



## Filing Receipt

**Received - 2022-06-27 02:46:04 PM**  
**Control Number - 52487**  
**ItemNumber - 420**

**SOAH DOCKET NO. 473-22-1074**  
**PUC DOCKET NO. 52487**

|                                      |          |                                |
|--------------------------------------|----------|--------------------------------|
| <b>APPLICATION OF ENTERGY TEXAS,</b> | <b>§</b> | <b>BEFORE THE STATE OFFICE</b> |
| <b>INC. TO AMEND ITS CERTIFICATE</b> | <b>§</b> |                                |
| <b>OF CONVENIENCE AND NECESSITY</b>  | <b>§</b> | <b>OF</b>                      |
| <b>TO CONSTRUCT ORANGE COUNTY</b>    | <b>§</b> |                                |
| <b>ADVANCED POWER STATION</b>        | <b>§</b> | <b>ADMINISTRATIVE HEARINGS</b> |

**ENTERGY TEXAS, INC.'S AMENDED RESPONSE TO SOAH ORDER NO. 9**

Pursuant to SOAH Order No. 9, Entergy Texas, Inc. (ETI or the Company) provides its exhibit list and an amended list of the individuals who have signed the Protective Order certification to date.

**I. EXHIBIT LIST**

ETI will offer the following exhibits:

| <b>EXHIBIT NO.</b> | <b>DESCRIPTION</b>  |
|--------------------|---|
| ETI-1              | Application (includes Errata No. 1)   |
| ETI-2              | Proof of Notice   |
| ETI-3              | Direct Testimony of Eliecer Viamontes   |
| ETI-3A             | Direct Testimony of Sallie T. Rainer ( <i>adopted by Eliecer Viamontes</i> includes Errata No. 3)   |
| <b>ETI-3B</b>      | <b>(Highly Sensitive) Direct Testimony of Sallie T. Rainer Exhibit STR-1 (<i>adopted by Eliecer Viamontes</i>)</b>  |
| ETI-4              | Direct Testimony and Exhibits of Abigail B. Weaver  |
| <b>ETI-4A</b>      | <b>(Highly Sensitive) Direct Testimony of Abigail B. Weaver (p.11, ABW-3, ABW-5 through 8, WP ABW Testimony includes Errata No. 2)</b>  |
| ETI-5              | Direct Testimony and Exhibits of Daniel Kline   |
| <b>ETI-5A</b>      | <b>(Highly Sensitive) Direct Testimony of Daniel Kline Exhibit DK-3 (Highly Sensitive Exhibit DK-5 provided on USB)</b>   |
| ETI-6              | Direct Testimony and Exhibits of Ryan Magee   |
| <b>ETI-6A</b>      | <b>(Highly Sensitive) Direct Testimony of Ryan Magee Exhibit RM-1</b>   |
| ETI-7              | Direct Testimony and Exhibits of Phong D. Nguyen (includes Errata No. 2 and 3)  |
| <b>ETI-7A</b>      | <b>(Highly Sensitive) Direct Testimony of Phong D. Nguyen Exhibit PDN-2 and PDN-3 (includes Errata No. 2) (Highly Sensitive WP1_Exhibit PDN-3, WP2-Exhibit PDN-3, and WP3_Exhibit PDN-3 provided on USB)</b>              |
| ETI-8              | Direct Testimony and Exhibits of Carlos Ruiz  |
| <b>ETI-8A</b>      | <b>(Highly Sensitive) Direct Testimony of Carlos Ruiz (Testimony pp. 6, 22 and 24; Exhibit CR-6, CR-8, WP-CR Testimony_Q55_Escalation Report_HSPM) Supplemental Exhibit CR-8_HSPM Voluminous_2-17-22 provided on USB)</b> |

| <b>EXHIBIT NO.</b> | <b>DESCRIPTION</b>  |
|--------------------|---|
| <b>ETI-8B</b>      | <b>(Highly Sensitive) ETI First Periodic Report on Market Escalation as Addressed in the Direct Testimony of Carlos Ruiz</b>                  |
| <b>ETI-8C</b>      | <b>(Highly Sensitive) ETI Third Periodic Report on Market Escalation as Addressed in the Direct Testimony of Carlos Ruiz</b>                  |
| ETI-9              | Direct Testimony and Exhibits of Deborah Saxton   |
| ETI-10             | Direct Testimony of Bobby R. Sperandeo  |
| <b>ETI-10A</b>     | <b>(Highly Sensitive) Direct Testimony of Bobby R. Sperandeo Exhibit BRS-1</b>  |
| ETI-11             | Direct Testimony and Exhibits of Allison P. Lofton (includes Errata No. 1)  |
| <b>ETI-11A</b>     | <b>(Highly Sensitive) Workpapers to Direct Testimony of Allison P. Lofton (WP2/Exhibit APL-3 and WP3/Exhibit APL-3 includes Errata No. 1)</b> |
| ETI-12             | Direct Testimony of Nicholas W. Owens   |
| ETI-12A            | Workpapers to the Direct Testimony of Nicholas W. Owens (Voluminous provided on USB)  |
| ETI-13             | Direct Testimony and Exhibits of Robert E. Hebner, Ph.D.  |
| ETI-14             | Direct Testimony and Exhibits of Wayne J. Oliver (includes Errata No. 1)  |
| <b>ETI-14A</b>     | <b>(Highly Sensitive) Direct Testimony of Wayne J. Oliver (Exhibit WJO-3 includes Errata No. 1)</b>   |
| ETI-15             | Supplemental Direct Testimony and Exhibits of William C. John   |
| ETI-16             | Supplemental Direct Testimony of Phong D. Nguyen  |
| <b>ETI-16A</b>     | <b>(Highly Sensitive) Supplemental Direct Testimony of Phong D. Nguyen (pp. 2, 4, 6)</b>  |
| ETI-17             | Supplemental Direct Testimony and Exhibit of Deborah Saxton   |
| ETI-18             | Supplemental Direct Testimony and Exhibits of Jess K. Totten  |
| ETI-19             | Rebuttal Testimony and Exhibits of Robert E. Hebner, Ph.D.  |
| ETI-19A            | Workpapers to the Rebuttal Testimony of Robert Hebner   |
| ETI-20             | Rebuttal Testimony and Exhibits of William C. John  |
| ETI-21             | Rebuttal Testimony of Daniel Kline  |
| ETI-22             | Rebuttal Testimony and Exhibits of Ellen Lapson   |
| ETI-22A            | Workpapers to the Rebuttal Testimony of Ellen Lapson  |
| ETI-23             | Rebuttal Testimony and Exhibits of Allison P. Lofton  |
| ETI-23A            | Workpapers to the Rebuttal Testimony of Allison Lofton  |
| <b>ETI-23B</b>     | <b>(Highly Sensitive) Workpapers to the Rebuttal Testimony of Allison Lofton</b>  |
| ETI-24             | Rebuttal Testimony of Ryan Magee  |
| <b>ETI-24A</b>     | <b>(Highly Sensitive) Rebuttal Testimony of Ryan Magee (p. 8 and Exhibit RM-R)</b>  |
| ETI-25             | Rebuttal Testimony and Exhibits of Phong D. Nguyen  |
| ETI-25A            | Workpapers to the Rebuttal Testimony of Phong D. Nguyen   |
| <b>ETI-25B</b>     | <b>(Highly Sensitive) Workpapers to the Rebuttal Testimony of Phong D. Nguyen (WPs 1-4, 7 and 9-10 provided on USB)</b>                       |
| ETI-26             | Rebuttal Testimony of Nicholas W. Owens   |
| ETI-26A            | Workpapers to the Rebuttal Testimony of Nicholas W. Owens   |
| <b>ETI-26B</b>     | <b>(Highly Sensitive) Workpapers to the Rebuttal Testimony of Nicholas Owens (WP/NWO Rebuttal Figure 1 provided on USB)</b>                   |

| <b>EXHIBIT NO.</b> | <b>DESCRIPTION</b>  |
|--------------------|---|
| ETI-27             | Rebuttal Testimony of Carlos Ruiz   |
| <b>ETI-27A</b>     | <b>(Highly Sensitive) Rebuttal Testimony of Carlos Ruiz Exhibit CR-R-1</b>  |
| ETI-28             | Rebuttal Testimony of Jess K. Totten  |
| ETI-28A            | Workpapers to the Rebuttal Testimony of Jess Totten   |
| ETI-29             | Rebuttal Testimony of Abigail B. Weaver   |
| <b>ETI-29A</b>     | <b>(Highly Sensitive) Rebuttal Testimony of Abigail B. Weaver (pp. 23 29, 30, 50 and 58) and Exhibits ABW-R-1 and ABW-R-2</b> |
| ETI-29B            | Workpapers to the Rebuttal Testimony of Abigail B. Weaver (WP-3/ABW Rebuttal Testimony voluminous provided on USB)            |
| <b>ETI-29C</b>     | <b>(Highly Sensitive) Workpapers to the Rebuttal Testimony of Abigail B. Weaver</b>   |
| ETI-30             | Supplemental Rebuttal Testimony of Phong D. Nguyen  |
| ETI-31             | Supplemental Rebuttal Testimony of Ellen Lapson   |

## **II. PARTIES SUBJECT TO THE PROTECTIVE ORDER**

In the event a discussion of Confidential or Highly Sensitive material is necessary during the Hearing on the Merits, the following individuals have signed the Protective Order certification to date:

| <b>Cities</b>             | <b>CONFIDENTIAL</b> | <b>HIGHLY SENSITIVE</b> |
|---------------------------|---------------------|-------------------------|
| Daniel Lawton             | X                   | X                       |
| Molly Mayhall Vandervoort | X                   | X                       |
| Kevin O'Donnell           | X                   | X                       |
| <b>ETEC</b>               | <b>CONFIDENTIAL</b> | <b>HIGHLY SENSITIVE</b> |
| David Brian               | X                   | X                       |
| Mark Davis                | X                   | X                       |
| Jacob Lawler              | X                   | X                       |
| Jack Madden               | X                   | X                       |
| Adrienne Waddell          | X                   | X                       |
| <b>OPUC</b>               | <b>CONFIDENTIAL</b> | <b>HIGHLY SENSITIVE</b> |
| Erin Cromleigh            | X                   | X                       |
| Chris Ekoh                | X                   | X                       |
| Tucker Furlow             | X                   | X                       |
| Adam Goodlett             | X                   | X                       |
| Karl Nalepa               | X                   | X                       |
| Janalee Paiz              | X                   | X                       |
| Rosie Reyna               | X                   | X                       |
| Barham Richard            | X                   | X                       |
| Melissa Silguero          | X                   | X                       |
| Zachary Stephenson        | X                   | X                       |
| Renee Wiersema            | X                   | X                       |
| <b>Sierra Club</b>        | <b>CONFIDENTIAL</b> | <b>HIGHLY SENSITIVE</b> |

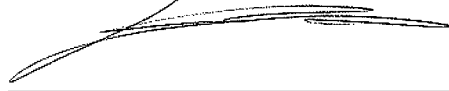
|                      |                     |                         |
|----------------------|---------------------|-------------------------|
| Tyler Fitch          | X                   | X                       |
| Devi Glick           | X                   | X                       |
| Lauren Hogrewe       | X                   | X                       |
| Tony Medoza          | X                   | X                       |
| Matthew Miller       | X                   | X                       |
| Joshua Smith         | X                   | X                       |
| Dru Spiller          | X                   | X                       |
| Rachel Wilson        | X                   | X                       |
| <b>Staff</b>         | <b>CONFIDENTIAL</b> | <b>HIGHLY SENSITIVE</b> |
| Mildred Anaele       | X                   | X                       |
| Albert Esser         | X                   | X                       |
| Tsungirira Gatora    | X                   | X                       |
| Therese Harris       | X                   | X                       |
| Nabaraj Pokharel     | X                   | X                       |
| Rachelle Robles      | X                   | X                       |
| Keith Rogas          | X                   | X                       |
| <b>TIEC</b>          | <b>CONFIDENTIAL</b> | <b>HIGHLY SENSITIVE</b> |
| Kellie Balli         | X                   | X                       |
| Ben Hallmark         | X                   | X                       |
| Jonathan Ly          | X                   | X                       |
| Jeffry Pollock       | X                   | X                       |
| Christian Rice       | X                   | X                       |
| Kitty Turney         | X                   | X                       |
| Rex Van Middlesworth | X                   | X                       |
| Charles Griffey      | X                   | X                       |

Respectfully submitted,

George G. Hoyt  
State Bar No. 24049270  
Laura B. Kennedy  
State Bar No. 24041234  
ENTERGY SERVICES, LLC  
919 Congress Avenue, Suite 701  
Austin, Texas 78701  
(512) 487-3945  
(512) 487-3958 (facsimile)  
[ghoyt90@entergy.com](mailto:ghoyt90@entergy.com)  
[lkenn95@entergy.com](mailto:lkenn95@entergy.com)

Lino Mendiola III  
State Bar No. 0079128  
Jeffrey Stuart  
State Bar No. 24066160  
EVERSHEDS SUTHERLAND (US) LLP  
600 Congress Avenue, Suite 2000  
Austin, Texas 78701

(512) 721-2700  
(512) 721-2656 (facsimile)  
[linmendiola@eversheds-sutherland.com](mailto:linmendiola@eversheds-sutherland.com)  
[jeffreystuart@eversheds-sutherland.com](mailto:jeffreystuart@eversheds-sutherland.com)



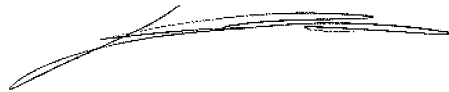
---

Jay Breedveld  
State Bar No. 00790362  
Carey Olney  
State Bar No. 24060363  
DUGGINS WREN MANN & ROMERO, LLP  
600 Congress Avenue, Suite 1900  
Austin, Texas 78701  
(512) 744-9300  
(512) 744-9399 (facsimile)  
[jbreedveld@dwmrlaw.com](mailto:jbreedveld@dwmrlaw.com)  
[colney@dwmrlaw.com](mailto:colney@dwmrlaw.com)

**ATTORNEYS FOR ENTERGY TEXAS,  
INC.**

**CERTIFICATE OF SERVICE**

I certify that on June 27, 2022, a true and correct copy of the foregoing document was served on all parties of record in accordance with the Second Order Suspending Rules issued in Project No. 50664.



---

Jay Breedveld