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Received - 2022-09-30 01:02:03 PM
Control Number - 53719
ItemNumber - 150

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

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

CITIES' SIXTH REQUEST FOR INFORMATION

Pursuant to §22.144 of the Commission's Procedural Rules, the Cities of Anahuac, Beaumont, Bridge City, Cleveland, Dayton, Groves, Houston, Huntsville, Liberty, Montgomery, Navasota, Nederland, Oak Ridge North, Orange, Pine Forest, Pinehurst, Port Arthur, Port Neches, Roman Forest, Rose City, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor, West Orange, and Willis ("Cities"), request that Entergy Texas, Inc. ("ETI" or "Company"), by and through its attorneys of record, provide all information requested on the attached Exhibit "A" pursuant to Tex. Admin. Code ("TAC") § 22.144.

Pursuant to TAC § 22.144(c)(2), Cities further request that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be a change in circumstances, which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to TAC § 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request.

All information responsive to the requests on the attached Exhibit "A" should be sent to the following:

E-mail:

danlawtonlawfirm@gmail.com
molly@mayhallvandervoort.com

Physical Delivery:

Daniel J. Lawton
12600 Hill Country Blvd., Suite R-275
Austin, Texas 78738
(512) 322-0019
(512) 329-2604 – fax

DEFINITIONS AND INSTRUCTIONS

A. “ETI,” “the Company” or “you” refers to Entergy Texas, Inc., and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The terms “document” or “documents” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, but you if necessary, into reasonably useable form. “Document” or “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Cities specifically request that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced by email (preferred) or on CD-ROM or flash drive in a format that is compatible with Microsoft Office applications and be produced with your response to these requests.

D. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting;

contradicting; in any way legal, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. 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.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. 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.

L. Pursuant to TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, 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.

Respectfully submitted,
LAWTON LAW FIRM, P.C.



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(512) 322-0019
(512) 329-2604 Fax
ATTORNEY FOR CITIES

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record in this proceeding on this the 30th day of September, 2022, in accordance with the Order Suspending Rules issued in Project No. 50664.

A handwritten signature in black ink, appearing to read "Molly Mayhall Vandervoort". The signature is written in a cursive, flowing style.

Molly Mayhall Vandervoort

ATTACHMENT A

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- Cities 6-1. Refer to the Direct Testimony of Kristin Sasser at 12. Please provide test year energy and revenues by class adjusted using 10-year average temperatures.
- Cities 6-2. Refer to the Direct Testimony of Kristin Sasser at 14. Please provide monthly Coincident Peak ("CP") and Maximum Diversified Demand ("MDD") by class adjusted using 10-year average temperatures.
- Cities 6-3. Refer to the Direct Testimony of Kristin Sasser. Please provide Exhibits KS-3 and KS-4 using 10-year average temperatures with supporting workpapers.
- Cities 6-4. Refer to the Direct testimony of Richard E. Lain at 17:
- a) Please indicate where Study "B" is in ETI's application. If not included in the application, please provide Study "B".
 - b) Please explain how Study "A" and Study "B" interact. In another words, how would an adjustment to Study "B" flow through to Study "A".
- Cities 6-5. Refer to the Direct Testimony of Crystal K. Elbe at 22. Ms. Elbe states that rate schedule SMS is excluded from ETI's cost allocation process. Please clarify if this means that customers that take service under rate schedule SMS are not allocated any costs of service. If SMS customers are allocated any costs, please explain how the costs are allocated to these customers.
- Cities 6-6. Refer to the Direct Testimony of Crystal K. Elbe at 31-32. Please explain why it is more expensive to provide the facilities necessary for service during peak summer months.
- Cities 6-7. Refer to the Direct Testimony of Crystal K. Elbe at 35. Please explain why ETI proposes to implement a monthly minimum bill provision of \$8.00 to the Traffic Signal Service rate schedule. What problem is ETI trying to solve with this provision?

- Cities 6-8. Refer to the Direct Testimony of David E. Hunt at 24. Please explain how ETI's proposed Rider MVDR compares to its Commercial Load Management SOP contained in its Energy Efficiency program portfolio.
- Cities 6-9. Refer to the Direct Testimony of Samantha F. Hill at 2-3. Please provide the statutory authority that allows ETI to construct transportation electrification and charging infrastructure.
- Cities 6-10. Refer to Schedule P-13.
- a) For each *Line Item*, please clarify whether “*New*” under the column labeled *Description* means this is a new line item in this filing or is a new *Allocation Factor* for an existing *Line Item*.
 - b) If the 3rd column represents a new allocation factor used in this filing, why is the 4th column empty? Please provide the *Allocation Factor* used in Docket No. 48371 for each *Line Item*.