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Received - 2022-05-23 10:12:11 AM
Control Number - 53517
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SOAH DOCKET NO. 473-22-2603
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**APPLICATION OF ENTERGY
TEXAS, INC. TO ADJUST ITS
ENERGY EFFICIENCY COST
RECOVERY FACTOR**

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**BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 2-1 THROUGH 2-3**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Entergy Texas, Inc., by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: May 23, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Keith Rogas
Division Director

Robert Dakota Parish
Managing Attorney

/s/ Merritt Lander
Merritt Lander
State Bar No. 24106183
Arnett Caviel
State Bar No. 24121533
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7290
(512) 936-7268 (facsimile)
Merritt.Lander@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on **Error! Reference source not found.**, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Merritt Lander
Merritt Lander

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DEFINITIONS

- 1) "ETI" or "the Company" refers to Entergy Texas, Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond ETI's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.**Error! Bookmark not defined.**

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 2-1** Please provide an affidavit (or testimony) from an attorney—who is licensed to practice in the State of Texas and familiar with the Company's request in this proceeding—attesting to the reasonableness and necessity of the affiliate rate-case expenses that the Company is seeking in this proceeding. Please include attestations about how the requested affiliate rate-case expenses meet the individual standards for rate-case expenses as laid out in 16 Texas Administrative Code § 25.245 (no duplication of effort, no excessive or extreme amounts of time spent, no billings at an excessive hourly rate, etc.).
- Staff 2-2** Please refer to Application Exhibit MRD-01, Table 10, regarding Program Funding for Calendar Year 2021.
- a) provide a detailed breakdown of the administrative and research and development costs outlined for the 2021 program year; and
 - b) provide copies of applicable invoices and contracts.
- Staff 2-3** Please refer to Application Exhibit MRD-01, Table 6, regarding Proposed Annual Budget Broken Out by Program for Each Customer Class. As it relates to Table 6, please provide the following information:
- a) a detailed breakdown of the research and development costs proposed for the 2022 and 2023 program years; and
 - b) copies of applicable contracts.