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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 NINTH REQUEST FOR INFORMATION:
OPUC 9:1 THROUGH 12

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to OPUC's Ninth 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 F. Yates

Kristen Yates
ENTERGY SERVICES, LLC
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Attachments: **OPUC 9:1 THROUGH 12**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to OPUC's Ninth 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 18th day of October 2022.

Kristen F. Yates
Kristen Yates

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.	Prepared By: Cora Lewis
to the Ninth Set of Data Requests	Sponsoring Witness: Crystal K. Elbe
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR920
	Ending Sequence No. LR920

Question No.: OPUC 9-1 Part No.: Addendum:

Question:

Please refer to Schedule Q-5.2. Please provide a detailed description of ETI' s process for performing the load research for each of the non-census classes for which information is provided in Schedule Q-5.2

Response:

Entergy's Customer Load Research ("LR") group performs load research analysis on a monthly basis. Billed energy is collected on a 2-month lag, in addition to interval data that is collected daily to produce accurate demand information for all major Rate Classes. Below is an outline of the process.

1. Request Bill Frequency through LR Control Version 2017.0.0.0.
2. Review and Edit Master Control Key Lists.
3. Extract interval data Current Load Database to the Extracted Load Database using Load Analysis 1.11.1.3.1.
4. LR Reporting populates by strata billed energy and customer bills. Energy is calculated using the original break points and applying those to the present population.
5. Load Analysis uses ratio estimation to approximate total class demands by combining energy with customer counts.
6. Review and provide report results from LR Reporting to complete required work for Schedule 5.2.

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Response of: Entergy Texas, Inc.	Prepared By: Cora Lewis
to the Ninth Set of Data Requests	Sponsoring Witness: Crystal K. Elbe
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR914
	Ending Sequence No. LR914

Question No.: OPUC 9-2 Part No.: Addendum:

Question:

Please refer to Schedule Q-5.2. Please describe the stratified random sampling method ETI used to develop each of the load research samples for non-census classes.

Response:

Entergy Texas, Inc.'s stratified random sampling method divides the population into non-overlapping segments, called strata, and sample customers are randomly selected for inclusion in each strata through the software application Load Analysis 1.11.1.3.1. For more details, please see Schedule Q-5.2, at page 49.

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Response of: Entergy Texas, Inc.	Prepared By: Cora Lewis
to the Ninth Set of Data Requests	Sponsoring Witness: Crystal K. Elbe
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR915
	Ending Sequence No. LR915

Question No.: OPUC 9-3 Part No.: Addendum:

Question:

Please refer to Schedule Q-5.2. Please state whether ETI designs each of the load research samples for non-census classes to meet or exceed the "90/10" load research standard specified by Federal Energy Regulatory Commission ("FERC") regulations implementing the Public Utility Regulatory Policies Act of 1978. If not, please identify the accuracy level used by ETI to design each of the load research samples for non-census classes

Response:

Yes. Entergy Texas, Inc. designs each of the load research samples for non-census classes to meet or exceed the 90/10 standard specified by the Federal Energy Regulatory Commission.

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Response of: Entergy Texas, Inc.	Prepared By: Cora Lewis
to the Ninth Set of Data Requests	Sponsoring Witness: Crystal K. Elbe
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR916
	Ending Sequence No. LR917

Question No.: OPUC 9-4 Part No.: Addendum:

Question:

Please refer to Schedule Q-5.2. For the load research samples for each of ETI' s non-census retail classes shown in Schedule Q-5.2, please provide the following information:

a. Definition of sample;
b. Definition of strata;
c. Stratification variables used;
d. Number of strata;
e. Strata allocation;
f. Randomization techniques utilized;
g. The age of survey samples; and
h. The number of sample meters installed on customers' premise by years (i.e., 0 to 1 year, 1 to 2 years, 2 to 3 years, etc.)
i. Explain all strata auditing procedures for sample meters.

Response:

a. Definition of sample: A subset of an entire population that a researcher surveys to obtain information on the entire population.
b. Definition of strata: A relatively homogenous subpopulation that is mutually exclusive of other subpopulations.
c. Stratification variables used:
    - General Service: Average Billed kW
    - Large General Service: Average Billed kW
    - Small General Service: Average Billed kWh
    - Residential: Summer/Winter kWh
d. Number of strata:
    - General Service: 4
    - Large General Service: 2
    - Small General Service: 3
    - Residential: 5
e. Strata allocation:
    - General Service:

1. 0.55041
2. 0.32834
3. 0.09468
4. 0.02657

- Large General Service:
  1. 0.71552
  2. 0.28448
- Small General Service:
  1. 0.74190
  2. 0.23838
  3. 0.01972
- Residential:
  1. 0.49003
  2. 0.11222
  3. 0.14722
  4. 0.18699
  5. 0.06353

f. Randomization techniques utilized: Stratified random sampling

g. The age of survey samples: 5 years

h. The number of sample meters installed on customers' premise by years (*i.e.*, 0 to 1 year, 1 to 2 years, 2 to 3 years, etc.):
   - 2016-2021: 1,235

i. Present Population and total Class Billed Energy are compared to Customer Care System monthly totals on a monthly basis. However, during base rate case preparation, it is also done on a Test-Year basis.

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Response of: Entergy Texas, Inc.	Prepared By: Cora Lewis
to the Ninth Set of Data Requests	Sponsoring Witness: Crystal K. Elbe
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR918
	Ending Sequence No. LR918

Question No.: OPUC 9-5 Part No.: Addendum:

Question:

Does ETI regularly perform data validation on the load research samples to ensure that the energy usage calculated from each sample corresponds closely with the population energy usage for their associated class or subclass? If so, please provide a detailed description of the data validation performed by ETI.

Response:

Yes. On a monthly basis, Entergy Texas, Inc. ("ETI") performs data validation on the load research samples to ensure that the energy usage calculated from each sample corresponds closely with the population energy usage for their associated class or subclass.

If the precision/accuracy doesn't meet the 90/10 load research industry standard for a given month, then the billed kWh and kW values are compared for each sample selection. The sum of sample estimations kWh/kW for all classes are also compared to plant loads within 2%-4% of their measured values. When preparing a base rate case, it is suitable to check whether summations balance to the coincident peak ("CP"). The collection of actual data, validation, and processing through billing ensures that the data becomes "billing grade" for its use in regulatory filings.

ENTERGY TEXAS, INC.
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Response of: Entergy Texas, Inc.	Prepared By: Cora Lewis
to the Ninth Set of Data Requests	Sponsoring Witness: Crystal K. Elbe
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR919
	Ending Sequence No. LR919

Question No.: OPUC 9-6 Part No.: Addendum:

Question:

Please refer to Schedules Q-5.2. Please identify the audits, studies, or other analysis ETI performs to verify that each of its load research samples results in meeting the targeted accuracy levels for the measurement of group loads at the time of system and customer group peaks.

Response:

Please see the Company's responses to OPUC 9-3 and OPUC 9-5.

ENTERGY TEXAS, INC.
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Response of: Entergy Texas, Inc. to the Ninth Set of Data Requests	Prepared By: Mark Hunter Sponsoring Witness: Khamsune Vongkhamchanh
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR924 Ending Sequence No. LR925

Question No.: OPUC 9-7 Part No.: Addendum:

Question:

Please refer to Schedule O-6.3, page 2. Please provide a detailed explanation why the proposed demand loss adjustment factors for Transmission Delivery - 230 kV and Above and for Transmission Delivery - Below 230 kV declined by approximately 63% and 59%, respectively, from the currently approved loss adjustment factors, while the demand loss adjustment factors for Delivery at Primary and Delivery at Secondary dropped by less than 5%. Please provide all analysis, workpapers, or other documents that support your response.

Response:

The Office of Public Utility Counsel ("OPUC") has subsequently revised their calculations to address a percent change in the proposed demand loss adjustment factors for Transmission Delivery - 230 kV and Above and for Transmission Delivery - Below 230 kV of -38.7% and -36.9%, respectively.

However, the proposed loss factors from the current base rate case (Docket No. 53719) and the approved loss factors from the Company's last base rate case (Docket No. 48371), along with the calculated changes and percent changes, are presented in the two tables below, as also presented in Direct Testimony of Khamsune Vongkhamchanh.

As seen in these tables below, the percent change between the proposed cumulative demand and energy loss factors (Docket No. 53719) and the approved cumulative demand and energy loss factors (Docket No. 48371) is minimal and does not reflect a significant change in the loss adjustment factors.

Please note that the question above (as well as the Direct Testimony of Khamsune Vongkhamchanh) refers to the percent change of the loss adjustment factors. However, OPUC's revised data appears to calculate the percent change of the percent loss, and not the percent change of the loss adjustment factors.

Demand Loss Factors

Cumulative Losses	Proposed Cumulative Demand Loss Factor in this Proceeding (Docket No. 53719) (A)	Approved Cumulative Demand Loss Factor in Prior Proceeding (Docket No. 48371) (B)	Change (C) = (B) - (A)	% Change (C) / (B)
Transmission Delivery - 230 KV and Above	1.002464	1.004022	-0.001558	-0.16%
Transmission Delivery - Below 230 KV	1.010983	1.017418	-0.006435	-0.63%
Delivery at Primary Distribution Feeder and Substation Transformers	1.057216	1.059999	-0.002783	-0.26%
Delivery at Secondary	1.078320	1.081032	-0.002712	-0.25%

Energy Loss Factors

Cumulative Losses	Proposed Cumulative Energy Loss Factor in this Proceeding (2022 Rate Case) (A)	Approved Cumulative Energy Loss Factor in Prior Proceeding (2018 Rate Case) (B)	Change (C) = (B) - (A)	% Change (C) / (B)
Transmission Delivery - 230 KV and Above	1.004137	1.004965	-0.000828	-0.08%
Transmission Delivery - Below 230 KV	1.016396	1.022111	-0.005715	-0.56%
Delivery at Primary Distribution Feeder and Substation Transformers	1.047994	1.048181	-0.000187	-0.02%
Delivery at Secondary	1.076798	1.075685	0.001113	0.10%

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Response of: Entergy Texas, Inc. to the Ninth Set of Data Requests	Prepared By: Mark Hunter Sponsoring Witness: Khamsune Vongkhamchanh
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR926 Ending Sequence No. LR926

Question No.: OPUC 9-8 Part No.: Addendum:

Question:

Please refer to Schedule O-6.3, page 2. Please provide a detailed explanation why the incremental difference in proposed demand loss adjustment factors for Delivery at Primary (5.7216%) over the demand loss adjustment factors for Transmission Delivery - Below 230 kV (1.0983%) increased by approximately 8% over the incremental difference in the current demand loss factors.

Response:

Please see the Company's response to OPUC 9-7.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc. to the Ninth Set of Data Requests	Prepared By: Mark Hunter Sponsoring Witness: Khamsune Vongkhamchanh
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR921 Ending Sequence No. LR921

Question No.: OPUC 9-9 Part No.: Addendum:

Question:

Please refer to Schedule O-6.3, page 2. Please identify the changes to the distribution system substation and primary feeder facilities and/or the changes to the distribution primary loads that caused the significant increase in the incremental demand loss adjustment factors for Delivery at Primary compared to Transmission Delivery loads.

Response:

Please see the Company's response to OPUC 9-7.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.	Prepared By: Mark Hunter
to the Ninth Set of Data Requests	Sponsoring Witness: Khamsune Vongkhamchanh
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR922
	Ending Sequence No. LR922

Question No.: OPUC 9-10 Part No.: Addendum:

Question:

Please refer to Schedule O-6.3, page 4. Please provide a detailed explanation why the proposed energy loss adjustment factors for Transmission Delivery - 230 kV and Above and for Transmission Delivery - Below 230 kV declined by approximately 20% and 35%, respectively, from the currently approved loss adjustment factors, while the energy loss adjustment factors for Delivery at Primary dropped by approximately 0.4% and the energy loss adjustment factors for Delivery at Secondary actually increased by approximately 1.4%. Please provide all analysis, workpapers or other documents that support your response.

Response:

The Office of Public Utility Counsel has subsequently revised the percentages in the question as follows:

> Please refer to Schedule O-6.3, page 4. Please provide a detailed explanation why the proposed energy loss adjustment factors for Transmission Delivery - 230 kV and Above and for Transmission Delivery - Below 230 kV declined by approximately 16.7% and 25.8%, respectively, from the currently approved loss adjustment factors, while the energy loss adjustment factors for Delivery at Primary dropped by approximately 0.4% and the energy loss adjustment factors for Delivery at Secondary actually increased by approximately 1.5%. Please provide all analysis, workpapers or other documents that support your response.

Please see the Company's response to OPUC 9-7.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc. to the Ninth Set of Data Requests	Prepared By: Mark Hunter Sponsoring Witness: Khamsune Vongkhamchanh
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR927 Ending Sequence No. LR927

Question No.: OPUC 9-11 Part No.: Addendum:

Question:

Please refer to Schedule O-6.3, page 4. Please provide a detailed explanation why the incremental difference in proposed energy loss adjustment factors for Delivery at Primary (4.7994%) over the energy loss adjustment factors for Transmission Delivery - Below 230 kV (1.6396%) increased by approximately 17.5% over the incremental difference in the current demand loss factors.

Response:

Please see the Company's response to OPUC 9-7.

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

Response of: Entergy Texas, Inc.	Prepared By: Mark Hunter
to the Ninth Set of Data Requests	Sponsoring Witness: Khamsune Vongkhamchanh
of Requesting Party: Office of Public Utility Counsel	Beginning Sequence No. LR923
	Ending Sequence No. LR923

Question No.: OPUC 9-12 Part No.: Addendum:

Question:

Please refer to Schedule O-6.3, page 4. Please identify the changes to the distribution system substation and primary feeder facilities and/or the changes to the distribution primary loads that caused the significant increase in the incremental energy loss adjustment factors for Delivery at Primary compared to Transmission Delivery loads.

Response:

Please see the Company's response to OPUC 9-7.