Control Number: 51381

Item Number: 44

Addendum StartPage: 0

DOCKET NO. 51381

APPLICATION OF ENTERGY TEXAS, INC. TO ESTABLISH A GENERATION COST RECOVERY RIDER RELATED TO THE MONTGOMERY COUNTY POWER STATION	§ § § § §	**PUBLIC UTILITY COMMISSION OF TEXAS**

RESPONSE OF ENTERGY TEXAS, INC.
TO STAFF'S FIRST REQUEST FOR INFORMATION:
STAFF 1: 1 THROUGH 4

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,

George G. Hoyt
George G. Hoyt
Entergy Services, LLC
919 Congress Avenue, Suite 701
Austin, Texas 78701
(512) 487-3945 telephone
(512) 487-3958 facsimile

Attachments: **STAFF 1:1 THROUGH 4**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Staff's First Request for Information has been sent by either hand delivery, electronic delivery, facsimile, overnight delivery, or U.S. Mail to the party that initiated this request in this docket on this the 8th day of November 2020.

George G. Hoyt
George G. Hoyt

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 51381

Response of: Entergy Texas, Inc.	Prepared By: Heather Naeher
to the First Set of Data Requests	Sponsoring Witness: Alliston P. Lofton
of Requesting Party: Commission Staff	Beginning Sequence No. LR274
	Ending Sequence No. LR274

Question No.: STAFF 1-1 Part No.: Addendum:

Question:

Please provide copies of any analyses, studies, or surveys ETI performed to determine the 30-year useful life of the Montgomery County Power Station (MCPS) proposed in the application and describe how these analyses, studies, or surveys were used to calculate the proposed useful life for MCPS.

Response:

See the direct testimony of Allison P. Lofton at pages 10-11.

See Entergy Texas, Inc's response to TIEC 2-2 for copies of the studies produced by the Electric Power Research Institute (EPRI) which reflect a 30-year useful life assumption for a CCGT, as well as other reputable sources such as National Renewable Energy Laboratory (NREL), IHS Markit, and U.S. Energy Information Administration (EIA), each demonstrating that a 30-year useful life for a CCGT unit is reasonable.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 51381

Response of: Entergy Texas, Inc.	Prepared By: Heather Naeher
to the First Set of Data Requests	Sponsoring Witness: Alliston P. Lofton
of Requesting Party: Commission Staff	Beginning Sequence No. LR275
	Ending Sequence No. LR275

Question No.: STAFF 1-2 Part No.: Addendum:

Question:

Please explain the methods ETI used to determine the useful life of MCPS. Provide major equipment used in the plant, for example: generators, turbines, etc. and state their useful life used to determine the overall life of the plant.

Response:

See Entergy Texas, Inc's response to Staff 1-1 for the basis of ETI's useful life assumption for MCPS.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 51381

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: Commission Staff	Prepared By: Heather Naeher Sponsoring Witness: Alliston P. Lofton Beginning Sequence No. LR276 Ending Sequence No. LR276

Question No.: STAFF 1-3 Part No.: Addendum:

Question:

Please provide any projections of the potential useful life for MCPS beyond the 30-year useful life proposed in the application. What is the estimated maximum life the plant can sustain? For each unit, please state the useful life assumed for depreciation purposes.

Response:

Entergy Texas, Inc. has no responsive assumptions or projections. As explained in the direct testimony of Allison P. Lofton at page 10 and in Exhibit GD-5 (Exhibit A), the design life of MCPS is 30 years, which is the useful life ETI has assumed for depreciation purposes.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 51381

Response of: Entergy Texas, Inc.	Prepared By: John Bearden/ Joshua Paternostro
to the First Set of Data Requests of Requesting Party: Commission Staff	Sponsoring Witness: Allison P. Lofton Beginning Sequence No. LR277 Ending Sequence No. LR277

Question No.: STAFF 1-4 Part No.: Addendum:

Question:

What is the total projected cost of completion for MCPS? How much of this total projected cost has ETI incurred as of the filing of the application in this docket?

Response:

The total projected cost of completion for MCPS remains as originally estimated at approximately $921.1 million. Of this total estimate, the Generation portion to be included in the GCRR is projected to be $812.6 million (see the Company's response to TIEC 1-4 for the total amount to be included in the 60-day update period).

In its application, ETI included its actually incurred MCPS-related generation invested capital through August 31, 2020 of approximately $690 million (see Schedule II Plant in Service). As of October 5, 2020, when ETI filed its application, ETI's actually incurred MCPS-related generation invested capital (through September 30, 2020) was approximately $724 million.