



Filing Receipt

Received - 2022-09-28 02:26:51 PM
Control Number - 53719
ItemNumber - 142

**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
---	----------------------	---

**OFFICE OF PUBLIC UTILITY COUNSEL’S
NINTH 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 Eighth 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.

SOAH Docket No. 473-22-04394
PUC Docket No. 53719
OPUC's Ninth Request For Information To
Entergy Texas, Inc.

- 9-1.** Please refer to Schedule Q-5.2. Please provide a detailed description of ETI's process for performing the load research for each of the non-census classes for which information is provided in Schedule Q-5.2.
- 9-2.** Please refer to Schedule Q-5.2. Please describe the stratified random sampling method ETI used to develop each of the load research samples for non-census classes.
- 9-3.** Please refer to Schedule Q-5.2. Please state whether ETI designs each of the load research samples for non-census classes to meet or exceed the "90/10" load research standard specified by Federal Energy Regulatory Commission ("FERC") regulations implementing the Public Utility Regulatory Policies Act of 1978. If not, please identify the accuracy level used by ETI to design each of the load research samples for non-census classes.
- 9-4.** Please refer to Schedule Q-5.2. For the load research samples for each of ETI's non-census retail classes shown in Schedule Q-5.2, please provide the following information:
- a. Definition of sample;
 - b. Definition of strata;
 - c. Stratification variables used;
 - d. Number of strata;
 - e. Strata allocation;
 - f. Randomization techniques utilized;
 - g. The age of survey samples; and
 - h. The number of sample meters installed on customers' premise by years (i.e., 0 to 1 year, 1 to 2 years, 2 to 3 years, etc.)
 - i. Explain all strata auditing procedures for sample meters.
- 9-5.** Does ETI regularly perform data validation on the load research samples to ensure that the energy usage calculated from each sample corresponds closely with the population energy usage for their associated class or subclass? If so, please provide a detailed description of the data validation performed by ETI.
- 9-6.** Please refer to Schedules Q-5.2. Please identify the audits, studies, or other analysis ETI performs to verify that each of its load research samples results in meeting the targeted accuracy levels for the measurement of group loads at the time of system and customer group peaks.

SOAH Docket No. 473-22-04394
PUC Docket No. 53719
OPUC's Ninth Request For Information To
Entergy Texas, Inc.

- 9-7.** Please refer to Schedule O-6.3, page 2. Please provide a detailed explanation why the proposed demand loss adjustment factors for Transmission Delivery – 230 kV and Above and for Transmission Delivery – Below 230 kV declined by approximately 63% and 59%, respectively, from the currently approved loss adjustment factors, while the demand loss adjustment factors for Delivery at Primary and Delivery at Secondary dropped by less than 5%. Please provide all analysis, workpapers, or other documents that support your response.
- 9-8.** Please refer to Schedule O-6.3, page 2. Please provide a detailed explanation why the incremental difference in proposed demand loss adjustment factors for Delivery at Primary (5.7216%) over the demand loss adjustment factors for Transmission Delivery – Below 230 kV (1.0983%) increased by approximately 8% over the incremental difference in the current demand loss factors.
- 9-9.** Please refer to Schedule O-6.3, page 2. Please identify the changes to the distribution system substation and primary feeder facilities and/or the changes to the distribution primary loads that caused the significant increase in the incremental demand loss adjustment factors for Delivery at Primary compared to Transmission Delivery loads.
- 9-10.** Please refer to Schedule O-6.3, page 4. Please provide a detailed explanation why the proposed energy loss adjustment factors for Transmission Delivery – 230 kV and Above and for Transmission Delivery – Below 230 kV declined by approximately 20% and 35%, respectively, from the currently approved loss adjustment factors, while the energy loss adjustment factors for Delivery at Primary dropped by approximately 0.4% and the energy loss adjustment factors for Delivery at Secondary actually increased by approximately 1.4%. Please provide all analysis, workpapers or other documents that support your response.
- 9-11.** Please refer to Schedule O-6.3, page 4. Please provide a detailed explanation why the incremental difference in proposed energy loss adjustment factors for Delivery at Primary (4.7994%) over the energy loss adjustment factors for Transmission Delivery – Below 230 kV (1.6396%) increased by approximately 17.5% over the incremental difference in the current demand loss factors.
- 9-12.** Please refer to Schedule O-6.3, page 4. Please identify the changes to the distribution system substation and primary feeder facilities and/or the changes to the distribution primary loads that caused the significant increase in the incremental energy loss adjustment factors for Delivery at Primary compared to Transmission Delivery loads.

Date: September 28, 2022

Respectfully submitted,

Chris Ekoh
Interim Chief Executive and Public Counsel
State Bar No. 06507015



Renee Wiersema
Assistant Public Counsel
State Bar No. 24094361
Justin Swearingen
Assistant Public Counsel
State Bar No. 24096794
1701 N. Congress Avenue, Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397
512-936-7500 (Telephone)
512-936-7525 (Facsimile)
renee.wiersema@opuc.texas.gov (Service)
justin.swearingen@opuc.texas.gov (Service)
opuc_eservice@opuc.texas.gov (Service)

ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
SOAH DOCKET NO. 473-22-04394
PUC DOCKET NO. 53719

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 28th day of September 2022, by facsimile, electronic mail, and/or first class, U.S. Mail.



Renee Wiersema