



Control Number: 49493



Item Number: 19

Addendum StartPage: 0

DOCKET NO. 49493  
SOAH Docket No. 473-19-4420

RECEIVED

APPLICATION OF ENTERGY TEXAS, §  
INC. FOR ADJUST ITS ENERGY §  
EFFICIENCY COST RECOVERY §  
FACTOR §

PUBLIC UTILITY COMMISSION  
2019 JUN -4 PM 12:19  
PUBLIC UTILITY COMMISSION  
OF TEXAS  
FILING CLERK

RESPONSE OF ENTERGY TEXAS, INC.  
TO STAFF'S FIRST REQUEST FOR INFORMATION:  
STAFF 1: 1 AND 2

Entergy Texas, Inc. ("Entergy Texas" or "the Company") files its Response to STAFF's First Request for Information. The response to such request is attached and is numbered as in the request. An additional copy is available for inspection at the Company's office in Austin, Texas.

Entergy Texas believes the foregoing response is correct and complete as of the time of the response, but the Company will supplement, correct or complete the response if it becomes aware that the response is no longer true and complete, and the circumstance is such that failure to amend the answer is in substance misleading. The parties may treat this response as if it were filed under oath.

Respectfully submitted,

Wajiha Rizvi / WC  
Wajiha Rizvi  
Entergy Services, Inc.  
919 Congress Avenue, Suite 701  
Austin, Texas 78701  
(512) 487-3962 telephone  
(512) 487-3958 facsimile

Attachments: STAFF 1: 1 AND 2

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to STAFF First Request for Information has been sent by either hand delivery, email, facsimile, overnight delivery, or U.S. Mail to the party that initiated this request in this docket on this the 3<sup>rd</sup> day of June 2019.

Wajiha Rizvi / WC  
Wajiha Rizvi

191

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
DOCKET NO. 49493

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Commission Staff

Prepared By: John K. Carson/Mark  
Delavan  
Sponsoring Witness: John K. Carson  
Beginning Sequence No. LR1  
Ending Sequence No. LR3

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Question No.: STAFF 1-1

Part No.:

Addendum:

Question:

Please provide a detailed breakdown of the administrative, and research and development costs outlined in Exhibit JKC-01, Table 10, at 18 for the 2018 program year. Provide copies of applicable invoices and contracts.

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Response:

The Company objects to this request on grounds that the responsive materials are protected ("confidential") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Confidential materials will be provided pursuant to the terms of the Protective Order in this docket.

For the Admin Costs and R&D costs shown in Exhibit JKC-1, Table 10, see the attached spreadsheet for a breakdown of the costs by category and location of applicable invoices.

	Load Management	Grand Total	Location of Applicable Invoices
<b>Labor &amp; Benefits</b>	\$ 21,263	\$ 288,129	No applicable invoices
<b>Business Meals</b>	\$ -	\$ 569	See attached CD
<b>Employee Mtgs &amp; Functions &amp; Awards</b>	\$ -	\$ 320	See attached CD
<b>Dues-Employee Indus &amp; Prof*</b>	\$ -	\$ 195	See attached CD
<b>Educational Reimbursement**</b>	\$ -	\$ 2,395	See attached CD
<b>Training &amp; Seminar &amp; Ind Mtg Fees</b>	\$ -	\$ 750	See attached CD
<b>Personal Car Mileage ***</b>	\$ -	\$ 1,105	No applicable invoices but see attached CD for
<b>Auto Rental</b>	\$ -	\$ 66	See attached CD
<b>Travel Transportation</b>	\$ -	\$ 374	See attached CD
<b>Lodging</b>	\$ -	\$ 2,000	See attached CD
<b>Airfare</b>	\$ -	\$ 2,351	See attached CD
<b>Agency Booking Fees</b>	\$ -	\$ 48	See attached CD
<b>Advertising Expenses****</b>	\$ -	\$ 1,064	See attached CD
<b>Recruiting Expense</b>	\$ -	\$ 129	See attached CD
<b>Postage and Overnight Delivery</b>	\$ -	\$ 10	See attached CD
<b>Mobile Device Service*****</b>	\$ -	\$ 720	No applicable invoices
<b>Other Contract Work</b>	\$ -	\$ 426,008	See detail below
ASSOCIATION OF ENERGY SERVICES	\$ -	\$ 2,500	See attached CD
Professional Organization	\$ -	\$ -	
CITIBANK USA NA	\$ -	\$ 151	See attached CD
Website Registration fees	\$ -	\$ -	
DUGGINS WREN MANN & ROMERO LLP	\$ -	\$ 5,142	*****
Legal Charges for Docket No. 48297 and Project No. 48692	\$ -	\$ -	
EDUCATION FOR TOMORROW ALLIANCE	\$ -	\$ 7,620	See attached CD
Promotional campaign	\$ -	\$ -	
FRONTIER ASSOCIATES LLC	\$ -	\$ 63,211	See attached CD
FRONTIER ENERGY INC*****	\$ -	\$ 106,874	See attached CD
Consulting Services, Deemed Savings updates, EUMMOT charges	\$ -	\$ -	
RAMEY AGENCY LLC	\$ -	\$ 93,915	See attached CD
Advertising	\$ -	\$ -	
TETRA TECH MA INC	\$ -	\$ 102,491	See attached CD
EM&V Contractor	\$ -	\$ -	
CLEARESULT INC	\$ -	\$ 44,105	See attached CD
Implementer	\$ -	\$ -	
<b>Payroll Tax Loader</b>	\$ 1,453	\$ 19,568	No applicable invoices
<b>Payroll Tax Accrual</b>	\$ 10	\$ 298	No applicable invoices
<b>Grand Total (including R&amp;D)</b>	\$ 22,726	\$ 746,098	

\*Association of Energy Engineers (AEE)

\*\*Employee Educational Reimbursement for Certified Energy Manager Class & Test

\*\*\*Mileage reimbursed at a rate of 53.5 cents per mile

\*\*\*\*Combined on attached CD with Ramey Agency Invoices

\*\*\*\*\*Mobile Device Service reflects employee stipends for mobile device of \$60 per month

\*\*\*\*\*The invoices that include the DWMR charges are attached to, and described in, the Affidavit of Wajih Rizvi that was included with the EECRF application

\*\*\*\*\*Includes \$140,000 for database project, 20% of which are treated as R&D costs

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO  
PARAGRAPH 4 OF DOCKET NO. 49493 PROTECTIVE ORDER**

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101, 552.104 and/or 552.110. ETI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Wajiha Rizvi  
Entergy Services, Inc.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
DOCKET NO. 49493

Response of: Entergy Texas, Inc.  
to the First Set of Data Requests  
of Requesting Party: Commission Staff

Prepared By: John K. Carson  
Sponsoring Witness: John K. Carson  
Beginning Sequence No. LR200  
Ending Sequence No. LR201

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Question No.: STAFF 1-2

Part No.:

Addendum:

Question:

Please provide a detailed copy breakdown of the research and development costs proposed for the 2019 and 2020 program years outlined in JKC-01, Table 6, at 14. Provide Copies of applicable contracts.

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Response:

Information included in the response contains protected (“confidential”) materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101, 552.104 and/or 552.110. Confidential materials will be provided pursuant to the terms of the Protective Order in this docket.

The research and development costs are associated with the continued development of the P3 software that houses Entergy Texas energy efficiency database and reporting platform. Per staff’s recommendation in ETI’s 2017 EECRF proceeding, Docket No. 47115, these costs are allocated for purposes of the administrative spending cap calculations as 20% to research and development costs and 80% to administrative costs.

The research and development costs are based on the monthly billings detailed in the attached Confidential Statements of Work.

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Wajiha Rizvi  
Entergy Services, Inc.