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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 SEVENTH REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC
QUESTION NOS. STAFF 7-1 THROUGH 7-13**

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 30, 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 30, 2022, in accordance with the SEVENTH 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 7-1** Since 1999, how many times has ETI, or its parent, determined that it would not pay annual incentive compensation because of a failure to meet EPS targets?
- Staff 7-2** If the answer to Staff 7-1 is other than none, please identify which years ETI failed to pay, and the associated target EPS and actual EPS.
- Staff 7-3** Please provide the relocation expenses that ETI incurred over the last 5 years.
- Staff 7-4** Does ETI maintain a telecommuting policy? If yes, since the pandemic, please explain in full whether the effects of the telecommuting policy has been reflected in the relocation expense amount included in the requested revenue requirement.
- Staff 7-5** Reference Staff RFI 1-65. Please describe in full whether ETI plans to replace the Edison Plaza lease that expires in 2024 with another rental space?
- Staff 7-6** If the answer to Staff 7-5 is no, please explain why the expense should be included as an annual expense for the duration of the rates established in this proceeding.
- Staff 7-7** Please provide a list of any capitalized fees or penalties associated with plant in service included in rate base since the last rate case. Please provide the amounts by FERC account.
- Staff 7-8** Please provide copies of Entergy Services, LLC's FERC Form 60 for each of the years 2017, 2018, 2019, 2020, and 2021.
- Staff 7-9** Please refer to ETI's Annual Report of Affiliate Activities filed in Project No. 36867 for the years 2017 and 2021 and provide detailed explanations and justifications for the increases in allocations from Entergy Services, LLC to ETI from 2017 to 2021 for the following FERC accounts:

<u>FERC Acct</u>	<u>Description</u>	<u>2017</u>	<u>2021</u>
514000	Maintenance of Misc Steam Plt	324,107	1,042,064

580000	Operation Supervision & Engineer	1,165,952	2,173,162
588000	Misc Distribution Expense	825,064	1,425,854
903001	Customer Records	2,989,280	9,452,427
930200	Miscellaneous General Expense	1,277,633	4,287,652

- Staff 7-10** Please refer to Schedule G-14 and provide a detailed explanation and breakdown of the \$810,289 in regulatory commission expenses ETI incurred in 2021 for the 2018 Texas rate case. Please separately provide the amounts for expenses incurred directly by ETI and those incurred and charged to ETI by Entergy Services LLC.
- Staff 7-11** If ETI's requested internal rate-case expenses include any amount for incentive compensation paid to ESI employees, provide separately by proceeding (Docket No. 49916 and Docket No. 53719) the total amount included by plan type as well as the amount for each that is based on financial measures. Provide detailed explanations and supporting calculations/documentation for any amount of financial based incentive compensation identified.
- Staff 7-12** Refer to ETI's proposed adjustments AJ19A - Affiliate Non-recoverable Expenses, AJ19H - Affiliate Non-qualified Pension Plan, AJ19O – Affiliate Aircraft Costs, AJ22B – Affiliate Incentive Compensation wherein ETI removed certain affiliate expenses from its requested rates. Do ETI's requested internal rate-case expenses for Docket No. 49916 and Docket No. 53719 include any amounts for such items that were removed from ETI's requested cost of service either through the Service Company Recipient Loader, Payroll Loader or Benefits and Pension Loader or otherwise? If so, provide the amount by type of such expense included in the requested internal rate-case expenses by proceeding. If not, please provide a detailed explanation (and supporting calculations/documentation) detailing how such costs were removed or otherwise excluded.
- Staff 7-13** Please refer to Exhibit REL-5 to the testimony of Richard E. Lain and provide separately by month each Service Company Recipient allocation factor, Payroll

Loader allocation factor, and Benefits and Pension Allocation factor by component. For each component and allocation factor that is different than the corresponding component and allocation factor applied during the 2021 test year, provide a detailed explanation and justification of the reasonableness of the difference.