



## Filing Receipt

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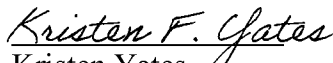
<b>APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**RESPONSE OF ENTERGY TEXAS, INC.  
TO CITIES FIFTH REQUEST FOR INFORMATION:  
CITIES 5:1 THROUGH 8**

Entergy Texas, Inc. (“ETI” or the “Company”) files its Response to Cities Fifth 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,

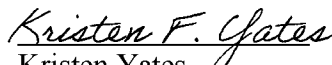
  
Kristen Yates

ENTERGY SERVICES, LLC  
919 Congress Avenue, Suite 701  
Austin, Texas 78701  
Office: (512) 487-3962  
Facsimile: (512) 487-3958

Attachments: **CITIES 5:1 THROUGH 8**

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Cities Fifth 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 Yates

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

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

of Requesting Party: CITIES

Prepared By: Bobby R. Sperandeo  
Sponsoring Witnesses: Bobby R.  
Sperandeo, Eliecer Viamontes  
Beginning Sequence No. PI1419  
Ending Sequence No. PI1419

Question No.: CITIES 5-1

Part No.:

Addendum:

Question:

In reference to the direct testimony of Mr. Viamontes at page 7, lines 9—10, provide the amounts of the \$2.5 billion of expected infrastructure investment by year through 2024.

Response:

Please refer to the table below and the Direct Testimonies of Beverly Gale, page 9, Kham Vongkhamchanh, pages 55-56, and Melanie L. Taylor, page 80, for anticipated capital spending by year from 2022 through 2024.

	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Total</b>
Utility Generation	110	270	515	895
Utility Transmission	115	175	185	475
Utility Distribution	260	390	355	1,005
Utility Other	70	70	40	180
ETI Total (\$M)	<b>555</b>	<b>905</b>	<b>1,095</b>	<b>2,555</b>

*\* Totals may not tie to other schedules due to rounding*

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

Response of: Entergy Texas, Inc.  
to the Fifth Set of Data Requests  
of Requesting Party: CITIES

Prepared By: Bobby R. Sperandeo  
Sponsoring Witness: Bobby R. Sperandeo  
Beginning Sequence No. PI1420  
Ending Sequence No. PI1420

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Question No.: CITIES 5-2

Part No.:

Addendum:

Question:

In reference to the direct testimony of Mr. Viamontes at page 7, lines 9—10, provide by year the projected financing plan for the \$2.5 billion of infrastructure investment between debt, equity, and/or preferred.

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Response:

In general, Entergy Texas, Inc. finances its capital plan with around 50% debt and 50% common equity, which is in line with previously approved capital structures.

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

Response of: Entergy Texas, Inc.  
to the Fifth Set of Data Requests  
of Requesting Party: CITIES

Prepared By: Bobby R. Sperandeo  
Sponsoring Witness: Bobby R. Sperandeo  
Beginning Sequence No. PI1421  
Ending Sequence No. PI1421

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Question No.: CITIES 5-3

Part No.:

Addendum:

Question:

In reference to the direct testimony of Mr. Viamontes at page 7, lines 9—10, provide by year the projected infrastructure investment forecast amount expected to qualify for recovery under the Distribution Cost Recovery Factor mechanism.

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Response:

The annual amount of spending has been provided in the Company's response to Cities 5-1. Qualification for capital spending to be recovered in other riders or factors outside of a base rate case is dependent on multiple factors, including but not limited to, the timing of closings, actual and specific FERC accounts used to record the capital closings, financial performance as measured by Entergy Texas Inc.'s ("ETI") annual Earnings Monitoring Report, and the timing of ETI's future base rate cases. An analysis has not been performed on the capital spending amounts to determine which mechanism will be used to recover the referenced infrastructure investment.

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

Response of: Entergy Texas, Inc.  
to the Fifth Set of Data Requests  
of Requesting Party: CITIES

Prepared By: Bobby R. Sperandeo  
Sponsoring Witness: Bobby R. Sperandeo  
Beginning Sequence No. PI1422  
Ending Sequence No. PI1422

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Question No.: CITIES 5-4

Part No.:

Addendum:

Question:

In reference to the direct testimony of Mr. Viamontes at page 7, lines 9—10, provide by year the projected infrastructure investment forecast amount expected to qualify for recovery under the Transmission Cost Recovery Factor mechanism.

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Response:

Please see the Company's response to Cities 5-3.

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

Response of: Entergy Texas, Inc.  
to the Fifth Set of Data Requests  
of Requesting Party: CITIES

Prepared By: Bobby R. Sperandeo  
Sponsoring Witness: Bobby R. Sperandeo  
Beginning Sequence No. PI1423  
Ending Sequence No. PI1423

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Question No.: CITIES 5-5

Part No.:

Addendum:

Question:

In reference to the direct testimony of Mr. Viamontes at page 7, lines 9—10, provide by year the projected infrastructure investment forecast amount expected to qualify for recovery under the Generation Cost Recovery Rider mechanism.

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Response:

Please see the Company's response to Cities 5-3.

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

Response of: Entergy Texas, Inc.  
to the Fifth Set of Data Requests  
of Requesting Party: CITIES

Prepared By: Jess K. Totten  
Sponsoring Witness: Jess K. Totten  
Beginning Sequence No. LC424  
Ending Sequence No. LC424

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Question No.: CITIES 5-6

Part No.:

Addendum:

Question:

In reference to the direct testimony of Mr. Totten at page 1, line 1 through page 17, line 1, provide any and all (if any) cost benefit studies supporting each 10-basis point adjustment or the total 30-basis point adjustment in equity return.

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Response:

The Company has not identified responsive documents to this request. Please see the Direct Testimony of Jess K. Totten for support of his basis point adjustment.



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

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

of Requesting Party: CITIES

Prepared By: Amber Yartym  
Sponsoring Witnesses: Beverley Gale,  
Andrew Dornier  
Beginning Sequence No. PI1424  
Ending Sequence No. PI1424

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Question No.: CITIES 5-7

Part No.:

Addendum:

Question:

Identify all ETI power plants that experienced outages during Winter Storm URI, detailing for each power plant the duration and root cause of the outage.

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Response:

Please see Schedule H-6.2a and Schedule H-6.2b.

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

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

of Requesting Party: CITIES

Prepared By: Anastasia R. Meyer  
Sponsoring Witnesses: Anastasia R.  
Meyer, Andrew L. Dornier  
Beginning Sequence No. LC428  
Ending Sequence No. LC432

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Question No.: CITIES 5-8

Part No.:

Addendum:

Question:

In reference to the direct testimony of Ms. Gale at page 7, line 7, through page 8, line 13, for each power plant and the Spindletop Storage facility listed provide the current expected or planned retirement/deactivation date.

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Response:

Information included in the response contains highly sensitive protected (“highly sensitive”) materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

There are currently no scheduled retirement dates for Entergy Texas, Inc. (“ETI”) owned power plants. The Company maintains deactivation planning assumptions for all units, which do not represent a decision to deactivate or retire units on a particular schedule. For certain units, ETI’s President and CEO has approved deactivation decisions based on the best information currently available. A deactivation decision reflects a management decision to remove a unit from service in a certain time frame absent changed circumstances and/or based on assumed resource additions. These decisions can be adjusted as warranted by new information.

The public and highly sensitive workpaper with the deactivation schedule, which is attached as Exhibit ARM-2 to the Direct Testimony of Anastasia R. Meyer, was filed with ETI’s Application. The public and highly sensitive workpaper with the deactivation schedule, which is attached as Exhibit ARM-2 to the Direct Testimony of Anastasia R. Meyer, was filed with ETI’s Application. Ms. Meyer’s public workpapers are included in ETI’s “Voluminous Exhibits and Workpapers\_Public.zip” file, which is available for download via the Commission’s Interchange at the following link:  
<https://interchange.puc.texas.gov/search/documents/?controlNumber=53719&itemNumber=3>

ETI is proposing to extend the useful life of the Spindletop Natural Gas Storage Facility from [REDACTED]. Please refer to the Direct Testimony of Andrew L. Dornier, pages 15-16 (Q27 through Q29) for justification and support.

Question No.: CITIES 5-8

Highly sensitive materials have been included on the secure ShareFile site provided to the parties that have executed protective order certifications in this proceeding.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO  
PARAGRAPH 4 OF DOCKET NO. 53719 PROTECTIVE ORDER**

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101 and/or 552.110. ETI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Kristen F. Yates  
Entergy Services, LLC.