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APPLICATION OF ENTERGY TEXAS, § BEFORE THE STATE OFFICE OF
INC. FOR A DISTRIBUTION COST § PUBLIC UTILITY COMMISSION
RECOVERY FACTOR § ADMINISTRATIVE HEARINGS

ENTERGY TEXAS, INC.'S LIST OF ISSUES

Entergy Texas, Inc. (ETI) files this List of Issues in accordance with the Order of Referral issued on March 29, 2019:

I. Issues to be Addressed in this Proceeding

16 Texas Admin. Code (TAC) § 25.243 governs this proceeding and prescribes the scope of issues to be addressed in a proceeding for approval of a Distribution Cost Recovery Factor (DCRF). ETI proposes the following as the issues to be addressed in this proceeding:

1. Does ETI's earnings monitoring report included in ETI's application show that ETI is earning more than its authorized rate of return, using weather-normalized data? 16 TAC § 25.243(e)(4).
2. If not, what is ETI's properly calculated DCRF, in accordance with PURA § 36.210 and 16 TAC § 25.243(d)? In making this determination, the following questions should be addressed:
 - a. What were the DCRF-related baseline costs established in ETI's most recent base-rate proceeding, Docket No. 48371?¹¹¹ 16 TAC § 25.243(d)(1).
 - b. What items should be categorized as ETI's distribution invested capital? What are ETI's distribution invested-capital costs? 16 TAC § 25.243(b)(3).
 - c. What is ETI's net distribution invested capital? 16 TAC §§ 25.243(b)(4), 25.243(d)(1).
 - d. What is the appropriate weather normalization adjustment using weather data for the most recent ten calendar years? 16 TAC § 25.243(b)(5).
 - e. Did ETI appropriately account for load growth? 16 TAC § 25.243(d)(1).
 - f. What is ETI's appropriate rate of return? 16 TAC § 25.243(d)(2).
 - g. Has ETI clearly identified costs, if any, included as distribution invested capital because of a change in accounting rules or practices since the test year in ETI's most

¹¹¹ *Application of ETI Texas, Inc. for Authority to Change Rates*, Docket No. 48371, Order (December 20, 2018).

recent base-rate proceeding, Docket No. 48371? 16 TAC. If so, has ETI proven that such costs are appropriate for recovery through the DCRF? 16 TAC § 25.243(d)(3).

- h. Has ETI included any costs in its proposed DCRF revenue requirement that were previously recovered through the Company's existing base rates, and if so, does this proposed treatment lead to improper double recovery of costs?
 - i. What is the utility's incremental revenue requirement to be collected through the DCRF? 16 TAC § 25.243(d).
3. What are the appropriate class allocations to set the DCRF rates, if any, in accordance with PURA § 36.210(a)(3) and 16 TAC § 25.243(d)?
 4. What rates, if any, should the Commission approve in an ETI DCRF rate schedule?

II. Issues Not to Be Addressed in this Proceeding

Consistent with 16 TAC § 25.243(e)(5), “[t]he issues of whether distribution invested capital included in an application for a DCRF or DCRF adjustment complies with PURA, including § 36.053 and § 36.058, and is prudent, reasonable, and necessary shall not be addressed in a DCRF proceeding unless the presiding officer finds that good cause exists to address these issues.”

III. Conclusion

In consideration of the preceding, ETI requests that the Commission adopt a preliminary order consistent with the issues listed above, and grant ETI such other relief to which it may show itself entitled.

Date: April 9, 2019

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that a true and correct copy of ETI List of Issues was served by email, facsimile, hand-delivery, overnight delivery, or 1st Class U.S. Mail on all parties of record in this proceeding on April 9, 2019.



Wajiha Rizvi
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