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**SOAH DOCKET NO. 474-24-04394
PUC DOCKET NO. 53719**

APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES	§ § §	PUBLIC UTILITY COMMISSION OF TEXAS
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**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC
QUESTION NOS. STAFF 5-1 THROUGH 5-4**

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: September 20, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Keith Rogas
Division Director

Sneha Patel
Managing Attorney

/s/ Mildred Anaele
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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 September 20, 2022, in accordance with the FIFTH Order Suspending Rules, issued in Project No. 50664.

/s/ Mildred Anaele
Mildred Anaele

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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 5-1** Reference Schedule G-14. Please provide a breakdown of the costs that are included in each listed item under "Texas Retail," including why ETI requests recovery of the amounts in expenses instead of through a separate rider. Additionally, provide the amount of time for which ETI expects amounts from older dockets to be recovered (e.g. Docket No. 29408).
- Staff 5-2** Reference Schedule G-7.8. Please provide the Total Electric as requested in a similar format to the first column, starting with net income matching that listed on Schedule A.
- Staff 5-3** Reference Schedule G-3 and G-15. Please explain the adjustment to the uncollectible accounts and write-off expenses on Schedule G-15 that result in different totals from the yearly amounts listed in Schedule G-3.
- Staff 5-4** Reference Direct Testimony of Eliecer Viamontes, page 38-39. Please explain what customer focused initiatives related to the Outside Services category have driven the increase in the O&M affiliate charge to ETI for the Utility and Executive Management Class Costs.
- Staff 5-5** Please provide the information provided in the columns labeled "Description," "Docket Number," and "Test Year Amount" on Schedule G-14 for the years 2018, 2019, and 2020 as well as the information for 2022 to date.
- Staff 5-6** Please refer to Schedule G-14 and provide the jurisdiction for Docket Number U-35991 and a justification for why such costs are included in proposed rates for Texas customers. If the costs were not directly incurred by ETI, provide the entity that directly incurred the costs, the total amount of costs incurred by that entity for the docket, and a detailed description of the method and associated calculation(s) used to allocated or otherwise assign costs to ETI.
- Staff 5-7** Please refer to Schedule G-14 and provide the amounts separately for Docket Nos. 49057 and 49874.
- Staff 5-8** Please refer to Schedule G-14, line 27 and provide a breakdown of the \$710,314 requested by docket number. Please also provide the breakdown of this item by docket number in the response to Staff 5-5.