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

APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**OFFICE OF PUBLIC UTILITY COUNSEL’S
SEVENTH REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC.**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Seventh Request for Information to Entergy Texas, Inc. (“ETI”). OPUC requests that ETI provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that ETI provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. “ETI,” the “Company,” “Applicant,” “You,” and “Your” refer 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.
2. “Document” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, summaries of interviews, reports of consultants, appraisals,

forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your 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.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or 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 to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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- 7-1. Please refer to ETI's filed Schedules O-1.3 and O-1.4. Please provide a detailed explanation why the adjusted kilowatt hours ("kWh") at Plant and kWh at Meter for each month for each customer class in Schedule O-1.4 equals the unadjusted kWh at Plant and kWh at Meter for each month for each customer class in Schedule O-1.3. Please provide the detailed explanation for each customer class and explain why ETI did not make any year-end customer adjustments or any weather normalization adjustments to kWh for the test-year.
- 7-2. Please refer to ETI's filed Schedules O-1.3 and O-1.4. Please provide a detailed explanation why the adjusted monthly Maximum Diversified Demands ("MDD") and Coincident Peak ("CP") demands at Plant and at Meter for the Residential Service and the Small General Service classes in Schedule O-1.4 equals the unadjusted monthly MDDs and CPs at Plant and at Meter for those customer classes in Schedule O-1.3. Please provide the detailed explanation for each customer class and explain why ETI did not make any year-end customer adjustments or any weather normalization adjustments to MDDs and CPs.
- 7-3. Please refer to ETI's filed Schedules O-1.3 and O-1.4. Please provide a detailed explanation why Schedule O-1.4 reveals adjustments were made to the monthly MDDs and CPs for the General Service, Large General Service, and Large Industrial Power Service customer classes, although no adjustments were made to the monthly kWh for those classes.
- 7-4. Please refer to ETI's filed Schedules O-1.3 and O-1.4. Please provide a detailed explanation why Schedule O-1.4 reveals adjustments were made to the monthly MDDs and CPs for the General Service, Large General Service, and Large Industrial Power Service, but not to the Residential Service and Small General Service customer classes.
- 7-5. Please refer to ETI's filed Schedules O-1.2, O-1.3 and O-1.4. Please explain why Schedule O-1.2 indicates adjustments were made to the monthly kWh for the Residential Service, Small General Service, General Service, Large General Service and Large Industrial Power Service classes, but Schedule O-1.4 does not reflect any such adjustments were made.
- 7-6. Please refer to ETI's filed Schedules O-1.4 and Q-7. Please explain why the kWh used to calculate Present Revenues, Proposed Rates and Proposed Revenues in Schedule Q-7 contains Year-End Customer Adjustments and Weather Adjustments for the Residential Service, Small General Service, General Service, Large General Service and Large Industrial Power Service classes, but Schedule O-1.4 does not reflect those adjustments.

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- 7-7. Were the kWh, MDDs and CPs from Schedule O-1.4 used by ETI to develop the kWh and demand allocators for its Class Cost of Service Study? If not, please identify the sources of the kWh, MDDs and CPs ETI used and where those sources were provided in the filing.
- 7-8. Please provide working electronic versions of all workpapers used by ETI to calculate the customer, energy and demand allocators used by ETI to allocate costs among its regulatory jurisdictions.
- 7-9. Please provide working electronic versions of all workpapers used by ETI to calculate the customer, energy and demand allocators used by ETI to allocate costs among Texas retail customer classes in its Class Cost of Service study.
- 7-10. Please provide, in working electronic format, the information provided in Schedule O-1.3 by month for the same customer classes shown in Schedule O-1.3 for the calendar years of 2017 through 2020. If possible, please provide this information in the same format as Schedule O-1.3.
- 7-11. Please refer to the Direct Testimony of Allison P. Lofton at 43:5 – 17. Please provide a detailed one-line diagram for each of the H-E-B Backup Generators that identifies the locations of backup generators and ETI's meter, any transformation between the backup generator and ETI's primary distribution feeder, and any transformation between the backup generator and the H-E-B load.
- 7-12. Please refer to the Direct Testimony of Allison P. Lofton at 43:5 – 17. For each of the H-E-B Backup Generators, please identify whether the generator is located on property owned by H-E-B or ETI. If the backup generator is on property owned by H-E-B, please provide a detailed description of any ETI right-of-way or property lease for the site of the backup generator, as well as any associated agreements between ETI and H-E-B for use of the site.
- 7-13. Please refer to the Direct Testimony of Allison P. Lofton at 43:5 – 17. Please provide all agreements between ETI and H-E-B related to ETI's installation of each of the two backup generators.
- 7-14. Please refer to the Direct Testimony of Allison P. Lofton at 43:5 – 17. Please provide all presentations and any other documents developed for or by ETI or delivered to ETI that address, discuss, or analyze locating either or both of the H-E-B Backup Generators at H-E-B locations.
- 7-15. Please identify any additional charges H-E-B pays, or any other benefits ETI receives from H-E-B, related to locating the two H-E-B Backup Generators at H-E-B sites and directly serving the H-E-B loads.

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- 7-16.** Please refer to ETI's Response to TIEC's First Request for Information ("RFI"), No. 1-24. Please provide all workpapers used to develop the portion of the costs for the backup generators recovered through ETI's Additional Facilities Charge ("AFC") rider, which is used to charge H-E-B for the backup generators.
- 7-17.** Please refer to ETI's Response to TIEC's First RFI, No. 1-24. Please identify the portion of the costs for the backup generators that ETI recovers from HEB and provide a detailed explanation of the justification for the portions of the costs that are recovered through the AFC rider and the portion that is not recovered through the AFC rider.
- 7-18.** Please refer to ETI's Response to TIEC's First RFI, No. 1-24. For each month since each of the generators have been placed into service, please provide the kWh generated by each facility related to outages and identify the fuel cost associated with that kWh.
- 7-19.** Please refer to ETI's Response to TIEC's First RFI No. 1-24. For each month since each of the H-E-B Backup Generators have been placed into service, please provide the kWh generated by each facility not related to outages and identify the fuel cost associated with that kWh.
- 7-20.** For each month since each of the H-E-B Backup Generators have been placed into service, please provide by generator the direct operations and maintenance expenses, depreciation expense, any property insurance associated with the generators, any property taxes associated with the generators, and any other costs associated with the generators.
- 7-21.** In the instances in which outages occur and the H-E-B Backup Generators supply energy directly to the H-E-B customers' loads, do the customers pay the associated fuel cost or the system average fuel cost for the kWh generated by the backup generators?
- 7-22.** Other than H-E-B, does ETI have any generation located on customer sites that are designed to provide backup generation for those specific customers.
- 7-23.** Please refer to WP/Schedule P-Volume 2, page 15 of 128. Please provide the detailed calculation of the Incentive O&M expense of \$3,580,962 as used in the Cash Working Capital computation. Please include the total per books incentive compensation by FERC Account along with each of the adjustments by FERC account to arrive at the \$3,580,962. Also, please separate the amounts related to the annual incentive compensation and the long-term incentive compensation.
- 7-24.** Please refer to WP/Schedule P-Volume 2, pages 105-106 of 128. Please provide the affiliate incentive compensation by FERC account prior to the adjustment shown on these pages. Please separate the amounts related to the annual incentive compensation and the long-term incentive compensation.

Date: September 21, 2022

Respectfully submitted,

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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 21st day of September 2022, by facsimile, electronic mail, and/or first class, U.S. Mail.



Renee Wiersema