



Control Number: 49057



Item Number: 201

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DOCKET NO. 49057

2019 FEB 14 PM 2:06

**APPLICATION OF ENTERGY
TEXAS, INC. TO SET A
TRANSMISSION COST RECOVERY
FACTOR**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

FILING CLERK

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NO. STAFF 4-1**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff of the Public Utility Commission of Texas (Commission) requests that Entergy Texas, Inc., by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 787112-3326.

201

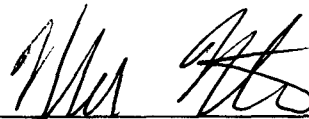
Dated: February 14, 2019

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Stephen Mack
Managing Attorney

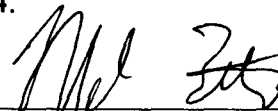


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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on February 14, 2019, in accordance with 16 TAC § 22.74.



Nick Buratto

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NO. STAFF 4-1**

DEFINITIONS

- A. "Entergy," "ETI," "the Company," or "you" refer to Entergy Texas, Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings, or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NO. STAFF 4-1**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
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QUESTION NO. STAFF 4-1**

- Staff 4-1 Please refer to the file “WP_Sch. VIII & Sch. IX - ATC and TCRED” (hereinafter the “ATC/TCRED work paper”) and the work papers for the MISO Settlement Statements, which are more specifically referred to below. Please explain the following discrepancies concerning MISO revenue credits:
- A) Compare the ATC/TCRED work paper with the April 2018 MISO work paper titled “WP_Sch VIII_Sch IX - Apr 2018”:
- 1) The ATC/TCRD work paper lists the value of “MISO Sch 7 Firm PTP – LT” for April 2018 as \$165,592.25, but the April 2018 MISO work paper lists the value of “Total Schedule 7 LT FIRM Transmission Service” as \$177,648.71, a difference of \$12,056.46. Please explain this discrepancy.
 - 2) The ATC/TCRD work paper lists the value of “MISO Sch 8 Non-firm” for April 2018 as \$7,775.95, but the April 2018 MISO work paper lists the value of “Total Schedule 8 NON-FIRM Transmission Service” as \$9,868.83, a difference of \$2,092.88. Please explain this discrepancy.
 - 3) The ATC/TCRD work paper lists the value of “MISO Sch 9 Network” for April 2018 as \$539,622.25, but the April 2018 MISO work paper lists the value of “Total Schedule 9 NETWORK Transmission Service” as \$542,934.60, a difference of \$3,312.35. Please explain this discrepancy.
 - 4) The ATC/TCRD work paper lists the value of “MISO Sch 41 Stm Securitization” for April 2018 as \$77,078.62, but the April 2018 MISO work paper lists the value of “Total Schedule 41 Entergy Storm Securitization Charges” as \$77,342.71, a difference of \$264.09. Please explain this discrepancy.
- B) Compare the ATC/TCRED work paper with the May 2018 MISO work paper titled “WP_Sch VIII_Sch IX - May 2018”:
- 1) The ATC/TCRD work paper lists the value of “MISO Sch 9 Network” for May 2018 as \$1,124,848.62, but the May 2018 MISO work paper lists the value of “Total Schedule 9 NETWORK Transmission Service” as \$1,148,754.18, a difference of \$23,905.56. Please explain this discrepancy.
 - 2) The ATC/TCRD work paper lists the value of “MISO Sch 41 Stm Securitization” for May 2018 as \$137,347.66, but the May 2018 MISO work paper lists the value of “Total Schedule 41 Entergy Storm Securitization Charges” as \$139,253.67, a difference of \$1,906.01. Please explain this discrepancy.

- C) Compare the ATC/TCRED work paper with the June 2018 MISO work paper titled "WP_Sch VIII_Sch IX - Jun 2018":
- 1) The ATC/TCRD work paper lists the value of "MISO Sch 9 Network" for June 2018 as \$804,910.14, but the June 2018 MISO work paper lists the value of "Total Schedule 9 NETWORK Transmission Service" as \$805,122.45, a difference of \$212.31. Please explain this discrepancy.
- D) Compare the ATC/TCRED work paper with the July 2018 MISO work paper titled "WP_Sch VIII_Sch IX - Jul 2018":
- 1) The ATC/TCRD work paper lists the value of "MISO Sch 9 Network" for July 2018 as \$762,221.41, but the July 2018 MISO work paper lists the value of "Total Schedule 9 NETWORK Transmission Service" as \$764,667.53, a difference of \$2,446.12. Please explain this discrepancy.
 - 2) The ATC/TCRD work paper lists the value of "MISO Sch 41 Stm Securitization" for July 2018 as \$153,942.71, but the July 2018 MISO work paper lists the value of "Total Schedule 41 Entergy Storm Securitization Charges" as \$154,141.31, a difference of \$198.60. Please explain this discrepancy.
- E) Compare the ATC/TCRED work paper with the September 2018 MISO work paper titled "WP_Sch VIII_Sch IX - Sep 2018":
- 1) The ATC/TCRD work paper lists the value of "MISO Sch 9 Network" for September 2018 as \$874,274.66, but the September 2018 MISO work paper lists the value of "Total Schedule 9 NETWORK Transmission Service" as \$876,913.29, a difference of \$2,638.63. Please explain this discrepancy.
 - 2) The ATC/TCRD work paper lists the value of "MISO Sch 41 Stm Securitization" for September 2018 as \$167,393.30, but the September 2018 MISO work paper lists the value of "Total Schedule 41 Entergy Storm Securitization Charges" as \$167,607.54, a difference of \$214.24. Please explain this discrepancy.