



## Filing Receipt

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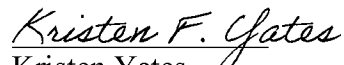
<b>APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**RESPONSE OF ENTERGY TEXAS, INC.  
TO STAFF'S FIFTH REQUEST FOR INFORMATION:  
STAFF 5:1 THROUGH 8**

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to Staff's 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,

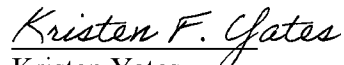
  
Kristen Yates

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

Attachments: **STAFF 5:1 THROUGH 8**

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Staff's 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 10<sup>th</sup> day of October 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: Commission Staff

Prepared By: Josh Paternostro  
Sponsoring Witness: Allison P. Lofton  
Beginning Sequence No. PI1429  
Ending Sequence No. PI1429

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Question No.: STAFF 5-1

Part No.:

Addendum:

Question:

Reference Schedule G-14. Please provide a breakdown of the costs that are included in each listed item under "Texas Retail," including why ETI requests recovery of the amounts in expenses instead of through a separate rider. Additionally, provide the amount of time for which ETI expects amounts from older dockets to be recovered (e.g. Docket No. 29408).

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Response:

Please see the attachment (TP-53719-00PUS005-X001) for a breakdown of the costs included under "Texas Retail." Historically, Entergy Texas, Inc. ("ETI") requested the recovery of these costs in base rate applications because the Commission's Substantive Rules do not expressly authorize the recovery of the expenses outlined in Schedule G-14 that were incurred in the preparation and processing of Texas Retail dockets (e.g., semi-annual fuel factor updates) in those dockets. These types of filings are made on an ongoing basis, and, as it has done in the past, ETI is requesting Commission approval of these types of costs incurred during the Test Year in its Application.

Staff 5-1:

Texas Retail(Schedule G-14):	Amount:	Docket Number:	Docket Info:
2018 Texas Rate Case Support	\$ 109	48371	ENTERGY TEXAS INC'S STATMENT OF INTENT AND APPLICATION FOR AUTHORITY TO CHANGE RATES
2018 Texas Rate Case Support-Other	\$ 810,180	48371	ENTERGY TEXAS INC'S STATMENT OF INTENT AND APPLICATION FOR AUTHORITY TO CHANGE RATES
2022 ETI Rate Case Support	\$ 42,542	53719	APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES
EGSI TX FUEL RELATED MATTERS	\$ 52,286	51575, 51762, 51815, 52452, 52487	Various <sup>(1)</sup>
ETI DCRF Distr Cost Recovery Factor	\$ 42,528	51416	APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS DISTRIBUTION COST RECOVERY FACTOR
ETI Generation Rider	\$ 176,000	51381, 51557	Various <sup>(2)</sup>
ETI Hurricane Laura Secur (Path 2)	\$ 357	52302	APPLICATION OF ENTERGY TEXAS, INC FOR A FINANCING ORDER
ETI TCRF	\$ 209,928	51406, 52624	Various <sup>(3)</sup>
Hurricane Laura Legal Services -TX	\$ 176,901	51997 <sup>(4)</sup>	APPLICATION OF ENTERGY TEXAS, INC. FOR DETERMINATION OF SYSTEM RESTORATION COSTS
PUCT Assistance Federal Proceedings	\$ 192,354	45978	APPLICATION OF ENTERGY TEXAS, INC. FOR PUBLIC UTILITY COMMISSION OF TEXAS CONSULTING FEE RIDER
			JOINT REPORT AND APPLICATION OF ENTERGY TEXAS, INC. AND EAST TEXAS ELECTRIC COOPERATIVE, INC. FOR REGULATORY APPROVALS RELATED TO TRANSFERS OF THE HARDIN COUNTY PEAKING FACILITY AND A PARTIAL INTEREST IN MONTGOMERY COUNTY POWER STATION
SPO ETI Hardin Expense	\$ 11,292	50790	APPLICATION OF ENTERGY TEXAS, INC. TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR
TX Energy Effic Cost Recovery Factr	\$ 27,929	49493 <sup>(5)</sup>	
Total:	\$ 1,742,406		

Notes:

<sup>(1)</sup> **51575:** APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO DEPLOY NATURAL GAS FIRED DISTRIBUTED GENERATION AND STATEMENT OF INTENT FOR RATE SCHEDULE UODG

**51762:** APPLICATION OF ENTERGY TEXAS, INC. TO IMPLEMENT AN INTERIM FUEL REFUND

**51815:** APPLICATION OF ENTERGY TEXAS, INC. TO REVISE FIXED FUEL FACTOR (SCHEDULE FF) IN COMPLIANCE WITH ORDER IN DOCKET NO. 32915

**52452:** APPLICATION OF ENTERGY TEXAS, INC. TO REVISE FIXED FUEL FACTOR (SCHEDULE FF) IN COMPLIANCE WITH ORDER IN DOCKET NO. 32915

**52487:** APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVEINEINCE AND NECESSITY TO CONSTRUCT ORANGE COUNTY ADVANCED POWER STATION

<sup>(2)</sup> **51381:** APPLICATION OF ENTERGY TEXAS, INC. TO ESTABLISH A GENERATION COST RECOVERY RIDER RELATED TO THE MONTGOMERY COUNTY POWER STATION

**51557:** APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS GENERATION COST RECOVERY RIDER TO REFLECT THE ACQUISITION OF THE HARDIN COUNTY PEAKING FACILITY

<sup>(3)</sup> **51406:** APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS TRANSMISSION COST RECOVERY FACTOR

**52624:** APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS TRANSMISSION COST RECOVERY FACTOR

<sup>(4)</sup> Charges are not included in the Hurricane Laura Securitization Docket.

<sup>(5)</sup> Charges are removed and recovered through EECRF rider.

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: Commission Staff

Prepared By: Kaitlyn Roberts  
Sponsoring Witness: Allison P. Lofton  
Beginning Sequence No. EV2060  
Ending Sequence No. EV2060

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Question No.: STAFF 5-2

Part No.:

Addendum:

Question:

Reference Schedule G-7.8. Please provide the Total Electric as requested in a similar format to the first column, starting with net income matching that listed on Schedule A

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Response:

The "Total Federal Income Taxes" amount of (\$2,407,269) on Schedule G-7.8, line 51, in the column labeled "Total Electric As Requested" reflects the federal income taxes adjusted to remove prior period amounts and amounts not included for ratemaking for the Test Year, at present rates. On Schedule A, lines 22, 25, and 28, the first three columns reflect the per book amounts, adjustments, and the as-adjusted amounts of federal income taxes for the Test Year (see column H for an "As Adjusted" federal income tax amount of (\$2,407,270)). The last four columns on Schedule A reflect the requested amounts included in the Cost of Service at the proposed rates. The "As Adjusted" amounts in column P reflect a requested federal income tax amount of \$66,041,486. This amount is based on the additional federal income taxes of \$68,448,756 (column N) associated with the requested incremental base revenues of \$330 million plus the Test Year as-adjusted amount of (\$2,407,269) in column H.

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: Commission Staff

Prepared By: Josh Paternostro  
Sponsoring Witness: Allison P. Lofton  
Beginning Sequence No. PI1430  
Ending Sequence No. PI1430

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Question No.: STAFF 5-3

Part No.:

Addendum:

Question:

Reference Schedule G-3 and G-15. Please explain the adjustment to the uncollectible accounts and write-off expenses on Schedule G-15 that result in different totals from the yearly amounts listed in Schedule G-3.

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Response:

There were three adjustments made to the uncollectible accounts that resulted in the difference in totals between Schedules G-3 and G-15.

- 1.) The Company proposes to adjust bad debt expense account 904 based upon the five-year average of uncollectible accounts in the amount of \$241,637. Reference Schedule MD-2 in the workpapers to Schedule P, WP/P MD 2.
- 2.) The Company has removed affiliate costs related to Gas and Nuclear Products that are not eligible for recovery in the amount of (\$18,121). Reference AJ19P. See the workpapers to Schedule P, WP/P AJ 19P.<sup>1</sup>
- 3.) The Company removed the per book deferred bad debt expense related to Covid - 19 in Account 904001 in AJ14C. See the workpapers to Schedule P, WP/P AJ 14C.1.<sup>1</sup>

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<sup>1</sup> The Company has proposed to recover the Covid-19 related Bad Debt over three years as it relates to Accrual of Regulatory Assets Order under Project No. 50664. See the Direct Testimony of Allison P. Lofton, page 25, Q 51.

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: Commission Staff

Prepared By: Paula Waters  
Sponsoring Witness: Eliecer Viamontes  
Beginning Sequence No. PI1431  
Ending Sequence No. PI1431

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Question No.: STAFF 5-4

Part No.:

Addendum:

Question:

Reference Direct Testimony of Eliecer Viamontes, page 38-39. Please explain what customer focused initiatives related to the Outside Services category have driven the increase in the O&M affiliate charge to ETI for the Utility and Executive Management Class Costs.

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Response:

The increase in contract costs is related to identification, evaluation, and development of customer solutions and sustainability initiatives, including customer service center and other support to better help Entergy Texas, Inc.'s ("ETI") customers achieve their objectives through:

- positive customer interactions and required levels of service to meet customers' evolving expectations (*e.g.*, initiatives to improve the initial and ongoing Contact Center experience, including service levels, average speed of answer, first call resolution, and eliminating the need for a call);
- delivery and management of new products and solutions to meet customers' reliability, affordability, resiliency, and decarbonization goals (*e.g.*, initiatives to help customers reduce their scope 1 and scope 2 carbon emissions, which could include the proposed Schedule GFO tariff); and
- organizational optimization.

ETI expects that delivering on these objectives and keeping pace with customers' rapidly evolving needs and expectations will require continued effort.

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: Commission Staff

Prepared By: Josh Paternostro  
Sponsoring Witness: Allison P. Lofton  
Beginning Sequence No. EV2065  
Ending Sequence No. EV2067

Question No.: STAFF 5-5

Part No.:

Addendum:

Question:

Please provide the information provided in the columns labeled "Description," "Docket Number," and "Test Year Amount" on Schedule G-14 for the years 2018, 2019, and 2020 as well as the information for 2022 to date.

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.

Please see Entergy Texas, Inc.'s ("ETI") FERC Form 1 reports for years 2018, 2019, and 2020, pages 350-351, for the requested information. For ETI's FERC Form 1 reports, see the Company's response to Cities 1-23.

Below is a breakdown of the amounts reflected in the "Other expenses incurred in connection with various filings before PUCT" line item in each of the FERC Form 1 reports.

**2018:**

<b>Docket No.</b>	<b>Amount (\$)</b>
38639	3,714
48316	722
48333	11,273
48371	146,048
Internal Payroll Costs <sup>1</sup>	519,586
<b>Total</b>	<b>681,343</b>

**2019:**

<b>Docket No.</b>	<b>Amount (\$)</b>
49140	8,432
Internal Payroll Costs <sup>1</sup>	572,336
<b>Total</b>	<b>580,768</b>

**2020:**

<b>Docket No.</b>	<b>Amount (\$)</b>
48439	320
49874	144
49916	6120
51069	3504
Internal Payroll Costs <sup>1</sup>	478,284
<b>Total</b>	<b>488,373</b>

<sup>1</sup> The docket number is not identifiable in the accounting system for internal payroll costs. These costs are included in-total as they are recorded to Account 928000.

Please see the highly sensitive attachment (TP-53719-00PUS005-X005\_HSPM) for 2022 to date charges by project code. The data that is used to assemble Schedule G-14 is not readily available in the format requested for 2022. 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.

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: Commission Staff

Prepared By: Josh Paternostro  
Sponsoring Witness: Allison P. Lofton  
Beginning Sequence No. EV2061  
Ending Sequence No. EV2061

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Question No.: STAFF 5-6

Part No.:

Addendum:

Question:

Please refer to Schedule G-14 and provide the jurisdiction for Docket Number U- 35991 and a justification for why such costs are included in proposed rates for Texas customers. If the costs were not directly incurred by ETI, provide the entity that directly incurred the costs, the total amount of costs incurred by that entity for the docket, and a detailed description of the method and associated calculation(s) used to allocated or otherwise assign costs to ETI.

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Response:

The Docket No. U-35991 reflected on line 6 and line 13 in Schedule G-14, is incorrect. Please see a revised Schedule G-14 attached (TP-53719-00PUS005-X006-001). The amount reflected on line 6 is related to costs associated with the Hurricane Laura Financing Order filing in Docket No. 52302 and was allocated to Entergy Texas, Inc. ("ETI") by Entergy Services, LLC ("ESL"). The amount reflected on line 13 was directly incurred by ETI and is related to the Hurricane Laura Storm Restoration Costs Determination filing in Docket No. 51997 but not included in the Hurricane Laura Securitization filing.

Please see the attachment (TP-53719-00PUS005-X006-002) for the details related to the amount allocated to ETI by ESL for Docket No. 52302.

**Entergy Texas, Inc.**  
**Cost of Service**  
**Schedule G-14 Regulatory Commission Expenses**  
**Electric**  
**For the Twelve Months Ended December 31, 2021**  
**Revised**

Schedule G-14  
 2022 TX Rate Case  
 Page 1 of 1

Line No.	Description	Docket Number	Test Year Amount	Company Adjustments [1]	Company Request
1	<b><u>Texas Retail</u></b>				
2	EGSI TX FUEL RELATED MATTERS	[2]	52,286	-	52,286
3	TX Energy Effic Cost Recovery Factor	49493	27,929	(26,286)	1,643
4	PUCT Assistance Federal Proceedings	45978	192,354	(137,796)	54,558
5	ETI Generation Rider	[3]	176,000	2,215	178,214
6	ETI Hurricane Laura Secur (Path 2)	52302	357	8	365
7	ETI PURA Sec. 39.4525	45978			
8	SPO ETI Hardin Expense	50790	11,292	231	11,523
9	2018 Texas Rate Case Support	48371	109	-	109
10	2018 Texas Rate Case Support-Other	48371	810,180	(811,745)	(1,565)
11	2022 ETI Rate Case Support	53719	42,542	(42,542)	-
12	ETI DCRF Distr Cost Recovery Factor	51416	42,528	2,091	44,619
13	Hurricane Laura Legal Services -TX	51997	176,901	-	176,901
14	ETI TCRF	[4]	209,928	1,926	211,854
15			<b>1,742,406</b>	<b>(1,011,898)</b>	<b>730,508</b>
16					
17	<b><u>FERC</u></b>				
18	FERC - OPEN ACCESS TRANSMISSION	Various	1,543	29	1,572
19			<b>1,543</b>	<b>29</b>	<b>1,572</b>
20					
21	<b><u>Other (No Jurisdiction Available)</u></b>				
22	FERC - OPEN ACCESS TRANSMISSION	Various	5,840	114	5,954
23	MISO Reactive Power Filing	Various	288	7	295
24			<b>6,128</b>	<b>121</b>	<b>6,249</b>
25					
26	<b><u>Other (No Jurisdiction Available)</u></b>				
27	Other - PUCT/FERC	Various	712,207	(1,893)	710,314
28			<b>712,207</b>	<b>(1,893)</b>	<b>710,314</b>
29					
30	<b>Total Regulatory Commission Expenses</b>		<b>2,462,284</b>	<b>(1,013,641)</b>	<b>1,448,644</b>

**Notes:**


[1] See Pro Forma Adjustments 14C, 14H, 19B, 19C, 20A, 20B, 22B, 27 and 30 for adjustments to Regulatory Commission Expenses.

[2] Docket Nos. 51575, 51762, 51815, 52452 & 52487

[3] Docket Nos. 51381 & 51557

[4] Docket Nos. 51406 & 52624

Company	Project	Account	Account Description	Project Description	Amount	Billing Method Description	Docket
TX000	F3PPLAURA2	4031AM	Deprec Exp billed from Serv Co	ETI Hurricane Laura Secur (Path 2)	33.36	DIRECT TX - Bill 100% to ETI	52302
TX000	F3PPLAURA2	408110	Employment Taxes	ETI Hurricane Laura Secur (Path 2)	20.08	DIRECT TX - Bill 100% to ETI	52302
TX000	F3PPLAURA2	926000	Employee Pension & Benefits	ETI Hurricane Laura Secur (Path 2)	79.88	DIRECT TX - Bill 100% to ETI	52302
TX000	F3PPLAURA2	926NS1	ASC 715 NSC - Emp Pens & Ben	ETI Hurricane Laura Secur (Path 2)	20.56	DIRECT TX - Bill 100% to ETI	52302
TX000	F3PPLAURA2	928000	Regulatory Commission Expense	ETI Hurricane Laura Secur (Path 2)	357.45	DIRECT TX - Bill 100% to ETI	52302

 Zoom

**Statement of Purpose:**  
The overall purpose of this project is to capture and manage costs associated with securitization of storm costs regarding Hurricane Laura at Entergy Texas, Inc (ETI). This will allow for the continued efficient operation of ETI, which will ultimately benefit customers.

**Primary Activities:**  
The primary activities associated with this project code are researching and implementing the securitization process. This involves several parties, including law firms, investment banks, and external auditors.

**Primary Products or Deliverables:**  
The primary products or deliverables of this project code are:  
1. Pricing and issuing the new securities  
2. Printing a preliminary and final Offering Memorandum  
3. Selling and underwriting  
4. Closing the deal with the proper legal documentation

**Justification for Billing Method:**  
Costs are driven by the fees of the auditors, various law firms, and investment banks involved in the stock deal. Usually the fees are a percentage of the principal amount to be refinanced. These costs solely benefit ETI; therefore, billing method DIRECTTX was chosen to charge all the costs to ETI.

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: Commission Staff

Prepared By: Josh Paternostro  
Sponsoring Witness: Allison P. Lofton  
Beginning Sequence No. PI1432  
Ending Sequence No. PI1432

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Question No.: STAFF 5-7

Part No.:

Addendum:

Question:

Please refer to Schedule G-14 and provide the amounts separately for Docket Nos. 49057 and 49874.

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Response:

The Docket Nos. 49057 and 49874 reflected on schedule G-14 for line 14 are incorrect. The amount reflected on line 14 is related to costs associated with Transmission Cost Recovery Factor proceedings, Docket Nos. 51406 and 52624. \$80,586 is attributable to Docket No. 51406 and \$129,342 is attributable to Docket No. 52624. See the attachment to the Company's response to Staff 5-6.

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: Commission Staff

Prepared By: Josh Paternostro  
Sponsoring Witness: Allison P. Lofton  
Beginning Sequence No. EV2070  
Ending Sequence No. EV2070

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Question No.: STAFF 5-8

Part No.:

Addendum:

Question:

Please refer to Schedule G-14, line 27 and provide a breakdown of the \$710,314 requested by docket number. Please also provide the breakdown of this item by docket number in the response to Staff 5-5.

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Response:

Please see the table below:

<b>Docket No.</b>	<b>Amount(\$)</b>
50790	1,176
51215	216
51575	4,544
51762	18,510
52254	3,510
52302	69,844
52487	12,356
52755	2,561
Internal Payroll Costs <sup>1</sup>	599,490
Pro Forma Adjustments <sup>2</sup>	(1,893)
<b>Total</b>	<b>710,314</b>

<sup>1</sup> The docket number is not identifiable in the accounting system for internal payroll costs.

<sup>2</sup> Reference the workpapers to Schedule P, AJ20B (Pg. 95), AJ22B (Pg. 106), J20A (Pg 87), and AJ30 (Pg. 122).

Please see also the Company's response to Staff 5-5.

The following files are not convertible:

TP-53719-00PUS005-X001.xlsx  
TP-53719-00PUS005-X006-001.xlsx  
TP-53719-00PUS005-X006-002.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.