

Filing Receipt

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

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

## RESPONSE OF ENTERGY TEXAS, INC. TO OPUC'S SIXTH REQUEST FOR INFORMATION: OPUC 6:1 THROUGH 3

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to OPUC's Sixth Request for Information. The response to such request is attached and is numbered as in the request. An additional copy is available for inspection at the Company's office in Austin, Texas.

ETI believes the foregoing response is correct and complete as of the time of the response, but the Company will supplement, correct or complete the response if it becomes aware that the response is no longer true and complete, and the circumstance is such that failure to amend the answer is in substance misleading. The parties may treat this response as if it were filed under oath.

Respectfully submitted,

Kristen F. Gates
Kristen Yates

ENTERGY SERVICES, LLC

919 Congress Avenue, Suite 701

Austin, Texas 78701

Office: (512) 487-3962 Facsimile: (512) 487-3958

Attachments: **OPUC 6:1 THROUGH 3** 

### CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to OPUC's Sixth Request for Information has been sent by either hand delivery, electronic delivery, facsimile, overnight delivery, or U.S. Mail to the party that initiated this request in this docket on this the 26<sup>th</sup> day of September 2022.

Kristen F. Gates
Kristen Yates

## ENTERGY TEXAS, INC. PUBLIC UTILITY COMMISSION OF TEXAS DOCKET NO. 53719

Response of: Entergy Texas, Inc. to the Sixth Set of Data Requests of Requesting Party: Office of Public Litilia

of Requesting Party: Office of Public Utility Counsel

Sponsoring Witness: Allison P. Lofton Beginning Sequence No. EV2050 Ending Sequence No. EV2050

Prepared By: Josh Paternostro

Question No.: OPUC 6-1 Part No.: Addendum:

## Question:

Please refer to ETI Response to OPUC RFI No. 3-6. Please provide the following based on the information provided:

- a. Please confirm or deny that the information included in this response for Nelson Unit 6 and Big Cajun 2 Unit 3 are based on the total gross plant and accumulated depreciation before taking into account ETI's percentage ownership;
- b. If confirm, please provide the percentage allocation that should be used for ETI by FERC account;
- c. Please confirm or deny that the Operating and Maintenance ("O&M") information provided for each plant is only ETI's share of the costs. If deny, please provide the amount for ETI only;
- d. Please confirm or deny that the ineligible costs included in response to Part (i) are included in the requested cost of service.

### Response:

- a. Deny.
- b. See the Company's response to subpart a.
- c. Confirm.
- d. Confirm. The non-reconcilable fuel costs at Test Year end provided in the Company's response to OPUC 3-6 are included in the requested cost of service.

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## ENTERGY TEXAS, INC. PUBLIC UTILITY COMMISSION OF TEXAS DOCKET NO. 53719

Response of: Entergy Texas, Inc. Prepared By: Josh Paternostro

to the Sixth Set of Data Requests

Sponsoring Witnesses: Allison P. Lofton,

Andrew L. Dornier

of Requesting Party: Office of Public Utility Beginning Sequence No. LC426

Counsel Ending Sequence No. LC426

Question No.: OPUC 6-2 Part No.: Addendum:

### Question:

Please refer to ETI's Response to OPUC RFI No. 3-6. Please confirm or deny that with the retirement of Big Cajun 2, Unit 3, the Big Cajun 2 Common will no longer be necessary for delivery of electricity to Texas customers. If confirm, please provide the same information requested in OPUC RFI No. 3-6 related to Big Cajun 2 Common. If deny, please provide an explanation as to why the Big Cajun 2 Common plant and its operating expenses continue to be required to serve customers.

### Response:

Confirm. Big Cajun Common costs are associated with facilities used, in part, for the operation of Big Cajun 2, Unit 3. Big Cajun Common costs are allocated based on the relative use made of the Big Cajun Common facility for the benefit of each of the three units at Big Cajun 2. Entergy Texas, Inc.'s ("ETI's") responsibility for Big Cajun Common costs is associated with its ownership in Big Cajun 2, Unit 3, and, therefore, terminates with its interest in that unit upon its retirement. The attachment (TP-53719-00OPC006-X002) contains Big Cajun Common capital amounts included in the Company's response to OPUC 3-6, for Subparts a, b, c, f, and g.

The Big Cajun 2, Unit 3 amounts reflected in the Company's response to OPUC 3-6, for subparts d, e, j, and k include costs associated with Big Cajun 2, Unit 3 and Big Cajun Common. ETI's share of the O&M costs for both facilities are combined on ETI's books and are not distinguishable.

There were no Big Cajun Common expenses to include for the Company's response to OPUC 3-6, subparts h, i, and l.

			Adjusted Plant							
			Plant Balance	AJ23 - Remove	Balance	Per Book	Proposed	AJ12 Adjusted		
			December 31,	Securitized Storm	December 31,	Depreceiation	Depreciati	Depreciation		
Plant Unit	Plant Accoun	t Plant Account Description	2021	Costs	2021	Expense	on Rate	Expense	Proforma Amount	Notes
Big Cajun Common	311	Structures & Improvements	827,847	-	827,847	28,206	16.762%	138,764	110,557	
Big Cajun Common	312	Boiler Plant Equipment	1,012,765	-	1,012,765	32,600	16.846%	170,607	138,006	
Big Cajun Common	314	Turbogenerator Units	316,524	-	316,524	10,145	15.817%	50,065	39,920	
Big Cajun Common	315	Accessory Electric Equip	847,724	-	847,724	26,757	15.697%	133,070	106,312	
Big Cajun Common	316	Misc Power Plant Equip	540,687	-	540,687	17,841	16.704%	90,319	72,478	
		• •	3,545,547	-	3,545,547	115,549		582,824	467,274	

Entergy Texas, Inc. Docket No. 53719 OPUC 6-2

Plant Unit	Plant Account	Accumulated Depreciation December 31, 2021	AJ23 - Remove Securitized Storm Costs	Adjusted Accumulated Depreciation Balance December 31, 2021
Big Cajun Common	311	(339,387)	-	(339,387)
Big Cajun Common	312	(162,192)	-	(162,192)
Big Cajun Common	314	(110,261)	-	(110,261)
Big Cajun Common	315	(308,183)	-	(308,183)
Big Cajun Common	316	(156,047)	-	(156,047)
		(1,076,071)	-	(1,076,071)

# ENTERGY TEXAS, INC. PUBLIC UTILITY COMMISSION OF TEXAS DOCKET NO. 53719

Response of: Entergy Texas, Inc. to the Sixth Set of Data Requests

of Requesting Party: Office of Public Utility

Counsel

Prepared By: Andrew L. Dornier Sponsoring Witness: Andrew L. Dornier

Beginning Sequence No. EV2051 Ending Sequence No. EV2051

Question No.: OPUC 6-3 Part No.: Addendum:

Question:

Please refer to ETI Response to OPUC RFI No. 3-3. Please provide the date on which the peak burns were experienced at each of the Sabine plant units.

### Response:

The peak burns provided in the Company's response to OPUC 3-3 are not references to actual historic burns but the MMBtus for each Sabine unit if it were to run at its peak. Throughout the year, the Sabine plant units will frequently hit peak burns when running, even for a limited duration. Particularly, the units will reach peak burns during the peak of the day in the summer and winter seasons.

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The following files are not convertible:

TP-53719-000PC006-X002.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.