



Control Number: 52067



Item Number: 16

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-2424
PUC DOCKET NO. 52067

2021 JUN 10 PM 3:53
FILED
CLERK

APPLICATION OF ENTERGY TEXAS, § BEFORE THE STATE OFFICE
INC. TO ADJUST ITS ENERGY §
EFFICIENCY COST RECOVERY § OF
FACTOR AND REQUEST TO ESTABLISH §
REVISED COST CAPS § ADMINISTRATIVE HEARINGS

RESPONSE OF ENTERGY TEXAS, INC.
TO STAFF'S FIRST REQUEST FOR INFORMATION:
STAFF 1: 1 THROUGH 11

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,

Miguel Suazo
Senior Counsel
ENTERGY SERVICES, LLC
919 Congress Avenue, Suite 701
Austin, Texas 78701
(512) 487-3961 telephone
(512) 487-3958 facsimile

Attachments: STAFF 1:1 THROUGH 11

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 10th day of June 2021.

Miguel Suazo
Miguel Suazo

14

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: John H. Bearden
Sponsoring Witness: J. Andrew Lewis Jr.
Beginning Sequence No. TH1
Ending Sequence No. TH1

Question No.: STAFF 1-1

Part No.:

Addendum:

Question:

Please confirm that Entergy Texas, Inc. (ETI or the Company) has removed all EECRF costs from its base rates. Please provide a detailed explanation.

Response:

Confirm.

In Docket No. 48371, ETI's most recent base rate proceeding, the costs associated with ETI's Energy Efficiency programs were removed from base rates through the pro forma adjustments listed below.

- Pro forma adjustment "AJ 16I Energy Efficiency Program – Direct" removed Energy Efficiency expense directly incurred by ETI.
- Pro forma adjustment "AJ 21B Affiliate Energy Efficiency" removed affiliate Energy Efficiency expenses that were allocated to ETI.

The adjustments are located in Docket No. 48371, ETI's Statement of Intent and Application for Authority to Change Rates, at Schedule_P Workpapers COS Vol 2 (May 15, 2018).

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: J. Andrew Lewis, Jr.
Sponsoring Witness: J. Andrew Lewis, Jr.
Beginning Sequence No. TH2
Ending Sequence No. TH2

Question No.: STAFF 1-2

Part No.:

Addendum:

Question:

Please confirm that the Company removed all incentive compensation costs-both financially based and non-financially based incentive compensation costs-from its request in this docket for the 2020, 2021, and 2022 energy efficiency program years. Please provide a detailed explanation.

Response:

The Company has removed all financially based incentive compensation costs from its request in this docket for the 2020, 2021, and 2022 program years.

In addition, ETI has identified \$149.62 of taxes on financially based incentive compensation amounts that was inadvertently included in the Company's request in this proceeding. The Company agrees to remove this amount.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: J. Andrew Lewis, Jr.
Sponsoring Witness: J. Andrew Lewis, Jr.
Beginning Sequence No. TH3
Ending Sequence No. TH3

Question No.: STAFF 1-3

Part No.:

Addendum:

Question:

Please refer to Exhibit JAL-3 and Cell I18. Please provide a worksheet showing the calculation or derivation of the amount of (\$16,277) for interest on over-recovery of the EECRF.

Response:

The calculation for the (\$16,277) amount is provided as part of Exhibit JAL-1, page 4 of 6 (Tab "TUA Calculation"). The (\$16,277) figure represents the total of the 2020 and 2021 interest figures on the total over/under recovery, which are approximately (\$11,994) (Cell V23) and (\$4,283) (Cell X23) respectively.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: Mark Delavan
Sponsoring Witness: J. Andrew Lewis, Jr.
Beginning Sequence No. TH4
Ending Sequence No. TH4

Question No.: STAFF 1-4

Part No.:

Addendum:

Question:

Please provide roll-up schedules for the rate-case expenses that the Company is requesting in this proceeding. Please provide amounts for services by month and for expenses by expense category (payroll, courier services, travel, etc.) by month.

Response:

Please see attachment.

ETI has identified \$149.62 of taxes on financially-based incentive compensation amounts that was inadvertently included in the Company's request in this proceeding. The Company agrees to remove this amount.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: Counsel
Sponsoring Witness: J. Andrew Lewis, Jr.
Beginning Sequence No. TH5
Ending Sequence No. TH5

Question No.: STAFF 1-5

Part No.:

Addendum:

Question:

Please provide supporting documentation---consistent with the requirements of 16 Texas Administrative Code § 25.245 for rate-case expenses-for all amounts for rate-case expenses for which ETI seeks recovery in this proceeding. Please provide timesheets and all monthly billings from outside companies with hours logged and descriptions of the work performed.

Response:

Please refer to the Company's response to Staff RFI Nos. 1-6 and 1-7.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: Counsel
Sponsoring Witness: N/A
Beginning Sequence No. TH11
Ending Sequence No. TH37

Question No.: STAFF 1-6

Part No.:

Addendum:

Question:

Refer to the Affidavit of Miguel Suazo (found on pages 138 through 143 of the PDF of the Application). Please provide a copy of Attachment 1 to the affidavit, which was referred to in the affidavit but was not included in the Application.

Response:

See attached.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: J. Andrew Lewis, Jr.
Sponsoring Witness: J. Andrew Lewis, Jr.
Beginning Sequence No. LR1
Ending Sequence No. LR3

Question No.: STAFF 1-7

Part No.:

Addendum:

Question:

Please provide supporting documentation---consistent with the requirements of 16 Texas Administrative Code § 25.245 for rate-case expenses and the statutory requirements for affiliate expenses---for the \$23,532.84 of affiliate rate-case expenses for which ETI seeks recovery in this proceeding ($\$22,944.91 + \$587.93 = \$23,532.84$). Please provide timesheets and all monthly billings from the service company to ETI with project codes and project code descriptions. Please indicate how many employees worked on the EECRF and descriptions of the work performed.

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 refer to the direct testimony of J. Andrew Lewis, Jr., Questions 23-36 and Exhibit JAL-5, for supporting descriptions and documentation of the EECRF affiliate expenses in accordance with the requirements of 16 Texas Admin. Code (“TAC”) § 25.245 and the statutory requirements for affiliate expenses. Mr. Lewis’s response to Question 29 addresses requirements of 16 TAC § 25.245 and his response to Question 31 addresses specific requirements of PURA § 36.058, which concerns payments to affiliates. Exhibit JAL-5 details the total charges to ETI by FERC Account and affiliate class and it documents the exclusion of prohibited charges. As referenced in Mr. Lewis’s response to Question 29, the affidavit of Entergy Services, LLC (“ESL”) Senior Counsel Miguel Suazo, which is included with the Company’s application, provides further support for the requested expenses, by documenting the scope and complexity of the case as required by 16 TAC § 25.245. Please also refer to the Company’s response to Staff 1-6 for Attachment 1 to Mr. Suazo’s affidavit.

Mr. Lewis’s response to Questions 25 and 30 contain detailed descriptions of the work performed by Entergy Services, LLC employees related to the 2020 EECRF filing, including the preparation of ETI’s application and supporting testimony; the preparation of legal pleadings required as part of the litigation of the case; the development of ETI’s

Question No.: STAFF 1-7

case strategy; and responses to discovery. Personnel charging to these project codes include ESL attorneys and ESL regulatory services personnel who help prepare the exhibits and rate schedules necessary for the EECRF application.

There were 8 ESL employees who worked on the EECRF during 2020. Please see the attached files for detailed support of the affiliate rate-case expenses, including timesheets and monthly billings.

Additionally, ETI has identified \$149.62 of taxes on financially based incentive compensation amounts that was inadvertently included in the Company's request in this proceeding. The Company agrees to remove this amount.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO
PARAGRAPH 4 OF DOCKET NO. 52067 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.

Erika N. Garcia
Entergy Services, Inc.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: John H. Bearden
Sponsoring Witness: J. Andrew Lewis, Jr.
Beginning Sequence No. TH7
Ending Sequence No. TH7

Question No.: STAFF 1-8

Part No.:

Addendum:

Question:

Please confirm that the \$23,532.84 of affiliate rate-case expenses for which ETI seeks recovery in this proceeding is not already included in base rates.

Response:

Confirm.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: J. Andrew Lewis, Jr.
Sponsoring Witness: J. Andrew Lewis, Jr.
Beginning Sequence No. TH8
Ending Sequence No. TH8

Question No.: STAFF 1-9

Part No.:

Addendum:

Question:

Please identify all affiliate expenses for which the Company is seeking recovery in this docket. (Are there any affiliate expenses besides the amounts of \$22,944.91 and \$587.93 as identified in the direct testimony of Jay Andrew Lewis, Jr.?) Please provide FERC accounts for any affiliate expenses not included on Exhibit JAL-5. Please provide project codes and work order numbers for all affiliate expenses requested in this docket.

Response:

All affiliate expenses that are included for recovery in ETI's EECRF filing are detailed in Exhibit JAL-5. There are no other affiliate expenses for which ETI is seeking recovery. Please see the Direct Testimony of Jay Andrew Lewis, Jr. at pages 10-16 for a discussion of the project codes for affiliate expenses. There are no work order numbers associated with these affiliate expenses.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: J. Andrew Lewis, Jr.
Sponsoring Witness: J. Andrew Lewis, Jr.
Beginning Sequence No. TH9
Ending Sequence No. TH9

Question No.: STAFF 1-10

Part No.:

Addendum:

Question:

What amount of affiliate expense is included in ETI's annual revenue requirement? What procedures did ETI follow to ensure that affiliate expenses requested in this proceeding are not already being recovered in annual base rates?

Response:

Please see the Direct Testimony of Jay Andrew Lewis Jr. at page 10, and the Company's response to Staff's RFI Number 1-9. The expenses referenced in the Company's response to 1-9 are the only affiliate expenses included in ETI's annual revenue requirement. ETI ensured that the affiliate expenses requested in this proceeding were not already being recovered in ETI's base rates by removing the expenses in the project codes containing the affiliate costs that were already being recovered through ETI's base rates.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 52067

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

Prepared By: J. Andrew Lewis, Jr.
Sponsoring Witness: J. Andrew Lewis, Jr.
Beginning Sequence No. TH10
Ending Sequence No. TH10

Question No.: STAFF 1-11

Part No.:

Addendum:

Question:

Does the Company's requested EECRF affiliate expenses include amounts for carrying charges on shared assets? If so, please provide the amount of carrying charges by category, such as depreciation, equity, and debt.

Response:

No.