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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 CITIES FIRST REQUEST FOR INFORMATION:
CITIES 1:3 – ADDENDUM 2

Entergy Texas, Inc. (“Entergy Texas” or “the Company”) files its Response to Cities 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,

Erika N. Garcia

Erika N. Garcia
ENERGY SERVICES, LLC
919 Congress Avenue, Suite 701
Austin, Texas 78701
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Attachments: **CITIES 1:3 ADDENDUM 2**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Cities 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 3rd day of August 2021.

Erika N. Garcia
Erika N. Garcia

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: CITIES

Prepared By: Phong Nguyen/Andrew
Dornier
Sponsoring Witness: N/A
Beginning Sequence No. TH48
Ending Sequence No. TH49

Question No.: CITIES 1-3

Part No.:

Addendum: 2

Question:

Please provide the avoided cost of capacity and avoided cost of energy in Midcontinent Independent System Operator (MISO) Zone 9 (Entergy) in 2020.

Response:

ETI has filed an objection to this request.

Addendum 1:

The avoided cost of capacity in Midcontinent Independent System Operator, Inc. (“MISO”) can be measured by MISO’s calculation of the cost of new entry (“CONE”), which for Load Resource Zone (“LRZ”) 9 was \$81.64 kW-year for the 2019/2020 planning year (June 1, 2019 – May 31, 2020) and \$86.35 kW-year for the 2020/2021 planning year (June 1, 2020 – May 31, 2021). These values are provided on page 8 of the “Cost of New Entry PY 2020/21, Resource Adequacy Subcommittee, 11 September 2019,” which is publicly available on MISO’s website at: [20190911 RASC Item 04a CONE 2020-2021380208.pdf \(misoenergy.org\)](https://www.misoenergy.org/20190911%20RASC%20Item%2004a%20CONE%202020-2021380208.pdf)

ETI is not in possession of the avoided cost of energy for MISO LRZ 9. For purposes of this response, ETI used the information within its possession, which includes the retail and wholesale loads (where applicable) of ETI, Entergy New Orleans, LLC (“ENO”), and Entergy Louisiana, LLC (“ELL”), to determine the load-weighted average of the ETI, ENO, and ELL load zone settlement point prices (the locational margin prices at which these load zones settled in the day-ahead and real time markets) for the peak periods (as defined in 16 Tex. Admin. Code § 25.181(c)(46)) covering the 2020 winter and summer peaks. For these areas of MISO LRZ 9, ETI calculated an avoided cost of energy of \$39.25/MWh in 2020.

Addendum 2:

In ETI’s Addendum 1, the load-weighted average of the ETI, ENO, and ELL load zone settlement point prices for the 2020 peak periods did not properly account for the load of ELL’s wholesale customer Sam Rayburn Municipal Power Agency (“SRMPA”) due to a

Question No.: CITIES 1-3 Addendum 2

formula error. When this error is corrected and the energy cost of the SRMPA load is appropriately accounted for, ETI calculated an avoided cost of energy of \$47.31/MWh or \$0.04731/kWh for the retail and wholesale loads of the Entergy Operating Companies in LRZ 9 (i.e., ETI, ENO, and ELL) in 2020.