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

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

RESPONSE OF ENTERGY TEXAS, INC.  
TO SIERRA CLUB'S THIRD REQUEST FOR INFORMATION:  
SIERRA CLUB'S 3:1 THROUGH 12

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to Sierra Club's Third 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  
919 Congress Avenue, Suite 701  
Austin, Texas 78701  
Office: (512) 487-3962  
Facsimile: (512) 487-3958

Attachments: SIERRA CLUB'S 3:1 THROUGH 12

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Sierra Club's Third 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 19<sup>th</sup> day of October 2022.

*Kristen F. Yates*  
Kristen Yates

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

Response of: Entergy Texas, Inc.  
to the Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Anastasia R. Meyer  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2673  
Ending Sequence No. LC2673

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Question No.: SIERRA 3-1

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of Company Witness Meyer on page 12. Explain why the retirement ages of Nelson 6 and Big Cajun 2 Unit 3 are confidential.

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Response:

Due to the competitive nature of the wholesale power market, the public disclosure of confidential information related to amount and timing of generation Entergy Texas, Inc. ("ETI") plans to deactivate likely would cause higher costs that ETI and other Entergy affiliates would have to pay for purchased power, and these higher costs would eventually be paid by ETI's customers. Public disclosure of commercially sensitive information also could result in less favorable terms and higher prices for which ETI can purchase power on a long-term basis. This could result in an increase in the cost of purchased power that ultimately would be reflected in the electric rates paid by retail customers of ETI.

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

Response of: Entergy Texas, Inc.  
to the Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Antonette Harvey  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2657  
Ending Sequence No. LC2659

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Question No.: SIERRA 3-2

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of Company Witness Meyer on page 12. State whether ETI has communicated its deactivation date assumptions for Nelson 6 to the plant operator (ELL).

- a. If yes, please state whether ELL is planning for a [REDACTED] proposed deactivation date of Nelson 6.
  - b. If no, please state why not and when ETI plans to notify ELL of its deactivation date assumptions.
- 

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 552.11. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Yes. In September 2021, the Nelson 6 co-owners were advised that both Entergy Texas, Inc. (“ETI”) and Entergy Louisiana, LLC (“ELL”) will be assuming a [REDACTED] deactivation for purposes of their upcoming supply plans, but ETI and ELL would be continuing to evaluate this assumption.

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 Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Daniel Boratko  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2660  
Ending Sequence No. LC2660

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Question No.: SIERRA 3-3

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of Company Witness Meyer on page 15 at lines 10-15. Please state whether ETI could procure energy and capacity from MISO to meet its generation and capacity needs if Nelson 6 were to be retired at the earlier date.

- a. If yes, please explain why ETI plans to keep operating Nelson 6 for generation capacity despite the analysis showing an earlier retirement date would be economic?
  - b. If no, please explain why not.
- 

Response:

- a. The Midcontinent Independent System Operator (“MISO”) capacity market is not a source of long-term capacity but rather a potential source of Zonal Resource Credits (“ZRCs”) for the upcoming planning year. In the short-term, the MISO market can help Entergy Texas, Inc. (“ETI”) balance its resource adequacy position. ETI can procure ZRCs from MISO’s capacity market, or, in the event of an overall MISO, MISO South, or Local Resource Zone 9 (“LRZ 9”) capacity shortfall, pay cost of new entry (“CONE”) to satisfy its MISO capacity auction requirements. ETI does not believe it is prudent to assume an earlier deactivation date for Nelson 6, as that is expected to lead to increased short-term risk for ETI customers, as well as tightening of the overall LRZ 9 capacity position, increasing the risk of incurring CONE pricing.

ETI offers all of its generation into and purchases all of its energy from the MISO energy markets. Accordingly, ETI would be more exposed to energy market price risk if Nelson 6 were retired at an earlier date than the assumed date.

- b. See the response to subpart a.

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

Response of: Entergy Texas, Inc.  
to the Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Anastasia R. Meyer  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2674  
Ending Sequence No. LC2675

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Question No.: SIERRA 3-4

Part No.:

Addendum:

Question:

Provide ETI' s projected generation (GWh) and capacity (MW) shortage for each year between now and 2030 both with and without Nelson Unit 6, assuming that OCAPS comes online.

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Response:

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Please see the highly sensitive attachments (TP-53719-00SIE003-X004-001\_HSPM through TP-53719-00SIE003-X004-002\_HSPM) showing Entergy Texas, Inc’s capacity and energy, respectively, surplus or deficit for each year between now and 2030, both with and without Nelson Unit 6, assuming Orange County Advanced Power Station comes online in 2026.

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PARAGRAPH 4 OF DOCKET NO. 53719 PROTECTIVE ORDER**

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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 Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Phong Nguyen  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2661  
Ending Sequence No. LC2661

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Question No.: SIERRA 3-5

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of Company Witness Meyer on Page 15 regarding the Nelson 6 analysis.

- a. Provide the energy and capacity market forecasts that the Company relied on for this analysis.
  - b. State the date that each of the energy and capacity market forecasts were produced.
  - c. State whether the Company has produced a more recent energy or capacity market forecast than the one it relied on for this analysis.
  - d. State whether ETI evaluated replacement resources other than a CT as an alternative to keeping Nelson 6 online.
- 

Response:

- a. The variable supply cost can be found in the highly sensitive attachment to the Company's response to Sierra Club 1-4. The Nelson 6 reference case analysis did not specifically rely on a capacity market forecast. The analysis evaluated the economics of deactivating Nelson 6 in 2026 versus 2030, relative to the cost of a combustion turbine ("CT"). Entergy Texas, Inc. ("ETI") ran a capacity price sensitivity using the Company's capacity price forecast. See the Company's response to Sierra Club 1-6 for the capacity price forecasts.
- b. Capacity price forecast sensitivity was produced in January 2021. The variable supply cost forecast was produced in May 2021.
- c. Yes.
- d. No. However, ETI's supply plan includes the addition of alternative resources, including renewable resources.

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

Response of: Entergy Texas, Inc.  
to the Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Phong Nguyen, Charles  
DeGeorge  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2662  
Ending Sequence No. LC2663

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Question No.: SIERRA 3-6

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of Company Witness Meyer on page 18 regarding EPG's economic analysis of Big Cajun 2 Unit 3.

- a. Provide the referenced modeling analysis, including all workbooks, inputs, and outputs.
  - b. Provide the Cleco 2020 and 2021 budgets as referenced on lines 14-16.
  - c. Provide the Nelson 6-contracted price of coal used in the Big Cajun Analysis.
- 

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 552.11. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

- a. See the Company's response to Sierra Club 1-5.
- b. See the highly sensitive attachments (TP-53719-00SIE003-X006-001\_HSPM and TP-53719-00SIE003-X006-002\_HSPM).
- c. See the highly sensitive attachments provided in the Company's response to Sierra Club 3-8.

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**

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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 Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Antonette Harvey  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2664  
Ending Sequence No. LC2666

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Question No.: SIERRA 3-7

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of Company Witness Meyer on page 19 regarding Cleco's public commitment to retire Big Cajun 2 Unit 3 by 2032. State whether ETI has communicated its deactivation date assumptions for Big Cajun 2 Unit 3 to the plant operator (Cleco)?

- a. If yes, please state whether Cleco is planning for a [REDACTED] deactivation date for the plant as well.
  - b. If no, please state why not and indicate when ETI plans to notify Cleco of its deactivation date assumptions.
- 

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 552.11. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

- a. Cleco<sup>1</sup> has not made any commitments beyond the one referenced in the Direct Testimony of Anastasia R. Meyer.
- b. Entergy Texas, Inc. has communicated to Cleco that it assumes a [REDACTED] deactivation of Big Cajun 2, Unit 3 for planning purposes. 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**

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Kristen F. Yates  
Entergy Services, LLC.

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

Response of: Entergy Texas, Inc.  
to the Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Phong Nguyen  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2693  
Ending Sequence No. LC2697

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Question No.: SIERRA 3-8

Part No.:

Addendum:

Question:

Refer to ETI response to Sierra Club RFI 1-6. Please provide responses for Big Cajun for all questions.

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Response:

Information included in the response contains highly sensitive protected (“highly sensitive”) materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101 and/or 552.11. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

- a. AURORA Electric Market Model, Excel, and Strategic Energy & Risk Valuation Model (“SERVM”).
- b. February 2021.
- c. Big Cajun 2 Unit 3 was modeled using economic dispatch for each year of the analysis.
- d. See the highly sensitive attachment provided in the Company’s response to Sierra Club 1-6 (TP-53719-00SIE001-X006-001\_HSPM) specifically the column for Business Plan 2021.
- e. The Big Cajun 2 Unit 3 assessment referred to in the Direct Testimony of Anastasia R. Meyer was not a retirement analysis. The Company does not control the decision on when the resource deactivates or retires. The assessment looked at the avoided cost associated with Big Cajun 2 Unit 3 under a range of useful life assumptions
- f. See the highly sensitive attachment (TP-53719-00SIE003-X008-001\_HSPM). In addition, see the highly sensitive attachments provided in the Company’s responses to Sierra Club 1-5, 1-6, and 3-5.
- g. See the response to subpart e.

- h. See the response to subpart e.
- i.
  - i. A full load heat rate of [REDACTED] Btu/kWh was used for Big Cajun 2 Unit 3.
  - ii. See the highly sensitive attachments provided in the Company's response to Sierra Club 1-5 and 3-6.
  - iii. See the highly sensitive attachment (TP-53719-00SIE003-X008-002\_HSPM).
  - iv. See the highly sensitive attachments provided in the Company's responses to Sierra Club 1-5 and 3-6.
  - v. See the highly sensitive attachments provided in the Company's responses to Sierra Club 1-5 and 3-6.
  - vi. No transmission upgrades were assumed in the analysis.
  - vii. Power market prices are not an input to the AURORA model. Power market prices are a result of the input assumptions, constraints, and generating unit commitment and dispatch performed by AURORA.
  - viii. See the highly sensitive attachments provided in the Company's response to Sierra Club 1-4.
  - ix. See the Company's response to subpart i.iii.
  - x. See the Company's response to subpart i.iii.
  - xi. See the Company's response to subpart i.iii.
- j. See the response to subpart e.
- k.
  - i. See the Company's response to subpart i.iii.
  - ii. See the Company's response to subpart i.iii.
  - iii. There are no specific VOM cost outputs, but these costs are embedded in the variably supply cost outputs of the AURORA model. See the Company's response to subpart f.
  - iv. This is not an output of the assessment. See the highly sensitive attachment provided in the Company's response to Sierra Club 1-4 for the input information.
  - v. This is not an output of the assessment. See the highly sensitive attachment provided in the Company's response to Sierra Club 1-4 for the input information.
  - vi. This is not an output of the assessment. See the highly sensitive attachment provided in the Company's response to Sierra Club 1-4 for the input information.
  - vii. See the Company's response to subpart i.iii.
- l. See the highly sensitive attachment provided in the Company's response to Sierra Club 1-4.

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**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO  
PARAGRAPH 4 OF DOCKET NO. 53719 PROTECTIVE ORDER**

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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 Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Jasmine Nguyen  
Sponsoring Witness: Beverley Gale  
Beginning Sequence No. LC2667  
Ending Sequence No. LC2667

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Question No.: SIERRA 3-9

Part No.:

Addendum:

Question:

Refer to ETI response to Sierra Club RFI 2-4(b) regarding projected capital expenditures for Nelson 6 and Big Cajun 3 Unit 2. State whether the Company has projected capital expenditures through each unit's respective projected retirement date. If the Company has not projected capital expenditures through each unit's respective projected retirement date, state the duration of the capital projection provided in Sierra Club RFI 2-4(b).

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Response:

No. The Company only has current capital expenditure projections for Entergy Operating Company operated units out five years. Cleco<sup>1</sup> provided capital expenditure projections to Entergy Texas, Inc. only to 2025.

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

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

Response of: Entergy Texas, Inc.  
to the Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Phong Nguyen  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2668  
Ending Sequence No. LC2670

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Question No.: SIERRA 3-10

Part No.:

Addendum:

Question:

Provide the capital expenditure forecast the Company used in its studies provided in response to Sierra Club RFI 1-4 and RFI 1-5 to determine the economic retirement dates of [REDACTED] for Big Cajun 2 Unit 3 and [REDACTED] for Nelson 6.

---

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 552.11. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

The Company has not assessed the economic retirement date for Big Cajun 2, Unit 3. See the Company’s response to Sierra Club 1-5. However, for the assumptions utilized in the Company’s economic assessment of Big Cajun 2, Unit 3 discussed in that response, see the highly sensitive attachments provided in the Company’s responses to Sierra Club 1-5 and Sierra Club 3-6.

For Nelson 6, please see the highly sensitive attachments provided in the Company’s responses to Sierra Club 1-4 and Sierra Club 1-6.

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  
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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 Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Josh Paternostro  
Sponsoring Witness: Allison P. Lofton  
Beginning Sequence No. LC2671  
Ending Sequence No. LC2671

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Question No.: SIERRA 3-11

Part No.:

Addendum:

Question:

Provide the undepreciated plant balances for Nelson 6 and Big Cajun 2 Unit 3 as of the beginning of the test year.

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Response:

The undepreciated plant balances as of the beginning of the Test Year for Nelson 6 and Big Cajun 2, Unit 3 are \$202,766,201 and \$111,601,353, respectively.

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

Response of: Entergy Texas, Inc.  
to the Third Set of Data Requests  
of Requesting Party: Sierra Club

Prepared By: Omar El Shal  
Sponsoring Witness: Anastasia R. Meyer  
Beginning Sequence No. LC2672  
Ending Sequence No. LC2673

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Question No.: SIERRA 3-12

Part No.:

Addendum:

Question:

Provide the Company's most recent cost projections for new supply side resources, including Solar PV, wind, battery storage, and paired storage resources.

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Response:

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Please see the highly sensitive attachment (TP-53719-00SIE003-X012\_HSPM) for the Company's most recent projections of new supply side resources.

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

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