

Program Incentives (These columns will auto-populate)			Program Specific Admin: <i>Enter Manually</i>			Total Admin Calculation (Excluding Bonus) Allocated based on Total Incentives: <i>Enter Values in cells C22, C23, C25 and results will auto-populate</i>					Total Admin Cost Effectiveness Calculation (Including Bonus) Allocated based on Program Costs:			
Program	Incentives	Incentive as % of Total Incentives (R&D/Other Admin Allocators)	Program Specific Admin (Do not include the costs paid by a utility for an EECRF proceeding here; these values are exempt from the CE test)	Program Specific R&D	Program Specific EM&V Admin (TetraTech Allocation not actual expenditures)	R&D/Other Admin Portion	EM&V Costs	Costs Paid by a Utility for an EECRF Proceeding (to be included in Total Admin for Bonus Calculation)	Total Admin for Bonus Calculation (Excluding Bonus)	Total Program Costs (EPR)	Program Costs as % of Total Spending (Bonus Allocator)	Bonus Portion (Enter value in C24)	Total Admin for Cost- effectiveness Calculation (Including Bonus)	Total Program Costs (Cost Effectiveness)
Commercial Solutions	\$ 2,569,181	43.48%	\$ 239,123.70	\$ 25,762.53	\$ 39,804.41	\$ -	\$ -	\$ 4,069.71	\$ 308,760.36	\$ 2,877,941.79	42.75%	\$ 715,269.43	\$ 1,019,960.08	\$ 3,589,141.51
Load Management	\$ 151,873	2.57%	\$ 30,097.21	\$ 1,522.91	\$ 9,447.06	\$ -	\$ -	\$ 240.57	\$ 41,307.75	\$ 193,180.25	2.87%	\$ 48,012.06	\$ 89,079.24	\$ 240,951.74
Residential SOP	\$ 1,556,896	26.35%	\$ 161,797.18	\$ 15,611.81	\$ 10,778.18	\$ -	\$ -	\$ 2,446.20	\$ 200,651.47	\$ 1,757,549.07	26.11%	\$ 436,812.56	\$ 634,999.83	\$ 2,191,895.43
Residential Solutions	\$ 747,075	12.64%	\$ 91,254.68	\$ 7,491.31	\$ 19,962.70	\$ -	\$ -	\$ 1,183.40	\$ 119,892.09	\$ 866,966.78	12.88%	\$ 215,471.64	\$ 334,180.32	\$ 1,081,255.01
Hard-To-Reach SOP	\$ 883,881	14.96%	\$ 126,307.86	\$ 8,863.14	\$ 16,187.92	\$ -	\$ -	\$ 1,400.11	\$ 152,759.03	\$ 1,036,639.72	15.40%	\$ 257,641.31	\$ 409,000.23	\$ 1,292,880.92
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Portfolio Total	\$ 5,908,905	100%	\$ 648,580.63	\$ 59,251.70	\$ 106,180.37	\$ -	\$ -	\$ 9,360.00	\$ 823,372.70	\$ 6,732,277.61	100%	\$ 1,673,207.00	\$ 2,487,219.70	\$ 8,396,124.61

Other Costs to Be Allocated Among All Programs Enter Blue Cells Manually; Green Will Autocalculate if Step 1 completed:		PUC Rule: How to allocate non-program specific expenses	
R&D and Non-program specific Admin to be Allocated <i>(Rate Case Expenses Details: Include any costs incurred by the utility for an EECRF filing here unless they have already been included in the program specific admin in column F. Do not include the costs paid by a utility for an EECRF proceeding here; these values are exempt from the CE test. Enter those costs separately in cell C25 below.)</i>		(i) Any portion of these costs which are not directly assignable to a specific program shall be allocated among the programs in proportion to the program incentive costs. Any bonus awarded by the commission shall not be included in program costs for the purpose of applying these limits.	
Third party EM&V Costs (Ex: Frontier EM&V; counted as admin)		(j) Any portion of these costs which are not directly assignable to a specific program shall be allocated among the programs in proportion to the program incentive costs. Any bonus awarded by the commission shall not be included in program costs for the purpose of applying these limits.	
Bonus for Cost-effectiveness (bonus collected during the PY)		(k) The bonus shall be allocated in proportion to the program costs associated with meeting the demand and energy goals and allocated to eligible customers on a rate class basis.	
Costs Paid by a Utility for an EECRF Proceeding <i>(To be included as admin in the "total program cost" input for the Bonus calculation in Step 4)</i>		These are costs to be included as admin in the "total program cost" for the bonus calculation (per the preamble pg 150). Please note these values are excluded from the cost-effectiveness test (per the preamble and email from Kate Rich). This is why they are not included in either the program-specific admin values or the non-program specific admin in other cells on this tab.	
	\$ 1,673,207.00		
	\$ 9,360.00		

Program Year 2020		
Energy Efficiency Performance Bonus Calculator		
	kW	kWh
Demand and Energy Goals	15,500	27,156,000
Actual Demand and Energy Savings	20,008	44,885,306
<i>Reported/Verified Hard-to-Reach</i>	1,768	
Program Costs (excluding bonus)	\$6,732,278	
Program Costs (including bonus)	\$8,405,485	
Performance Bonus	\$4,704,294	

Directions:

Fill in blue cell and performance bonus will calculate.

All green cells will auto-populate

All inputs must be accounted for the in the "Fixed Inputs," "Admin Allocation," and "Results Calculator" tabs in order to correctly calculate bonus.

11%	Hard-to-Reach Goal Met?
	Bonus Calculation Details
129%	Percentage of Demand Reduction Goal Met (Reported kW/Goal kW)
165%	Percentage of Energy Reduction Goal Met (Reported kWh/Goal kWh)
TRUE	Met Requirements for Performance Bonus?
\$55,448,426	Total Avoided Costs
\$8,405,485	Total Program Costs (including bonus)
\$47,042,941	Net Benefits
\$6,840,270	Calculated Bonus (((Achieved Demand Reduction/Demand Goal - 100%) / 2) * Net Benefits)
\$4,704,294	Maximum Bonus Allowed (10% of Net Benefits)

Residential & Commercial EULs					
Sector	TRM Measure	DO NOT DELETE, FOR SEARCH Step 2.1.6	Energy Efficiency Measure	EUL (years)	TRM Version
Custom	NA	1	Custom	NA	NA
Residential	2.1.1	2	Res Standard Compact Fluorescent Lamps (Standard Baseline)	8.0	7.0
Residential	2.1.1	3	Res Standard Compact Fluorescent Lamps (Low Income Baseline)	10.0	7.0
Residential	2.1.2	4	Res Specialty Compact Fluorescent Lamps (Standard Baseline)	8.0	7.0
Residential	2.1.2	5	Res Specialty Compact Fluorescent Lamps (Low Income Baseline)	10.0	7.0
Residential	2.1.3	6	Res ENERGY STAR Omni-Directional LED Lamps (Standard Baseline)	8.0	7.0
Residential	2.1.3	7	Res ENERGY STAR Omni-Directional LED Lamps (Low Income Baseline)	10.0	7.0
Residential	2.1.4	8	Res ENERGY STAR Specialty and Directional LED Lamps (Standard Baseline)	8.0	7.0
Residential	2.1.4	9	Res ENERGY STAR Specialty and Directional LED Lamps (Low Income Baseline)	10.0	7.0
Residential	2.2.1	10	Res Air Conditioner or Heat Pump Tune-Up	5.0	7.0
Residential	2.2.2	11	Res Duct Efficiency Improvement	18.0	7.0
Residential	2.2.3	12	Res Ground Source Heat Pump	20.0	7.0
Residential	2.2.4	13	Res Central Air Conditioners	18.0	7.0
Residential	2.2.4	14	Res Central Heat Pump	15.0	7.0
Residential	2.2.5	15	Res Mini-Split Air Conditioners	18.0	7.0
Residential	2.2.5	16	Res Mini-Split Heat Pump	15.0	7.0
Residential	2.2.6	17	Res Large Capacity Split System & Single-Package Air Conditioners	18.0	7.0
Residential	2.2.6	18	Res Large Capacity Split System & Single-Package Heat Pumps	15.0	7.0
Residential	2.2.6	19	Res Large Capacity Split System & Single-Package Ground Source Heat Pumps	20.0	7.0
Residential	2.2.7	20	Res Packaged Terminal Heat Pumps (PTHP)	15.0	7.0
Residential	2.2.8	21	Res Room Air Conditioner (Window)	8.0	7.0
Residential	2.2.9	22	Res ENERGY STAR Connected Thermostats	11.0	7.0
Residential	2.2.10	23	Res Smart Thermostat Demand Response	1.0	7.0
Residential	2.2.11	24	Res Evaporative Cooling	15.0	7.0
Residential	2.3.1	25	Res Air Infiltration	11.0	7.0
Residential	2.3.2	26	Res Ceiling Insulation	25.0	7.0
Residential	2.3.3	27	Res Attic Encapsulation	25.0	7.0
Residential	2.3.4	28	Res Wall Insulation	25.0	6.0
Residential	2.3.5	29	Res Floor Insulation	25.0	7.0
Residential	2.3.6	30	Res ENERGY STAR Windows	25.0	7.0
Residential	2.3.7	31	Res Solar Screens	10.0	7.0
Residential	2.3.8	32	Res Cool Roofs	15.0	7.0
Residential	2.4.1	33	Res Faucet Aerators	10.0	7.0
Residential	2.4.2	34	Res Low-Flow Showerheads	10.0	7.0
Residential	2.4.3	35	Res Water Heater Pipe Insulation	13.0	7.0
Residential	2.4.4	36	Res Water Heater Tank Insulation	7.0	7.0
Residential	2.4.5	37	Res Water Heater Installation - Tankless	20.0	7.0
Residential	2.4.5	38	Res Water Heater Installation - Fuel Substitution	11.0	7.0
Residential	2.4.6	39	Res Heat Pump Water Heater	13.0	7.0
Residential	2.4.7	40	Res Solar Water Heater	15.0	7.0
Residential	2.4.8	41	Res Showerhead Temperature Sensitive Restrictor Valves	10.0	7.0
Residential	2.4.9	42	Res Tub Spout & Showerhead Temperature Sensitive Restrictor Valves	10.0	7.0
Residential	2.5.1	43	Res ENERGY STAR Ceiling Fans	10.0	7.0
Residential	2.5.2	44	Res ENERGY STAR Clothes Washer	11.0	7.0
Residential	2.5.3	45	Res ENERGY STAR Clothes Dryers	16.0	7.0
Residential	2.5.4	46	Res ENERGY STAR Dishwashers	15.0	7.0
Residential	2.5.5	47	Res ENERGY STAR Refrigerators	16.0	7.0
Residential	2.5.6	48	Res ENERGY STAR Freezers	22.0	7.0

Custom

Res Standard Compact Fluorescent Lamps (Standard Baseline)

Res Standard Compact Fluorescent Lamps (Low Income Baseline)

Res Specialty Compact Fluorescent Lamps (Standard Baseline)

Res Specialty Compact Fluorescent Lamps (Low Income Baseline)

Res ENERGY STAR Omni-Directional LED Lamps (Standard Baseline)

Res ENERGY STAR Omni-Directional LED Lamps (Low Income Baseline)

Res ENERGY STAR Specialty and Directional LED Lamps (Standard Baseline)

Res ENERGY STAR Specialty and Directional LED Lamps (Low Income Baseline)

Res Air Conditioner or Heat Pump Tune-Up

Res Duct Efficiency Improvement

Res Ground Source Heat Pump

Res Central Air Conditioners

Res Central Heat Pump

Res Mini-Split Air Conditioners

Res Mini-Split Heat Pump

Res Large Capacity Split System & Single-Package Air Conditioners

Res Large Capacity Split System & Single-Package Heat Pumps

Res Large Capacity Split System & Single-Package Ground Source Heat Pumps

Res Packaged Terminal Heat Pumps (PTHP)

Res Room Air Conditioner (Window)

Res ENERGY STAR Connected Thermostats

Res Smart Thermostat Demand Response

Res Evaporative Cooling

Res Air Infiltration

Res Ceiling Insulation

Res Attic Encapsulation

Res Wall Insulation

Res Floor Insulation

Res ENERGY STAR Windows

Res Solar Screens

Res Cool Roofs

Res Faucet Aerators

Res Low-Flow Showerheads

Res Water Heater Pipe Insulation

Res Water Heater Tank Insulation

Res Water Heater Installation - Tankless

Res Water Heater Installation - Fuel Substitution

Res Heat Pump Water Heater

Res Solar Water Heater

Res Showerhead Temperature Sensitive Restrictor Valves

Res Tub Spout & Showerhead Temperature Sensitive Restrictor Valves

Res ENERGY STAR Ceiling Fans

Res ENERGY STAR Clothes Washer

Res ENERGY STAR Clothes Dryers

Res ENERGY STAR Dishwashers

Res ENERGY STAR Refrigerators

Res ENERGY STAR Freezers

Residential	2 5 7	49	Res ENERGY STAR Pool Pumps	10 0	7 0	Res ENERGY STAR Pool Pumps
Residential	2 5 8	50	Res ENERGY STAR Air Purifiers	9 0	7 0	Res ENERGY STAR Air Purifiers
Residential	2 5 9	51	Res Advanced Power Strips	10 0	7 0	Res Advanced Power Strips
Residential	2 5 10	52	Res ENERGY STAR Electric Vehicle Supply Equipment (EVSE)	10 0	7 0	Res ENERGY STAR Electric Vehicle Supply Equipment (EVSE)
Residential	2 5 11	53	Res Solar Attic Fans	15 0	7 0	Res Solar Attic Fans
Residential	2 6 1	54	Res Refrigerator/Freezer Recycling	8 0	7 0	Res Refrigerator/Freezer Recycling
Commercial	2 1 1	55	Comm Lamps and Fixtures Halogen Lamps	1 5	7 0	Comm Lamps and Fixtures Halogen Lamps
Commercial	2 1 1	56	Comm Lamps and Fixtures High Intensity Discharge Lamps	15 5	7 0	Comm Lamps and Fixtures High Intensity Discharge Lamps
Commercial	2 1 1	57	Comm Lamps and Fixtures Integrated-ballast CCFL Lamps	4 5	7 0	Comm Lamps and Fixtures Integrated-ballast CCFL Lamps
Commercial	2 1 1	58	Comm Lamps and Fixtures Integrated-ballast CFL Lamps	2 5	7 0	Comm Lamps and Fixtures Integrated-ballast CFL Lamps
Commercial	2 1 1	59	Comm Lamps and Fixtures Integral LED Lamps	9 0	7 0	Comm Lamps and Fixtures Integral LED Lamps
Commercial	2 1 1	60	Comm Lamps and Fixtures LED Fixtures	15 0	7 0	Comm Lamps and Fixtures LED Fixtures
Commercial	2 1 1	61	Comm Lamps and Fixtures LED Corn Cob	15 0	7 0	Comm Lamps and Fixtures LED Corn Cob
Commercial	2 1 1	62	Comm Lamps and Fixtures LED Tubes	15 0	7 0	Comm Lamps and Fixtures LED Tubes
Commercial	2 1 1	63	Comm Lamps and Fixtures Modular CFL and CCFL Fixtures	16 0	7 0	Comm Lamps and Fixtures Modular CFL and CCFL Fixtures
Commercial	2 1 1	64	Comm Lamps and Fixtures T8 and T5 Linear Fluorescents	15 5	7 0	Comm Lamps and Fixtures T8 and T5 Linear Fluorescents
Commercial	2 1 2	65	Comm Lighting Controls Occupancy Sensor	10 0	7 0	Comm Lighting Controls Occupancy Sensor
Commercial	2 1 2	66	Comm Lighting Controls Photocell (Daylighting Control)	10 0	7 0	Comm Lighting Controls Photocell (Daylighting Control)
Commercial	2 1 2	67	Comm Lighting Controls Timeclock	10 0	7 0	Comm Lighting Controls Timeclock
Commercial	2 1 2	68	Comm Lighting Controls Tuning Control	10 0	7 0	Comm Lighting Controls Tuning Control
Commercial	2 1 3	69	Comm LED Traffic Signals (8" & 12" Red Green & Yellow)	6 0	7 0	Comm LED Traffic Signals (8" & 12" Red, Green, & Yellow)
Commercial	2 1 3	70	Comm LED Traffic Signals (Large Pedestrian Signal)	5 0	7 0	Comm LED Traffic Signals (Large Pedestrian Signal)
Commercial	2 1 3	71	Comm LED Traffic Signals (Small Pedestrian Signal)	5 0	7 0	Comm LED Traffic Signals (Small Pedestrian Signal)
Commercial	2 2 1	72	Comm Air Conditioner or Heat Pump Tune-Up	5 0	7 0	Comm Air Conditioner or Heat Pump Tune-Up
Commercial	2 2 2	73	Comm Split System/Single Packaged Air Conditioners & Heat Pumps	15 0	7 0	Comm Split System/Single Packaged Air Conditioners & Heat Pumps
Commercial	2 2 3	74	Comm HVAC Chillers Screw / Scroll / Reciprocating Chillers	20 0	7 0	Comm HVAC Chillers Screw / Scroll / Reciprocating Chillers
Commercial	2 2 3	75	Comm HVAC Chillers Centrifugal Chillers	25 0	7 0	Comm HVAC Chillers Centrifugal Chillers
Commercial	2 2 4	76	Comm Packaged Terminal Air Conditioners & Heat Pumps	15 0	7 0	Comm Packaged Terminal Air Conditioners & Heat Pumps
Commercial	2 2 4	77	Comm Packaged Terminal Room Air Conditioners	11 0	7 0	Comm Packaged Terminal Room Air Conditioners
Commercial	2 2 5	78	Comm HVAC VFD (AHU)	15 0	7 0	Comm HVAC VFD (AHU)
Commercial	2 2 5	79	Comm HVAC VFD (Hot Water Pumps)	15 0	7 0	Comm HVAC VFD (Hot Water Pumps)
Commercial	2 2 5	80	Comm HVAC VFD (Chilled Water Pumps)	15 0	7 0	Comm HVAC VFD (Chilled Water Pumps)
Commercial	2 2 6	81	Comm Condenser Air Evaporative Pre-Cooling	15 0	7 0	Comm Condenser Air Evaporative Pre-Cooling
Commercial	2 2 7	82	Comm Computer Room Air Conditioners	15 0	7 0	Comm Computer Room Air Conditioners
Commercial	2 2 8	83	Comm High-Volume Low-Speed (HVLS) Fans	9 0	7 0	Comm High-Volume Low-Speed (HVLS) Fans
Commercial	2 3 1	84	Comm ENERGY STAR Roofs	15 0	7 0	Comm ENERGY STAR Roofs
Commercial	2 3 2	85	Comm Window Treatments (Film)	10 0	7 0	Comm Window Treatments (Film)
Commercial	2 3 3	86	Comm Entrance & Exit Door Air Infiltration	11 0	7 0	Comm Entrance & Exit Door Air Infiltration
Commercial	2 4 1	87	Comm ENERGY STAR Combination Ovens	12 0	7 0	Comm ENERGY STAR Combination Ovens
Commercial	2 4 2	88	Comm ENERGY STAR Electric Convection Ovens	12 0	7 0	Comm ENERGY STAR Electric Convection Ovens
Commercial	2 4 3	89	Comm ENERGY STAR Commercial Dishwashers	11 0	7 0	Comm ENERGY STAR Commercial Dishwashers
Commercial	2 4 4	90	Comm ENERGY STAR Hot Food Holding Cabinets	12 0	7 0	Comm ENERGY STAR Hot Food Holding Cabinets
Commercial	2 4 5	91	Comm ENERGY STAR Electric Fryers	12 0	7 0	Comm ENERGY STAR Electric Fryers
Commercial	2 4 6	92	Comm Pre-Rinse Spray Valves	5 0	7 0	Comm Pre-Rinse Spray Valves
Commercial	2 4 7	93	Comm ENERGY STAR Electric Steam Cookers	12 0	7 0	Comm ENERGY STAR Electric Steam Cookers
Commercial	2 4 8	94	Comm Demand Controlled Kitchen Ventilation	15 0	7 0	Comm Demand Controlled Kitchen Ventilation
Commercial	2 4 9	95	Comm Commercial Ice Maker	8 5	7 0	Comm Commercial Ice Maker
Commercial	2 5 1	96	Comm Door Heater Controls	12 0	7 0	Comm Door Heater Controls
Commercial	2 5 2	97	Comm ECM Evaporator Fan Motor	15 0	7 0	Comm ECM Evaporator Fan Motor
Commercial	2 5 3	98	Comm Electronic Defrost Controls	10 0	7 0	Comm Electronic Defrost Controls
Commercial	2 5 4	99	Comm Evaporator Fan Controls	16 0	7 0	Comm Evaporator Fan Controls

Commercial	2 5 5	100	Comm Night Covers for Open Refrigerated Display Cases	5 0	7 0	Comm Night Covers for Open Refrigerated Display Cases
Commercial	2 5 6	101	Comm Solid and Glass Door Reach-Ins	12 0	7 0	Comm Solid and Glass Door Reach-Ins
Commercial	2 5 7	102	Comm Strip Curtains for Walk-In Refrigerated Storage	4 0	7 0	Comm Strip Curtains for Walk-In Refrigerated Storage
Commercial	2 5 8	103	Comm Zero Energy Doors for Refrigerated Cases	12 0	7 0	Comm Zero Energy Doors for Refrigerated Cases
Commercial	2 5 9	104	Comm Door Gaskets for Walk-in & Reach-in Coolers & Freezers	4 0	7 0	Comm Door Gaskets for Walk-in & Reach-in Coolers & Freezers
Commercial	2 6 1	105	Comm Vending Machine Controls	5 0	7 0	Comm Vending Machine Controls
Commercial	2 6 2	106	Comm Lodging Guest Room Occupancy Sensor Controls	10 0	7 0	Comm Lodging Guest Room Occupancy Sensor Controls
Commercial	2 6 3	107	Comm Pump-Off Controller	15 0	7 0	Comm Pump-Off Controller
Commercial	2 6 4	108	Comm ENERGY STAR Pool Pumps	10 0	7 0	Comm ENERGY STAR Pool Pumps
Commercial	2 6 5	109	Comm Computer Power Management	3 0	7 0	Comm Computer Power Management
Commercial	2 6 6	110	Comm Premium Efficiency Motors	15 0	7 0	Comm Premium Efficiency Motors
Commercial	2 6 7	111	Comm Central Domestic Hot Water (DHW) Controls	15 0	7 0	Comm Central Domestic Hot Water (DHW) Controls
M&V	2 1 1	112	M&V Air Conditioning Tune-Up	5 0	7 0	M&V Air Conditioning Tune-Up
M&V	2 1 2	113	M&V Ground Source Heat Pump	15 0	7 0	M&V Ground Source Heat Pump
M&V	2 1 3	114	M&V Variable Refrigerant Flow Systems	15 0	7 0	M&V Variable Refrigerant Flow Systems
M&V	2 2 1	115	M&V New Homes	23 0	7 0	M&V New Homes
M&V	2 3 1	116	M&V Comm Solar Photovoltaic (PV)	30 0	7 0	M&V Comm Solar Photovoltaic (PV)
M&V	2 3 2	117	M&V Res Solar Photovoltaic (PV)	30 0	7 0	M&V Res Solar Photovoltaic (PV)
M&V	2 3 3	118	M&V Solar Shingles	30 0	7 0	M&V Solar Shingles
M&V	2 4 1	119	M&V Comm Behavioral	1 0	7 0	M&V Comm Behavioral
M&V	2 4 2	120	M&V Air Compressors < 75 hp	10 0	7 0	M&V Air Compressors < 75 hp
M&V	2 4 3	121	M&V Comm Retro-Commissioning	5 0	7 0	M&V Comm Retro-Commissioning
M&V	2 4 4	122	M&V Thermal Energy Storage	15 0	7 0	M&V Thermal Energy Storage
M&V	2 5 1	123	M&V Res Load Curtailment	1 0	7 0	M&V Res Load Curtailment
M&V	2 5 2	124	M&V Comm Load Curtailment	1 0	7 0	M&V Comm Load Curtailment
M&V	X	125	M&V Project - 15 EUL	15		M&V Project - 15 EUL
M&V	X	126	M&V Project - 2 9 EUL	2 9		M&V Project - 2 9 EUL
M&V	X	127	Old Measure - 8 5 EUL	8 5		Old Measure - 8 5 EUL
M&V	X	128	M&V Project - 10 EUL	10		M&V Project - 10 EUL

							Grand Total
	F3PCR56902	F3PCR56903	F3PCR56904	F3PCR56905	F3PCR56906	F3PPR56917	
Labor & Benefits	\$ 13,189	\$ 39,080	\$ 39,112	\$ 89,187	\$ 46,811	\$ 20,354	\$ 247,733
003 - Salaries & Wages - Exempt	\$ 9,245	\$ 28,003	\$ 28,025	\$ 64,435	\$ 33,285	\$ 14,592	\$ 177,586
007 - Payroll Accrual	\$ 91	\$ (1,255)	\$ (1,255)	\$ (3,399)	\$ (900)	\$ (386)	\$ (7,105)
018 - Benefits Alloc - Standard Rate	\$ 2,254	\$ 7,552	\$ 7,558	\$ 17,222	\$ 8,679	\$ 3,721	\$ 46,986
716 - OPEB Service Cost Loader	\$ 221	\$ 675	\$ 676	\$ 1,561	\$ 807	\$ 354	\$ 4,293
717 - OPEB Non-Service Cost Loader	\$ (1,842)	\$ (5,650)	\$ (5,654)	\$ (13,172)	\$ (6,809)	\$ (3,034)	\$ (36,161)
718 - Qual Pension Svc Cost Loader	\$ 1,171	\$ 3,439	\$ 3,442	\$ 8,200	\$ 4,237	\$ 1,858	\$ 22,347
719 - Qual Pens Non-Svc Cost Loader	\$ 400	\$ 1,286	\$ 1,288	\$ 2,767	\$ 1,533	\$ 629	\$ 7,903
890 - Non-Productive Loader	\$ 1,650	\$ 5,029	\$ 5,033	\$ 11,572	\$ 5,978	\$ 2,621	\$ 31,884
Business Meals & Meetings	\$ 2,392	\$ -	\$ -	\$ 233	\$ -	\$ -	\$ 2,625
024 - Business Meals/Entertainment	\$ 11	\$ -	\$ -	\$ 32	\$ -	\$ -	\$ 43
027 - Employee Mtgs/Functions/Awards	\$ 2,381	\$ -	\$ -	\$ 199	\$ -	\$ -	\$ 2,580
058 - Consumables	\$ -	\$ -	\$ -	\$ 2	\$ -	\$ -	\$ 2
Training & Education	\$ 1,202	\$ -	\$ -	\$ 330	\$ 1,283	\$ -	\$ 2,815
022 - Dues-Employee Indus & Prof	\$ 1,037	\$ -	\$ -	\$ -	\$ 567	\$ -	\$ 1,604
526 - Training/Seminar/Ind Mtg Fees	\$ 165	\$ -	\$ -	\$ 330	\$ -	\$ -	\$ 495
572 - Dues-Chmbr of Com & Civic Orgs	\$ -	\$ -	\$ -	\$ -	\$ 716	\$ -	\$ 716
Travel & Transportation	\$ 333	\$ (31)	\$ (31)	\$ 1,435	\$ (10)	\$ (16)	\$ 1,680
026 - Personal Car Mileage - Local	\$ -	\$ -	\$ -	\$ 589	\$ 28	\$ -	\$ 618
031 - Travel Transportation	\$ 125	\$ -	\$ -	\$ 5	\$ -	\$ -	\$ 130
032 - Lodging	\$ 212	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 212
201 - Transportation	\$ (15)	\$ (31)	\$ (31)	\$ (73)	\$ (38)	\$ (16)	\$ (204)
525 - Airfare	\$ -	\$ -	\$ -	\$ 914	\$ -	\$ -	\$ 914
528 - Agency Booking Fees	\$ 10	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10
Miscellaneous Expenses	\$ 489	\$ -	\$ -	\$ 0	\$ -	\$ -	\$ 489
095 - Materials & Supplies	\$ 60	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 60
097 - Materials & Supplies Loader	\$ 3	\$ -	\$ -	\$ 0	\$ -	\$ -	\$ 3
276 - Computer & Office Supplies	\$ 383	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 383
740 - Service Company Recipient	\$ 42	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 42
Payroll Tax	\$ 876	\$ 2,545	\$ 2,547	\$ 5,817	\$ 3,069	\$ 1,346	\$ 16,201
810 - Payroll Tax Loader	\$ 870	\$ 2,639	\$ 2,641	\$ 6,072	\$ 3,137	\$ 1,375	\$ 16,734
820 - Payroll Tax Accrual	\$ 7	\$ (94)	\$ (94)	\$ (255)	\$ (68)	\$ (29)	\$ (533)

							Grand Total
	F3PCR56902	F3PCR56903	F3PCR56904	F3PCR56905	F3PCR56906	F3PPR56917	
Other Contract Work	\$ 413,440	\$ 33,958	\$ 35,717	\$ -	\$ -	\$ -	\$ 483,115
ASSOCIATION OF ENERGY SERVICES	\$ 2,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500
Professional Organization	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
CITIBANK USA NA	\$ 935	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 935
Printing Charges	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
CLEARRESULT INC	\$ -	\$ 29,700	\$ 29,700	\$ -	\$ -	\$ -	\$ 59,400
Implementer	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
EDUCATION FOR TOMORROW ALLIANCE	\$ 9,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9,000
Promotional campaign	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
ENERCHOICE LLC	\$ -	\$ 4,258	\$ 6,017	\$ -	\$ -	\$ -	\$ 10,275
Implementer	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
FRONTIER ENERGY INC	\$ 170,185	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 170,185
Consulting Services, Deemed Savings upates, EUMMOT charges	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
HEARST NEWSPAPERS LLC DBA HOUSTON	\$ 27,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 27,000
Advertising	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
RAMEY AGENCY LLC	\$ 77,456	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 77,456
Advertising	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
TETRA TECH MA INC	\$ 100,132	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,132
EM&V Contractor	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
DR HORTON HOMES	\$ 26,232	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 26,232
R&D Pilot	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Grand Total	\$ 431,922	\$ 75,552	\$ 77,345	\$ 97,002	\$ 51,153	\$ 21,684	\$ 754,658

Other Contract Work	80% Admin	20% R&D	Grand Total
FRONTIER ENERGY INC			
Research and Development - P3 Database	\$ 112,003	\$ 28,001	\$ 140,004

Research & Development	
Research and Development - P3 Database	\$ 28,001
Association of Energy Services Providers (AESP)	\$ 2,500
DR Horton Water Heater Heat Pump Pilot	\$ 26,232
Home Builders Association of S.E. Texas	\$ 1,409
Greater Houston Builders Association	\$ 716
AESP Conference	\$ 199
Association of Energy Engineers (AEE)	\$ 195
Total:	\$ 59,252

WORKPAPERS FILED ELECTRONICALLY

All workpapers in relation to the Direct Testimony of John K. Carson have been filed electronically on the PUCT Interchange.

DOCKET NO. 52067

APPLICATION OF ENTERGY	§	
TEXAS, INC. TO ADJUST ITS	§	PUBLIC UTILITY COMMISSION
ENERGY EFFICIENCY COST	§	
RECOVERY FACTOR AND	§	OF TEXAS
REQUEST TO ESTABLISH	§	
REVISED COST CAPS	§	

DIRECT TESTIMONY

OF

JAY ANDREW LEWIS, JR.

ON BEHALF OF

ENTERGY TEXAS, INC.

APRIL 30, 2021

ENTERGY TEXAS, INC.
DIRECT TESTIMONY OF JAY ANDREW LEWIS, JR.
2021 EECRF APPLICATION

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EXHIBITS

Exhibit JAL-1	Calculations for 2022 EECRF
Exhibit JAL-2	Revised Rider Schedule EECRF
Exhibit JAL-3	Calculation of Costs Recoverable through 2022 EECRF
Exhibit JAL-4	2020 EECRF Revenues
Exhibit JAL-5	2020 Affiliate Costs by Account and by Class

1 I. INTRODUCTION AND PURPOSE

2 Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

3 A. My name is Jay Andrew Lewis, Jr. My business address is 639 Loyola Avenue,
4 New Orleans, Louisiana 70113. I am employed by Entergy Services, LLC,
5 (“ESL”), the service company affiliate of Entergy Texas, Inc. (“ETI” or the
6 “Company”) as Regulatory Analyst III in the Fuel & Special Riders Department.

7

8 Q2. ON WHOSE BEHALF ARE YOU SUBMITTING THIS DIRECT TESTIMONY?

9 A. I am submitting this direct testimony to the Public Utility Commission of Texas
10 (“Commission”) on behalf of ETI.

11

12 Q3. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

13 A. I have a Bachelor of Science degree in Finance from Louisiana State University
14 and a Juris Doctor from Loyola University New Orleans College of Law. I am
15 licensed to practice law in the State of Louisiana.

16

17 Q4. PLEASE DESCRIBE BRIEFLY YOUR PROFESSIONAL EXPERIENCE.

18 A. I have been employed by ESL for approximately six years and have been an analyst
19 in the Fuel and Special Riders Department since January 2019. Prior to my current
20 position, I worked in the Accounting organization in the Miscellaneous Receivables
21 department for approximately three years. Prior to working for ESL, I practiced law
22 with firms local to the New Orleans metropolitan area and as a solo practitioner,

1 focusing primarily on homeowners' insurance litigation, where I represented both
2 individual policyholders and insurance companies during the course of my practice.

3

4 Q5. WAS THIS TESTIMONY PREPARED BY YOU OR UNDER YOUR DIRECT
5 SUPERVISION?

6 A. Yes.

7

8 Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

9 A. My direct testimony presents the calculation of the proposed rates for the
10 Company's 2022 Energy Efficiency Cost Recovery Factor ("EECRF") tariff
11 ("Rider EECRF"). Attached as my Exhibit JAL-1 is the calculation of the proposed
12 Rider EECRF rates for 2022. Exhibit JAL-2 is the revised Rider EECRF tariff rate
13 schedule for 2022. My direct testimony also supports the Company's request to
14 recover energy efficiency affiliate expenses associated with Project Codes
15 F3PPEECRF3 and F3PCR56902. I provide the levels of these expenses for
16 calendar year 2020 and address the reasonableness of the expenses.

17

18 Q7. DO YOU SPONSOR ANY EXHIBITS?

19 A. Yes, I sponsor the exhibits listed in the Table of Contents to my testimony.

II. EECRF FOR 2022

Q8. DOES ETI CURRENTLY HAVE AN EECRF IN PLACE?

A. Yes. ETI's current EECRF was approved in Docket No. 50803¹ to recover \$9,431,190. This amount included: (a) estimated 2021 energy efficiency program costs of \$7,608,671; (b) a performance bonus of \$2,405,052 for 2019 program achievements; (c) evaluation, monitoring, and verification ("EM&V") costs of \$104,402 to be collected in 2021; (d) a \$742,299 adjustment for the over-recovery of 2019 program costs, including \$28,868 in interest; and (e) \$12,862 for Cities' rate case expenses and \$42,501 for ETI's rate case expenses in Docket No. 49493. ETI began collecting revenues under the current tariff with the first billing cycle of the January 2021 billing month.

Q9. IS ETI ASKING FOR AN ADJUSTMENT TO ITS CURRENT EECRF?

A. Yes. ETI is requesting that the 2022 EECRF be set to recover \$12,080,473. The calculation for ETI's proposed EECRF is shown in Exhibit JAL-1.

Q10. PLEASE DETAIL THE COSTS THAT THE COMPANY IS SEEKING TO RECOVER UNDER ITS REDETERMINED EECRF.

A. As further detailed below, ETI seeks to recover \$12,080,473 in its 2022 EECRF, which is comprised of five parts: (a) estimated 2022 energy efficiency program costs of the Company's forecasted energy efficiency program budget amount of

¹ *Application of Entergy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 50803, Final Order (Oct. 23, 2020).

1 \$7,798,726; (b) a performance bonus of \$4,704,294 for 2020 program
2 achievements; (c) EM&V costs of \$104,092 to be collected in 2022; (d) a \$589,306
3 refund for the over-recovery of 2020 program costs, including \$16,277 in interest;
4 and (e) \$9,360 for Cities' rate case expenses and \$53,307 for ETI's rate case
5 expenses in Docket No. 50803. The cost components for the 2022 EECRF are
6 shown in Exhibit JAL-3.

7 ETI witness John K. Carson's Exhibit JKC-7 shows the projected costs the
8 Company expects to incur to achieve the savings goals required for 2022. The
9 forecast is for \$7,902,818 in 2022. This total is comprised of \$6,900,741 for
10 incentive costs, \$897,985 for administrative costs (including R&D), and \$104,092
11 for EM&V costs.

12 Further, 16 Texas Administrative Code ("TAC") § 25.182(e) sets forth the
13 requirements that entitle ETI to collect a performance bonus for efficiently and
14 effectively managing its energy efficiency programs during 2020. ETI's
15 performance bonus is calculated to be \$4,704,294 as presented in Mr. Carson's
16 Exhibit JKC-8.

17 Next, the Company's energy efficiency costs incurred in 2020 were
18 \$7,049,268 while ETI's 2020 EECRF revenues totaled \$7,638,574. My Exhibit
19 JAL-4 shows the Company's monthly revenues recorded under ETI's approved
20 2020 EECRF rates. The difference in actual EECRF revenues collected and the
21 actual costs incurred results in an over-recovery of \$589,306 including \$16,277 in
22 interest. This calculation is also shown in Exhibit JAL-3.

1 Finally, the Company is seeking to recover \$62,667 in rate case expenses
2 related to last year's EECRF proceeding, Docket No. 50803. These costs include
3 \$53,307 for ETI's costs incurred and \$9,360 for the Cities' costs incurred as shown
4 in Table 10 of Exhibit JKC-1 and Exhibit JAL-3 (combined \$62,667).

5

6 III. RIDER EECRF CALCULATION

7 Q11. WHAT IS THE PURPOSE OF RIDER EECRF AND WHAT IS ITS PROPOSED
8 EFFECTIVE DATE?

9 A. The purpose of Rider EECRF is to recover the costs associated with energy
10 efficiency programs from the customer classes that receive services under these
11 programs. The revised rates are requested to be effective on and after the first
12 billing cycle of January 2022.

13

14 Q12. PLEASE DESCRIBE THE CALCULATION OF THE REDETERMINED RIDER
15 EECRF RATES.

16 A. Exhibit JAL-1 to my direct testimony contains the calculation of ETI's proposed
17 rates for Rider EECRF. These proposed rates are based on the following:

- 18 • the projected energy efficiency costs by rate class that the Company expects
19 to incur during the twelve-month period beginning January 1, 2022 through
20 December 31, 2022;
- 21 • the Company's 2020 Energy Efficiency Performance Bonus ("Performance
22 Bonus") by rate class recoverable under 16 TAC § 25.182(e);

- 1 • a true-up adjustment by rate class for over/under recovery of energy
2 efficiency costs for 2020 as required by 16 TAC § 25.182(d)(10)(D); and
3 • the forecasted billing determinants for each rate class, excluding Large
4 Industrial Power Service (“LIPS”) industrial transmission level customers
5 and opt-out industrial distribution level customers consistent with 16 TAC
6 § 25.181(u), for the twelve-month period beginning January 2022 through
7 December 2022.

8 Company witness Mr. Carson explains in his direct testimony the derivation of the
9 cost components of the proposed rates.

10

11 Q13. PLEASE EXPLAIN HOW THE COMPANY’S PROJECTED ENERGY
12 EFFICIENCY COSTS FOR 2022 ARE ALLOCATED TO THE RATE CLASSES.

13 A. Mr. Carson provides the projected energy efficiency costs for 2022 by rate class, as
14 shown in his Exhibit JKC-7 and my Exhibit JAL-1, page 2 of 6.

15

16 Q14. HOW WAS THE COMPANY’S 2020 PERFORMANCE BONUS ALLOCATED
17 TO THE RATE CLASSES?

18 A. The \$4.7 million Performance Bonus provided by Mr. Carson was allocated to each
19 rate class in proportion to the program costs directly assigned to each rate class,
20 which excludes the LIPS transmission level and Lighting rate classes as required
21 by 16 TAC § 25.182(e)(6). Please refer to my Exhibit JAL-1, page 3 for this
22 allocation.

1 Q15. WHAT METHODOLOGY WAS USED TO ALLOCATE THE TRUE-UP
2 ADJUSTMENT TO THE RATE CLASSES?

3 A. The actual 2020 energy efficiency program costs were allocated to the appropriate
4 rate class based on Table 10 in Exhibit JKC-1 (the 2021 Energy Efficiency Plan
5 and Report) and Exhibit JKC-5. As Mr. Carson explains in his direct testimony,
6 the program costs were directly assigned to each rate class to the maximum extent
7 possible. Costs that could not be directly assigned to rate classes were allocated in
8 proportion to the program costs directly assigned to the rate classes receiving
9 services from the programs (excluding the LIPS industrial transmission level and
10 Lighting rate classes).

11 The 2018 performance bonus and the 2018 true-up adjustment were then
12 removed from the 2020 EECRF revenues. The actual 2020 program costs as well
13 as the 2018 proceeding costs, both separated by rate class, were then compared to
14 the adjusted revenues recovered from each rate class collected from the Company's
15 2020 Rider EECRF in order to calculate the over/under recovery of the 2020
16 program costs. Additionally, interest for 2020 and 2021 was calculated by rate
17 class and compounded annually using the annual interest rates authorized by the
18 Commission. My Exhibit JAL-1, page 4 shows the calculation of the true-up
19 adjustment.

20

21 Q16. HOW WERE THE RIDER EECRF RATES FOR 2022 CALCULATED?

22 A. Exhibit JAL-1, page 1 shows the calculation of the Rider EECRF rates for 2022.
23 The 2022 projected energy efficiency costs, performance bonus, and the true-up

1 adjustment previously discussed were added together to obtain the total energy
2 efficiency costs by rate class to be collected in 2022. The costs by rate class were
3 then divided by the forecasted billing determinants for each rate class (excluding
4 LIPS industrial transmission level and opt-out customers) for the twelve-month
5 period beginning January 2022 through December 2022. ETI's proposed EECRF
6 rates are provided in Exhibit JAL-2.

7

8 Q17. HOW WERE THE RIDER EECRF RATES FOR 2022 CALCULATED FOR
9 COMPARISON TO THE COST CAP?

10 A. The total energy efficiency costs by rate class were adjusted to exclude the EM&V
11 costs and Cities' EECRF proceeding costs to determine the EECRF costs subject
12 to the caps defined in 16 TAC § 25.182(d)(7). Exhibit JAL-1, page 1 shows the
13 EECRF costs subject to the caps.

14

15 Q18. DO THE RIDER EECRF RATES FOR 2022 MEET THE COST CAP
16 REQUIREMENTS PER THE COMMISSION RULES?

17 A. Yes, for the residential class. As shown in Exhibit JAL-1, page 1, the Company's
18 proposed rates exceed the established commercial cost cap requirements. Company
19 witness Carson discusses the exceedance of the commercial cost cap and the
20 Company's request for a good cause exception from the Commission to revise the
21 commercial cost cap in this Application in accordance with 16 TAC § 25.181(e)(2).

1 Q19. HOW WERE THE COMPANY'S FORECASTED BILLING DETERMINANTS
2 DEVELOPED FOR 2022?

3 A. The forecasted billing determinants were produced by the Company's forecast
4 model at the rate class level. The forecasted billing determinants exclude LIPS
5 industrial transmission level and opt-out customers. Exhibit JAL-1, page 6,
6 provides the forecasted billing determinants.

7

8 Q20. WERE ANY CALCULATIONS OR ESTIMATES OF SYSTEM LOSSES AND
9 LINE LOSSES USED TO CALCULATE THE EECRF RATES?

10 A. No. The forecasted 2022 billing determinants were billing determinants obtained
11 "at the meter;" therefore, no line loss calculations are needed.

12

13 Q21. ARE YOU SPONSORING AN UPDATED RIDER EECRF?

14 A. Yes. The updated Rider EECRF tariff schedule is attached to this testimony as
15 Exhibit JAL-2.

16

17 Q22. HAVE YOU MADE A DETERMINATION OF THE IMPACT OF THE
18 REQUESTED EECRF RATES ON RESIDENTIAL SERVICE CUSTOMERS?

19 A. Yes. I have determined the impact for a residential customer, assuming a monthly
20 usage of 1,000 kWh. The requested EECRF rates as calculated in Exhibit JAL-1
21 would result in a \$0.12 per month increase to a residential service customer's bill.
22 This would be a 0.09% increase to such customers' bills based on EECRF currently
23 approved by the Commission.

1 IV. AFFILIATE ENERGY EFFICIENCY EXPENSES

2 Q23. WHAT DOES THIS PORTION OF YOUR TESTIMONY ADDRESS?

3 A. This portion of my testimony addresses costs charged to ETI from ESL under
4 Project Code F3PPEECRF3 and F3PCR56902 (the “Affiliate Energy Efficiency
5 Expenses”).
6

7 Q24. WHAT ARE THE AFFILIATE ENERGY EFFICIENCY EXPENSES BY
8 PROJECT CODE FOR WHICH ETI SEEKS RECOVERY?

9 A. The affiliate charges by project code for which ETI seeks recovery are the
10 following:

11 F3PPEECRF3: \$22,944.91

12 F3PCR56902: \$587.93
13

14 Q25. PLEASE DESCRIBE PROJECT CODE F3PPEECRF3.

15 A. The overall purpose of this project is to capture and manage costs associated with
16 services provided in the preparation, production, and litigation of the EECRF filing.
17 The primary activities associated with this project code are preparation of the ETI
18 Application and testimony; preparation of all legal pleadings required as part of the
19 litigation of the case; review of opposing party filings; development of ETI
20 strategy; management and oversight of consultants and attorneys; and responses to
21 discovery. Personnel charging to this project code include ESL attorneys and ESL
22 regulatory services personnel who help prepare the exhibits and rate schedules
23 necessary for the EECRF Application.

1 Q26. HOW WERE THE PROJECT CODE F3PPEECRF3 COSTS ALLOCATED
2 AMONG THE VARIOUS ENTERGY OPERATING COMPANIES?

3 A. The costs are driven by the activities necessary for the preparation, production, and
4 litigation of ETI's EECRF filing. All services charged to this project code relate to
5 and are caused exclusively by ETI, and therefore, are appropriately charged 100%
6 to ETI, under billing method DIRECTTX.

7

8 Q27. WHAT WAS THE TOTAL LEVEL OF COSTS ESL CHARGED TO ETI IN 2020
9 FOR PROJECT CODE F3PPEECRF3?

10 A. The total amount charged by ESL to ETI for calendar year 2020 was \$27,172. After
11 exclusions and adjustments (such as for depreciation and financially based
12 incentive compensation), the remaining charges total \$22,945. The total charges to
13 ETI by Federal Energy Regulatory Commission ("FERC") Account and by affiliate
14 class of charges are shown in my Exhibit JAL-5.

15

16 Q28. WHAT AMOUNT DOES THE COMPANY PROPOSE BE FOUND
17 REASONABLE AND RECOVERABLE FOR ITS 2020 PROJECT CODE
18 F3PPEECRF3 AFFILIATE COSTS IN THIS CASE?

19 A. The Company proposes that the adjusted charges of \$22,945 be found reasonable
20 and recoverable through the 2022 EECRF.

1 **Q29.** IS THE COMPANY PRESENTING INFORMATION CONSISTENT WITH THE
2 FACTORS LISTED IN 16 TAC § 25.245(b) TO SUPPORT ITS RATE CASE
3 EXPENSES FOR LAST YEAR’S EECRF PROCEEDING?

4 A. Yes. ETI is providing information consistent with the factors listed in 16 TAC
5 § 25.245(b) to the extent available. The affidavit of ESL Senior Counsel, Miguel
6 Suazo, details much of this information, including a discussion of the scope and
7 complexity of the case, which is applicable to the affiliate rate case expenses as
8 well. Similar to the activities his affidavit describes, the work done by ESL
9 personnel included preparing the testimony and exhibits, responding to discovery
10 as well as providing subject matter expertise on the issues addressed in the case.

11 Additionally, ESL personnel charged no lodging, meals, beverages, or
12 transportation to ETI for last year’s EECRF proceeding. For ESL costs, ETI
13 estimates that the charges per issue were as follows: preparation of the Energy
14 Efficiency Plan & Report (\$7,732); preparation of the EECRF application and
15 direct testimony (\$5,759); rate case expense issues (\$1,170); responding to
16 discovery (\$4,291); miscellaneous procedural matters and expenses such as the
17 procedural schedule, list of issues, and case status discussions (\$2,088); and
18 settlement-related activities including settlement discussions, settlement
19 documents preparation, and activities related to seeking approval of the settlement
20 and final order by the Commission (\$1,904). As noted above, after exclusions and
21 adjustments (for depreciation and financially based incentive compensation), the
22 remaining charges total \$22,945. The use of external and ESL employees was
23 monitored to ensure there was no duplication of services.

1 Q30. PLEASE DESCRIBE PROJECT CODE F3PCR56902.

2 A. The overall purpose of this expense project is to capture and manage administrative,
3 general, and program costs (including vendors, contractors, etc.) associated with
4 the implementation and operation of the ETI energy efficiency programs. The
5 primary activities associated with this project code are payroll and expenses of a
6 general nature incurred by the ETI energy efficiency programs. The primary
7 products or deliverables of this project code are for the implementation and
8 operation of the ETI energy efficiency programs. In particular, the 2020 ESL
9 charges to this code were primarily related to marketing and digital media design
10 to raise awareness of ETI's energy efficiency programs.

11

12 Q31. HOW WERE THE PROJECT CODE F3PCR56902 COSTS ALLOCATED
13 AMONG THE VARIOUS ENTERGY OPERATING COMPANIES?

14 A. The costs charged to this code are driven by ETI's energy efficiency program.
15 Therefore, charges are appropriately directed 100% to ETI through billing method
16 DIRECTTX.

17

18 Q32. WHAT WAS THE TOTAL LEVEL OF COSTS ESL CHARGED TO ETI IN 2020
19 FOR PROJECT CODE F3PCR56902?

20 A. The total amount charged by ESL to ETI for calendar year 2020 was \$685. After
21 exclusions and adjustments (such as for depreciation and financially based
22 incentive compensation), the remaining charges total approximately \$588. The

1 total charges to ETI by FERC Account and by affiliate class of charges are shown
2 in my Exhibit JAL-5.

3

4 Q33. WHAT AMOUNT DOES THE COMPANY PROPOSE BE FOUND
5 REASONABLE AND RECOVERABLE FOR ITS 2020 PROJECT CODE
6 F3PCR56902 AFFILIATE COSTS IN THIS CASE?

7 A. The Company proposes that the adjusted charges of \$588 be found reasonable and
8 recoverable through the 2022 EECRF.

9

10 Q34. HAVE YOU REVIEWED THE REQUESTED AFFILIATE ENERGY
11 EFFICIENCY EXPENSES TO DETERMINE WHETHER SUCH EXPENSES
12 ARE REASONABLE AND NECESSARY?

13 A. Yes.

14

15 Q35. HOW DID YOU DETERMINE WHETHER THE AFFILIATE ENERGY
16 EFFICIENCY EXPENSES PRESENTED WERE REASONABLE AND
17 NECESSARY?

18 A. I examined the affiliate costs in the context of the information presented by ETI in
19 its most recent rate case to ensure that such costs are reasonable and necessary. In
20 particular, the process through which project code charges are billed to affiliates
21 was explained in Company witness Barbara Heard's direct testimony in Docket No.
22 48371, ETI's 2018 rate case. In addition, the Company's affiliate class witnesses
23 from Docket No. 48371, including those who address the ETI direct charges,

1 explained how the budgeting and cost control processes work within their business
2 units. For example, timesheet and expense reports are reviewed by supervisors to
3 ensure accuracy. Also, Company witness Jennifer A. Raeder in Docket No. 48371
4 supported the reasonableness and necessity of the compensation and benefits paid
5 to ESL employees.

6 In Docket No. 48371, Company witnesses presented direct testimony
7 regarding the various classes of affiliate costs that ETI received from ESL, and
8 Exhibit JAL-5 shows the ESL project code charges to ETI by affiliate class. For
9 example, a portion of the costs in Project Code F3PPEECRF3 was incurred by the
10 Legal Services class of affiliate costs. Company witness Dan Falstad presented
11 testimony in Docket No. 48371 supporting the reasonableness and necessity of the
12 charges to ETI from the Legal Services class. The processes and practices
13 described in the Company's direct testimony in Docket No. 48371 regarding
14 billing, budgeting, cost control, compensation, and benefits remain in effect today.
15 These processes and practices help to ensure that the requested Project Code
16 expenses are necessary and reasonable, represent the actual costs of the services,
17 do not include prohibited expenses, do not include charges for duplicative services
18 or expenses, and are no higher than the prices charged to other affiliates, or to non-
19 affiliates, for the same or similar classes of items. Moreover, these processes and
20 practices were used in prior ETI EECRF cases to support similar expenses.²

² *Application of Entergy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 50803, Final Order (Oct. 23, 2020); *Application of Entergy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 49493, Final Order (Nov. 21, 2019); *Application of Entergy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 48333, Final Order (Dec. 10, 2018);

1 Q36. WHAT DO YOU CONCLUDE WITH RESPECT TO THE REASONABLENESS
2 AND NECESSITY OF THE AFFILIATE ENERGY EFFICIENCY EXPENSES?

3 A. Based on my review and analysis, as described above, the Company's Affiliate
4 Energy Efficiency Expenses are reasonable and necessary, represent the actual
5 costs of the services, do not include prohibited expenses, do not include charges for
6 duplicative services or expenses, and are no higher than the prices charged to other
7 affiliates, or to non-affiliates, for the same or similar classes of items.

8

9 Q37. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

10 A. Yes.

Application of Entergy Texas, Inc. for Authority to Determine Rates for Energy Efficiency Cost Recovery Factor, Docket No. 47115, Final Order (Sept. 29, 2017); Docket No. 45915, Application of Entergy Texas Inc. for Authority to Redetermine Rates for the Energy Efficiency Cost Recovery Factor, Final Order (Sept. 28, 2016); Docket No. 44696, Application of Entergy Texas Inc. for Authority to Redetermine Rates for the Energy Efficiency Cost Recovery Factor, Final Order (Sept. 25, 2015); and Docket No. 42485 Application of Entergy Texas, Inc. for Authority to Redetermine Rates for Energy Efficiency Cost Recovery Factor, Final Order (Nov. 21, 2014).

ENTERGY TEXAS, INC.
ENERGY EFFICIENCY COST RECOVERY FACTOR RIDER
2021 RATE REDETERMINATION FOR RATES TO BE BILLED IN 2022

Exhibit JAL-1
Docket No. 52067
Page 1 of 6

Line No.	Variable Name	Variable Description	Rate Class						Total Co.
			Residential	SGS	GS	LGS	LIPS	Lighting	
1	PEEC _k	Projected Energy Efficiency Cost (1)	\$ 4,393,550	\$ 221,923	\$ 1,874,347	\$ 1,309,261	\$ 103,737	\$ -	\$ 7,902,818
2	TUA _k	True-Up Adjustment (2)	\$ (607,681)	\$ 35,676	\$ 124,492	\$ 100,230	\$ (179,264)	\$ (92)	\$ (526,639)
3	EERR _k	Energy Efficiency Cost (L1 + L2)	\$ 3,785,869	\$ 257,599	\$ 1,998,839	\$ 1,409,491	\$ (75,527)	\$ (92)	\$ 7,376,179
4	BD _k	Projected Billing Determinants (BD) (3)	6,153,603,124	404,472,844	3,247,028,870	1,379,879,771	8,593,293,245	92,409,785	19,870,687,640
5		Less Projected LIPS Industrial Transmission and Opt out customers BD (3)				77,086,388	7,892,862,122		7,969,948,510
6	BD _k	Projected Adjusted Billing Determinants	6,153,603,124	404,472,844	3,247,028,870	1,302,793,383	700,431,124	92,409,785	11,900,739,130
7	EECRF _k	Energy Efficiency Cost Recovery Factor (LN 3/LN 6) per kWh	\$ 0.000615	\$ 0.000637	\$ 0.000616	\$ 0.001082	\$ (0.000108)	\$ (0.000001)	N/A
8	EEPB _k	Energy Efficiency Performance Bonus (4)	\$ 2,537,964	\$ 136,997	\$ 1,157,066	\$ 808,229	\$ 64,039	\$ -	\$ 4,704,294
9	BD _k	Projected Adjusted Billing Determinants	6,153,603,124	404,472,844	3,247,028,870	1,302,793,383	700,431,124	92,409,785	11,900,739,130
10	EECRF _k	Energy Efficiency Cost Recovery Factor (LN 8/ LN 9) per kWh	\$ 0.000412	\$ 0.000339	\$ 0.000356	\$ 0.000620	\$ 0.000091	\$ -	N/A
11		Energy Efficiency Cost Recovery Factor for all customers except LIPS Industrial Transmission (6) (LN7 + LN10)	\$ 0.001027	\$ 0.000976	\$ 0.000972	\$ 0.001702	\$ (0.000017)	\$ (0.000001)	
12		Energy Efficiency Cost Recovery Factor for LIPS Industrial Transmission Customers					\$ -		
13		Cost Cap Rate (5)	\$ 0.001364	\$ 0.000853	\$ 0.000853	\$ 0.000853	\$ 0.000853		
14		Total Energy Efficiency Costs (LN 3 + LN 8)	\$ 6,323,833	\$ 394,596	\$ 3,155,905	\$ 2,217,720	\$ (11,488)	\$ (92)	\$ 12,080,473
15		Total Energy Efficiency Costs Subject to Cost Cap (5)	\$ 6,285,300	\$ 389,958	\$ 3,122,201	\$ 2,193,527	\$ (7,600)	\$ (89)	\$ 11,983,298
16		Maximum Energy Efficiency Cost per Cost Cap (LN 9 * LN 13)	\$ 8,393,515	\$ 345,015	\$ 2,769,716	\$ 1,111,283	\$ 597,468		\$ 13,216,997
17		Amount Over/(Under) Cost Cap (5) (LN 15 - LN 16)	\$ (2,108,215)	\$ 44,943	\$ 352,485	\$ 1,082,244	\$ (605,068)		
18		Aggregate Amount Over/(Under) Cost Cap for Non-Residential Classes (6)						\$ 874,604	

Notes.

- (1) See Exhibit JAL-1, Page 2
- (2) See Exhibit JAL-1, Page 4
- (3) See Exhibit JAL-1, Page 6
- (4) See Exhibit JAL-1, Page 3
- (5) Per 16 Texas Admin Code (TAC) § 25 182(d)(7) excluding Evaluation, Measurement, and Verification (EM&V) Costs per JL-1, Page 2, municipal EECRF proceeding expenses per JCL-1, Page 5, and interest per JAL-1, Page 4
- (6) The Company's proposed rates are under the established cost cap requirements as reflected on lines 13 - 18

Amounts may not add or agree with other schedules due to rounding

ENTERGY TEXAS, INC.
ENERGY EFFICIENCY COST RECOVERY (EECR) FACTOR RIDER
2022 PROJECTED ENERGY EFFICIENCY COSTS

Rate Class		Incentives (1)	Admin (1)	R&D (1)	EM&V Costs (1)	Total Projected Energy Efficiency Costs
RES	Residential	\$ 3,794,219	\$ 434,741	\$ 112,325	\$ 52,264	\$ 4,393,550
SGS	Small Gen Service	196,454	21,580	612	3,278	\$ 221,923
GS	General Service	1,659,235	182,263	5,167	27,682	\$ 1,874,347
LGS	Large General Service	1,159,002	127,314	3,609	19,336	\$ 1,309,261
LIPS	Large Ind Power Service excluding Industrial Transmission	91,832	10,087	286	1,532	\$ 103,737
LGT	Lighting					\$ -
Total Applicable Retail		\$ 6,900,741	\$ 775,985	\$ 122,000	\$ 104,092	\$ 7,902,818

Notes:

(1) Per Exhibit JKC-7

Amounts may not add or agree with other schedules due to rounding.

ENTERGY TEXAS, INC.
ENERGY EFFICIENCY COST RECOVERY FACTOR RIDER
2020 ENERGY EFFICIENCY PERFORMANCE BONUS (EPPB)

Rate Class		Allocation (2)	EPPB by Rate Class (3)
RES	Residential	53.950%	\$ 2,537,964
SGS	Small Gen. Service	2.912%	136,997
GS	General Service	24.596%	1,157,066
LGS	Large General Service	17.181%	808,229
LIPS	Large Ind. Power Service Industrial Transmission	0.000%	-
LIPS	Large Ind. Power Service - Non-Industrial Transmission	1.361%	64,039
LGT	Lighting	0.000%	-
Total Applicable Retail		100.000%	\$ 4,704,294

Notes:

- (1) Per Exhibit JKC-8
- (2) Per Exhibit JAL-1, page 5 of 6 allocation percentages based upon the directly assigned incentive costs per Exhibit JKC-5
- (3) EPPB X Applicable Rate Class Allocation.

Amounts may not add or agree with other schedules due to rounding.

ENTERGY TEXAS, INC
ENERGY EFFICIENCY COST RECOVERY FACTOR RIDER
TRUE-UP OF 2020 ENERGY EFFICIENCY COSTS

Rate Class	Actual 2020 EECR Costs by Rate Class (1)	2020 EM&V Costs For Review of 2019 Program (5)	Actual 2018 Performance Bonus Collected in 2020 Rates (2)	Actual 2018 Proceeding Costs Collected in 2020 Rates (3)	2018 True- Up Adj. Collected in 2020 Rates (3)	Actual 2020 EECR Revenues by Rate Class (4)	2020 EECR Costs True-Up (Over)/Under Recovery (6)	2020 Interest on (Over)/Under Recovery (7)	2021 Interest on (Over)/Under Recovery (7)	EECR (Over)/Under Recovery Including Interest
RES Residential	\$ 3,604,227	56,929	\$ 935,630	\$ 61,139	\$ (483,859)	\$ 4,762,965	\$ (588,899)	\$ (13,839)	\$ (4,942)	\$ (607,681)
SGS Small Gen Service	\$ 190,902	2,517	-	-	(222,821)	(63,974)	\$ 34,573	\$ 812	\$ 290	\$ 35,676
GS General Service	\$ 1,612,348	21,260	403,881	24,607	(513,707)	1,427,745	\$ 120,644	\$ 2,835	\$ 1,013	\$ 124,492
LGS Large General Service	\$ 1,129,384	24,298	228,516	17,182	392,082	1,694,330	\$ 97,132	\$ 2,283	\$ 815	\$ 100,230
LIPS Large Ind Power Service - excluding Industrial Transmission	\$ 89,237	1,177	105,180	6,408	(558,143)	(182,419)	\$ (173,723)	\$ (4,082)	\$ (1,458)	\$ (179,264)
LGT Lighting	\$ -	-	-	-	(162)	(73)	\$ (89)	\$ (2)	\$ (1)	\$ (92)
Total Company	\$ 6,626,097	\$ 106,180	\$ 1,673,207	\$ 109,336	\$ (1,386,610)	\$ 7,638,574	\$ (510,363)	\$ (11,994)	\$ (4,283)	\$ (526,639)

Notes

- (1) Based on Exhibit JKC-1, ETI's 2021 Energy Efficiency Plan and Report, Table 10 and JAL-1, page 5 of 6. This amount includes 2020 proceeding costs but excludes EM&V Costs.
(2) Per Docket No. 49493 Final EECRF Compliance Tariff Filing, the 2018 performance bonus was allocated in proportion to the program costs allocated to each rate class.
(3) As per Docket No. 49493 Final Order and Final EECRF Compliance Tariff Filing.
(4) Per Exhibit JAL-4 and W/P JAL-1.
(5) Based on Exhibit JKC-1, ETI's 2020 Energy Efficiency Plan and Report, Table 10 and JAL-1, page 5 of 6.
(6) This True-Up amount includes 2020 proceeding costs.
(7) Interest Calculated per Docket No. 48692:
2020 Annual Interest Rate 2.35%
2021 Annual Interest Rate 0.82%

Amounts may not add or agree with other schedules due to rounding.

ENTERGY TEXAS, INC
ENERGY EFFICIENCY COST RECOVERY FACTOR RIDER
2020 ACTUAL ENERGY EFFICIENCY COSTS

Rate Class		% of Directly Assigned Incentive Costs (2)	Directly Assigned Incentive Costs (3)	Directly Assigned Admin Costs (3)	Residential & Hard-to-Reach (1)				Commercial Solutions MTP + SCORE (1)					Load Management SOP (1)					Total Actual 2020 Cost Allocation
					Allocation EM&V Costs	Allocation R&D Costs	Allocation Utility Proceeding Costs	Allocation Cities Proceeding Costs	Allocation (2)	Allocation EM&V Costs	Allocation R&D Costs	Allocation Utility Proceeding Costs	Allocation Cities Proceeding Costs	Allocation (2)	Allocation EM&V Costs	Allocation R&D Costs	Allocation Utility Proceeding Costs	Allocation Cities Proceeding Costs	
RES	Residential	53.950%	\$ 3,187,851	\$ 350,601	\$ 56,929	\$ 31,966	\$ 28,759	\$ 5,050											\$3,661,156
SGS	Small Gen. Service	2.912%	172,077	15,473					2.912%	\$ 2,517	\$ 1,629	\$ 1,466	\$ 257						193,419
GS	General Service	24.596%	1,453,351	130,683					24.596%	21,260	13,760	12,380	2,174						1,633,608
LGS	Large General Service	17.181%	1,015,189	91,284					17.181%	14,850	9,612	8,647	1,518	17.181%	9,447	\$ 1,523	\$ 1,370	\$ 241	1,153,681
LIPS	LIPS - excluding Industrial Transmission	1.361%	80,437	7,233					1.361%	1,177	762	685	120						90,413
LGT	Lighting	0.000%																	-
Total Company		100.000%	\$ 5,908,905	\$ 595,274	\$ 56,929	\$ 31,966	\$ 28,759	\$ 5,050	46.050%	\$ 39,804	\$ 25,763	\$ 23,178	\$ 4,070	17.181%	\$ 9,447	\$ 1,523	\$ 1,370	\$ 241	\$6,732,278

Notes

- (1) Represents total 2020 actual costs per Exhibit JKC-1, Table 10, less directly assigned incentive and administrative costs from Exhibit JKC-5
(2) Those costs that could not be directly assigned by rate class in Exhibit JKC-5 were allocated in proportion to the program costs directly assigned by rate class
For those programs providing services to only certain rate classes, the allocation of costs was only between those rate classes
(3) Per Exhibit JKC-5

Amounts may not add or agree with other schedules due to rounding

ENTERGY TEXAS, INC.
ENERGY EFFICIENCY COST RECOVERY FACTOR RIDER
BILLING DETERMINANTS BY RATE CLASS
(kWH)

Billing Determinants by Class

Residential	6,153,603,124
Small General Service	404,472,844
General Service	3,247,028,870
Large General Service	1,379,879,771
Large Industrial Power Service	8,593,293,245
Lighting	92,409,785
Total	<u>19,870,687,640</u>

Large Industrial Power Service Industrial Transmission Voltage Levels

230 KV	3,341,152,885
69/138 KV	<u>4,551,709,237</u>
Total	<u>7,892,862,122</u>

Large General Service Opt out customers

69/138 KV	<u>77,086,388</u>
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Amounts may not add or agree with other schedules due to rounding

Attachment A

ENTERGY TEXAS, INC.
ENERGY EFFICIENCY COST RATES
RIDER SCHEDULE EECRF

Applicable through December 2022 Billing Month

T

Net Monthly Rate

The following Energy Efficiency Cost Recovery Factor will be added to the rates set out in the Net Monthly Bill for electric service billed under all retail rate schedules * on file with the Public Utility Commission of Texas. The Energy Efficiency Cost Recovery Factor shall be effective for bills rendered on and after the first billing cycle of January 2022. Amounts billed pursuant to this Rider EECRF are not subject to the IHE but are subject to State and local sales taxes.

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* Excluded Schedules: EAPS, LQF, SMS and SQF.

<u>Rate Class</u>	<u>Rate Schedules</u>	<u>Energy Efficiency Cost Recovery Factor (1)</u>	
Residential	RS, RS-TOD	\$0.001027 per kWh	I
Small General Service	SGS, UMS, TSS	\$0.000976 per kWh	I
General Service	GS, GS-TOD	\$0.000972 per kWh	I
Large General Service	LGS, LGS-TOD	\$0.001702 per kWh	R
Large Industrial Power Service –			
Industrial Transmission Customers Only	LIPS, LIPS-TOD	\$0.000000 per kWh	
Other than Industrial Transmission Customers	LIPS, LIPS-TOD	(\$0.000017) per kWh	I
Lighting	SHL, LS-E, ALS, RLU	(\$0.000001) per kWh	R

Notes:

(1) See Attachment B

Exhibit JAL-3

2022 Energy Efficiency Projected Program Costs	\$ 7,798,726
EM&V Expenses to be Collected in 2022	\$ 104,092
2020 Performance Bonus	\$ 4,704,294
2020 (Over)/Under-recovery of EECRF Costs	\$ (589,306)
2020 EECRF Proceeding costs	\$ 62,667
Requested Amount for 2022 EECRF	\$ 12,080,473

Amount Expended for Energy Efficiency Programs in 2020*	\$ 6,563,430
Amount of 2018 Performance Bonus in 2020 Rates	\$ 1,673,207
2018 True-Up in 2020 Rates	\$ (1,386,610)
2018 Proceeding costs in 2020 Rates	\$ 109,336
2020 EM&V Costs	\$ 106,180
Interest on Over-recovery for 2020 and 2021	\$ (16,277)
Total Costs for 2020	\$ 7,049,268
Revenue Billed in 2020	\$ (7,638,574)
Revenue (Over)/Under Collected in 2020	\$ (589,306)

*This amount does not include 2020 proceeding costs or EM&V costs

Exhibit JAL - 4
Entergy Texas, Inc.
2020 Energy Efficiency Program Revenue

Jan-20	574,135.99
Feb-20	534,620.22
Mar-20	595,960.01
Apr-20	516,946.76
May-20	517,794.42
Jun-20	727,072.16
Jul-20	808,135.56
Aug-20	813,215.54
Sep-20	802,496.67
Oct-20	644,434.12
Nov-20	547,539.70
Dec-20	556,222.72
TOTAL	7,638,573.87

Exhibit JAL-5

Affiliate Costs in Projects F3PPEECRF3 by Account and Class

Class	FERC Account	Acct Desc	Payroll Indicator	Amount
Human Resources	926000	Employee Pension & Benefits	NON-PAYROLL	\$ 3,847.98
	926NS1	Employee Pension & Benefits	NON-PAYROLL	\$ 1,213.33
Human Resources Total				\$ 5,061.31
Legal Services/Litigation Support	408110	Employment Taxes	NON-PAYROLL	\$ 432.16
	920000	Adm & General Salaries	NON-PAYROLL	\$ 2,683.79
	920000	Adm & General Salaries	PAYROLL	\$ 4,890.56
Legal Services/Litigation Support Total				\$ 8,006.51
Regulatory Services	408110	Employment Taxes	NON-PAYROLL	\$ 484.70
	928000	Regulatory Commission Expense	NON-PAYROLL	\$ 3,155.59
	928000	Regulatory Commission Expense	PAYROLL	\$ 5,487.94
Regulatory Services Total				\$ 9,128.23
Accounting Governance & Controls	408110	Employment Taxes	NON-PAYROLL	\$ 176.06
	928000	Regulatory Commission Expense	NON-PAYROLL	\$ 831.32
	928000	Regulatory Commission Expense	PAYROLL	\$ 2,118.58
Accounting Governance & Controls				\$ 3,125.96
Other Expenses	4031AM	Deprec Exp billed from Serv Co	NON-PAYROLL	\$ 1,849.85
Other Expenses Total				\$ 1,849.85
Total affiliate costs in F3PPEECRF3				\$ 27,171.86

Affiliate Costs in Project F3PPEECRF3 by Account and Class
Excluding Incentive Compensation and Depreciation

Class	FERC Account	Acct Desc	Payroll Indicator	Amount
Human Resources	926000	Employee Pension & Benefits	NON-PAYROLL	\$ 3,672.15
	926NS1	Employee Pension & Benefits	NON-PAYROLL	\$ 1,213.33
Human Resources Total				\$ 4,885.48
Legal Services/Litigation Support	408110	Employment Taxes	NON-PAYROLL	\$ 432.16
	920000	Adm & General Salaries	NON-PAYROLL	\$ 1,755.07
	920000	Adm & General Salaries	PAYROLL	\$ 4,890.56
Legal Services/Litigation Support Total				\$ 7,077.79
Regulatory Services	408110	Employment Taxes	NON-PAYROLL	\$ 484.70
	928000	Regulatory Commission Expense	NON-PAYROLL	\$ 2,117.06
	928000	Regulatory Commission Expense	PAYROLL	\$ 5,487.94
Regulatory Services Total				\$ 8,089.70
Accounting Governance & Controls	408110	Employment Taxes	NON-PAYROLL	\$ 176.06
	928000	Regulatory Commission Expense	NON-PAYROLL	\$ 597.30
	928000	Regulatory Commission Expense	PAYROLL	\$ 2,118.58
Accounting Governance & Controls				\$ 2,891.94
Other Expenses	4031AM	Deprec Exp billed from Serv Co	NON-PAYROLL	\$ -
Other Expenses Total				\$ -
Total Affiliate costs requested in EECRF				\$ 22,944.91

Exhibit JAL-5

Affiliate Costs in Projects F3PCR56902 by Account and Class

Class	FERC Account	Acct Desc	Payroll Indicator	Amount
Human Resources	926000	Employee Pension & Benefits	NON-PAYROLL	\$ 94.47
	926NS1	Employee Pension & Benefits	NON-PAYROLL	\$ 28.22
Human Resources Total				\$ 122.69
Other Expenses	4031AM	Deprec Exp billed from Serv Co	NON-PAYROLL	\$ 37.84
	408110	Employment Taxes	NON-PAYROLL	\$ 25.70
	908000	Customer Assistance Expenses	NON-PAYROLL	\$ 207.66
	908000	Customer Assistance Expenses	PAYROLL	\$ 291.05
Other Expenses Total				\$ 562.25
Total affiliate costs in F3PCR56902				\$ 684.94

**Affiliate Costs in Project F3PCR56902 by Account and Class
Excluding Incentive Compensation and Depreciation**

Class	FERC Account	Acct Desc	Payroll Indicator	Amount
Human Resources	926000	Employee Pension & Benefits	NON-PAYROLL	\$ 90.38
	926NS1	Employee Pension & Benefits	NON-PAYROLL	\$ 28.22
Human Resources Total				\$ 118.60
Other Expenses	4031AM	Deprec Exp billed from Serv Co	NON-PAYROLL	\$ -
	408110	Employment Taxes	NON-PAYROLL	\$ 25.70
	908000	Customer Assistance Expenses	NON-PAYROLL	\$ 152.58
	908000	Customer Assistance Expenses	PAYROLL	\$ 291.05
Other Expenses Total				\$ 469.33
Total Affiliate costs requested in EECRF				\$ 587.93

WORKPAPERS FILED ELECTRONICALLY

All workpapers in relation to the Direct Testimony of Jay Andrew Lewis, Jr. have been filed electronically on the PUCT Interchange.

STATE OF TEXAS §
COUNTY OF TRAVIS §

1. "My name is Miguel Suazo, and I am an attorney licensed by the State Bar of Texas. I have practiced in the area of utility law since 2019. I am employed by Entergy Services, LLC ("ESL") as Senior Counsel. I am filing this affidavit on behalf of Entergy Texas, Inc. ("ETI" or "the Company"). I am over the age of 18 years and of sound mind. My statements in this affidavit are based upon personal knowledge and are true and correct.
2. ETI is requesting recovery of 2020 Energy Efficiency Cost Recovery Factor ("EECRF") proceeding expenses incurred by itself and the Cities.¹ The 2020 EECRF proceeding, Docket No. 50803, was filed by ETI on May 1, 2020 and was the proceeding in which ETI's EECRF for 2021 was established. A final order was issued in Docket No. 50803 on October 23, 2020.
3. I support the rate case expenses incurred by ETI for external legal counsel, copying and production services, and courier service. Company witness Jay Andrew Lewis Jr. supports the rate case expenses of \$22,945 incurred by ETI for affiliate legal counsel and regulatory personnel support from ESL. The Affidavit of Mr. Daniel J. Lawton supports the reasonableness of the Cities' expenses.

Provided as my Attachment 1 to this affidavit are invoices and supporting documentation for the external rate case expenses I support. Included in these expenses are \$30,034 for ETI's outside counsel expenses from Duggins Wren Mann & Romero, LLP ("DWMR"). Also included in ETI's requested rate case expenses for Docket No. 50803 are expenses in the amount of \$63 for Magic Couriers for delivery charges for

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the filing pleadings, discovery responses, and service to parties and \$265 for Kennedy Reporting Services.

4. The requested total 2020 EECRF proceeding expenses for ETI (including affiliate charges) of \$53,307 was less than the average ETI EECRF proceeding costs over the past five years which included approved rate case expenses totaling \$42,501 for Docket No. 49493 (as approved in Docket No. 50803); \$98,064 for Docket No. 48333 (as approved in 49493); \$58,404 for Docket No. 47115 (as approved in Docket No. 48333); \$53,482 for Docket No. 45915 (as approved in Docket No. 47115); and \$86,379 for Docket No. 44696 (as approved in Docket No. 45915).
5. I have reviewed the rate case expenses incurred by ETI in Docket No. 50803, and I affirm that they are reasonable and necessary. In my review and analysis, per 16 Tex. Admin. Code ("TAC") § 25.245(b), I considered:
 - a. the nature, extent, and difficulty of the work done by the attorney or other professional in the rate case;
 - b. the time and labor required and expended by the attorney or other professional;
 - c. the fees or other consideration paid to the attorney or other professional for the services rendered;
 - d. the expenses incurred for lodging, meals and beverages, transportation, or other services or materials;
 - e. the nature and scope of the rate case, including:
 - i. the size of the utility and number and type of consumers served;
 - ii. the amount of money or value of property or interest at stake;
 - iii. the novelty or complexity of the issues addressed;
 - iv. the amount and complexity of discovery;
 - v. the occurrence and length of a hearing; and
 - f. the specific issue or issues in the rate case and the amount of rate-case expenses reasonably associated with each issue.
6. I also considered the factors that, under 16 TAC § 25.245(c), the presiding officer is directed to address; namely, whether and the extent to which the evidence shows that:
 - a. the fees paid to, tasks performed by, or time spent on a task by an attorney or other professional were extreme or excessive;
 - b. the expenses incurred for lodging, meals and beverages, transportation, or other services or materials were extreme or excessive;
 - c. there was duplication of services or testimony;
 - d. the utility's or municipality's proposal on an issue in the rate case had no reasonable basis in law, policy, or fact and was not warranted by any reasonable argument for the extension, modification, or reversal of commission precedent;

- c. rate-case expenses as a whole were disproportionate, excessive, or unwarranted in relation to the nature and scope of the rate case addressed by the evidence pursuant to subsection (b)(5) of this section; or
 - f. the utility or municipality failed to comply with the requirements for providing sufficient information pursuant to subsection (b) of this section.
7. ETI provides service to approximately 473,000 retail customers in 68 cities and 27 counties across 15,320 square miles throughout southeast Texas. ETI owns approximately 2,747 miles of transmission lines, 13,194 miles of distribution lines, and multiple generating plants. In addition, ETI obtains a significant amount of services from ESL, its service company affiliate. ETI's last approved annual non-fuel revenue requirement was \$962,538,565. Accordingly, ETI is a substantial and complex utility.
 8. ETI's application in Docket No. 50803 requested that the EECRF for 2021 collect a total of \$9,431,190. Ultimately, the Commission approved a unanimous stipulation approving recovery of \$9,431,190. Given the amount at risk, it was reasonable for ETI to engage outside counsel with the necessary experience and capacity to prosecute Docket No. 50803.
 9. DWMR assumed extensive responsibilities related to nearly all aspects of Docket No. 50803. The expenses charged by DWMR were reasonable and necessary to assist ETI in preparing and prosecuting Docket No. 50803, including the initial filing, direct testimony, responding to discovery, assisting with case strategy and prosecution, and assisting with documenting the eventual settlement of the case. The energy efficiency-related issues addressed in that proceeding required extensive subject matter expertise not possessed by many attorneys. DWMR had the experience and subject matter expertise required to efficiently prepare and prosecute Docket No. 50803.
 10. The time required to prepare and prosecute an EECRF proceeding at the Public Utility Commission of Texas ("PUCT") depends on the particular facts and circumstances of the case, including the extent to which parties contest specific issues. Evidence of the time and labor required and expended in connection with Docket No. 50803 case is contained in the DWMR invoices included in my Attachment 1.
 11. Compensation to outside counsel is based on the hourly rates of the attorneys and paralegals and out-of-pocket expenses reimbursed without mark-up. The attorney fees charged were billed at \$355/hour. The majority of the charges incurred by ETI for Docket No. 50803 were for the services of DWMR attorney Mr. Everett Britt at a rate

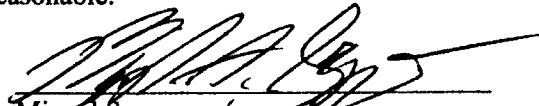
of \$355/hour. I compared these hourly billing rates to the hourly billing rates submitted by utilities and municipalities in Project No. 41622 (related to the Commission's Rate Case Expense Rule, 16 TAC § 25.245), reviewed past cases filed with the PUCT for fees and tasks of outside counsel and consultants, and reviewed survey information regarding the hourly rates of Texas lawyers. Based on this review, I conclude that the hourly rates charged by DWMR are well within the reasonable range of rates charged by other firms.

12. Based on the reasonableness of DWMR's hourly rates, the necessity and quality of the services provided, and the lack of duplication of such services with those provided by internal counsel, the resulting total level of fees paid to DWMR in connection with Docket No. 50803 – \$30,034 – is also reasonable. Considering the EECRF revenue requirement amount requested, at stake, and ultimately approved (roughly \$9.5 million), I do not consider the total amount of fees paid to DWMR to be extreme or excessive.
13. No lodging, transportation, or meals expenses were incurred by outside counsel for Docket No. 50803.
14. The level of fees paid to DWMR is consistent with the novelty and complexity of the specific issues raised and contested in prior EECRF cases as well as Docket No. 50803.
15. The level of fees paid to DWMR is also in line with the amount and complexity of discovery received from PUCT Staff in Docket No. 50803. In addition to responding to formal discovery, the Company also addressed issues raised informally by Staff.
16. The level of fees paid to DWMR is consistent with ETI's need to be prepared to fully prosecute the case through hearing if needed as well as the fact that Docket No. 50803 settled prior to a hearing.
17. DWMR costs associated with work on ETI's 2020 EECRF proceeding are itemized as follows: preparation of the Energy Efficiency Plan and Report (33.7%); preparation of the EECRF application and direct testimony (25.1%); rate case expense issues (5.1%); responding to discovery (18.7%); miscellaneous procedural matters such as the procedural schedule, list of issues, and case status discussions (9.1%); and settlement-related activities including settlement discussions, settlement document preparation, and activities related to seeking approval of the settlement and final order by the Commission (8.3%).


18. The provision of services in connection with Docket No. 50803 limited DWMR counsel's ability to accept and perform other work. Docket No. 50803 included numerous hard filing deadlines and required many hours of attorney time that could not be committed to other work.
19. DWMR counsel brought value to Docket No. 50803 owing to the fact that the attorneys in the firm have represented the Company for many years and in numerous rate cases and other proceedings before the PUCT. These attorneys' long-term relationship and knowledge of the Company's business and regulatory requirements enabled DWMR to capably and efficiently represent ETI in this matter. In particular, Mr. Britt has represented ETI in prior EECRF proceedings and is familiar with the Company's energy efficiency programs, goals, and revenue requirements.
20. DWMR has extensive experience representing utilities before the PUCT and other regulatory agencies. The firm enjoys an excellent reputation in the area of utility regulation. Their lawyers have represented numerous utilities before the Commission for decades. I am personally familiar with the work and reputations of DWMR and the particular attorneys that provided services for Docket No. 50803. I am also personally familiar with the work and reputation of DWMR regarding its trial and appellate court practice involving appeals of administrative agency orders. The firm has a strong reputation in the area of administrative and utility practice as well.
21. The number of attorneys assigned to Docket No. 50803 was reasonable. ETI monitored the activities and charges of DWMR and its own attorneys and staff to ensure no duplication of effort.
22. Ultimately, in Docket No. 50803, the Commission approved recovery of \$9,431,190 through the Company's 2021 EECRF, which was 100% of the amount requested. Thus, ETI derived significant value from the services rendered by its outside counsel.
23. In my opinion, it was reasonable for ETI to engage DWMR to assist in the preparation and presentation of Docket No. 50803. Moreover, the rates of DWMR are very reasonable given the work performed, and the attorneys' training, education, and experience. For the reasons explained above, it should be determined that the fees paid to, tasks performed by, and time expended by DWMR were not extreme or excessive. As noted above, there were no charges for lodging, meals and beverages, or

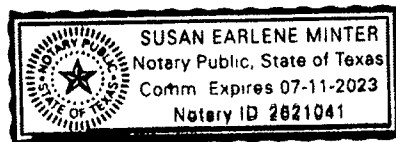
transportation or any duplication of effort. While ETI has broken out its expenses by issue or activity type, in an effort to comply with 16 TAC § 25.245(b)(6), the Company did not take any positions lacking a reasonable basis in law, policy, or fact. Finally, as ETI's total rate case expenses comprise less than 1% of the EECRF amounts requested and approved, I conclude that such expenses were not disproportionate, excessive, or extreme in relation to the nature or scope of Docket No. 50803.

24. In light of all the preceding factors, I conclude the Company's requested level of rate case expenses for Docket No. 50803 is reasonable."


Miguel Suazo

Subscribed and sworn to before me today, April 29, 2021.


Notary Public, in and for the State of Texas



PUCT DOCKET NO. _____

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

AFFIDAVIT OF DANIEL J. LAWTON REGARDING REASONABLENESS OF CITIES' RATE CASE
EXPENSES FOR THE DOCKET NO. 50803

I, Daniel J. Lawton, state the following facts under my oath.

1. My name is Daniel J. Lawton. I am over eighteen years of age and am not disqualified from making this affidavit.
2. I am giving this affidavit to support the reasonableness of Cities' rate case expenses in Application of Entergy Texas, Inc. For Authority to Adjust Its Energy Efficiency Cost Recovery Factor; Docket No.50803, filed with the Public Utility Commission of Texas in May 2020.
3. I am an attorney with The Lawton Law Firm P.C., 12600 Hill Country Blvd. Suite R-275, Austin Texas, 78738. The Lawton Law Firm was retained by Cities in the Entergy Texas, Inc. service area to represent the interest of the customers located within the municipal boundaries of Cities in this proceeding.¹
4. I address the reasonableness of actual fee related charges of the Lawton Law Firm in Docket No. 50803. Cities total rate case expenses for this matter total \$9,360.00. Attached hereto as Attachment 1 is a true and correct copy of the Lawton law Firm invoices for legal expenses incurred in Docket No. 50803. These invoices set out the time and a description of the task(s) performed spent working on the case.
5. As shown in Attachment 1 Mr. Lawton's billing rate is \$340.00 per hour. Ms. Molly Vandervoort billing rate is \$240.00. These are the normal billing rates charged for

¹ Cities consist of the municipalities of Anahuac, Beaumont, Bridge City, Cleveland, Conroe, Dayton, Groves, Houston, Huntsville, Liberty, Montgomery, Navasota, Nederland, Oak Ridge North, Pine Forrest, Pinehurst, Port Arthur, Port Neches, Rose City, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor, and West Orange ("Cities")

legal services. These billing rates are reasonable rates for an attorney providing these services before utility regulatory agencies in Texas. Part of the basis of my opinion is a review of the hourly rates charged by other attorneys to perform similar services.

6. The hourly rates charged by the firm are inclusive of ordinary out-of-pocket expenses. The Lawton Law Firm does not charge for normal copying, fax, deliveries, telephone or courier services. The Lawton Law Firm does charge for larger extraordinary expenses such as, expert costs, transcripts, and large copy jobs that are sent out for copying.
7. The total rate case expenses incurred by the Lawton Law Firm in Docket No. 50803 are shown in Table 1 below:


Table 1
LAWTON LAW FIRM CHARGES
MAY THROUGH SEPTEMBER 2020
DOCKET NO. 50803

Attorney	Hours	Rate	Total Charge
Daniel Lawton	21.6 Hrs.	\$340.00	\$7,344.00
Molly Vandervoort	8.4 Hrs.	\$240.00	\$2,016.00
Total	30.0 Hrs.		\$9,360.00

Actual invoices including billing detail are included in Attachment 1. The time spent in this proceeding was for reviewing compliance with the Commission's Energy Efficiency Rule and requirements, work analyzing the case, ETI EECRF calculations (including bonus calculations), and concluding the case. Based on my experience I conclude that: (1) the hourly rates of the Lawton Law Firm are reasonable; (2) the actual hours billed for the required case tasks are reasonable and necessary, (3) the calculation of total charges is correct; (4) there is no double billing of charges, (5) none of the charges should have been assigned to other matters, (6) there was no occasion where an attorney billing exceeded 12 hours in a day, and (7) no expenses were billed and no luxury or personal items,

such as first class travel, alcohol, valet parking, or meals in excess of \$25.00 were included in any invoice or charges.

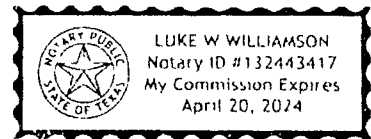
8. I have concluded that the time spent by the Lawton Law Firm and total fees incurred by the Cities are reasonable relative to the efforts necessary to represent the Cities in ETI's Docket No. 50803 EECRF proceeding.
9. The statements made in this affidavit are true and correct.


Daniel J. Lawton

State of Texas §
County of Travis §

Subscribed and Sworn to before me the undersigned authority, on the 30th day of April 2021, by Daniel J. Lawton.

Notary Public, State of Texas



ATTACHMENT A

THE LAWTON LAW FIRM, P.C.

12600 Hill Country Blvd , Suite R-275 • Austin, Texas 78738 • 512/322-0019 • Fax: 512/329-2604

**July 2020 Invoice-PUC Docket No. 50803; Application of Entergy Texas, Inc. To Adjust
Its Energy Efficiency Cost Recovery Factor**

Daniel Lawton	16.1 Hrs	\$340.00	\$5,474.00
Molly Mayhall Vandervoort	4.6 Hrs	\$240.00	\$1,104.00
Total Fees			\$6,578.00
EXPENSES:			
Total Fees and Expenses			\$6,578.00

* Please see attachment {Attachment Letter}

THE LAWTON LAW FIRM, P.C.

**July 2020 Invoice-PUC Docket No. 50803; Application of Entergy Texas, Inc. To
Adjust Its Energy Efficiency Cost Recovery Factor**

Daniel Lawton

5/12/20	3.6 Hrs	Review filing testimony and schedules
5/14/20	2.5 Hrs	Review filing testimony and schedules
5/20/20	1.5 Hrs	Review prior years analysis and review filing testimony and schedules
6/9/20	1.8 Hrs	Review filing bonus calculations
6/11/20	2.5 Hrs	Review filing testimony and schedules
6/12/20	1.5 Hrs	Review Company calculations
6/23/20	1.2 Hrs	Review Company calculations
6/26/20	0.5 Hrs	Review discovery responses
6/27/20	1.0 Hrs	Summary for client
Total Hours	16.1 HRS	

Molly Mayhall Vandervoort

5/13/20	0.8 Hrs	Draft and file intervention
6/4/20	1.0 Hrs	Review procedural schedule and correspond with parties, review discovery responses
6/10/20	1.2 Hrs	Attend prehearing via zoom, Participate in Zoom conference w/ parties and schedule
6/14/20	1.6 Hrs	Review Application and testimony
Total	4.6 Hrs	

THE LAWTON LAW FIRM, P.C.

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**August 2020 Invoice for July Services-PUC Docket No. 50803; Application of Entergy
Texas, Inc. To Adjust Its Energy Efficiency Cost Recovery Factor**

Daniel Lawton	3.0 Hrs	\$340.00	\$1,020.00
Molly Mayhall Vandervoort	1.4 Hrs	\$240.00	\$336.00
Total Fees			\$1,356.00
EXPENSES:			
Total Fees and Expenses			\$1,356.00

* Please see attachment {Attachment Letter}

THE LAWTON LAW FIRM, P.C.

August 2020 Invoice for July Services-PUC Docket No. 50803; Application of Entergy Texas, Inc. To Adjust Its Energy Efficiency Cost Recovery Factor

Daniel Lawton

7/15/20	1.5 Hrs	Review and summary of settlement considerations
7/30/20	1.5 Hrs	Review and summary of settlement considerations
Total Hours	3.0 HRS	

THE LAWTON LAW FIRM, P.C.

August 2020 Invoice for July Services-PUC Docket No. 50803; Application of Entergy Texas, Inc. To Adjust Its Energy Efficiency Cost Recovery Factor

Molly Mayhall Vandervoort

7/13/20	0.3 Hrs	Participate in settlement meeting via WebEx
7/31/20	1.1 Hrs	Review and provide comments on settlement documents
Total	1.4 Hrs	

THE LAWTON LAW FIRM, P.C.

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**September 2020 Invoice for August Services-PUC Docket No. 50803; Application of
Entergy Texas, Inc. To Adjust Its Energy Efficiency Cost Recovery Factor**

Daniel Lawton	2.5 Hrs	\$340.00	\$850.00
Molly Mayhall Vandervoort	1.9 Hrs	\$240.00	\$456.00
Total Fees			\$1,306.00
EXPENSES:			
Total Fees and Expenses			\$1,306.00

* Please see attachment {Attachment Letter}

THE LAWTON LAW FIRM, P.C.

September 2020 Invoice for August Services-PUC Docket No. 50803; Application of Entergy Texas, Inc. To Adjust Its Energy Efficiency Cost Recovery Factor

Daniel Lawton

8/10/20	2.5 Hrs	Review all settlement documents finalize case
7		
Total Hours	2.5 HRS	

THE LAWTON LAW FIRM, P.C.

September 2020 Invoice for August Services-PUC Docket No. 50803; Application of Entergy Texas, Inc. To Adjust Its Energy Efficiency Cost Recovery Factor

Molly Mayhall Vandervoort

[illegible]

THE LAWTON LAW FIRM, P.C.

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October 2020 Invoice for September Services-PUC Docket No. 50803; Application of Entergy Texas, Inc. To Adjust Its Energy Efficiency Cost Recovery Factor

Molly Mayhall Vandervoort	0.5 Hrs	\$240.00	\$120.00
Total Fees			\$120.00
EXPENSES:			
Total Fees and Expenses			\$120.00

* Please see attachment (Attachment Letter)

Molly Mayhall Vandervoort

9/25/20		0.5 Hrs	Reviewed proposed final order and Company edits.
Total		0.5 Hrs	