



## Filing Receipt

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

<b>APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**OFFICE OF PUBLIC UTILITY COUNSEL’S  
FIRST 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 First 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 or within 20 days pursuant to 16 TAC § 22.144(c)(1) if a procedural schedule has not been adopted. 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.

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**OPUC's First Request For Information To**  
**Entergy Texas, Inc.**

- 1-1.** Please refer to the Direct Testimony of Mr. Gregory S. Wilson, page 7. Please provide a copy of the Monte Carlo simulation study that was used by Mr. Wilson to determine his recommendations with respect to the annual storm expense and the storm reserve. Be sure to provide the study in its native Microsoft Excel format with all formulas included.
- 1-2.** Please refer to the Direct Testimony of Mr. Gregory S. Wilson, page 4. Please provide the years and actual storm losses used to determine the average annual expected storm losses of \$4.972 million in Docket No. 41791.
- 1-3.** Please refer to the Direct Testimony of Mr. Gregory S. Wilson, Exhibit GSW-3.

  - a. Please provide the calculation of how the costs related to Hurricanes Rita, Gustav, Ike, Laura, Delta and Harvey were removed from the costs from each of these years of historical data.
  - b. Please confirm or deny that the annual costs shown on this exhibit are already net of the costs for each of these hurricanes.
- 1-4.** Please refer to the Direct Testimony of Mr. Gregory S. Wilson, Exhibit GSW-3. Please confirm or deny that Mr. Wilson has always conducted his Monte Carlo analysis for regulatory proceedings with 25 years of historical storm data. If deny, provide the case numbers for those regulatory proceedings in which Mr. Wilson used less than 25 years.
- 1-5.** Please refer to the Direct Testimony of Mr. Gregory S. Wilson, Exhibit GSW-3. Given that a Monte Carlo simulation study is used to support Mr. Wilson's recommended storm reserve adjustments, please provide a detailed explanation of how the actual and trended storm costs are used in the Monte Carlo analysis.
- 1-6.** Please refer to the Direct Testimony of Mr. Gregory S. Wilson, Exhibit GSW-5. Please reconcile the amounts shown on this exhibit to the annual amounts shown on Exhibit GSW-3. Please also include identification of the line items on this exhibit that are related to Hurricanes Rita, Gustav, Ike, Laura, Delta and Harvey.
- 1-7.** Please refer to the Direct Testimony of Mr. Gregory S. Wilson, Exhibit GSW-6. Please provide a detailed description of this exhibit and the purpose for including data back to 1986 in the analysis. Please also reconcile the information included in this exhibit to the annual amounts shown on Exhibit GSW-3.

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- 1-8.** Please refer to Schedule G-1.1, sponsored by Ms. Allison P. Lofton. Please provide the base payroll, overtime and other pay by employee for the test year. Please include in your response the justification/explanation of the “other pay” issued each month by employee.
- 1-9.** Please refer to Schedule G-1.1, sponsored by Ms. Lofton. Please provide the overtime payroll for each of the calendar years 2015-2017. Please include in your response an explanation as to why the overtime payroll was greater in 2020 and 2021 than in the other years shown on this schedule.
- 1-10.** Please refer to Schedule G-1.6, sponsored by Ms. Jennifer A. Raeder. With respect to short-term incentive compensation awarded during the test year, please provide the following information:
- a. Date of awards;
  - b. Incentive compensation awarded by employee and plan identification;
  - c. Payroll base on which incentive pay was computed by employee;
  - d. Target percentages for incentive pay by employee or employee position. If provided by employee position, include the position with each employee's information;
  - e. List of each performance measure on which incentive pay can be awarded and the weight of such performance measure in the final award computation for the test year; and
  - f. Detailed computation of incentive pay adjustment included in the filing by employee with explanation of how it complies with prior Commission decisions.
  - g. Please confirm or deny that incentive awards were based on percentages that were greater than 100% of target rates by position.
- 1-11.** Please refer to the Direct Testimony of Ms. Raeder, pages 7-8. Please provide copies of each of Entergy's Annual Incentive Programs for each of the years 2018, 2019, 2020 and 2021.
- 1-12.** Please refer to the Direct Testimony of Ms. Raeder, page 3. Please provide copies of each of Entergy's Long-Term Incentive Programs for each of the years 2018, 2019, 2020 and 2021.
- 1-13.** Please refer to the Direct Testimony of Ms. Lofton, pages 22-23. Please confirm or deny that Ms. Lofton took into consideration the performance metrics required to fund the annual incentive compensation plans when developing her recommended adjustment to remove

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financially based incentive compensation costs. If deny, please provide a detailed explanation of why such consideration was not given to the performance metrics required for funding any annual incentive compensation plan. If confirm, please provide the detailed computations that demonstrate removal of such financially based incentive compensation awards.

- 1-14.** Please refer to the Direct Testimony of Ms. Lofton, pages 22-23. Please provide a schedule that shows the adjustment to plant in service to remove all financially based incentive compensation by year for each of the years since Docket No. 39896. Please provide this information by FERC account. Also, please provide all underlying workpapers which show the calculation of the adjustment by year.
- 1-15.** Please refer to the Direct Testimony of Mr. David C. Batten, page 4. Please confirm or deny that the requested reserve for pension and Other Post-Employment Benefits (“OPEB”) expense includes non-qualified pension expense. If confirm, provide a detailed explanation of how the request complies with recent Commission decisions concerning the regulatory treatment of non-qualified pension expense. Also, please provide the detailed computation of the requested reserve by each type of qualified pension expense, non-qualified pension expense and OPEB expense.
- 1-16.** Please refer to the Direct Testimony of Ms. Lofton, pages 20-21. Please provide copies of the most recent actuarial reports concerning pension, OPEBs, and non-qualified pension plans.
- 1-17.** Please refer to the Direct Testimony of Ms. Lofton, page 20. With respect to Adjustment 17, please provide all underlying workpapers that show the calculation of this adjustment, the underlying actuarial amounts that were used in the adjustment and a detailed description of why the Company chose to treat OPEBs in this manner. Please include any presentations, emails, and/or other communications concerning this adjustment.
- 1-18.** Please refer to the Direct Testimony of Ms. Lofton, page 13. Please provide a listing of all non-qualified pension plans and the associated expense that was included in the requested test year cost of service. Also, please provide a copy of the most recent actuarial reports associated with each of these non-qualified pension plans.



Date: July 19, 2022

Respectfully submitted,  
Chris Ekoh  
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ATTORNEYS FOR THE  
OFFICE OF PUBLIC UTILITY COUNSEL

**CERTIFICATE OF SERVICE**  
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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 19th day of July 2022 by facsimile, electronic mail, and/or first class, U.S. Mail.

  
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Zachary Stephenson