



## Filing Receipt

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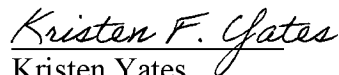
<b>APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**RESPONSE OF ENTERGY TEXAS, INC.  
TO TIEC’S FOURTH REQUEST FOR INFORMATION:  
TIEC 4:1 THROUGH 10**

Entergy Texas, Inc. (“ETI” or the “Company”) files its Response to TIEC’s Fourth 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,

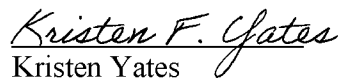
  
Kristen Yates

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

Attachments: **TIEC 4:1 THROUGH 10**

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to TIEC’s Fourth 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 13<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 Fourth Set of Data Requests

of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Antonette Harvey  
Sponsoring Witnesses: Beverley Gale,  
Anastasia R. Meyer

Beginning Sequence No. LC2626

Ending Sequence No. LC2626

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Question No.: TIEC 4-1

Part No.:

Addendum:

Question:

To the extent not already discussed in the direct testimonies of Beverley Gale and Anastasia R. Meyer, please describe the ownership and management structure of Nelson Unit 6 and Big Cajun II Unit 3. In your description, please include explanations of the roles, responsibilities, and decision-making procedures of the co-owner's committees.

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Response:

Please see the Joint Ownership Participation and Operating Agreements provided in response to TIEC 4-2.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
DOCKET NO. 53719

Response of: Entergy Texas, Inc.  
to the Fourth Set of Data Requests

of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Laura Berryman  
Sponsoring Witnesses: Beverly Gale,  
Anastasia R. Meyer

Beginning Sequence No. LC2170

Ending Sequence No. LC2171

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Question No.: TIEC 4-2

Part No.:

Addendum:

Question:

Please provide the joint ownership participation and operating agreements mentioned on page 10 of the Direct Testimony of Beverley Gale.

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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.

See the highly sensitive attachments (TP-53719-00TIE004-X002-001\_HSPM through TP-53719-00TIE004-X002-011\_HSPM). 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 Fourth Set of Data Requests

Prepared By: Antonette Harvey  
Sponsoring Witnesses: Beverly Gale,  
Anastasia R. Meyer

of Requesting Party: Texas Industrial Energy  
Consumers

Beginning Sequence No. LC2620

Ending Sequence No. LC2620

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Question No.: TIEC 4-3

Part No.:

Addendum:

Question:

Please explain the process by which co-owners of Nelson 6 and Big Cajun II Unit 3 would propose and then establish a decommission date for those plants.

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Response:

As detailed in Section 4.1.5 of the Joint Ownership Participation and Operating Agreement ("JOPOA") for Nelson 6, page 34, decommissioning must be decided by 100% vote of the Committee (*i.e.*, representatives of co-owners having 100% of the Ownership Interests).

For Big Cajun 2, Unit 3, per Section 5.1 (Commercial Operations) of the JOPOA, Cajun, as the agent of the co-owners, has "full control over the planning, licensing, acquiring of permits, design, construction, operation, maintenance, decommissioning, storage, and disposition of Coal Unit 3." However, per Section 7.2 (Information) of the JOPOA, Cajun shall keep the co-owners informed as to planning and progress of construction, acquisition, completion, operation, maintenance, and decommissioning of Big Cajun 2, Unit 3. The agreement does contemplate a Management Advisory Committee, which includes Entergy representation, "to serve in an advisory capacity only and to make recommendations to Cajun as Project Manager." Recommendations could include the timing of decommissioning.

See also the Company's response to TIEC 4-2.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
DOCKET NO. 53719

Response of: Entergy Texas, Inc.  
to the Fourth Set of Data Requests

of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Antonette Harvey  
Sponsoring Witnesses: Beverly Gale,  
Anastasia R. Meyer  
Beginning Sequence No. LC2621

Ending Sequence No. LC2621

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Question No.: TIEC 4-4

Part No.:

Addendum:

Question:

Have the co-owners of Nelson 6 or Big Cajun II Unit 3 determined when either of those plants will be decommissioned? If so, please state when those plants will be decommissioned and provide any analyses supporting those decommission dates.

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Response:

No.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
DOCKET NO. 53719

Response of: Entergy Texas, Inc.  
to the Fourth Set of Data Requests

of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Antonette Harvey  
Sponsoring Witnesses: Beverly Gale,  
Anastasia R. Meyer

Beginning Sequence No. LR905

Ending Sequence No. LR913

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Question No.: TIEC 4-5

Part No.:

Addendum:

Question:

To the extent not already provided in response to ETI's response to Cities 4-2, please provide any communication from the last four years between ETI and any other entity that owns an interest in Nelson Unit 6 or Big Cajun II Unit 3 regarding proposed or potential retirement dates for these units.

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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 the highly sensitive attachments (TP-53719-00TIE004-X005-001\_HSPM and TP-53719-00TIE004-X005-002\_HSPM) for communications with the co-owners for Nelson 6. The Company does not have any responsive documents for Big Cajun 2, Unit 3. However, please see the Direct Testimony of Anastasia R. Meyer for a discussion of what has been communicated by Cleco<sup>1</sup> regarding its plans for the retirement of Big Cajun 2, Unit 3.

Highly sensitive materials have been included on the secure ShareFile site provided to the parties that have executed protective order certifications in this proceeding

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<sup>1</sup> Cleco Power, Cleco Cajun LLC, and Louisiana Generating, LLC (together, "Cleco").



**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 Fourth Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Phong D. Nguyen,  
Anastasia R. Meyer

Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2622

Ending Sequence No. LC2622

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Question No.: TIEC 4-6

Part No.:

Addendum:

Question:

To the extent not already provided in response to ETI's response to Cities 4-2, please provide any analyses completed in the last four years regarding proposed or potential retirement dates for Nelson Unit 6 or Big Cajun II Unit 3.

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Response:

For the deactivation analysis for Nelson 6, please see the Company's response to Sierra Club 1-4 and 1-6. As Entergy Texas, Inc. is not the operator of Big Cajun 2, Unit 3, it has not conducted a deactivation analysis for Big Cajun 2, Unit 3. However, please see the Company's response to Sierra Club 1-5.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
DOCKET NO. 53719

Response of: Entergy Texas, Inc.

to the Fourth Set of Data Requests

of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Rick N. Johnson, Anne  
Kulakowski

Sponsoring Witnesses: Bobby R.  
Sperandeo, Jr.

Beginning Sequence No. LC2623

Ending Sequence No. LC2623

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Question No.: TIEC 4-7

Part No.:

Addendum:

Question:

To the extent not already provided in ETI's response to TIEC 1-8, please provide all presentations from the last four years, including but not limited to presentations made to shareholders and investors, referencing the retirements of Nelson Unit 6 or Big Cajun II Unit 3.

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Response:

To the Company's knowledge, no presentations to shareholders or investors reference the retirements of Nelson 6 or Big Cajun 2, Unit 3. However, the Company's response to TIEC 1-8 includes presentations that state Entergy's intention to retire all coal-fired capacity by the end of 2030.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
DOCKET NO. 53719

Response of: Entergy Texas, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Anastasia R. Meyer  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2624

Ending Sequence No. LC2624

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Question No.: TIEC 4-8

Part No.:

Addendum:

Question:

Please state when ETI believes Nelson 6 and Big Cajun II Unit 3 should be retired and explain the bases for ETI's belief.

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Response:

There are currently no scheduled retirement dates for Entergy Texas, Inc. ("ETI") owned generating units. The deactivation assumptions included in the Direct Testimony of Anastasia R. Meyer represent ETI's reasonable expectation based on currently available information. Please see Anastasia R. Meyer's Direct Testimony, Q20 through Q31, and Exhibits ARM-3 through ARM-5 for planned deactivation dates and rationale.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
DOCKET NO. 53719

Response of: Entergy Texas, Inc.  
to the Fourth Set of Data Requests

of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Olena Harvey  
Sponsoring Witnesses: Beverly Gale,  
Anastasia R. Meyer  
Beginning Sequence No. PI1957

Ending Sequence No. PI1957

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Question No.: TIEC 4-9

Part No.:

Addendum:

Question:

Please state whether ETI has advocated to any other entity that owns an interest in Nelson 6 or Big Cajun II Unit 3 for the retirement of Nelson 6 before ■■■ or of Big Cajun II Unit 3 before ■■■

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Response:

Entergy has made a public commitment to cease burning coal by 2030. The Company has not made any other public announcements, either for Nelson 6 or for Entergy's minority share of Big Cajun 2, Unit 3, besides this corporate commitment.

See also the Company's response to TIEC 4-7.

ENTERGY TEXAS, INC.  
PUBLIC UTILITY COMMISSION OF TEXAS  
DOCKET NO. 53719

Response of: Entergy Texas, Inc.  
to the Fourth Set of Data Requests  
of Requesting Party: Texas Industrial Energy  
Consumers

Prepared By: Daniel Boratko  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2625

Ending Sequence No. LC2625

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Question No.: TIEC 4-10

Part No.:

Addendum:

Question:

Referring to the direct testimony of Anastasia R. Meyer at page 12, line 11, please state who “proposed” the deactivation dates for Nelson 6 and Big Cajun II Unit 3 and who those dates were proposed to.

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Response:

Entergy’s Enterprise Planning Group proposed deactivation assumptions to the Entergy Texas, Inc.’s (“ETI”) Operating Committee as part of ETI’s 2022 Business Plan.