08/16/2018
51	Direct Testimony and Exhibits of Rudolph P. Griffin	05/15/2018
51A	Highly Sensitive Protected Workpapers to the Direct Testimony of Rudolph P. Griffin	05/15/2018
52	Revenue Requirement Adoption of R. Phillip Griffin's Direct Testimony and Rebuttal Testimony and Exhibit of Myra L. Talkington	08/16/2018
53	Cost Allocation/Rate Design Adoption of R. Phillip Griffin's Direct Testimony and Rebuttal Testimony of Myra L. Talkington	08/16/2018
54	Direct Testimony and Exhibits of Richard E. Lain	05/15/2018
54A	Exhibit REL-3 (HSPM) to the Direct Testimony and Exhibits of Richard E. Lain	05/15/2018
55	Rebuttal Testimony and Exhibits of Richard E. Lain	08/16/2018
56	Direct Testimony and Exhibits of Stephen F. Morris	05/15/2018
57	Rebuttal Testimony and Exhibits of Stefan Boedeker	08/16/2018
58	Rebuttal Testimony and Exhibits of Allen J. Becker	08/16/2018
59	Entergy Texas Inc.'s Fourth Petition for Review of Municipal Ordinances and Motion to Consolidate (Appeal of Actions of the Cities of Beaumont, Cleveland, Groves, Houston, Huntsville, Liberty, Oak Ridge North, Pinehurst, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor and West Orange; consolidated with Dkt. 48371 on September 19, 2018)	09/07/2018



60	Entergy Texas Inc.'s Fifth Petition for Review of Municipal Ordinances and Motion to Consolidate (Appeal of Actions of the Cities of Bridge City, Conroe, Dayton, Orange, Port Arthur, and Port Neches; consolidated with Dkt. 48371 on September 19, 2018)	09/13/2018
61	Entergy Texas Inc.'s Sixth Petition for Review of Municipal Ordinances and Motion to Consolidate (Appeal of Actions of the Cities of Anahuac, Cut and Shoot, Navasota, and Nederland)	09/26/2018
62	Unopposed Stipulation and Settlement Agreement	10/5/2018
63	Supplement Testimony of Richard E. Lain in Support of Stipulation	10/5/2018

**Commission Staff:**

1	Direct Testimony of Grant Gervais (Cost Allocation & Rate Design Phase) on Behalf of the Public Utility Commission of Texas	08/08/2018
1A	Workpapers to the Direct Testimony of Grant Gervais	08/09/2018
2	Commission Staff's First Errata to the Direct Testimony of Grant Gervais	08/16/2018
3	Direct Testimony of David B. Smithson (Revenue Requirement Phase) on Behalf of the Public Utility Commission of Texas	08/08/2018
4	Direct Testimony of Ruth Stark (Revenue Requirement Phase) on Behalf of the Public Utility Commission of Texas	08/08/2018
4A	Workpapers to the Direct Testimony of Ruth Stark	08/09/2018
5	Direct Testimony of Reginald J. Tuvilla (Revenue Requirement Phase) on Behalf of the Public Utility Commission of Texas	08/08/2018
5A	Confidential Workpapers to the Direct Testimony of Reginald J. Tuvilla	08/09/2018
6	Direct Testimony of Mark Filarowicz (Revenue Requirement Phase) on Behalf of the Public Utility Commission of Texas	08/08/2018
6A	Workpapers to the Direct Testimony of Mark Filarowicz	08/09/2018

7	Cross-Rebuttal Testimony and Workpapers of William B. Abbott on Behalf of the Public Utility Commission of Texas	08/16/2018
8	Supplemental Testimony of Ruth Stark in Support of Stipulation	10/5/2018
9	Supplemental Testimony of Grant Gervais in Support of Stipulation	10/5/2018

**Texas Industrial Energy Consumers:**

1	Direct Testimony and Exhibits of Michael P. Gorman (Revenue Requirement Phase) on Behalf of Texas Industrial Energy Consumers	08/01/2018
1A	Workpapers to the Direct Testimony of Michael P. Gorman (Revenue Requirement)	08/02/2018
1B	Confidential Workpapers to the Direct Testimony of Michael P. Gorman	08/02/2018
2	Direct Testimony and Exhibits of Jeffry Pollock (Cost Allocation/Rate Design Phase) on Behalf of Texas Industrial Energy Consumers	08/01/2018
2A	Workpapers to the Direct Testimony of Jeffry Pollock (Cost Allocation Rate Design)	08/02/2018
2B	Confidential Workpapers to the Direct Testimony of Jeffry Pollock (Cost Allocation Rate Design)	08/02/2018
3	Direct Testimony and Exhibits of Jeffry Pollock (Revenue Requirement Phase) on Behalf of Texas Industrial Energy Consumers	08/01/2018
3A	Workpapers to the Direct Testimony of Jeffry Pollock (Revenue Requirement)	08/02/2018
4	Cross-Rebuttal Testimony and Exhibits of Jeffry Pollock (Cost Allocation/Rate Design Phase) On Behalf of Texas Industrial Energy Consumers	08/16/2018
4A	Workpapers to the Cross-Rebuttal Testimony and Exhibits of Jeffry Pollock (Cost Allocation/Rate Design Phase) On Behalf of Texas Industrial Energy Consumers	08/17/2018

**Office of Public Utility Counsel:**

1	Direct Testimony of Constance T. Cannady on Behalf of Office of Public Utility Counsel (Revenue Requirement Phase)	08/01/2018
1A	Workpapers to the Direct Testimony of Constance T. Cannady	08/01/2018
1B	Confidential Portions of the Direct Testimony of Constance T. Cannady on Behalf of Office of Public Utility Counsel (Revenue Requirement Phase)	08/01/2018
1C	Confidential Workpapers to the Direct Testimony of Constance T. Cannady	08/01/2018
2	Direct Testimony of Clarence L. Johnson on Behalf of Office of Public Utility Counsel (Cost Allocation Rate Design Phase)	08/01/2018
2B	Workpapers to the Direct Testimony of Clarence L. Johnson	08/01/2018
3	Cross-Rebuttal Testimony of Clarence L. Johnson on Behalf of Office of Public Utility Counsel (Cost Allocation Rate Design Phase)	08/16/2018
4	Direct Testimony of Cynthia L. Zamora on Behalf of Office of Public Utility Counsel (Revenue Requirement Phase)	08/01/2018
4A	Workpapers to the Direct Testimony of Cynthia L. Zamora	08/01/2018

**Cities:**

1	Direct Testimony of Karl J. Nalepa on Behalf of Cities Served by Entergy Texas, Inc.	08/01/2018
1A	Attachment C (HSPM) to the Direct Testimony of Karl J. Nalepa	08/01/2018
2	Direct Testimony of Brian T. Murphy on Behalf of Cities Served by Entergy Texas, Inc.	08/01/2018
3	Direct Testimony of Mark E. Garrett on Behalf of Cities Served by Entergy Texas, Inc.	08/01/2018
4	Direct Testimony and Exhibits of Kevin W. O'Donnell on Behalf of Cities Served by Entergy Texas, Inc.	08/01/2018
5	Direct Testimony and Exhibits of David J. Garrett on Behalf of Cities Served by Entergy Texas, Inc.	08/01/2018
6	Cities' Submission of Workpapers	08/03/2018

**Wal-Mart Stores, Inc.:**

1	Direct Testimony and Exhibits on Rate Design Issues of Gregory W. Tillman on Behalf of Walmart, Inc.	08/01/2018
2	Direct Testimony and Exhibits on Revenue Requirement Issues of Gregory W. Tillman on Behalf of Walmart, Inc.	08/01/2018

**E.I. du Pont de Nemours and Company:**

1	Direct Testimony and Exhibits of Franklin Maduzia, Jr. on Behalf of E.I. du Pont de Nemours and Company (DuPont)	08/01/2018
1A	Confidential Portions of the Direct Testimony and Exhibits of Franklin Maduzia, Jr.	08/01/2018