



Filing Receipt

Received - 2022-10-17 02:50:59 PM
Control Number - 53719
ItemNumber - 185

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

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

**RESPONSE OF ENTERGY TEXAS, INC.
TO OPUC’S EIGHTH REQUEST FOR INFORMATION:
OPUC 8:1 THROUGH 23**

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

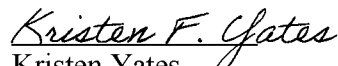
Respectfully submitted,


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

Attachments: **OPUC 8:1 THROUGH 23**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to OPUC’s Eighth 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 17th day of October 2022.


Kristen Yates

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. EV2335
Ending Sequence No. EV2336

Question No.: OPUC 8-1

Part No.:

Addendum:

Question:

Please refer to the Direct Testimony of Samantha F. Hill at 8:18 - 9:4. Please provide a detailed explanation how ETI intends to recover the costs related to the portions of the transportation electrification ("TE") infrastructure and equipment that the customer does not want to own and maintain.

Response:

For charging infrastructure that the customer does not want to own and maintain, Entergy Texas, Inc. ("ETI") will supply the infrastructure and equipment and charge the host customer for its use according to the terms of the Customer Agreement, which is attached to the Direct Testimony of Samantha F. Hill as Exhibit SFH-3. Once the scope of work and costs are developed and agreed upon, the customer will enter into a Customer Agreement with ETI and the customer will agree to pay a net monthly TECI-1 Rider payment for a customer-selected Recovery Term (between 1 year and 10 years), along with agreed-on annual operation and maintenance ("O&M") costs incurred by ETI for the Company-owned infrastructure. The net monthly payments collected under the TECI-1 Rider will be treated as an offset against ETI's overall revenue requirement.

ETI will install and maintain the agreed-upon infrastructure up to and including the charging equipment, or shore power connection. Once the customer-selected Recovery Term has ended, the costs to install the infrastructure will have been fully recovered from the TECI-1 Rider customer via its monthly payments made to ETI.

Further, under ETI's proposed TECI-1 Rider offering, the TECI-1 Rider customer will be paying for any electricity usage by the vehicle charger under an existing eligible non-residential rate schedule. Finally, the charges assessed under the TECI-1 Rider will only be charged to those customers who voluntarily elect to enroll in the TECI-1 Rider, and no costs associated with the administration of the Rider will be imposed on any customers who have not elected to participate.¹

¹ See the Direct Testimony of Samantha F. Hill at page 16.

Importantly, the TECI-1 Rider is not materially different from other offerings that ETI provides to customers and the TECI-Rider recovers costs in a manner not materially different from how those similar PUCT-approved offerings are recovered currently.

For example, while the TECI-1 Rider is specific to transportation electrification (“TE”) infrastructure and equipment, it is not materially different from what ETI provides to customers today through the PUCT-approved Additional Facilities Charge (“AFC”) Rider, Option B. The TECI-1 Rider was developed based on the rationale and methodology behind ETI’s existing AFC Rider. In principle and application, the TECI-1 Rider is no different than the AFC Rider.

In another example, the TECI-1 Rider is similar to the PUCT-approved Area Lighting Service (“ALS”) Rate Schedule where ETI will install, own, and maintain the required area lighting facilities for the use of the host site customer. The participating customer signs up for the ALS Rate Schedule, benefits from the lighting service, and pays for the entirety of the cost of the property and the services.

Below is an illustrative example of the TECI-1 Rider net monthly charges that will be included in a host customer’s monthly bill, specifically the “Monthly Charging Infrastructure Charge” and the “Monthly Charging Infrastructure O&M Fixed Cost.” In this example, the customer has entered into the Customer Agreement for \$50,000 of total installed costs (less applicable adjustments) and \$6,000 in total agreed upon fixed O&M, covering the full 10-year term of the Customer Agreement. The customer has also chosen a recovery term of 5 years (or 60 months).

Total installed cost, less applicable adjustment	\$50,000
x Five year Recovery Term Monthly %	2.386%
Monthly Charging Infrastructure Charge	\$1,193
Monthly Charging Infrastructure O&M Fixed Cost	\$100*
*\$6,000/60 months = \$100 monthly payment	

In this example, the customer will pay the above two net monthly charges for the 5-year Recovery Term. Once the 5-year customer-selected Recovery Term has ended, the example costs to install and maintain the infrastructure (*i.e.*, the \$50,000 of total installed costs and \$6,000 in total agreed upon fixed O&M) will have been fully recovered from the customer via its monthly payments made to ETI. The Customer Agreement will continue to run for the full 10-year term.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. EV2330
Ending Sequence No. EV2330

Question No.: OPUC 8-2

Part No.:

Addendum:

Question:

Please refer to the Direct Testimony of Samantha F. Hill at 8:18 - 9:4. Please provide a detailed explanation for any proposed safeguards that will ensure that only TECI-1 Rider customers will be subject to any costs related to “the portions of the TE infrastructure and equipment that the customer does not want to own and maintain.”

Response:

The Customer Agreement attached as Exhibit SFH-3 to the Direct Testimony of Samantha F. Hill ensures that the host customer bears the responsibility for all of the infrastructure and equipment costs that it does not want to maintain, as well as the ongoing O&M costs.

Please see the Company’s response to OPUC 8-1 for an explanation of how the charges assessed under the TECI-1 Rider will only be charged to those customers who voluntarily elect to enroll in the TECI-1 Rider (much like Entergy Texas, Inc.’s (“ETI”) existing Additional Facilities Charge (“AFC”) Rider).

In order to further ensure that only the participating customer pays for the cost of the TECI-1 Rider, participating customers must meet certain eligibility requirements and their legal liabilities, responsibilities, and obligations to pay for the costs of the TECI-1 Rider are included in the Customer Agreement entered into between ETI and the participating customer. Examples of those legal provisions include the terms and conditions for contract termination and breach, duties of care, equipment casualty, customers’ liabilities and responsibilities, and force majeure. Further, ETI has the right to remove and salvage any equipment owned by ETI, as covered in Part 4 Disposal of TECI Facilities.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. EV2331
Ending Sequence No. EV2331

Question No.: OPUC 8-3

Part No.:

Addendum:

Question:

Is it ETI's intention to maintain a separate accounting for all investment in TE infrastructure and equipment that customers do not want to own and maintain? If so, please provide a detailed description of ETI's proposed accounting for that investment.

Response:

The Entergy Texas, Inc. ("ETI") owned transportation electrification ("TE") infrastructure and equipment costs would be booked in accordance with Federal Energy Regulatory Commission's ("FERC") Uniform System of Accounts to electric plant account 371 (installations on customers' premises).

Depreciation expense associated directly with the TE infrastructure and equipment investment will be booked in accordance with FERC Uniform System of Accounts to account 403 (depreciation expense).

All ongoing maintenance expenses associated directly with the TE infrastructure and equipment investment will be booked in accordance with FERC Uniform System of Accounts to account 598 (maintenance of miscellaneous distribution plant) and any operating expenses will be booked in accordance with FERC Uniform System of Accounts to account 586 (meter expenses).

Other expenses incurred such as additional property taxes will be booked to the FERC accounts currently used for similar types of expenses.

For monthly revenues received under the TECI-1 Rider, ETI proposes that those revenues be booked in accordance with FERC Uniform System of Accounts to revenue account 456 (other electric revenues) and treated as an offset against ETI's overall revenue requirement.

See also the Company's response to OPUC 8-1.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. EV2332
Ending Sequence No. EV2332

Question No.: OPUC 8-4

Part No.:

Addendum:

Question:

Please refer to the Direct Testimony of Samantha F. Hill at 12:4 - 16. Please identify where the costs for the ETI employees or representatives who consult with potential TECI- 1 Rider customers will be booked and provide a detailed explanation for ETI' s proposed treatment.

Response:

The Company is not planning to add incremental resources at this time to facilitate projects that are constructed in conjunction with the TECI-1 Rider. The initial costs for an Entergy Texas, Inc. ("ETI") employee or representative who will consult with a potential TECI-1 Rider customer would be recorded in Federal Energy Regulatory Commission's ("FERC") Uniform System of Accounts account 912 (Demonstrating and selling expenses).

Once a customer desires to enter into the Customer Agreement with ETI to construct transportation electrification ("TE") infrastructure in conjunction with the TECI-1 Rider, internal labor and related costs will be estimated and incorporated into the total installed cost that will be used to calculate the Net Monthly Bill.

These costs as they relate to the TECI-1 Rider are not included in this base rate application.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. EV2337
Ending Sequence No. EV2338

Question No.: OPUC 8-5

Part No.:

Addendum:

Question:

Does ETI consider TECI-1 Rider service to be a normal public utility service?
Please provide a detailed explanation for ETI's answer.

Response:

The Office of Public Utility Counsel did not define what it meant by “normal public utility service,” but there is nothing in Texas law that precludes Entergy Texas, Inc. (“ETI”) from constructing, owning, and maintaining transportation electrification (“TE”) infrastructure and equipment. As discussed in the Direct Testimony of Samantha F. Hill, page 16, the costs and revenues associated with the TECI-1 Rider will be booked in accordance with Federal Energy Regulatory Commission’s (“FERC”) Uniform System of Accounts to accounts as follows:

- Electric plant - 371 (Installations on customers' premises)
- Depreciation expense - 403 (Depreciation expense).
- Maintenance expenses - 598 (Maintenance of miscellaneous distribution plant)
- Operating expenses - 586 (Meter expenses).
- TECI-1 Payments - 456 (Other electric revenues)

In a 2020 FERC audit report,¹ FERC stated that the electric vehicle (“EV”) chargers installed, owned, and maintained by San Diego Gas & Electric Company (“SDG&E”) and located on host customer property are appropriately recorded in utility property FERC account 371. FERC account 371 – Installations on customers’ premises should include “the cost installed of equipment on the customer's side of a meter when the utility incurs such cost and when the utility retains title to and assumes full responsibility for maintenance and replacement of such property.”² The FERC audit report stated, “The EV charging stations are made of several components that include hardware and software that facilitate retail end-use customer access to a low voltage power supply with control and monitoring oversight by SDG&E.”

¹ <https://cms.ferc.gov/sites/default/files/2021-03/FA19-3-000-SanDiegoGas-Electric.pdf>.

² <https://www.law.cornell.edu/cfr/text/18/part-101>.

The TECI-1 Rider is not materially different from the PUCT-approved Additional Facilities Charge (“AFC”) Rider, Option B, or the PUCT-approved Area Lighting Service (ALS) Rate Schedule, as described in the Company’s response to OPUC 8-1.

Finally, per the Edison Electric Institute’s July 2022 Electric Transportation Biannual State Regulatory Update,³ electric companies are currently (and increasingly) engaged in many different facets of TE, with 62 electric companies⁴ in 34 states and Washington, DC, having received regulatory approval for TE filings. These TE approvals include many programs that offer the same or similar services as the TECI-1 Rider.

³ <https://www.eei.org/-/media/Project/EEI/Documents/Issues-and-Policy/Electric-Transportation/ET-Biannual-State-Regulatory-Update.pdf>.

⁴ This count of 62 electric companies omits Entergy New Orleans, LLC and the transportation electrification approved programs in docket UD-18-07.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. EV2339
Ending Sequence No. EV2339

Question No.: OPUC 8-6

Part No.:

Addendum:

Question:

Does ETI consider TE-related infrastructure and equipment to be investment that is expected to be used and useful to provide electric utility service to its distribution customers? Please provide a detailed explanation for ETI's answer.

Response:

Yes. The property will be used and useful and will be used in the provision of service to Entergy Texas, Inc.'s customers.

See the Company's response to OPUC 8-5.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. EV2333
Ending Sequence No. EV2333

Question No.: OPUC 8-7

Part No.:

Addendum:

Question:

If a customer ceases operations prior to the end of the initial term of the Customer Agreement or sells their facilities to another party that does not choose to participate in the TECI-1 Rider prior to the end of the initial term of the Customer Agreement, please explain what will happen to the unrecovered costs of the facilities?

Response:

Pursuant to Section 5.2, Termination by Customer, of the Customer Agreement, if a TECI-1 Rider customer ceases operations or sells their facilities to another party that does not choose to participate in the TECI-1 Rider prior to the end of the initial term of the Customer Agreement, then the unrecovered costs of the facilities are due from the TECI-1 Rider customer in a lump sum payment equal to the remaining unpaid Fees calculated through the end of the Initial Term.¹ Further, Entergy Texas, Inc. ("ETI") has the right to remove and salvage any equipment owned by ETI, under Section 4.2, Disposal of TECI Facilities, of the Customer Agreement.²

¹ TECI-1 Rider Rate Schedule attached as Exhibit SFH-3 to the Direct Testimony of Samantha F. Hill at Sec. 5.2.

² *Id.* at Sec. 4.2.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. PI1975
Ending Sequence No. PI1975

Question No.: OPUC 8-8

Part No.:

Addendum:

Question:

Please refer to the Direct Testimony of Samantha F. Hill at 17:8 - 18:22. Will the rate for the TECI-1 Rider recover any operations and maintenance ("O&M") expenses booked to FERC Account numbers 901 through 935? Please provide a detailed explanation for ETI's treatment of these O&M expenses in the development of this rider.

Response:

No. See the Company's responses to OPUC 8-3 and 8-4.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. EV2334
Ending Sequence No. EV2334

Question No.: OPUC 8-9

Part No.:

Addendum:

Question:

Please refer to page 2, Section V of Exhibit SFH-1 to the Direct Testimony of Samantha F. Hill. Please provide all analysis, workpapers, or other documents that support ETI's proposal to not require TECI-1 Rider customers to reimburse ETI for the cost to upgrade or extend facilities except for any amount of investment that exceeds the projected revenues for the first four years.

Response:

Entergy Texas, Inc.'s ("ETI") PUCT-approved Extension of Service Policy¹ allows ETI to extend new or upgraded service to customers without a reimbursement for the costs when the projected revenue² for the first four years of service for new or additional load is equal to or exceeds the Company's projected infrastructure investment.

ETI designed the TECI-1 Rider to equitably apply the same policies and procedures for new or additional load. Specifically, because the TECI-1 Rider is extending service to serve new load from transportation electrification ("TE") infrastructure and equipment (for example electric vehicle chargers) or upgrading service to serve additional load from new TE infrastructure and equipment, ETI designed the TECI-1 Rider to allow for the same revenue applications as the PUCT-approved Electric Extension Policy does today for similar scenarios.

¹ *Compliance Tariff Pursuant to the Final Order in Docket No. 39896; Application of Entergy Texas, Inc. for Authority to Change Rates, Reconcile Fuel Costs, and Obtain Deferred Accounting Treatment*, Docket No. 40742, Compliance Tariff at 3.1-3.4 (Item No. 22) (Nov. 21, 2012), available here https://interchange.puc.texas.gov/Documents/40742_22_742846.PDF.

² Projected revenue is defined in the Extension of Service Policy.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. PI1977
Ending Sequence No. PI1977

Question No.: OPUC 8-10

Part No.:

Addendum:

Question:

If a TECI-1 Rider customer discontinues service prior to the end of four years, how does ETI intend to recover the costs to extend electric service for new TE and charging infrastructure load, or incremental load for additional TE charging infrastructure?

Response:

The recovery of costs included in the TECI-1 Rider Net Monthly Bill from a customer in breach of the contract is detailed in the Customer Agreement as described in the Company's response to OPUC 8-7.

As stated in the TECI-1 Rider Rate Schedule attached as Exhibit SFH-1 to the Direct Testimony of Samantha F. Hill:

"The Company further retains the right to require an agreement with a minimum monthly charge from the Customer to secure projected Contract Revenues or to require financial security to secure any investment projected to be received by the Company."

In summary, the TECI-1 Rider customer may have a separate minimum monthly charge to ensure Entergy Texas, Inc. ("ETI") recovers the four years of projected revenues that were adjusted out of the Net Monthly Bill.¹ In the event a TECI-1 Rider customer discontinues service prior to the end of four years, it will be treated as any other customer defaulting on their electricity bill and will enter the collections process.

Alternatively, in the case that ETI required financial security to secure the TECI-1 Rider investment, that financial security can be retained by ETI to cover the uncollected projected revenue.

¹ Defined in Exhibit SFH-1 to the Direct Testimony of Samantha F. Hill.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. LC2638
Ending Sequence No. LC2639

Question No.: OPUC 8-11

Part No.:

Addendum:

Question:

Please refer to the Direct Testimony of Samantha F. Hill at 3:4 - 9. Please provide a clear and detailed definition of the “early adoption” period for electric vehicles (“EVs”) and identify the expected length and the maximum length of the “early adoption” period. In addition, please identify where in ETI’s filing the definition and maximum length of the early adoption period is provided.

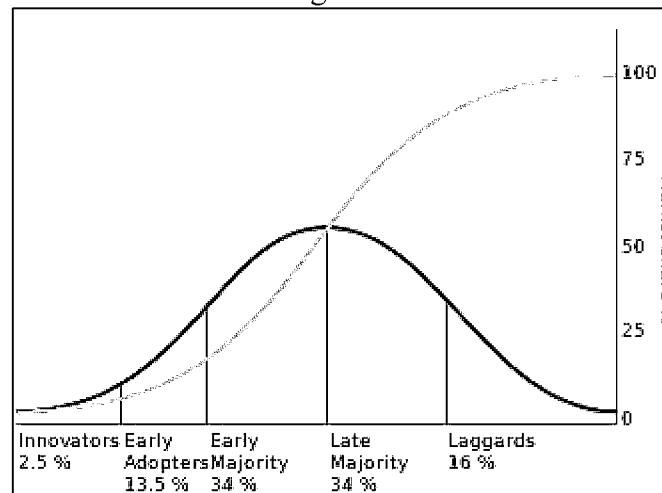
Response:

The term “early adopter” is used to describe the first customers to adopt a new product or technology, *i.e.*, electric vehicles (“EVs”), before the majority of the population. Specifically, in the Direct Testimony of Samantha F. Hill at page 22, the early adoption period is described as a timeframe in which “Consumers are purchasing EVs in greater numbers, but they still represent a *small percentage of total new vehicle sales.*” [emphasis added]

More specifically, the Rogers Diffusion of Innovation theory¹ seeks to explain rate categories in which new ideas and technology spread. In Figure 1 shown below, the Rogers Diffusion of Innovation theory shows that ~16% adoption is the point when the early adoption period generally ends. The online publication, EVAdoption, states “the 16% metric is a precise and widely-accepted point at which to demarcate when EVs have started to achieve mass adoption.”²

¹ https://en.wikipedia.org/wiki/Diffusion_of_innovations.

² <https://evadoption.com/when-will-electric-cars-go-mainstream-what-does-that-even-mean/>.

Figure 1³

However, it is important to note that the expected length and maximum length of the early adoption period will vary based on geographic location among other factors. For instance, a metropolitan city center may experience increased EV adoption and phase out of the early adoption period more quickly than a rural area.

Further, based on recent sales trends, the adoption rate is growing and while projections may vary, a September 2022 report from BloombergNEF⁴ forecasts that just over half of passenger cars sold in the U.S. will be electric vehicles by 2030.

It is with this geographic variation in mind that Entergy Texas, Inc. (“ETI”) developed the TECDA Rider to automatically adjust back to standard Rate Schedule GS rates if the station utilization increases above the monthly 15% floor on load factor. In this way, TECDA Rider is self-correcting over time and is expected to “phase out” on its own as EV adoption increases in the coming years and EV charging becomes more prevalent.

Further, because ETI believes that adoption phases will vary throughout its service territory, the Company is proposing that a TECDA Rider customer be limited to using the TECDA Rider for a term of five years. ETI believes five years is an adequate amount of time to support the increase in utilization, as well as limiting any potential impact on other customers.

³ https://en.wikipedia.org/wiki/Diffusion_of_innovations.

⁴ <https://www.bloomberg.com/news/articles/2022-09-20/more-than-half-of-us-car-sales-will-be-electric-by-2030#xj4y7vzkg>.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. LC2640
Ending Sequence No. LC2640

Question No.: OPUC 8-12

Part No.:

Addendum:

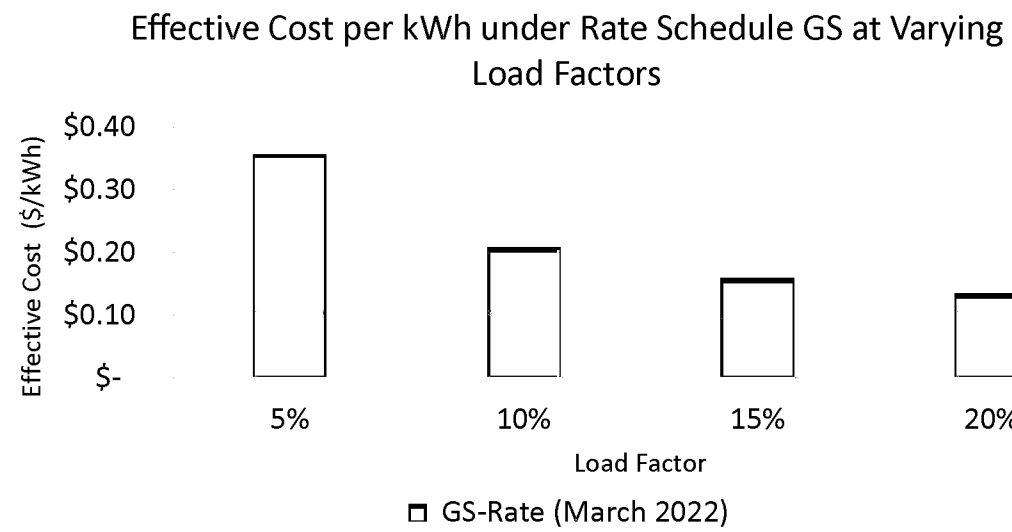
Question:

Please refer to the Direct Testimony of Samantha F. Hill at 27:9 -17. Please provide all workpapers, cost analyses, other analyses, reports, or other documents that were used to support the reasonableness of reducing the billing demand under the TECDA-1 Rider when the actual calculated load factor for any customer is less than 15% in a billing month.

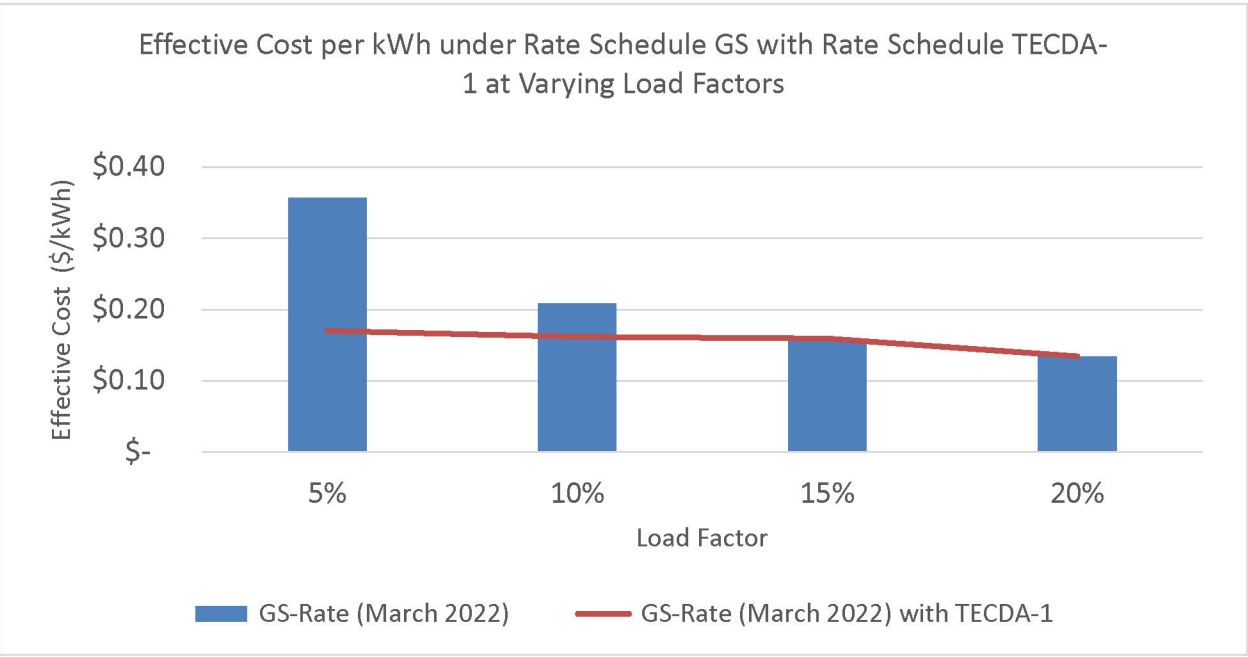
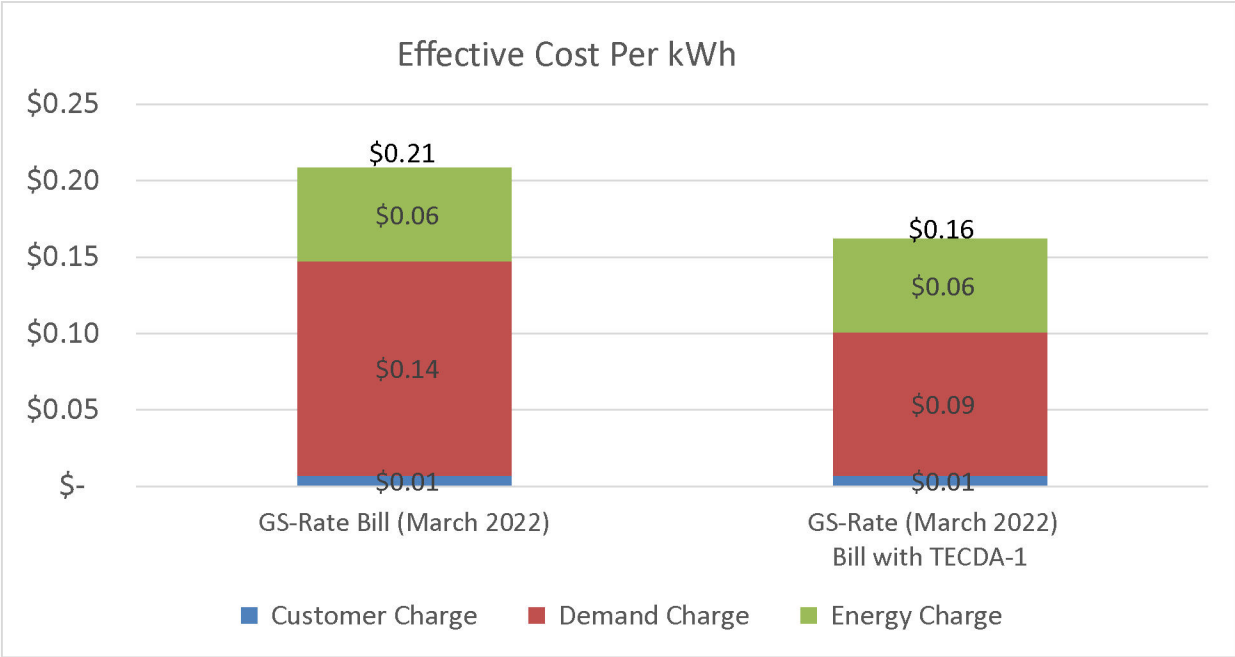
Response:

See the attachment (TP-53719-00OPC008-X012), which is the workpaper supporting the analysis presented in Figures 2, 3, and 4 in the Direct Testimony of Samantha F. Hill.

See also the Direct Testimony of Samantha F. Hill pages 39-40 at footnotes 26, 27, and 28.



Standard GS Rate		
GS-Rate (March 2022)		
5.00%	\$	0.36
10.00%	\$	0.21
15.00%	\$	0.16
20.00%	\$	0.13



Example Number of Chargers		10.00
Example KW per Charger		7.5
Total unadjusted KW for all Chargers		75

Standard GS Rate vs Demand Limiter		
	GS-Rate (March 2022)	GS-Rate (March 2022) with TECDA-1
5.00%	\$ 0.36	\$ 0.17
10.00%	\$ 0.21	\$ 0.16
15.00%	\$ 0.16	\$ 0.16
20.00%	\$ 0.13	\$ 0.13

Rate Schedule GS (From GS % Tabs)				
AVERAGE BILLED KW		BILLED KWH	AVERAGE LOAD FACTOR	ESTIMATED RATE REVENUE
75		32,850.00	5%	\$ 11,726.08
75		65,700.00	10%	\$ 13,697.70
75		98,550.00	15%	\$ 15,669.14
75		131,400.00	20%	\$ 17,640.50

Effective cost per KWh using 10% load factor on GS Rate and TECDA Adj				
	Customer Charge	Demand Charge	Energy Charge	Totals

Rate Schedule GS with TECDA Adjustment (from TECDA Adj Tabs)				
AVERAGE BILLED KW		BILLED KWH	AVERAGE LOAD FACTOR	ESTIMATED RATE REVENUE

GS-Rate Bill (March 2022)	\$ 0.01	\$ 0.14	\$ 0.06	\$ 0.21
GS-Rate (March 2022) Bill with TECDA-1	\$ 0.01	\$ 0.09	\$ 0.06	\$ 0.16

25.00		32,850.00		15%	\$ 5,584.04
50.00		65,700.00		15%	\$ 10,626.69
75.00		98,550.00		15%	\$ 15,669.14
75.00		131,400.00		20%	\$ 17,640.50

ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED Mar-22

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	75	75	75	75	75	75	75	75	75	75	75	75	900
KWH	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	32,850
CUSTOMER CHARGE	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	470.40
BILLING LOAD CHARGES	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	6,660.00
ENERGY CHARGES:													
ALL KWH	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	726.00
VOLTAGE ADJ.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUBTOTAL	654.70	654.70	654.70	654.70	654.70	654.70	654.70	654.70	654.70	654.70	654.70	654.70	7,856.40
RIDER TCJA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER FITC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AMS Surcharge	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	71.28
RIDER RCE-4	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	4.20
RIDER TTC	0.00	0.00	0.00	0.00	0.00	0.00	5.80	0.00	0.00	0.00	0.00	0.00	5.80
IHE DISCOUNT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER EECRF	2.66	2.66	2.66	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	19.32
RIDER HRC	0.00	0.00	0.00	7.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(12.35)	(4.99)
RIDER SRC	12.73	12.73	12.73	11.47	11.47	11.47	11.47	11.47	11.47	11.47	12.73	12.73	143.94
RIDER SCO	0.00	0.00	0.00	(0.30)	(0.30)	(0.30)	(0.30)	(0.30)	(0.30)	(0.30)	(0.30)	0.00	(2.40)
RIDER DCRF	39.98	63.00	63.00	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	525.80
RIDER TCRF	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	804.60
RIDER RPCEA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER PCF	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.36
RIDER GCRR	105.30	105.60	105.60	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	1,264.20
RIDER MTM	(3.26)	(3.26)	(3.26)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(41.55)
FACILITIES CHARGES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUEL ADJ.	95.03	95.03	104.21	81.34	81.34	81.34	81.34	79.38	95.03	95.03	95.03	95.03	1,079.12
TOTAL EXCL. TAXES	980.51	1,003.83	1,013.01	970.95	963.59	963.59	969.39	961.63	977.28	977.28	978.54	966.49	11,726.08
MINIMUM	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	7,130.40
BILL EXCL. TAXES	980.51	1,003.83	1,013.01	970.95	963.59	963.59	969.39	961.63	977.28	977.28	978.54	966.49	11,726.08
<u>BILLING KW DETERMINATION:</u>													
METERED KW	75	75	75	75	75	75	75	75	75	75	75	75	
P.F. ADJD. KW	66	66	66	66	66	66	66	66	66	66	66	66	
MAX KW W/LOSSES	75	75	75	75	75	75	75	75	75	75	75	75	
CONTRACT POWER	75	75	75	75	75	75	75	75	75	75	75	75	
50% 1ST 500, 75% EXCESS	38	38	38	38	38	38	38	38	38	38	38	38	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	863.77	887.09	887.09	863.20	863.20	863.20	863.20	863.20	863.20	863.20	863.20	863.50	10,407.05

ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED Mar-22

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	75	75	75	75	75	75	75	75	75	75	75	75	900
KWH	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	65,700
CUSTOMER CHARGE	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	470.40
BILLING LOAD CHARGES	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	6,660.00
ENERGY CHARGES:													
ALL KWH	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	1,452.00
VOLTAGE ADJ.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUBTOTAL	715.20	715.20	715.20	715.20	715.20	715.20	715.20	715.20	715.20	715.20	715.20	715.20	8,582.40
RIDER TCJA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER FITC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AMS Surcharge	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	71.28
RIDER RCE-4	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	8.52
RIDER TTC	0.00	0.00	0.00	0.00	0.00	0.00	11.61	0.00	0.00	0.00	0.00	0.00	11.61
IHE DISCOUNT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER EECRF	5.32	5.32	5.32	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	38.64
RIDER HRC	0.00	0.00	0.00	14.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(24.69)	(9.96)
RIDER SRC	25.46	25.46	25.46	22.94	22.94	22.94	22.94	22.94	22.94	22.94	25.46	25.46	287.88
RIDER SCO	0.00	0.00	0.00	(0.60)	(0.60)	(0.60)	(0.60)	(0.60)	(0.60)	(0.60)	(0.60)	0.00	(4.80)
RIDER DCRF	39.98	63.00	63.00	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	525.80
RIDER TCRF	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	804.60
RIDER RPCEA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER PCF	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.84
RIDER GCRR	105.30	105.60	105.60	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	1,264.20
RIDER MTM	(3.26)	(3.26)	(3.26)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(41.55)
FACILITIES CHARGES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUEL ADJ.	190.06	190.06	208.41	162.68	162.68	162.68	162.68	158.75	190.06	190.06	190.06	190.06	2,158.24
TOTAL EXCL. TAXES	1,151.83	1,175.15	1,193.50	1,132.99	1,118.26	1,118.26	1,129.87	1,114.33	1,145.64	1,145.64	1,148.16	1,124.07	13,697.70
MINIMUM	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	7,130.40
BILL EXCL. TAXES	1,151.83	1,175.15	1,193.50	1,132.99	1,118.26	1,118.26	1,129.87	1,114.33	1,145.64	1,145.64	1,148.16	1,124.07	13,697.70
<u>BILLING KW DETERMINATION:</u>													
METERED KW	75	75	75	75	75	75	75	75	75	75	75	75	
P.F. ADJD. KW	66	66	66	66	66	66	66	66	66	66	66	66	
MAX KW W/LOSSES	75	75	75	75	75	75	75	75	75	75	75	75	
CONTRACT POWER	75	75	75	75	75	75	75	75	75	75	75	75	
50% 1ST 500, 75% EXCESS	38	38	38	38	38	38	38	38	38	38	38	38	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	924.27	947.59	947.59	923.40	923.40	923.40	923.40	923.40	923.40	923.40	923.40	924.00	11,130.65

ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED Mar-22

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	75	75	75	75	75	75	75	75	75	75	75	75	900
KWH	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	98,550
CUSTOMER CHARGE	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	470.40
BILLING LOAD CHARGES	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	6,660.00
ENERGY CHARGES:													
ALL KWH	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	2,178.00
VOLTAGE ADJ.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUBTOTAL	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	9,308.40
RIDER TCJA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER FITC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AMS Surcharge	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	71.28
RIDER RCE-4	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	12.72
RIDER TTC	0.00	0.00	0.00	0.00	0.00	0.00	17.41	0.00	0.00	0.00	0.00	0.00	17.41
IHE DISCOUNT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER EECRF	7.98	7.98	7.98	3.79	3.79	3.79	3.79	3.79	3.79	3.79	3.79	3.79	58.05
RIDER HRC	0.00	0.00	0.00	22.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(37.04)	(14.95)
RIDER SRC	38.19	38.19	38.19	34.41	34.41	34.41	34.41	34.41	34.41	34.41	38.19	38.19	431.82
RIDER SCO	0.00	0.00	0.00	(0.90)	(0.90)	(0.90)	(0.90)	(0.90)	(0.90)	(0.90)	(0.90)	0.00	(7.20)
RIDER DCRF	39.98	63.00	63.00	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	525.80
RIDER TCRF	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	804.60
RIDER RPCEA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER PCF	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	1.20
RIDER GCRR	105.30	105.60	105.60	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	1,264.20
RIDER MTM	(3.26)	(3.26)	(3.26)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(41.55)
FACILITIES CHARGES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUEL ADJ.	285.08	285.08	312.62	244.03	244.03	244.03	244.03	238.13	285.08	285.08	285.08	285.08	3,237.36
TOTAL EXCL. TAXES	1,323.12	1,346.44	1,373.98	1,295.02	1,272.93	1,272.93	1,290.34	1,267.03	1,313.98	1,313.98	1,317.76	1,281.62	15,669.14
MINIMUM	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	7,130.40
BILL EXCL. TAXES	1,323.12	1,346.44	1,373.98	1,295.02	1,272.93	1,272.93	1,290.34	1,267.03	1,313.98	1,313.98	1,317.76	1,281.62	15,669.14
<u>BILLING KW DETERMINATION:</u>													
METERED KW	75	75	75	75	75	75	75	75	75	75	75	75	
P.F. ADJD. KW	66	66	66	66	66	66	66	66	66	66	66	66	
MAX KW W/LOSSES	75	75	75	75	75	75	75	75	75	75	75	75	
CONTRACT POWER	75	75	75	75	75	75	75	75	75	75	75	75	
50% 1ST 500, 75% EXCESS	38	38	38	38	38	38	38	38	38	38	38	38	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	984.77	1,008.09	1,008.09	983.60	983.60	983.60	983.60	983.60	983.60	983.60	983.60	984.50	11,854.25

ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED Mar-22

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	75	75	75	75	75	75	75	75	75	75	75	75	900
KWH	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	131,400
CUSTOMER CHARGE	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	470.40
BILLING LOAD CHARGES	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	6,660.00
ENERGY CHARGES:													
ALL KWH	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	2,904.00
VOLTAGE ADJ.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUBTOTAL	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	10,034.40
RIDER TCJA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER FITC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AMS Surcharge	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	71.28
RIDER RCE-4	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	16.92
RIDER TTC	0.00	0.00	0.00	0.00	0.00	0.00	23.21	0.00	0.00	0.00	0.00	0.00	23.21
IHE DISCOUNT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER EECRF	10.64	10.64	10.64	5.05	5.05	5.05	5.05	5.05	5.05	5.05	5.05	5.05	77.37
RIDER HRC	0.00	0.00	0.00	29.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(49.38)	(19.92)
RIDER SRC	50.92	50.92	50.92	45.88	45.88	45.88	45.88	45.88	45.88	45.88	50.92	50.92	575.76
RIDER SCO	0.00	0.00	0.00	(1.20)	(1.20)	(1.20)	(1.20)	(1.20)	(1.20)	(1.20)	(1.20)	0.00	(9.60)
RIDER DCRF	39.98	63.00	63.00	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	525.80
RIDER TCRF	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	804.60
RIDER RPCEA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER PCF	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	1.56
RIDER GCRR	105.30	105.60	105.60	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	1,264.20
RIDER MTM	(3.26)	(3.26)	(3.26)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(41.55)
FACILITIES CHARGES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUEL ADJ.	380.11	380.11	416.82	325.37	325.37	325.37	325.37	317.51	380.11	380.11	380.11	380.11	4,316.47
TOTAL EXCL. TAXES	1,494.42	1,517.74	1,554.45	1,457.04	1,427.58	1,427.58	1,450.79	1,419.72	1,482.32	1,482.32	1,487.36	1,439.18	17,640.50
MINIMUM	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	7,130.40
BILL EXCL. TAXES	1,494.42	1,517.74	1,554.45	1,457.04	1,427.58	1,427.58	1,450.79	1,419.72	1,482.32	1,482.32	1,487.36	1,439.18	17,640.50
<u>BILLING KW DETERMINATION:</u>													
METERED KW	75	75	75	75	75	75	75	75	75	75	75	75	
P.F. ADJD. KW	66	66	66	66	66	66	66	66	66	66	66	66	
MAX KW W/LOSSES	75	75	75	75	75	75	75	75	75	75	75	75	
CONTRACT POWER	75	75	75	75	75	75	75	75	75	75	75	75	
50% 1ST 500, 75% EXCESS	38	38	38	38	38	38	38	38	38	38	38	38	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	1,045.27	1,068.59	1,068.59	1,043.80	1,043.80	1,043.80	1,043.80	1,043.80	1,043.80	1,043.80	1,043.80	1,045.00	12,577.85

ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED Mar-22

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	25	25	25	25	25	25	25	25	25	25	25	25	300
KWH	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	2,738	32,850
CUSTOMER CHARGE	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	470.40
BILLING LOAD CHARGES	185.00	185.00	185.00	185.00	185.00	185.00	185.00	185.00	185.00	185.00	185.00	185.00	2,220.00
ENERGY CHARGES:													
ALL KWH	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	60.50	726.00
VOLTAGE ADJ.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUBTOTAL	284.70	284.70	284.70	284.70	284.70	284.70	284.70	284.70	284.70	284.70	284.70	284.70	3,416.40
RIDER TCJA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER FITC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AMS Surcharge	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	71.28
RIDER RCE-4	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	4.20
RIDER TTC	0.00	0.00	0.00	0.00	0.00	0.00	5.80	0.00	0.00	0.00	0.00	0.00	5.80
IHE DISCOUNT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER EECRF	2.66	2.66	2.66	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	19.32
RIDER HRC	0.00	0.00	0.00	7.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(12.35)	(4.99)
RIDER SRC	12.73	12.73	12.73	11.47	11.47	11.47	11.47	11.47	11.47	11.47	12.73	12.73	143.94
RIDER SCO	0.00	0.00	0.00	(0.30)	(0.30)	(0.30)	(0.30)	(0.30)	(0.30)	(0.30)	(0.30)	0.00	(2.40)
RIDER DCRF	13.33	21.00	21.00	13.33	13.33	13.33	13.33	13.33	13.33	13.33	13.33	13.33	175.30
RIDER TCRF	22.35	22.35	22.35	22.35	22.35	22.35	22.35	22.35	22.35	22.35	22.35	22.35	268.20
RIDER RPCEA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER PCF	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.36
RIDER GCRR	35.10	35.20	35.20	35.10	35.10	35.10	35.10	35.10	35.10	35.10	35.10	35.10	421.40
RIDER MTM	(1.09)	(1.09)	(1.09)	(1.18)	(1.18)	(1.18)	(1.18)	(1.18)	(1.18)	(1.18)	(1.18)	(1.18)	(13.89)
FACILITIES CHARGES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUEL ADJ.	95.03	95.03	104.21	81.34	81.34	81.34	81.34	79.38	95.03	95.03	95.03	95.03	1,079.12
TOTAL EXCL. TAXES	471.13	478.90	488.08	461.75	454.39	454.39	460.19	452.43	468.08	468.08	469.34	457.29	5,584.04
MINIMUM	224.20	224.20	224.20	224.20	224.20	224.20	224.20	224.20	224.20	224.20	224.20	224.20	2,690.40
BILL EXCL. TAXES	471.13	478.90	488.08	461.75	454.39	454.39	460.19	452.43	468.08	468.08	469.34	457.29	5,584.04
BILLING KW DETERMINATION:													
METERED KW	25	25	25	25	25	25	25	25	25	25	25	25	
P.F. ADJD. KW	22	22	22	22	22	22	22	22	22	22	22	22	
MAX KW W/LOSSES	25	25	25	25	25	25	25	25	25	25	25	25	
CONTRACT POWER	25	25	25	25	25	25	25	25	25	25	25	25	
50% 1ST 500, 75% EXCESS	13	13	13	13	13	13	13	13	13	13	13	13	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	354.39	362.16	362.16	354.00	354.00	354.00	354.00	354.00	354.00	354.00	354.00	354.30	4,265.01

ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED Mar-22

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	50	50	50	50	50	50	50	50	50	50	50	50	600
KWH	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	5,475	65,700
CUSTOMER CHARGE	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	470.40
BILLING LOAD CHARGES	370.00	370.00	370.00	370.00	370.00	370.00	370.00	370.00	370.00	370.00	370.00	370.00	4,440.00
ENERGY CHARGES:													
ALL KWH	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	121.00	1,452.00
VOLTAGE ADJ.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUBTOTAL	530.20	530.20	530.20	530.20	530.20	530.20	530.20	530.20	530.20	530.20	530.20	530.20	6,362.40
RIDER TCJA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER FITC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AMS Surcharge	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	71.28
RIDER RCE-4	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	8.52
RIDER TTC	0.00	0.00	0.00	0.00	0.00	0.00	11.61	0.00	0.00	0.00	0.00	0.00	11.61
IHE DISCOUNT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER EECRF	5.32	5.32	5.32	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	2.52	38.64
RIDER HRC	0.00	0.00	0.00	14.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(24.69)	(9.96)
RIDER SRC	25.46	25.46	25.46	22.94	22.94	22.94	22.94	22.94	22.94	22.94	25.46	25.46	287.88
RIDER SCO	0.00	0.00	0.00	(0.60)	(0.60)	(0.60)	(0.60)	(0.60)	(0.60)	(0.60)	(0.60)	0.00	(4.80)
RIDER DCRF	26.65	42.00	42.00	26.65	26.65	26.65	26.65	26.65	26.65	26.65	26.65	26.65	350.50
RIDER TCRF	44.70	44.70	44.70	44.70	44.70	44.70	44.70	44.70	44.70	44.70	44.70	44.70	536.40
RIDER RPCEA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER PCF	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.84
RIDER GCRR	70.20	70.40	70.40	70.20	70.20	70.20	70.20	70.20	70.20	70.20	70.20	70.20	842.80
RIDER MTM	(2.17)	(2.17)	(2.17)	(2.35)	(2.35)	(2.35)	(2.35)	(2.35)	(2.35)	(2.35)	(2.35)	(2.35)	(27.66)
FACILITIES CHARGES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUEL ADJ.	190.06	190.06	208.41	162.68	162.68	162.68	162.68	158.75	190.06	190.06	190.06	190.06	2,158.24
TOTAL EXCL. TAXES	897.14	912.69	931.04	878.39	863.66	863.66	875.27	859.73	891.04	891.04	893.56	869.47	10,626.69
MINIMUM	409.20	409.20	409.20	409.20	409.20	409.20	409.20	409.20	409.20	409.20	409.20	409.20	4,910.40
BILL EXCL. TAXES	897.14	912.69	931.04	878.39	863.66	863.66	875.27	859.73	891.04	891.04	893.56	869.47	10,626.69
<u>BILLING KW DETERMINATION:</u>													
METERED KW	50	50	50	50	50	50	50	50	50	50	50	50	
P.F. ADJD. KW	45	45	45	45	45	45	45	45	45	45	45	45	
MAX KW W/LOSSES	50	50	50	50	50	50	50	50	50	50	50	50	
CONTRACT POWER	50	50	50	50	50	50	50	50	50	50	50	50	
50% 1ST 500, 75% EXCESS	25	25	25	25	25	25	25	25	25	25	25	25	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	669.58	685.13	685.13	668.80	668.80	668.80	668.80	668.80	668.80	668.80	668.80	669.40	8,059.64

ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED Mar-22

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	75	75	75	75	75	75	75	75	75	75	75	75	900
KWH	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	8,213	98,550
CUSTOMER CHARGE	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	470.40
BILLING LOAD CHARGES	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	6,660.00
ENERGY CHARGES:													
ALL KWH	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	181.50	2,178.00
VOLTAGE ADJ.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUBTOTAL	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	775.70	9,308.40
RIDER TCJA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER FITC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AMS Surcharge	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	71.28
RIDER RCE-4	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	1.06	12.72
RIDER TTC	0.00	0.00	0.00	0.00	0.00	0.00	17.41	0.00	0.00	0.00	0.00	0.00	17.41
IHE DISCOUNT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER EECRF	7.98	7.98	7.98	3.79	3.79	3.79	3.79	3.79	3.79	3.79	3.79	3.79	58.05
RIDER HRC	0.00	0.00	0.00	22.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(37.04)	(14.95)
RIDER SRC	38.19	38.19	38.19	34.41	34.41	34.41	34.41	34.41	34.41	34.41	38.19	38.19	431.82
RIDER SCO	0.00	0.00	0.00	(0.90)	(0.90)	(0.90)	(0.90)	(0.90)	(0.90)	(0.90)	(0.90)	0.00	(7.20)
RIDER DCRF	39.98	63.00	63.00	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	525.80
RIDER TCRF	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	804.60
RIDER RPCEA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER PCF	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	1.20
RIDER GCRR	105.30	105.60	105.60	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	1,264.20
RIDER MTM	(3.26)	(3.26)	(3.26)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(41.55)
FACILITIES CHARGES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUEL ADJ.	285.08	285.08	312.62	244.03	244.03	244.03	244.03	238.13	285.08	285.08	285.08	285.08	3,237.36
TOTAL EXCL. TAXES	1,323.12	1,346.44	1,373.98	1,295.02	1,272.93	1,272.93	1,290.34	1,267.03	1,313.98	1,313.98	1,317.76	1,281.62	15,669.14
MINIMUM	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	7,130.40
BILL EXCL. TAXES	1,323.12	1,346.44	1,373.98	1,295.02	1,272.93	1,272.93	1,290.34	1,267.03	1,313.98	1,313.98	1,317.76	1,281.62	15,669.14
<u>BILLING KW DETERMINATION:</u>													
METERED KW	75	75	75	75	75	75	75	75	75	75	75	75	
P.F. ADJD. KW	66	66	66	66	66	66	66	66	66	66	66	66	
MAX KW W/LOSSES	75	75	75	75	75	75	75	75	75	75	75	75	
CONTRACT POWER	75	75	75	75	75	75	75	75	75	75	75	75	
50% 1ST 500, 75% EXCESS	38	38	38	38	38	38	38	38	38	38	38	38	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	984.77	1,008.09	1,008.09	983.60	983.60	983.60	983.60	983.60	983.60	983.60	983.60	984.50	11,854.25

ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED Mar-22

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	75	75	75	75	75	75	75	75	75	75	75	75	900
KWH	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	10,950	131,400
CUSTOMER CHARGE	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	39.20	470.40
BILLING LOAD CHARGES	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	555.00	6,660.00
ENERGY CHARGES:													
ALL KWH	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	242.00	2,904.00
VOLTAGE ADJ.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUBTOTAL	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	836.20	10,034.40
RIDER TCJA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER FITC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AMS Surcharge	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	5.94	71.28
RIDER RCE-4	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	1.41	16.92
RIDER TTC	0.00	0.00	0.00	0.00	0.00	0.00	23.21	0.00	0.00	0.00	0.00	0.00	23.21
IHE DISCOUNT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER EECRF	10.64	10.64	10.64	5.05	5.05	5.05	5.05	5.05	5.05	5.05	5.05	5.05	77.37
RIDER HRC	0.00	0.00	0.00	29.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(49.38)	(19.92)
RIDER SRC	50.92	50.92	50.92	45.88	45.88	45.88	45.88	45.88	45.88	45.88	50.92	50.92	575.76
RIDER SCO	0.00	0.00	0.00	(1.20)	(1.20)	(1.20)	(1.20)	(1.20)	(1.20)	(1.20)	(1.20)	0.00	(9.60)
RIDER DCRF	39.98	63.00	63.00	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	39.98	525.80
RIDER TCRF	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	67.05	804.60
RIDER RPCEA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RIDER PCF	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	0.13	1.56
RIDER GCRR	105.30	105.60	105.60	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	105.30	1,264.20
RIDER MTM	(3.26)	(3.26)	(3.26)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(3.53)	(41.55)
FACILITIES CHARGES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUEL ADJ.	380.11	380.11	416.82	325.37	325.37	325.37	325.37	317.51	380.11	380.11	380.11	380.11	4,316.47
TOTAL EXCL. TAXES	1,494.42	1,517.74	1,554.45	1,457.04	1,427.58	1,427.58	1,450.79	1,419.72	1,482.32	1,482.32	1,487.36	1,439.18	17,640.50
MINIMUM	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	594.20	7,130.40
BILL EXCL. TAXES	1,494.42	1,517.74	1,554.45	1,457.04	1,427.58	1,427.58	1,450.79	1,419.72	1,482.32	1,482.32	1,487.36	1,439.18	17,640.50
<u>BILLING KW DETERMINATION:</u>													
METERED KW	75	75	75	75	75	75	75	75	75	75	75	75	
P.F. ADJD. KW	66	66	66	66	66	66	66	66	66	66	66	66	
MAX KW W/LOSSES	75	75	75	75	75	75	75	75	75	75	75	75	
CONTRACT POWER	75	75	75	75	75	75	75	75	75	75	75	75	
50% 1ST 500, 75% EXCESS	38	38	38	38	38	38	38	38	38	38	38	38	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	1,045.27	1,068.59	1,068.59	1,043.80	1,043.80	1,043.80	1,043.80	1,043.80	1,043.80	1,043.80	1,043.80	1,045.00	12,577.85

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witness: Samantha F. Hill
Beginning Sequence No. LC2641
Ending Sequence No. LC2642

Question No.: OPUC 8-13

Part No.:

Addendum:

Question:

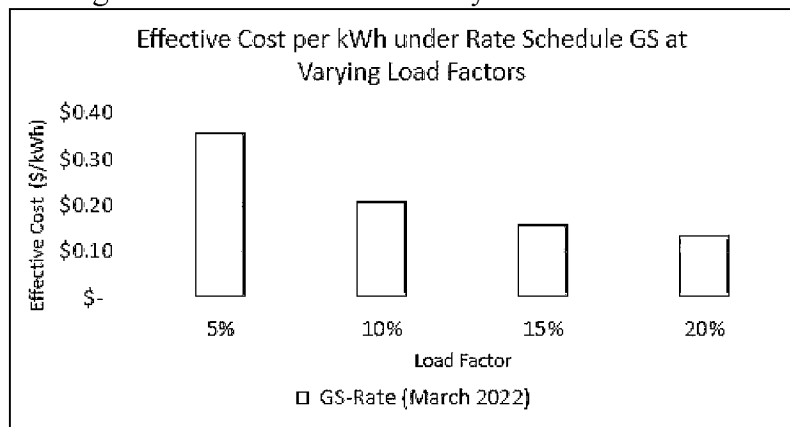
Please refer to the Direct Testimony of Samantha F. Hill at 27:9 -17. Please provide all workpapers, analyses, reports or other documents that support the decision by ETI to establish the 15% load factor to adjust billing demands, rather than using a lower percentage load factor.

Response:

While the minimum load factor could be set at a different level, a minimum monthly load factor of 15% reasonably balances facilitating the development of transportation electrification (“TE”) infrastructure and equipment and minimizing any impact on other customers.

Further, as shown by Figure 2¹ in the Direct Testimony of Samantha F. Hill (also included below), the load factor of 15% sits at an inflection point whereby beyond a 15% load factor, driven by higher utilization, there are diminishing incremental decreases in the effective cost per kWh. Conversely, below a 15% load factor, driven by lower utilization, the incremental effective cost per kWh significantly escalates as cost is spread over less usage (kWh).

Figure 2 in the Direct Testimony of Samantha F. Hill



¹ Workpaper for Figure 2 is included in the Company’s response to OPUC 8-12.

For example, as shown in Figure 2 in the Direct Testimony of Samantha F. Hill, the incremental difference in effective cost per kWh decreases as load factors increase, as follows:

GS-Rate (March 2022)		Diminishing Incremental Differences
5.00%	\$0.36	
10.00%	\$0.21	$\$0.36 - \$0.21 = \$0.15$
15.00%	\$0.16	$\$0.21 - \$0.16 = \$0.05$
20.00%	\$0.13	$\$0.16 - \$0.13 = \$0.03$

Entergy Texas, Inc. (“ETI”) believes that a percentage chosen below a 15% load factor would not be enough of a reduction in demand charges to help facilitate the adoption of TE infrastructure and equipment (like electric vehicle chargers) and a percentage chosen above a 15% load factor would not provide materially different changes to the effective cost per kWh.

As shown in Figure 2 of the Direct Testimony of Samantha F. Hill, a lower load factor would equate to an effective cost per kWh that may be prohibitively high for an electric vehicle (“EV”) charger site host to operate during the early phase of EV market growth, which may inhibit the desire/ability to install an EV charger with separate electric service. Moreover, this situation can also lead to electricity bills where the effective overall cost per kWh exceeds the revenue that a publicly-accessible station can receive from seeking compensation from EV drivers for use of the equipment. In other words, a customer site that may want to offer public charging access and derive revenue from offering that service to EV drivers may be inhibited from doing so given the potential inability to manage its electricity rates.

ETI believes that stabilizing the effective cost per kWh to a narrow band that would be between \$0.15 and \$0.20 based on PUCT-approved rates and riders for electric service to new separately metered TE equipment will facilitate and encourage investment in TE infrastructure and equipment and foster greater adoption of electric vehicles and other similar electrified equipment by customers, which in turn will benefit all customers in the long-term through reduced air pollution and potentially lower electric rates as fixed costs are spread over increased usage.

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

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

Prepared By: Gareth Hutchinson
Sponsoring Witnesses: Samantha F. Hill,
Crystal K. Elbe

of Requesting Party: Office of Public Utility
Counsel

Beginning Sequence No. PI1978
Ending Sequence No. PI1978

Question No.: OPUC 8-14

Part No.:

Addendum:

Question:

For each ETI Texas retail rate class that is assessed a demand charge, please identify the number and percentage of customers that had a load factor equal to, or less than, 15% for any month during the test-year.

Response:

The table below shows the total number of customers who had load factors less than or equal to 15% for the noted number of cumulative months during the test year. Load factors were calculated using billed demands. Note that not all customers with load factors less than 15% for at least one month during the test year constitute low load factor customers, as many will return to above a 15% load factor for the majority of the year.

Please see below:

Number of Cumulative Months with Load Factor <=15	No. of General Service Customers	%	No. of Large General Service Customers	%	No. Large Industrial Power Service Customers	%
12	449	2%	3	1%	3	2%
11	621	3%	4	1%	4	3%
10	783	4%	5	1%	4	3%
9	973	5%	8	2%	5	4%
8	1,147	5%	9	2%	6	5%
7	1,376	6%	13	3%	9	7%
6	1,709	8%	17	4%	10	8%
5	2,128	10%	22	5%	12	9%
4	2,655	12%	23	6%	14	11%
3	3,406	16%	28	7%	15	11%
2	4,357	20%	31	8%	17	13%
1	5,990	28%	44	11%	32	24%

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

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

of Requesting Party: Office of Public Utility
Counsel

Prepared By: Samantha F. Hill
Sponsoring Witnesses: Samantha F. Hill
and Crystal K. Elbe
Beginning Sequence No. PI1964
Ending Sequence No. PI1964

Question No.: OPUC 8-15

Part No.:

Addendum:

Question:

Please refer to the Direct Testimony of Samantha F. Hill at 27:9 -17. When customers taking service under the TECDA-1 Rider have billing demands adjusted because their load factor was less than 15%, does ETI expect to reflect these billing demands and revenue adjustments in future rate cases and recover any unrecovered costs from customers?

Response:

Entergy Texas, Inc. ("ETI") does not expect to make any adjustments related to TECDA-1 Rider billed demands in future rate cases. ETI will follow the same process that it uses today to calculate a revenue requirement and will not adjust billing demands for the TECDA-1 Rider.

TECDA-1 Rider participating customers may experience a temporary demand charge decrease where the monthly utilization equates to a lower than 15% monthly load factor, but ETI believes the application of the TECDA-1 Rider would not materially impact non-participating ETI customers.

First, ETI has proposed safeguards to minimize any impact on non-participating customers including limiting the amount of individual participant load, limiting the amount of TECDA-1 Rider total load, and limiting each participant to a term of five years (as detailed in Direct Testimony of Samantha F. Hill on page 38, lines 1-18). See also the Company's response to OPUC 8-2.

Next, expected increased revenues from electric vehicle ("EV") charging that result from expanded market penetration of EVs will contribute to the recovery of the utility's fixed costs and put downward pressure on electric rates, thereby benefitting all customers.

Finally, the TECDA-1 Rider is "self-correcting" to the extent that a bill for a given site would automatically reflect the unadjusted Schedule General Service demand charges if the site's load factor increases to or is above the 15% minimum load factor for a given month.

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

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

Prepared By: Samantha F. Hill
Sponsoring Witnesses: Samantha F. Hill
and Crystal K. Elbe

of Requesting Party: Office of Public Utility
Counsel

Beginning Sequence No. PI1965
Ending Sequence No. PI1966

Question No.: OPUC 8-16

Part No.:

Addendum:

Question:

Please provide any ETI load research data and analysis for TE charging, or shore power charging loads, and any other information prepared by or for ETI, that provides demand, energy, load factor, system peak coincident factor, class peak coincident factor, or similar information.

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 attachment (TP-53719-00OPC008-X016_HSPM), which presents load research data and analysis, including the capacity factor of the average electric vehicle (“EV”) charger at the time of the Entergy Texas, Inc. monthly peaks.

The file was prepared using interval data for the period February 2, 2021 to January 31, 2022, obtained from EV Direct Current (“DC”) fast charging stations that are served by one or more of the Entergy Operating Companies.¹

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

¹ The Entergy Operating Companies (“EOCs”) include Entergy Arkansas, LLC; Entergy Louisiana, LLC; Entergy Mississippi, LLC; Entergy New Orleans, LLC; and Entergy Texas, Inc.

**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.

DRAFT DUE TO LITIGATION SUPPORT

PREPARED AT THE REQUEST OF AN ATTORNEY FOR ENTERGY PRIVILEGED AND CONFIDENTIAL DOCUMENT ATTORNEY WORK PRODUCT

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

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

Prepared By: Samantha F. Hill
Sponsoring Witnesses: Samantha F. Hill
and Crystal K. Elbe

of Requesting Party: Office of Public Utility
Counsel

Beginning Sequence No. PI1976
Ending Sequence No. PI1976

Question No.: OPUC 8-17

Part No.:

Addendum:

Question:

Please refer to the Direct Testimony of Samantha F. Hill at 27:9 -17. In future rate proceedings, does ETI intend to adjust coincident peak (“CP”) and maximum day demand (“MDD”) used to allocate costs among customer classes to reflect the adjusted demands for TECDA-1 Rider customers, or does ETI intend to utilize actual demands?

Response:

Entergy Texas, Inc. will follow the same process that it uses today to allocate costs among customer classes using actual demands. Calculating coincident peak (“CP”) and maximum diversified demand (“MDD”)¹ uses actual demands. As such, the TECDA-1 Rider adjusted billing demands will not impact future cost allocation among customer classes.

¹ Entergy Texas, Inc. responded to the question using the electric service term “diversified demand,” which is the sum of the demands imposed by a group of loads over a particular period.

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

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

Prepared By: Jocelyn K Myles
Sponsoring Witnesses: Samantha F. Hill
and Crystal K. Elbe

of Requesting Party: Office of Public Utility
Counsel

Beginning Sequence No. PI1967
Ending Sequence No. PI1967

Question No.: OPUC 8-18

Part No.:

Addendum:

Question:

Please identify any other ETI rates or riders that contain provisions to adjust billing demands based on monthly load factors.

Response:

Entergy Texas, Inc. ("ETI") does not have any rate or rider schedules that contain provisions to adjust demand specifically based on monthly load factors. ETI does offer riders that provide for modifications to what otherwise would be billed to the customer. For example, see Schedule SMC (Special Minimum Charge Rider to Schedules SGS, GS and LGS).

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

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

Prepared By: Samantha F. Hill
Sponsoring Witnesses: Samantha F. Hill
and Crystal K. Elbe

of Requesting Party: Office of Public Utility
Counsel

Beginning Sequence No. PI1968
Ending Sequence No. PI1969

Question No.: OPUC 8-19

Part No.:

Addendum:

Question:

Please identify all instances in which ETI believes it is appropriate to adjust billing demands based on monthly load factors and provide a detailed explanation supporting each such instance.

Response:

Other than for separately metered electric vehicle (“EV”) charging sites experiencing low utilization in the early EV adoption period, Entergy Texas, Inc. (“ETI”) has not considered other instances in which it is appropriate to adjust billing demands based on monthly load factors. There could be instances in the future that ETI has not identified today.

Although ETI believes that the Commission-approved demand charges represent a well-supported means of ensuring reliable, efficient use of the grid and fairness to all commercial customers, ETI also recognizes the temporary and transitional needs of separately metered EV charging host sites during this early adoption period.

For separately metered EV charging sites, ETI believes it is appropriate to temporarily adjust billing demands based on monthly load factors. EV chargers can create sharp spikes in load during charging sessions over short periods of time (*e.g.*, typically 20-30 minute Direct Current Fast Charging sessions for a full charge), causing high demand charges. Where utilization of the charging station is low (*i.e.*, during the nascent stage of EV market development), the demand charges incurred make up a significantly greater share of the bill than energy charges and must be spread over relatively small kWh sales, resulting in what can be a high effective cost per kWh. Such a dynamic is likely to inhibit customer desire to install EV chargers with separate electric service. A high effective cost per kWh could make the economics of deploying commercial EV charging stations a challenge and can result in a barrier to EV market development. For example, a customer site that may want to offer public charging access and derive revenue from offering that service to EV drivers may be inhibited from doing so given the potential inability to manage and recover its electricity rates.

ETI recognizes that the demand charge challenges are temporary during the EV early adoption phase until public and fleet EV charging station utilization increases. Once

Question No.: OPUC 8-19

utilization of the EV chargers increases the demand charges can be spread over higher kWh sales, resulting in a more stable and predictable effective cost per kWh.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Jessica B. Little
Sponsoring Witness: Allison P. Lofton
Beginning Sequence No. PI1970
Ending Sequence No. PI1971

Question No.: OPUC 8-20

Part No.:

Addendum:

Question:

Please refer to workpapers supporting the Adjustment AJ28 Prepaid Pension. Please provide the underlying support for the calculation of the \$17,190,000 in pension costs included on this workpaper, with reference to any other supporting documents included in this rate filing package. Please confirm or deny that this calculation is a per book amount. If deny, provide a detailed explanation of any adjustments made per book.

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.

Denied. The amount of \$17,190,000 is a projected amount for years 2022 – 2026 provided by AON, the Company’s actuary.

Please see the highly sensitive attachment (TP-53719-00OPC008 X020_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 Eighth Set of Data Requests

Prepared By: Kaitlyn Roberts
Sponsoring Witnesses: Allison P. Lofton,
David C. Batten

of Requesting Party: Office of Public Utility
Counsel

Beginning Sequence No. PI1972
Ending Sequence No. PI1972

Question No.: OPUC 8-21

Part No.:

Addendum:

Question:

Please refer to ETI's Response to Cities Request For Information ("RFI") No. 2-15. Please confirm or deny that the savings identified for the post-retirement health plan in 2021 have already been taken into account in ETI's per books expense for post-retirement benefits.

Response:

Confirmed.

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

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

Prepared By: Kaitlyn Roberts
Sponsoring Witnesses: Allison P. Lofton,
David C. Batten

of Requesting Party: Office of Public Utility
Counsel

Beginning Sequence No. PI1973
Ending Sequence No. PI1973

Question No.: OPUC 8-22

Part No.:

Addendum:

Question:

Please refer to ETI's Response to Cities RFI No. 2-15. Please confirm or deny that the savings identified for the post-retirement health plan and the qualified pension plans for 2022 have been taken into account in ETI's adjusted expense. If confirm, please provide a schedule demonstrating how the savings have been incorporated into the requested expense amounts.

Response:

Confirmed. The savings identified for the qualified pension plans for 2022 have been taken into account in ETI's adjusted expense. Please see the workpapers to Schedule P, WP/P AJ18.2, page 79.

Denied. The post-retirement health plan savings have not been incorporated into the requested expense amounts, see the workpapers to Schedule P, WP/P AJ17.1 – AJ17.2, pages 76-77. Please see the Direct Testimony of David C. Batten pages 3 – 8 for an explanation on why the Company has proposed this adjustment.

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

Response of: Entergy Texas, Inc.
to the Eighth Set of Data Requests
of Requesting Party: Office of Public Utility
Counsel

Prepared By: Josh Paternostro
Sponsoring Witness: Allison P. Lofton
Beginning Sequence No. PI1974
Ending Sequence No. PI1974

Question No.: OPUC 8-23

Part No.:

Addendum:

Question:

Please refer to ETI's Response to OPUC RFI No. 5-2. Please provide the same information included in this response as it relates to the capitalized incentive that was awarded to ETI direct employees for each of the years 2018-2021. Please provide the information separately for short-term incentive and long-term incentive that was capitalized each year.

Response:

Please see the charts below reflecting the amounts recorded to Construction Work In Progress, account 107, for capitalized short-term and long-term incentive compensation awarded to Entergy Texas, Inc. direct employees for the years requested. The timing of when these amounts were closed to Plant In Service, accounts 101 and 106, and thus included in rate base, cannot be determined.

Short-term incentive:

Year	Account	Amount (\$)
2018	107000	1,480,033
2019	107000	1,672,498
2020	107000	1,589,822
2021	107000	2,033,763
Grand Total		6,776,116

Long-term incentive:

Year	Account	Amount (\$)
2018	107000	251,935
2019	107000	269,928
2020	107000	320,212
2021	107000	189,662
Grand Total		1,031,737

The following files are not convertible:

RP-53719-00OPC008-X012 workpaper
analysis.xlsx

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

Contact centralrecords@puc.texas.gov if you have any questions.