



Control Number: 49493



Item Number: 27

Addendum StartPage: 0

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

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

PUBLIC UTILITY COMMISSION
OF TEXAS

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

Entergy Texas, Inc. ("Entergy Texas" or "the Company") files its Response to STAFF's Second 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
Wajiha Rizvi
Entergy Services, Inc.
919 Congress Avenue, Suite 701
Austin, Texas 78701
(512) 487-3962 telephone
(512) 487-3958 facsimile

Attachments: STAFF 2: 1 AND 2

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to STAFF Second 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 3rd day of July 2019.

Wajiha Rizvi
Wajiha Rizvi

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

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

Prepared By: John K. Carson
Sponsoring Witness: John K. Carson
Beginning Sequence No. SS73
Ending Sequence No. SS74

Question No.: STAFF 2-1

Part No.:

Addendum:

Question:

Please refer to ETI's confidential response to STAFF 1-1. Please list and provide a detailed description of each of the services provided by Ramey Agency, LLC.

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.

Please see the confidential attachment for the services and detailed descriptions of the services provided by Ramey Agency LLC.

**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 Second Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: John K. Carson
Sponsoring Witness: John K. Carson
Beginning Sequence No. SS1
Ending Sequence No. SS2

Question No.: STAFF 2-2

Part No.:

Addendum:

Question:

Please provide complete copies of contracts for implementation of all of ETI's 2019 and 2020 market transformation programs (MTPs) and standard offer programs (SOPs). For MTP contracts, include the fixed fee and the at-risk fee compensation schedule, and the breakout between cash and non-cash incentives.

Response:

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

Please see the attached highly sensitive contracts.

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

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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.