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**SOAH DOCKET NO. 473-22-04394
PUC DOCKET NO. 53719**

APPLICATION OF ENTERGY	§	BEFORE THE STATE OFFICE
TEXAS, INC. FOR AUTHORITY	§	OF
TO CHANGE RATES	§	ADMINISTRATIVE HEARINGS

**TEXAS INDUSTRIAL ENERGY CONSUMERS SECOND REQUEST FOR
INFORMATION TO ENTERGY TEXAS, INC.**

Pursuant to 16 T.A.C. § 22.144, Texas Industrial Energy Consumers (“TIEC”) requests that Entergy Texas, Inc. (“ETI”) provide all of the information requested in Exhibit “A” within the time frame specified under the procedural schedule set in this proceeding.

Pursuant to 16 T.A.C. § 22.144(c)(2), TIEC further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to 16 T.A.C. § 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. TIEC further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested.

All information responsive to the requests on the attached Exhibit “A” should be sent to the following persons via overnight courier, on a piecemeal basis as individual items become available:

Mr. Rex D. VanMiddlesworth
Mr. Benjamin B. Hallmark
Mr. Christian E. Rice
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DEFINITIONS AND INSTRUCTIONS

A. "ETI," "the Company" or "you" refers to Entergy Texas Inc., and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The terms "document" or "documents" are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced, reproduced or stored by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. The definition includes electronic information that has been deleted. "Document" or "documents" shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, TIEC specifically requests that any electronic or magnetic information (which is included in the definition of "document") that is responsive to a request herein be produced on CD-ROM in a format that is compatible with Adobe Acrobat, Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable .pdf copy of the entire email string. Attachments to emails should be provided with the email in searchable .pdf form, unless it is stored in a different format, in which the attachment should be produced in its native format and provided on CD-Rom.

D. The terms "and" and "or" shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. 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.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. If any document is withheld under any claims of privilege, please furnish a list identifying each document for which a privilege is claimed together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed. This instruction is not intended to impose an obligation greater than contemplated by the Commission’s rules and any applicable orders in this case.

L. Pursuant to 16 T.A.C. § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

N. The term “emails” includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph “D.” regarding specific instructions for producing such items.

O. “Communications” refers to correspondence of any kind, including emails.

P. “Identify” and “describe” shall have the meaning set forth below according to the context in which the term is used:

- i. When used in reference to an individual, shall mean to state his or her full name, business affiliation, job title, and business address and telephone number;
- ii. When used in reference to a corporation, shall mean to state its full name, its state of incorporation, its address and its principal place of business;

- iii. When used in reference to any entity other than an individual or corporation, shall mean to state its official name, its organizational form and its address;
- iv. When used in reference to a document, shall mean to state the type of document, date, author, addressee, title, its present location, the name and address of its custodian, and the substance of the contents thereof. In lieu of identifying any document, copies thereof may be furnished; and
- v. When used in reference to a communication, shall mean to state the form of the communication (e.g., telephone conversation, letter, telegram, teletype, telecopy, written memorandum, face to face conversation, or any other form), the date of the communication or the dates on which the communication was sent and/or received if not the same, the parties to the communication, the party who initiated it, the substance of the communication, and the present location and the name and address of the custodian if the communication was non-verbal and/or of any written memorialization of the communication.

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Christian E. Rice

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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, Christian E. Rice, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 13th day of September, 2022 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Christian E. Rice

Christian E. Rice

**SOAH DOCKET NO. 473-22-04394
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APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**TEXAS INDUSTRIAL ENERGY CONSUMERS SECOND REQUEST FOR
INFORMATION TO ENTERGY TEXAS, INC.**

- TIEC 2-1** Please explain the current status of the assumed deactivation dates for Big Cajun II Unit 3 and Nelson Unit 6, including whether a formal retirement decision for these units has been made. If a formal decision has been made, please provide supporting documentation, including any board resolutions. If no formal retirement decision has been made, state when a final decision is expected.

- TIEC 2-2** Please provide any analyses and documents supporting a 30-year lifespan for Montgomery County Power Station (MCPS).

- TIEC 2-3** Please provide any documents comparing the lifespans of combined cycle gas turbine plants installed in the past ten years.

- TIEC 2-4** Please state whether ETI intends to retire Sabine 4 by the later of 2026 or when the proposed Orange County Advanced Power Station would enter service.

- TIEC 2-5** Referring to the Direct Testimony of Dane A. Watson, Exhibit DAW-2, Appendix A, please provide in live EXCEL format the backup supporting all hard-coded, numerical inputs.

- TIEC 2-6** Referring to workbook AJ12-Depreciation Expense, please provide in live EXCEL format the backup supporting all hard-coded, numerical inputs on the worksheet titled "AJ12.6-12.9".

- TIEC 2-7** Please reconcile the proforma adjustment calculated in the worksheet titled "AJ12.6-12.9" of the workbook AJ12-Depreciation Expense with the depreciation expense calculated in Exhibit DAW-2, Appendix A.

- TIEC 2-8** Referring to ETI's Response to Cities 1-12, please provide documents supporting the costs associated with the Power Through generation program for which ETI is seeking cost recovery in this case.

- TIEC 2-9** Please provide a copy of any agreements between ETI and retail customers regarding the installation of generators located near a customer's premises.

- TIEC 2-10** Please provide a schedule showing how any costs associated with supporting the generation identified in TIEC 2-24 were allocated to Texas retail customers along with workpapers in "live" EXCEL format.

- TIEC 2-11** Please provide in live EXCEL format the Retail Pricing Benchmarking Analysis presented in Exhibit RDS-3.
- TIEC 2-12** Please describe and provide a copy of any analysis conducted by ETI, or on ETI's behalf, that supports the conclusion that ETI has performed better than other utilities in restoring service to retail customers after major storms and provide supporting documents.
- TIEC 2-13** Please provide a copy of any analysis or survey in ETI's possession comparing the projected/actual cost incurred by other utilities to construct combined cycle gas turbine generation to serve retail customers in the past ten years.
- TIEC 2-14** Please provide a copy of any analysis or survey in ETI's possession comparing the projected/actual in-service dates for placing new combined cycle gas turbine generation into service in the past ten years.
- TIEC 2-15** Please describe and provide a copy of any analysis conducted by ETI, or on ETI's behalf, that supports the conclusion that ETI's cost/time management of the construction of the MCPS was superior to other utilities that have installed power plants comparable to MCPS and provide supporting documents.
- TIEC 2-16** Please provide ETI's SAIDI and SAIFI reliability metrics for the test year and for each of the past five years.

The following RFIs pertain to the Direct Testimony of Jess K. Totten:

- TIEC 2-17** Referring to ETI's response to TIEC 1-22(a), please admit or deny that no calculations were performed to derive each 10 basis point increase to return on equity (ROE) recommended by Jess K. Totten. If denied, please provide those calculations.
- TIEC 2-18** Please identify any PUC proceedings of which you are aware in which a utility requested an adder or bonus to its ROE, or requested a higher ROE than the PUC would otherwise adopt, based on Public Utility Regulatory Act (PURA) Section 36.052 or the considerations listed within that statutory provision.
- TIEC 2-19** Please identify any PUC proceedings of which you are aware in which the PUC approved an adder or bonus to the utility's ROE, or approved a higher ROE than otherwise would have been adopted, based on Public Utility Regulatory Act (PURA) Section 36.052 or the considerations listed within that statutory provision.
- TIEC 2-20** Please identify any regulatory proceedings of which you are aware in which any regulatory commission approved an adder or bonus to the utility's ROE, or approved a higher ROE than the regulatory authority otherwise would have adopted based on the utility's efforts in conserving resources, quality of service, retail rates, quality of management or other similar considerations.

- TIEC 2-21** Referring to page 19, lines 13-16, please explain what you mean by the phrase “would otherwise adopt.”
- TIEC 2-22** Please provide a copy of all studies or analyses relied upon by Mr. Totten in supporting ETI’s contention that ETI performed better than other utilities to bring MCPS into commercial operation both ahead of schedule and under budget.
- TIEC 2-23** Please state whether Mr. Totten has conducted independent analysis comparing ETI’s storm restoration timelines with other utilities. If so, provide a copy of the analyses.
- TIEC 2-24** Please state whether Mr. Totten has conducted independent analysis comparing the projected/actual cost and projected/actual commercial operation date of installing new combined-cycle generation capacity. If so, provide a copy of the analyses.

The following discovery requests pertain to the Direct Testimony of Khamsune Vongkhamchanh.

- TIEC 2-25** Referring to Schedule O-6.3, please provide a complete copy of ETI’s line loss study supporting the proposed peak demand and energy loss factors and supporting workpapers in “live” EXCEL format.
- TIEC 2-26** Please explain why ETI’s proposed energy loss factors are higher than the proposed peak demand loss factors.
- TIEC 2-27** Please identify the circumstances under which the energy loss factors would be higher than the peak demand loss factors.

The following discovery requests pertain to the Direct Testimony of Crystal K. Elbe.

- TIEC 2-28** Referring to Schedule O-1.2:
- a. Please state whether the monthly per books kWh sales are based on billed or actual usage.
 - b. Please explain the substantial drop in LIPS kWh sales in March 2021 relative to the January-February and March-April.
- TIEC 2-29** Please provide in live EXCEL format the workpapers to Schedule O-1.7 showing the monthly unadjusted and adjusted billing demands for the demand-metered rate classes.