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

2021 JUN 23 PM 2:11

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 SECOND REQUEST FOR INFORMATION:
STAFF 2: 1, 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,

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 2:1, 2

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to STAFF's Second 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 23rd day of June 2021.

Miguel Suazo
Miguel Suazo

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

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

Prepared By: Mark Delavan
Sponsoring Witness: John K. Carson
Beginning Sequence No. LR176
Ending Sequence No. LR343

Question No.: STAFF 2-1

Part No.:

Addendum:

Question:

Please provide a detailed breakdown of the administrative, research, and development costs outlined in Exhibit JKC-01, Table 10, at 19 for the 2020 program year. Provide copies of applicable invoices and contracts.

Response:

Please refer to Exhibit JKC-10 to the Direct Testimony of John K. Carson for a detailed breakdown of the 2020 Administrative and Research and Development (“R&D”) costs, and page 21 of Exhibit JKC-01 to the Direct Testimony of John K. Carson for additional descriptions of these costs. Please note that the R&D costs shown at the bottom of Exhibit JKC-10 are a subset of the “Grand Total” amount of Administrative costs shown in that exhibit. Please also see the attachments to this response for copies of invoices and contracts.

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

Prepared By: Mark Delavan
Sponsoring Witness: John K. Carson
Beginning Sequence No. LR344
Ending Sequence No. LR345

Question No.: STAFF 2-2

Part No.:

Addendum:

Question:

Please provide a detailed breakdown of the research and development costs proposed for the 2021 and 2022 program years outlined in Exhibit JKC-01, Table 6, at 15. Provide copies of applicable contracts.

Response:

The Research & Development (“R&D”) costs for the 2021 and 2022 program years are broken down into two categories: (1) the energy efficiency database costs; and (2) the online energy efficiency marketplace program costs.

The database costs make up \$22,000 of the \$47,000 total budgeted under the “Admin” column in Exhibit JKC-01, Table 6. Pursuant to ETI’s contract with Frontier Energy, the total annual cost to maintain the database is \$140,000. In Docket No. 47115, at Staff’s request, ETI agreed to charge 80% of the costs associated with the database to Administrative costs and 20% to R&D costs on an annual basis. As part of its Errata No. 2 in that docket, ETI updated Table 6 to reflect this agreement and included \$22,000 as R&D costs. Each of ETI’s EECRF filings since 2017 have shown this \$22,000 amount for R&D costs associated with the maintenance of the database. However, ETI notes that the correct amount of R&D costs budgeted for the database in Table 6 should be \$28,000, as that is 20% of \$140,000. ETI will include the correct amount of \$28,000 in Table 6 of its 2022 Energy Efficiency Plan and Report. Although ETI has under-collected the cost of the database costs in its EECRF for program years since 2017, the total cost has subsequently been addressed in the over-under calculations for the following program years since 2017.

The online energy efficiency marketplace pilot program has \$75,000 budgeted under the “Incentive” column and \$25,000 budgeted under the “Admin” column in Exhibit JKC-01, Table 6 as part of the total \$100,000 R&D budget.

Program	R&D Incentive	R&D Admin	R&D Budget
P3 Database Improvement	\$0	\$22,000	\$22,000
Online Marketplace Pilot	\$75,000	\$25,000	\$100,000
Total:	\$75,000	\$47,000	\$122,000

Question No.: STAFF 2-2

Please refer to the attachments to Staff 2-1 for copies of ETI's contracts with Frontier Energy.