THE REPORTER: This is the court reporter. It is 2:49 p.m., and we are off the record.

(Recess: 2:49 p.m. to 2:54 p.m.)

THE REPORTER: It is 2:54 p.m., and we are back on the record.

Q (BY MR. LAWLER) Mr. Watson, returning to your discussion of the previous depreciation study that you conducted for the Direct Assignment Study in the 2017 rate case, I know you said it took weeks.

Do you have an estimate of approximately how many hours or the cost of that study?

A No, I don't.

Q Okay. And do you believe -- is it possible that the study would take less time to repeat the study than it took the first time now that you have, you know, a basis from which to work and you've done it once?

A Possibly to some degree. I would -- I would suggest it would probably be -- it's still in the weeks, but less than the last one simply because of, you know, some efficiencies we'd get this time.

MR. LAWLER: Okay. And we pass the witness.

MR. MIRABAL: This is Justin Mirabal on behalf of Rayburn Country Electric Cooperative. We would like to ask the witness a few follow-up questions.

EXAMINATION

BY MR. MIRABAL:

Q Good afternoon, Mr. Watson.

A Good afternoon.

Q I want to start by repeating some of the instructions that Mr. Lawler gave you earlier. We will not go off the record today unless I instruct the court officer to pause. However, I will go off the record if you or your attorney ask me to.

If you do not understand my question, please ask me to repeat the question. If you answer my question, then I will assume you understood the question. If you realize that one of your answers is incomplete, please stop me and I will go back to the question that you would like to respond to, and I will remind you that you're still under oath.

Do you understand that you're still under oath, Mr. Watson?

A I do.

Q What were you instructed to do in connection with Oncor's rate case in this proceeding?

A To develop a depreciation study for Oncor's assets as of Year End 2021, I believe, and to assist in some of the schedules, the E schedules and B schedules,

as necessary.

Q Were you given any background materials about Oncor's prior rate cases before preparing your testimony?

A I do not believe so since we were involved in the last rate case.

Q Do you have a copy of your prepared testimony with you, Mr. Watson?

A I do.

Q Do you also have a copy of the rate study that you prepared, which is marked as DAW-2?

A I do.

Q Did anyone assist you in preparing your testimony in this case?

A Yes, my senior staff; primarily Dr. Ponder.

Q Anyone else besides from Dr. Ponder?

A I don't recall if any of -- my office manager probably did a lot of the formatting for me. I don't recall if any other of my staff assisted in the preparation.

Q How did Dr. Ponder assist you?

A She -- I mean, we worked together to develop the individual Q&As, and she would draft and I would edit, as appropriate, for my final review of it.

Q Who assisted you in preparing the depreciation

study that was marked as DAW-2?

A Dr. Ponder as well, and I think some of my other staff were brought in to do various life runs or building the net salvage database, various things where we could have lower level staff do some of the -- the data work. I don't remember if other senior staff were involved in that or not. They may have been

MR. FISHER: Mr. Mirabal, where are you going with these questions? This is outside the scope of the noticed deposition.

MR. MIRABAL: I'm just probing how the study was developed, and depreciation is -- was noticed in the deposition, and this is -- goes to the witness' depreciation study.

MR. FISHER: No, the depreciation study was not noticed. The depreciation, ETEC 3, Third Set, was noticed, and the second bullet point, which Oncor objected to, likewise is not just a general depreciation study notice.

So if you would like to -- this is not a deposition on depreciation studies in general where Mr. Watson -- for the rate case. If you would limit your questions to the noticed deposition topics, then I would appreciate it, or else I will instruct the witness to not answer.

MR. MIRABAL: Understood.

Q (BY MR. MIRABAL) What data did Oncor provide you for your depreciation study?

MR. FISHER: I would instruct the witness to not answer the question.

Q (BY MR. MIRABAL) Did Frank Lewis provide that data?

MR. FISHER: Once again, I would instruct the witness to not answer. It's outside the scope of the noticed deposition.

Q (BY MR. MIRABAL) Is the data used in your depreciation study publicly available?

MR. FISHER: Once again, I would instruct the witness not to answer.

Q (BY MR. MIRABAL) Mr. Watson, did you verify the accuracy of the data that you were provided from Oncor for your depreciation study?

MR. FISHER: Once again, I would instruct the witness not to answer.

Q (BY MR. MIRABAL) Mr. Watson, do you know where depreciation data is maintained at Oncor?

MR. FISHER: Once again, I'm going to instruct the witness not to answer.

Q (BY MR. MIRABAL) Mr. Watson, what accounting systems does Oncor use to maintain its depreciation

data?

MR. FISHER: Once again, I'm going to instruct the witness not to answer. If you'd like to get more detailed as to specific matters within the scope of the deposition, I'd be happy to have you continue.

Q (BY MR. MIRABAL) Mr. Watson, do you have personal knowledge of Oncor's accounting procedures?

MR. FISHER: Once again, I believe this has already been asked. I allowed Mr. Lawler to ask those questions without interruption, but I don't think we need to do it again.

MR. MIRABAL: We have no further questions.

THE REPORTER: Mr. Lawler, we cannot hear you.

MR. LAWLER: Thank you. If other parties have questions, I think now might be the time, you know, assuming they do, but if not -- you know, we have no further questions and would reserve any other questions for the hearing.

And thank you, Mr. Watson.

THE WITNESS: Thank you.

THE REPORTER: Do we need to go off the record at this time? I'm not seeing anyone else.

(No response)

THE REPORTER: It is 3:05 p.m., and we are off the record.

(Deposition concluded at 3:05 p.m.)

(Signature waived in an off-the-record discussion)

SOAH DOCKET NO. 473-22-2695

PUC DOCKET NO. 53601

APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY, LLC, FOR AUTHORITY TO CHANGE RATES	))))	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

REPORTER'S CERTIFICATE

ORAL DEPOSITION OF DANE WATSON

Wednesday, August 24, 2022

I, KIM PENCE, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, DANE WATSON, was duly sworn and that the transcript of the deposition is a true record of the testimony given by the witness;

That examination and signature of the witness to the deposition transcript was waived by the witness with the agreement of the parties at the time of the deposition;

That I was located in Paige, Texas for the taking of this deposition, and the witness was located in Indianapolis, Indiana;

That the original deposition was delivered to Mr. Jacob Lawler, Custodial Attorney.

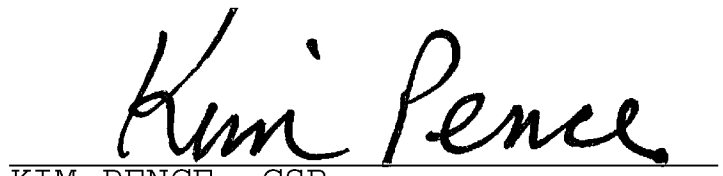
That pursuant to information given to the

deposition officer at the time said testimony was taken, the following includes all parties of record and the amount of time used by each party at the time of the deposition:

Mr. Jacob J. Lawler (47m)
Attorney for East Texas Electric Cooperative, Inc.
Ms. Adrianne M. Waddell (no time)
Attorney for East Texas Electric Cooperative, Inc.
Mr. Howard V. Fisher (no time)
Attorney for Oncor Electric Delivery Company, LLC
Mr. Tab R. Urbantke (no time)
Attorney for Oncor Electric Delivery Company, LLC
Ms. Lauren Freeland (no time)
Attorney for Oncor Electric Delivery Company, LLC
Mr. Justin J. Mirabal (8m)
Attorney for Rayburn Country Electric Cooperative, Inc.
Ms. Emma F. Hand (no time)
Attorney for Rayburn Country Electric Cooperative, Inc.
Ms. Marty Hopkins (no time)
Attorney for Hunt Energy Network, LLC
Mr. Michael A. McMillin (no time)
Attorney for Texas Industrial Energy Consumers

I further certify that I am neither counsel for, related to, nor employed by any of the parties in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of this action.

Certified to by me on this 25th day of August, 2022.



KIM PENCE, CSR
Certified Shorthand Reporter
CSR No. 4595 - Expires 12/31/24

Firm Registration No. 276
Kennedy Reporting Service, Inc.
100 E. Whitestone Blvd., Ste. 148
Cedar Park, Texas 78613
512.474.2233

ETEC Depo Exhibit 1

2017 RATE CASE
ONCOR ELECTRIC DELIVERY COMPANY LLC
DIRECT ASSIGNMENT OF COSTS FOR WHOLESALE CLASSES

POI Distribution Line Costs and Rate Design

StudyID: 6220735
Description of Wholesale POI: Rayburn, Cooper Highway, Sulphur Springs East, Feeder 1402

Cost Allocation

	Load (kW) @ Feeder Peak	
Feeder	6,970	(A)
Wholesale POI	6,536	(B)
Allocation Factor	93.7782%	(C) = (B/A)

Facilities Investment by Account

Account	Original Investment (D)	Depreciation (E)	Net Investment (F) = (D + E)	% of POI Feeder to POI Allocation Factor (C)	Assigned Amount (G) = (F*C)	
364 Poles Towers & Fixtures	$80,734	($30,234)	$50,501	93.7782%	$47,359	
365 Overhead Conductors and Devices	$18,380	($15,630)	$2,750	93.7782%	$2,579	
366 Underground Conduit	$0	$0	$0	93.7782%	$0	
367 Underground Conductors and Devices	$0	$0	$0	93.7782%	$0	
368 Line Transformers	$0	$0	$0	93.7782%	$0	
369 Services	$0	$0	$0	93.7782%	$0	
370 Meters	$0	$0	$0	93.7782%	$0	
371 Installations on Customers' Premises	$0	$0	$0	93.7782%	$0	
372 Leased Property on Customers' Premises	$0	$0	$0	93.7782%	$0	
373 Street Lighting and Signal Systems	$0	$0	$0	93.7782%	$0	
Total Feeder	$99,114	($45,863)	$53,251		$49,937	(H)

Revenue Requirement

Investment Assigned to POI	$49,937	(H)
Revenue Coverage Factor	55.3571%	(I)
Revenue Requirement	$27,644	(J) = (H*I)

ETEC Depo Exhibit 2

DOCKET 53601
TO ETEC RFI SET NO. 1
QUESTION NO. 1-20
SUPPLEMENT

Attachment 5
Page 1 of 1

2022 RATE CASE
ONCOR ELECTRIC DELIVERY COMPANY LLC

POI Distribution Line Costs and Rate Design

StudyID: 6220735
Description of Wholesale POI: Rayburn, Cooper Highway, Sulphur Springs East, Feeder 1402

Cost Allocation

	Load (kW) @ Feeder Peak	
Feeder	0	(A)
Wholesale POI	4,384	(B)
Allocation Factor		(C) = (B/A)

Facilities Investment by Account

Account	Original Investment	Depreciation	Net Investment	% of POI Feeder to POI Allocation Factor	Assigned Amount	
	(D)	(E)	(F) = (D + E)	(C)	(G) = (F*C)	
364 Poles Towers & Fixtures	$110,048					
365 Overhead Conductors and Devices	$24,924					
366 Underground Conduit	$2,254					
367 Underground Conductors and Devices	$8,214					
368 Line Transformers	$0					
369 Services	$0					
370 Meters	$0					
371 Installations on Customers' Premises	$0					
372 Leased Property on Customers' Premises	$0					
373 Street Lighting and Signal Systems	$0					
Total Feeder	$145,439					(H)

Revenue Requirement

Investment Assigned to POI		(H)
Revenue Coverage Factor		(I)
Revenue Requirement		(J) = (H*I)

ETEC Depo Exhibit 3

Request

Please refer to Oncor's Direct Assignment Study (DAS) filed in Docket No. 46957. Provide a working Excel file copy, with all formulas and links intact, of the workpaper supporting the development of accumulated depreciation referred to on page 10 of that study.

Response

The following response was prepared by or under the direct supervision of Dane A. Watson, the sponsoring witness for this response.

The electronic native files requested will be made available on the Oncor FTP site.

ELECTRONIC FILE:

Native File 1 – Workpapers supporting development of accumulated depreciation.

Request

Please refer to Oncor's DAS filed in Docket No. 46957 and to the Wholesale DAS Errata filed in that case. Provide working computer file copies of the calculations of all depreciation expense and accumulated depreciation amounts provided in Attachments 3 and 5 of the DAS and in the errata.

Response

The following response was prepared by or under the direct supervision of Dane A. Watson, the sponsoring witness for this response.

Working computer files are provided in the response to ETEC RFI Set No. 3, Question No. 3-01.

Request

Please refer to ETEC RFIs 1-18 and 1-20 to Oncor. For each of the directly assigned plant facilities and amounts provided in response to those two RFIs, provide the following information: (1) the average service life, (2) the remaining service life, and (3) the net salvage ratio.

Response

This request is the subject of an objection filed with the Commission. Subject to and without waiving its objections, Oncor responds as follows:

The following response was prepared by or under the direct supervision of Matthew A. Troxle, Darryl E. Nelson, and Dane A. Watson, the sponsoring witnesses for this response.

For each depreciable plant account, the proposed life (the average service life) as requested in subpart (1) of the request is shown in Appendix C of Exhibit DAW-2 to the direct testimony of Dane A. Watson (Bates pages 881 and 882). The proposed net salvage rate/ratio requested in subpart (3) of the request is also shown in Appendix C of Exhibit DAW-2 to the direct testimony of Dane A. Watson (Bates pages 881 and 882).

Providing the remaining service life as requested in subpart (2) of the request would require an analysis/study which Oncor has not performed. The remaining service life will vary based on the age of each asset within the depreciable plant account. See Appendix D of Exhibit DAW-2 to the direct testimony of Dane A. Watson (Bates pages 883 through 928), which shows the allocation of accumulated depreciation within each plant account by vintage year. The column labeled "RL" stands for remaining life, and that information is found in various tabs within Appendix D of Exhibit DAW-2 to the direct testimony of Dane A. Watson (Bates pages 883 through 928).

Request

Please refer to pages 9 and 10 of the DAS filed in Docket No. 46957. Provide a working Excel file of the workpaper or analysis used to calculate: (1) the "vintage balances within each asset group", (2) the "theoretical reserve ratio for each vintage", and the (3) the "proration factors" referenced on those pages.

Response

The following response was prepared by or under the direct supervision of Dane A. Watson, the sponsoring witness for this response.

The requested analysis is found in response to ETEC RFI Set No. 3, Question No. 3-01. The computation of accumulated depreciation for the direct assignment study was performed in Access, not Excel. The accumulated depreciation computation was based on the age of each facility and plant account. The folder labeled "B-5 Reserve Allocation" contains the theoretical reserve ratio for each vintage year and the proration factors used for the allocation of the reserve. The average service life, remaining life, and net salvage ratio for each functional group by account and vintage are shown in the folder labeled "Curve Point by Function." An access database was used to make the reserve allocation computation. The calculations are found in the folder labeled "Access Data base." The results were exported into Excel files found in the folder labeled "File by location."

ETEC Depo Exhibit 4

Filing Receipt

Received - 2022-08-19 02:48:10 PM
Control Number - 53601
ItemNumber - 359

SOAH DOCKET NO. 473-22-2695
DOCKET NO. 53601

APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY, LLC FOR AUTHORITY TO CHANGE RATES	**§**	**BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

EAST TEXAS ELECTRIC COOPERATIVE, INC.'S NOTICE OF INTENT TO TAKE DEPOSITION OF CORPORATE REPRESENTATIVE AND REQUEST FOR INFORMATION

To: Oncor Electric Delivery Company LLC, 1445 Ross Avenue, Suite 3700, Dallas, Texas 75202.

Notice of Deposition

Please take notice that pursuant to Texas Rule of Civil Procedure 199 and by agreement with counsel for Oncor Electric Delivery Company LLC ("Oncor"), East Texas Electric Cooperative, Inc. ("ETEC") will take the oral deposition of the Corporate Representative of Oncor, starting at 2:00 p.m. on Wednesday, August 24, 2022 via Zoom video conferencing. Parties may attend and participate using the following information:

Zoom Meeting ID: 845 2039 9702

Web:
Meeting URL: https://hklaw.zoom.us/j/84520399702

Telephone:
+1 346 248 7799 (US Toll)
+1 669 900 6833 (US Toll)
+1 719 359 4580 (US Toll)
+1 253 215 8782 (US Toll)
877 853 5257 (US Toll Free)
888 475 4499 (US Toll Free)
833 548 0276 (US Toll Free)
833 548 0282 (US Toll Free)

The deposition will be conducted in accordance with the Texas Rules of Civil Procedure before a certified court reporter authorized to administer oaths and transcribe sworn testimony. The deposition will continue from day to day until completed. Said corporate representative shall

testify about the matters known or reasonably available to Oncor concerning the information listed on the attached Exhibit "A."

Request for Information

Please bring to the deposition a copy of all documents or other information the corporate representative reviewed in preparation for the above-noticed deposition. In addition, please bring or have accessible the following information pertaining to ETEC 3-3: (1) Original cost of the facilities (including without limitation such information as may be obtained from Oncor Electric Delivery Company LLC's Distribution Information System and Fixed Asset Management system, or their current equivalents, including plant additions and retirements since the test year used for the Direct Assignment Study filed in Docket No. 46957) based on the type, size and vintage year of each facility used to service individual wholesale points of interconnection; and (2) Actual or estimated accumulated depreciation (through the current test year) associated with the gross plant for each wholesale point of interconnection and the supporting data.

Respectfully submitted,

/s/ Jacob Lawler

Mark C. Davis
State Bar No. 05525050
Mark.Davis@hklaw.com
Adrianne M. Waddell
State Bar No. 24098556
Adrianne.Waddell@hklaw.com
Jacob J. Lawler
State Bar No. 24076502
Jacob.Lawler@hklaw.com
HOLLAND & KNIGHT, LLP
98 San Jacinto Blvd., Suite 1900
Austin, Texas 78701
(512) 472-1081
(512) 472-7473 FAX

ATTORNEYS FOR
EAST TEXAS ELECTRIC
COOPERATIVE, INC.

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 19, 2022, in accordance with the Second Order Suspending Rules, issued in Docket No. 50664.

/s/ Jacob Lawler
Jacob Lawler

SOAH DOCKET NO. 473-22-2695
DOCKET NO. 53601

APPLICATION OF ONCOR ELECTRIC	**§**	**BEFORE THE STATE OFFICE**
DELIVERY COMPANY, LLC FOR	**§**	**OF**
AUTHORITY TO CHANGE RATES	**§**	**ADMINISTRATIVE HEARINGS**

EXHIBIT A

- East Texas Electric Cooperative, Inc.'s Third Set of Request for Information to Oncor Electric Delivery Company LLC
- The following information pertaining to ETEC 3-3: (1) Original cost of the facilities (including without limitation such information as may be obtained from Oncor Electric Delivery Company LLC's Distribution Information System and Fixed Asset Management system, or their current equivalents, including plant additions and retirements since the test year used for the Direct Assignment Study filed in Docket No. 46957) based on the type, size and vintage year of each facility used to service individual wholesale points of interconnection; and (2) Actual or estimated accumulated depreciation (through the current test year) associated with the gross plant for each wholesale point of interconnection and the supporting data

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Anastasia R. Meyer Sponsoring Witness: Anastasia R. Meyer Beginning Sequence No. EV2340 Ending Sequence No. EV2340

Question No.: TIEC 5-3 Part No.: Addendum:

Question:

Please describe ETI's environmental sustainability goals, including any carbon emissions goals. Please also state whether ETI has plans to meet those goals and, if so, how ETI plans to meet them.

Response:

Entergy Texas, Inc. ("ETI"), along with the other Entergy Operating Companies, is committed, across the Corporation, to achieving carbon dioxide (CO_2) net-zero emissions by 2050 while balancing affordability and reliability for its customers. Based on current planning, by 2030, absolute emissions from oxides of nitrogen and sulfur dioxide will be 90% below 2000 levels and mercury emissions will be near zero. The CO_2 reduction goal for 2030 is a 50% reduction in the utility emission rate as compared to 2000 levels.

Aligned with industry and market assumptions, ETI believes that its path to 2050 net-zero will be supported by technology and market developments. A net-zero strategy may also utilize methods and mechanisms to address any residual emissions. While it is too early to commit to a specific path to net-zero, ETI is committed to working with all stakeholders to optimize its strategy while balancing affordability, reliability, and environmental stewardship.

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

Response of: Entergy Texas, Inc.	Prepared By: Kristin Quinn, Anne Kulakowski
to the Fifth Set of Data Requests	Sponsoring Witness: Bobby R. Sperandeo, Jr.
of Requesting Party: Texas Industrial Energy Consumers	Beginning Sequence No. EV2341
	Ending Sequence No. EV2341

Question No.: TIEC 5-4 Part No.: Addendum:

Question:

Please provide any documents, including presentations and press releases, that ETI has provided to investors or credit ratings agencies in the last four years regarding ETI's environmental sustainability goals—including carbon reduction goals—or plans to meet those goals.

Response:

Entergy Texas, Inc. ("ETI") has not provided any documents to investors or credit ratings agencies in the last four years regarding ETI's environmental sustainability goals. Accordingly, ETI has no documents responsive to this request.

Please see Entergy's Investor Relations website for presentations and information provided to investors and others related to Entergy's environmental sustainability goals, including carbon reduction goals, at https://www.entergy.com/investor_relations/. See also the Company's response to TIEC 1-8.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Lauren Hayes, Lynsi Oster Sponsoring Witness: Jennifer A. Raeder Beginning Sequence No. EV2342 Ending Sequence No. EV2342

Question No.: TIEC 5-5 Part No.: Addendum:

Question:

Please explain how executive compensation is tied to ETI's or Entergy Corp.'s environmental goals (including carbon-related goals).

Response:

Entergy Corporation's executives who participate in the Executive Annual Incentive Plan ("EAIP") are eligible for Short-term Incentive ("STI") awards under the 2019 Omnibus Incentive Plan ("2019 OIP"). Please refer to the Direct Testimony of Jennifer A. Raeder, Q17, page 7, for eligible employee groups in the EAIP. Maximum funding for the STI awards is determined by the Entergy Achievement Multiplier ("EAM") performance measures. Annually, after a review of the Company's strategic plan, the Personnel Committee engages in a rigorous process to determine the financial, strategic, and operational measures and the targets for each measure that will be used to determine the EAM. As stated in the Direct Testimony of Jennifer A. Raeder, Q23, page 11, beginning in 2021, the Personnel Committee decided that the EAM would be based on both financial and Environmental, Social, and Governance ("ESG") measures, with the financial measure weighted 60% and the four ESG measures, including Environmental Stewardship, each weighted at 10%. These measures were selected because the committee considered them to represent key ways that the Company creates sustainable value for its stakeholders that may not be fully captured in its quarterly and annual financial results. Once the EAM is scored and the maximum level of funding is calculated, individual STI awards are determined based on the executive's personal overall individual performance. The EAM formula is not used as a performance measure for determining individual STI awards, except with respect to payouts awarded to the members of the Office of the Chief Executive under the EAIP.

Environmental Stewardship is one of the four ESG measures used to determine overall funding of incentive payments made under the EAIP. This key measure assesses the progress toward environmental commitments through performance on key initiatives and utility CO2 emission rate outcomes. In 2021, Entergy achieved performance of 140% of target on its Environmental Stewardship goal. Please see the publicly available Entergy's Notice of 2022 Annual Meeting of Shareholders and Proxy Statement on page 52 for details on the key outcomes resulting in this achievement level.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Lauren Hayes, Lynsi Oster, Paula Johnson Sponsoring Witness: Jennifer A. Raeder Beginning Sequence No. LC2676 Ending Sequence No. LC2692

Question No.: TIEC 5-6 Part No.: Addendum:

Question:

Please provide any documents provided to ETI executives in the last four years detailing how their compensation might be impacted by ETI's or Entergy Corp.'s meeting, or failing to meet, environmental goals (including carbon-related goals).

Response:

Information included in the response contains protected ("confidential") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101 and/or 552.110. Confidential materials will be provided pursuant to the terms of the Protective Order in this docket.

As detailed in the Company's response to TIEC 5-5, 2021 was the first time that Environmental Stewardship was factored into the Entergy Achievement Multiplier ("EAM") funding. In early 2021, attachments TP-53719-00TIE005-X006-001_CONF through TP-53719-TIE005-X006-003_CONF were shared with employees to communicate the changes to the EAM calculation. Exhibit JAR-1 to the Direct Testimony of Jennifer A. Raeder, Executive Annual Incentive Program Compendium 2021 Plan Year, pages 11-13 includes further details on Short-Term Incentive funding. This document is available to all employees.

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

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

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101 and/or 552.110. ETI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

Kristen F. Yates
Entergy Services, LLC.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Richard D. Starkweather Sponsoring Witness: Richard D. Starkweather Beginning Sequence No. EV2354 Ending Sequence No. EV2354

Question No.: TIEC 5-7 Part No.: Addendum:

Question:

Please provide the native file for exhibits RDS-2, RDS-4, and RDS-5.

Response:

Please see the attachments (TP-53719-00TIE005-X007-001 through TP-53719-00TIE005-X007-003).

List of National Peer Group Companies

No.	Company ID	Company Name
1	4199135	Entergy Texas, Inc.
2	4024697	AES Indiana
3	4014956	Alabama Power Company
4	4058371	Alaska Electric Light and Power Company
5	4272394	Ameren Illinois Company
6	4056972	Appalachian Power Company
7	4056974	Arizona Public Service Company
8	4056975	Atlantic City Electric Company
9	4057075	Avista Corporation
10	4007784	Baltimore Gas and Electric Company
11	6949631	Bear Valley Electric Service
12	4215172	Black Hills Colorado Electric, Inc.
13	4065694	Black Hills Power, Inc.
14	4057076	Central Hudson Gas & Electric Corporation
15	4056978	Central Maine Power Company
16	4059189	Cheyenne Light, Fuel and Power Company
17	4056982	Cleco Power LLC
18	4000672	Commonwealth Edison Company
19	4057080	Consolidated Edison Company of New York, Inc.
20	4057081	Consumers Energy Company
21	4059540	Dahlberg Light & Power Company
22	4057082	Delmarva Power & Light Company
23	4057099	Dominion Energy South Carolina, Inc.
24	4057083	DTE Electric Company
25	4004320	Duke Energy Carolinas, LLC
26	4056998	Duke Energy Florida, LLC
27	4062444	Duke Energy Indiana, LLC
28	4057103	Duke Energy Kentucky, Inc.
29	4057079	Duke Energy Ohio, Inc.
30	4004192	Duke Energy Progress, LLC
31	4004307	Duquesne Light Company
32	4056994	El Paso Electric Company
33	3005475	Empire District Electric Company
34	4056995	Entergy Arkansas, LLC
35	4112564	Entergy Louisiana, LLC
36	4008616	Entergy Mississippi, LLC
37	4057085	Entergy New Orleans, LLC
38	4057089	Evergy Kansas South, Inc.
39	4072456	Evergy Metro, Inc.

List of National Peer Group Companies

No.	Company ID	Company Name
40	4000843	Evergy Missouri West, Inc.
41	4060026	Fitchburg Gas and Electric Light Company
42	4056997	Florida Power & Light Company
43	4057086	Florida Public Utilities Company
44	4004152	Georgia Power Company
45	4063057	Golden State Water Company
46	4056999	Green Mountain Power Corporation
47	4057000	Gulf Power Company
48	4060446	Hawaii Electric Light Company, Inc.
49	4057001	Hawaiian Electric Company, Inc.
50	4057002	Idaho Power Company
51	4057003	Indiana Michigan Power Company
52	4057087	Interstate Power and Light Company
53	4057004	Jersey Central Power & Light Company
54	4057006	Kentucky Power Company
55	4042397	Kentucky Utilities Company
56	4060895	Kingsport Power Company
57	4232403	Liberty Utilities (CalPeco Electric) LLC
58	4060294	Liberty Utilities (Granite State Electric) Corp.
59	4057090	Louisville Gas and Electric Company
60	4008754	Madison Gas and Electric Company
61	4057008	Massachusetts Electric Company
62	4061329	Maui Electric Company, Limited
63	4010692	MDU Resources Group, Inc.
64	4057009	Metropolitan Edison Company
65	4057091	MidAmerican Energy Company
66	4061513	Minnesota Power Enterprises, Inc.
67	4057010	Mississippi Power Company
68	4057011	Monongahela Power Company
69	4057012	Narragansett Electric Company
70	4061726	Nevada Power Company
71	4004389	New York State Electric & Gas Corporation
72	4057014	Niagara Mohawk Power Corporation
73	4012860	Northern Indiana Public Service Company
74	4057754	Northern States Power Company - MN
75	4061925	Northern States Power Company - WI
76	4057053	NorthWestern Corporation
77	4061951	Northwestern Wisconsin Electric Company
78	4008369	NSTAR Electric Company
79	4014480	Ohio Edison Company
80	4057015	Ohio Power Company

List of National Peer Group Companies

No.	Company ID	Company Name
81	4057016	Oklahoma Gas and Electric Company
82	4057093	Orange and Rockland Utilities, Inc.
83	4147257	Otter Tail Power Company
84	4004218	Pacific Gas and Electric Company
85	4001587	PacifiCorp
86	4062222	PECO Energy Company
87	4057018	Pennsylvania Electric Company
88	4018463	Pennsylvania Power Company
89	4057019	Portland General Electric Company
90	4044391	Potomac Electric Power Company
91	4057021	PPL Electric Utilities Corporation
92	4057094	Public Service Company of Colorado
93	4057022	Public Service Company of New Hampshire
94	4073320	Public Service Company of New Mexico
95	4057023	Public Service Company of Oklahoma
96	4057095	Public Service Electric and Gas Company
97	4062485	Puget Sound Energy, Inc.
98	4057096	Rochester Gas and Electric Co
99	4062660	Rockland Electric Company
100	4057097	San Diego Gas & Electric Company
101	4057098	Sierra Pacific Power Company
102	4009083	Southern California Edison Company
103	4057100	Southern Indiana Gas and Electric Company
104	4057026	Southwestern Electric Power Company
105	4057027	Southwestern Public Service Company
106	4063281	Superior Water, Light and Power Company
107	3010781	Tampa Electric Company
108	4056983	The Cleveland Electric Illuminating Company
109	4056992	The Connecticut Light and Power Company
110	4017451	The Dayton Power and Light Company
111	4057020	The Potomac Edison Company
112	4057029	The Toledo Edison Company
113	3004222	The United Illuminating Company
114	4057030	Tucson Electric Power Company
115	4057538	UGI Utilities, Inc.
116	4057102	Union Electric Company
117	4059391	Unitil Energy Systems, Inc.
118	4092733	UNS Electric, Inc.
119	4887639	Upper Michigan Energy Resources Corporation
120	4081463	Upper Peninsula Power Company
121	3001167	Versant Power

List of National Peer Group Companies

No.	Company ID	Company Name
122	4057032	Virginia Electric and Power Company
123	4057033	West Penn Power Company
124	4082573	Westar Energy (KPL)
125	4063994	Wheeling Power Company
126	4057105	Wisconsin Electric Power Company
127	4008669	Wisconsin Power and Light Company
128	4057106	Wisconsin Public Service Corporation

Entergy Texas, Inc.
Fixed Fuel Factor Revenues

		FFF Sales at Meter (kWh)	Retail Fixed Fuel Factor	Estimated FFF Revenues	Total Company Fuel Expense
January	2020	1,415,993,082	0.0231702	$ 32,808,843	
February	2020	1,388,136,614	0.0231702	$ 32,163,403	
March	2020	1,482,144,268	0.0228285	$ 33,835,130	
April	2020	1,396,094,614	0.0228285	$ 31,870,746	
May	2020	1,398,200,491	0.0228285	$ 31,918,820	
June	2020	1,699,489,779	0.0228285	$ 38,796,802	
July	2020	1,832,017,597	0.0228285	$ 41,822,214	
August	2020	1,861,243,372	0.0228285	$ 42,489,394	
September	2020	1,781,977,050	0.0294701	$ 52,515,042	
October	2020	1,499,006,840	0.0294701	$ 44,175,881	
November	2020	1,419,297,169	0.0294701	$ 41,826,830	
December	2020	1,502,976,272	0.0294701	$ 44,292,861	
	Totals	18,676,577,148		$ 468,515,966	
January	2021	1,628,714,396	0.0294701	$ 47,998,376	$ 43,374,011
February	2021	1,762,125,748	0.0294701	$ 51,930,022	$ 103,418,274
March	2021	1,646,677,316	0.0290620	$ 47,855,736	
April	2021	1,665,658,468	0.0290620	$ 48,407,366	
May	2021	1,679,062,070	0.0290620	$ 48,796,902	
June	2021	1,990,940,031	0.0290620	$ 57,860,699	
July	2021	2,066,567,893	0.0290620	$ 60,058,596	
August	2021	2,130,193,340	0.0290620	$ 61,907,679	
September	2021	2,082,548,925	0.0339519	$ 70,706,493	
October	2021	1,823,451,280	0.0339519	$ 61,909,636	
November	2021	1,802,397,131	0.0339519	$ 61,194,807	
December	2021	1,652,370,810	0.0339519	$ 56,101,129	
	Totals	21,930,707,408		$ 674,727,441	
			Year to Year Increase	$ 206,211,474	
			Month to Month Increase		$ 60,044,263
			Percent Increase	44.0%	138.4%

Sources: Application of Entergy Texas, Inc. to Revise Fixed Fuel Factor (Schedule FF) in Compliance with Order in Docket No. 32915; Docket Nos. 49873, 50568, 51196, 51815, 52452, and 53255.

EEI Typical Bills and Average Rates Report
Summer 2020

		Residential General Service Rates in effect July 1, 2020				Commercial General Service Rates in effect July 1, 2020						
Demand (kW)								40	40	500	500	
Energy (kWh)		500	750	1,000	FCA (in cents)	375	1,500	10,000	14,000	150,000	180,000	FCA (in cents)
Typical Electric Bills (in $/month)												
Alabama	Alabama Power Company	$ 78.25	$ 109.91	$ 141.58	2.3920	$ 94	$ 297	$ 1,510	$ 1,937	$ 20,952	$ 24,149	2.3920
Arkansas	Entergy Arkansas, Inc.	$ 60.70	$ 86.16	$ 111.60	1.0520	$ 58	$ 137	$ 931	$ 1,177	$ 14,991	$ 16,352	1.0520
Florida	Duke Energy Florida	$ 70.51	$ 100.29	$ 130.09	3.0670	$ 62	$ 203	$ 1,153	$ 1,429	$ 15,373	$ 17,420	3.3500
Florida	Florida Power & Light Company	$ 52.50	$ 74.46	$ 96.43	2.2040	$ 45	$ 145	$ 956	$ 1,144	$ 13,359	$ 14,623	2.2260
Florida	Florida Public Utilities Company	$ 78.42	$ 105.95	$ 133.49	7.4600	$ 83	$ 216	$ 1,187	$ 1,518	$ 16,104	$ 18,397	N/A
Florida	Gulf Power Company	$ 80.06	$ 110.27	$ 140.43	3.2620	$ 73	$ 213	$ 1,139	$ 1,460	$ 17,072	$ 18,874	3.2620
Florida	Tampa Electric Company	N/A	N/A	N/A	2.2850	N/A	N/A	N/A	N/A	N/A	N/A	2.6380
Georgia	Georgia Power Company	$ 62.87	$ 92.63	$ 129.88	2.3375	$ 82	$ 264	$ 1,439	$ 1,595	$ 16,510	$ 17,680	2.3375
Illinois	Ameren Illinois	$ 54.52	$ 74.86	$ 92.00	N/A	$ 66	$ 160	$ 949	$ 1,236	$ 6,872	$ 7,050	N/A
Kentucky	Kentucky Utilities Company	$ 62.45	$ 85.19	$ 107.93	(0.3510)	$ 76	$ 206	$ 1,187	$ 1,649	$ 14,863	$ 15,584	(0.3510)
Kentucky	Louisville Gas & Electric Company	$ 64.14	$ 88.86	$ 113.58	(0.1150)	$ 76	$ 203	$ 1,159	$ 1,609	$ 17,093	$ 17,923	(0.1150)
Louisiana	CLECO Power LLC	$ 65.06	$ 92.09	$ 116.47	0.025975	$ 55	$ 185	$ 1,082	$ 1,271	$ 14,477	$ 15,889	0.027675
Louisiana	Entergy Louisiana, Inc.	$ 51.30	$ 74.82	$ 98.32	1.8000	$ 75	$ 187	$ 1,076	$ 1,395	$ 11,865	$ 13,597	1.8000
Louisiana	Entergy Louisiana, LLC (Entergy Gulf States, Inc.)	$ 51.61	$ 71.86	$ 92.10	1.8000	$ 64	$ 181	$ 826	$ 1,022	$ 10,850	$ 12,326	1.8000
Louisiana	Entergy New Orleans, Inc.	$ 61.05	$ 86.97	$ 112.91	1.2338	$ 59	$ 163	$ 1,092	$ 1,363	$ 15,034	$ 16,693	1.2338
Mississippi	Entergy Mississippi	$ 60.39	$ 78.62	$ 96.82	(0.027942)	$ 60	$ 177	$ 1,051	$ 1,342	$ 11,378	$ 13,019	(0.027942)
Mississippi	Mississippi Power Company	$ 77.57	$ 105.10	$ 135.53	2.4409	$ 83	$ 195	$ 1,114	$ 1,371	$ 14,750	$ 16,499	N/A
Missouri	Ameren Missouri	$ 69.27	$ 99.37	$ 129.48	(0.00207)	$ 50	$ 170	$ 1,074	$ 1,500	$ 15,862	$ 17,996	(0.00207)
North Carolina	Dominion Energy North Carolina	$ 66.19	$ 93.66	$ 121.13	0.00014	$ 58	$ 166	$ 939	$ 1,239	$ 13,769	$ 14,797	0.00014
North Carolina	Duke Energy Carolinas	$ 60.92	$ 83.95	$ 106.97	0.1675	$ 67	$ 197	$ 872	$ 1,291	$ 11,746	$ 15,931	0.1327
North Carolina	Duke Energy Progress	$ 67.62	$ 93.70	$ 119.78	N/A	$ 70	$ 181	$ 995	$ 1,211	$ 12,083	$ 13,467	N/A
South Carolina	Dominion Energy South Carolina	$ 65.92	$ 94.04	$ 124.45	2.3590	$ 66	$ 192	$ 1,189	$ 1,664	$ 16,409	$ 17,640	2.3570
South Carolina	Duke Energy Carolinas	$ 67.36	$ 94.75	$ 122.14	0.1811	$ 64	$ 213	$ 953	$ 1,416	$ 16,247	$ 17,604	0.0706
South Carolina	Duke Energy Progress	$ 67.21	$ 94.42	$ 121.63	N/A	$ 62	$ 201	$ 1,059	$ 1,278	$ 13,156	$ 14,580	N/A
Texas	El Paso Electric Company	$ 61.66	$ 89.22	$ 117.24	0.6211	$ 54	$ 186	$ 1,297	$ 1,529	$ 17,341	$ 19,008	0.4330
Texas	Entergy Texas	$ 62.40	$ 87.52	$ 112.65	2.33406	$ 52	$ 155	$ 894	$ 1,109	$ 12,698	$ 13,740	2.27767
Texas	Southwestern Electric Power Company	$ 63.58	$ 91.37	$ 119.16	3.4060	$ 50	$ 164	$ 915	$ 1,110	$ 12,654	$ 14,117	3.300012
Texas	Southwestern Public Service Company	$ 57.09	$ 80.63	$ 104.17	1.6852	$ 41	$ 129	$ 859	$ 942	$ 10,962	$ 11,588	1.6852
Virginia	Dominion Energy Virginia	$ 62.47	$ 90.41	$ 120.27	0.017357	$ 50	$ 159	$ 1,048	$ 1,242	$ 12,770	$ 13,391	0.017357
	Average for Peer Group (Calculated)	$ 64.40	$ 90.40	$ 116.72		$ 64	$ 187	$ 1,069	$ 1,359	$ 14,187	$ 15,712	
	Q1	$ 60.87	$ 84.88	$ 107.69		$ 55	$ 164	$ 947	$ 1,230	$ 12,511	$ 13,704	
	Median	$ 63.23	$ 90.89	$ 118.20		$ 63	$ 186	$ 1,067	$ 1,353	$ 14,614	$ 15,910	
	Q3	$ 67.43	$ 94.50	$ 125.71		$ 74	$ 203	$ 1,155	$ 1,505	$ 16,140	$ 17,650	

EEI Typical Bills and Average Rates Report
Summer 2020

		Industrial General Service Rates in effect July 1, 2020									
	Demand (kW)	75	75	75	1,000	1,000	1,000	50,000	50,000	50,000	
	Energy (kWh)	15,000	30,000	50,000	200,000	400,000	650,000	15,000,000	25,000,000	32,500,000	FCA (in cents)
Typical Electric Bills (in $/month)											
Alabama	Alabama Power Company	$ 2,250	$ 3,903	$ 6,007	$ 19,180	$ 31,590	$ 45,591	$ 1,251,302	$ 1,805,388	$ 2,220,954	2.2562
Arkansas	Entergy Arkansas, Inc.	$ 1,516	$ 2,441	$ 3,989	$ 20,250	$ 34,414	$ 40,582	$ 1,357,347	$ 1,763,072	$ 1,998,701	1.0520
Florida	Duke Energy Florida	$ 1,891	$ 2,925	$ 4,057	$ 23,743	$ 37,386	$ 50,614	$ 1,519,274	$ 2,053,477	$ 2,521,314	3.3170
Florida	Florida Power & Light Company	$ 1,593	$ 2,297	$ 3,236	$ 22,424	$ 30,849	$ 40,915	$ 744,854	$ 1,076,744	$ 1,325,662	2.1390
Florida	Florida Public Utilities Company	$ 1,817	$ 3,057	$ 4,711	$ 24,346	$ 39,635	$ 58,746	$ 1,588,892	$ 2,353,342	$ 2,926,679	N/A
Florida	Gulf Power Company	$ 1,793	$ 2,996	$ 4,599	$ 27,870	$ 39,881	$ 54,894	$ 1,680,557	$ 2,281,081	$ 2,536,176	3.2620
Florida	Tampa Electric Company	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.6380
Georgia	Georgia Power Company	$ 2,356	$ 2,936	$ 3,628	$ 32,007	$ 40,318	$ 49,438	$ 1,483,773	$ 1,872,932	$ 2,139,856	2.3375
Illinois	Ameren Illinois	$ 1,307	$ 2,382	$ 3,816	$ 9,811	$ 10,946	$ 12,366	$ 415,609	$ 472,377	$ 514,953	N/A
Kentucky	Kentucky Utilities Company	$ 2,525	$ 2,971	$ 3,565	$ 26,791	$ 31,417	$ 37,200	$ 1,365,214	$ 1,590,137	$ 1,758,829	(0.3510)
Kentucky	Louisville Gas & Electric Company	$ 2,524	$ 3,058	$ 3,772	$ 29,898	$ 35,277	$ 42,001	$ 1,508,567	$ 1,773,279	$ 1,971,813	(0.1150)
Louisiana	CLECO Power LLC	$ 1,829	$ 2,535	$ 3,477	$ 24,135	$ 33,554	$ 45,327	$ 1,482,475	$ 1,763,492	$ 1,974,254	N/A
Louisiana	Entergy Louisiana, Inc.	$ 1,607	$ 2,747	$ 3,821	$ 16,399	$ 27,456	$ 38,978	$ 1,058,909	$ 1,554,464	$ 1,717,716	1.8000
Louisiana	Entergy Louisiana, LLC (Entergy Gulf States, Inc.)	$ 1,310	$ 2,044	$ 2,983	$ 16,180	$ 25,813	$ 37,302	$ 958,514	$ 1,276,915	$ 1,502,179	1.8000
Louisiana	Entergy New Orleans, Inc.	$ 1,784	$ 2,803	$ 4,005	$ 23,985	$ 35,046	$ 47,047	$ 1,448,750	$ 1,965,291	$ 2,325,313	1.2338
Mississippi	Entergy Mississippi	$ 1,601	$ 2,640	$ 4,026	$ 15,261	$ 25,604	$ 33,833	$ 1,059,670	$ 1,187,318	$ 1,283,054	(0.027942)
Mississippi	Mississippi Power Company	$ 1,974	$ 2,944	$ 3,881	$ 22,453	$ 34,252	$ 46,396	$ 1,306,270	$ 1,862,049	$ 2,195,912	N/A
Missouri	Ameren Missouri	$ 1,607	$ 3,069	$ 4,095	$ 24,117	$ 37,949	$ 50,776	$ 1,503,325	$ 1,840,784	$ 2,103,846	(0.00207)
North Carolina	Dominion Energy North Carolina	$ 1,379	$ 2,475	$ 3,426	$ 19,959	$ 30,781	$ 40,304	$ 1,343,724	$ 1,724,636	$ 2,010,320	0.00014
North Carolina	Duke Energy Carolinas	$ 1,356	$ 2,554	$ 3,429	$ 17,283	$ 33,388	$ 44,332	$ 1,216,370	$ 1,658,530	$ 1,990,151	0.0817
North Carolina	Duke Energy Progress	$ 1,555	$ 2,247	$ 3,121	$ 22,838	$ 32,446	$ 46,462	$ 1,284,360	$ 1,764,760	$ 2,225,385	N/A
South Carolina	Dominion Energy South Carolina	$ 1,782	$ 2,966	$ 3,838	$ 23,822	$ 31,579	$ 41,274	$ 1,291,229	$ 1,679,046	$ 1,969,908	2.3050
South Carolina	Duke Energy Carolinas	$ 1,566	$ 2,900	$ 3,810	$ 18,477	$ 31,590	$ 48,546	$ 1,118,938	$ 1,832,003	$ 2,173,052	0.0745
South Carolina	Duke Energy Progress	$ 1,605	$ 2,453	$ 3,345	$ 22,928	$ 31,944	$ 46,799	$ 1,272,492	$ 1,723,292	$ 2,240,617	N/A
Texas	El Paso Electric Company	$ 2,191	$ 3,007	$ 3,887	$ 29,998	$ 37,001	$ 45,754	$ 1,486,848	$ 1,856,044	$ 2,132,941	0.7804
Texas	Entergy Texas	$ 1,436	$ 2,242	$ 3,316	$ 17,517	$ 27,677	$ 32,618	$ 835,998	$ 1,106,071	$ 1,303,329	2.21403
Texas	Southwestern Electric Power Company	$ 1,542	$ 2,282	$ 3,269	$ 20,588	$ 30,429	$ 42,768	$ 1,042,080	$ 1,467,596	$ 1,786,733	3.21389
Texas	Southwestern Public Service Company	$ 1,327	$ 1,606	$ 1,978	$ 16,971	$ 20,691	$ 25,340	$ 814,619	$ 971,654	$ 1,089,430	1.6537
Virginia	Dominion Energy Virginia	$ 1,873	$ 2,431	$ 2,877	$ 23,351	$ 27,489	$ 32,661	$ 1,256,906	$ 1,462,313	$ 1,616,369	0.017357
	Average for Peer Group (Calculated)	$ 1,746	$ 2,675	$ 3,713	$ 21,878	$ 31,657	$ 42,102	$ 1,239,174	$ 1,633,503	$ 1,912,695	
	Q1	$ 1,536	$ 2,419	$ 3,338	$ 18,237	$ 29,741	$ 38,559	$ 1,059,480	$ 1,466,275	$ 1,692,379	
	Median	$ 1,607	$ 2,694	$ 3,791	$ 22,646	$ 31,767	$ 43,550	$ 1,287,795	$ 1,743,854	$ 1,994,426	
	Q3	$ 1,878	$ 2,967	$ 3,993	$ 24,122	$ 35,104	$ 46,861	$ 1,482,800	$ 1,844,599	$ 2,202,173	

EEI Typical Bills and Average Rates Report
Summer 2020

Average Rates 12 Months Ending June 30, 2020		Total Retail	Residential	Commercial	Industrial
Average Rates (in cents/kWh)					
Alabama	Alabama Power Company	10.20	13.46	12.10	6.25
Arkansas	Entergy Arkansas, Inc.	8.53	10.38	8.95	6.35
Florida	Duke Energy Florida	11.62	13.51	10.01	7.14
Florida	Florida Power & Light Company	9.54	10.64	8.26	5.96
Florida	Florida Public Utilities Company	13.41	15.07	13.03	5.47
Florida	Gulf Power Company	11.37	13.34	10.30	7.12
Florida	Tampa Electric Company	9.72	10.73	8.93	7.56
Georgia	Georgia Power Company	9.42	12.13	N/A	5.72
Illinois	Ameren Illinois	N/A	10.22	7.73	N/A
Kentucky	Kentucky Utilities Company	9.07	10.53	10.82	6.30
Kentucky	Louisville Gas & Electric Company	9.81	11.14	10.24	7.01
Louisiana	CLECO Power LLC	10.33	11.57	10.73	7.31
Louisiana	Entergy Louisiana, Inc.	6.57	9.05	8.84	4.55
Louisiana	Entergy Louisiana, LLC (Entergy Gulf States, Inc.)	6.39	8.96	7.66	4.64
Louisiana	Entergy New Orleans, Inc.	8.74	9.88	8.50	5.83
Mississippi	Entergy Mississippi	9.23	10.02	9.51	6.66
Mississippi	Mississippi Power Company	9.04	13.20	10.36	6.40
Missouri	Ameren Missouri	8.44	10.02	7.50	6.11
North Carolina	Dominion Energy North Carolina	8.56	11.14	9.08	5.70
North Carolina	Duke Energy Carolinas	8.40	10.45	7.71	5.90
North Carolina	Duke Energy Progress	9.71	11.70	9.53	6.56
South Carolina	Dominion Energy South Carolina	10.30	12.97	10.27	6.34
South Carolina	Duke Energy Carolinas	8.62	11.64	9.43	5.72
South Carolina	Duke Energy Progress	9.40	12.43	10.09	6.19
Texas	El Paso Electric Company	9.45	11.97	10.06	7.01
Texas	Entergy Texas	6.94	9.94	7.15	4.57
Texas	Southwestern Electric Power Company	8.12	10.22	8.31	6.30
Texas	Southwestern Public Service Company	5.29	9.59	6.83	3.45
Virginia	Dominion Energy Virginia	8.94	10.84	7.43	6.24
	Average for Peer Group (Calculated)	9.11	11.27	9.26	6.08
	Q1	8.51	10.22	8.13	5.72
	Median	9.15	10.84	9.26	6.25
	Q3	9.74	12.13	10.25	6.59

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Richard D. Starkweather Sponsoring Witness: Richard D. Starkweather Beginning Sequence No. EV2343 Ending Sequence No. EV2343

Question No.: TIEC 5-8 Part No.: Addendum:

Question:

Please explain why Mr. Starkweather began his benchmarking in 2017.

Response:

Richard D. Starkweather began his benchmarking analysis in 2017 so that the last available five years of Federal Energy Regulatory Commission ("FERC") Form 1 data could be included in the analysis. In Mr. Starkweather's opinion, five years is a reasonable time period for such benchmarking analyses to capture a utility's overall performance relative to its peers. Shorter time periods (two to three years) are often unduly influenced by specific events (*e.g.*, the COVID-19 pandemic) and longer time periods (seven or eight years or longer) do not necessarily capture current utility performance levels as operating practices and procedures are often changed over time to better meet the needs of customers.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Richard D. Starkweather Sponsoring Witness: Richard D. Starkweather Beginning Sequence No. EV2344 Ending Sequence No. EV2344

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

Question:

What portion of the level of utility rates in the benchmark group during the period 2017 - 2021 was from decisions made by utility management during that time period?

Response:

Changes in a utility's rates over time can be an indicator of the utility's underlying management processes and actions. For example, more efficient business processes – all other things being the same – could lead to lower costs and rates. To what extent a utility's management processes and actions (or decisions) lead to lower costs and rates during a specific time period (*e.g.*, 2017-2021) would require a detailed review and analysis of the utility's business processes, cost structure, and rates.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Richard D. Starkweather Sponsoring Witness: Richard D. Starkweather Beginning Sequence No. EV2345 Ending Sequence No EV2345

Question No.: TIEC 5-10 Part No.: Addendum:

Question:

Please admit or deny that decisions made by utilities, such as what generation should be built, taken up to 30-40 years prior to 2017 have a substantial impact on utility rates during 2017-2021.

Response:

Richard D. Starkweather admits that decisions made by utilities, such as what generation should be built, several years prior to 2017 can have an impact on utility rates during 2017-2021, though it is unclear how substantial this impact may be. Certainly, decisions about generation mix would impact fuel and operating costs, and the inclusion of different assets with differing depreciation rates in rate base would also impact utility rates. However, a detailed analysis of a utility's underlying rate base and operating costs would have to be completed to determine the impact of such earlier decisions on utility rates during a specific time period.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests	Prepared By: Richard D. Starkweather Sponsoring Witness: Richard D. Starkweather
of Requesting Party: Texas Industrial Energy Consumers	Beginning Sequence No. EV2418 Ending Sequence No. EV2418

Question No.: TIEC 5-11 Part No.: Addendum:

Question:

Please state whether Mr. Starkweather believes that the level of natural gas prices had a substantial impact on the level of utility rates during the period 2017 - 2021 and whether Mr. Starkweather believes that ETI management had any measurable impact on the level of natural gas prices during the period 2017 - 2021. If answered in the affirmative, please provide an estimate of that impact and how Mr. Starkweather estimated the impact.

Response:

It is Richard D. Starkweather's opinion that fuel prices impact the overall level of utility rates. There are many components included within a utility's retail tariff – monthly customer charges, demand and energy charges, rate riders, taxes, and fuel clause adjustments, among others. In addition, there are many factors that influence utility fuel costs on a month-to-month basis, including electricity demand, fuel supply constraints, weather events, and generation resource availability.

While Mr. Starkweather did not review fuel costs over the period 2017 through 2019, he did review Entergy Texas, Inc.'s ("ETI") fixed fuel factor ("FFF") filings for calendar years 2020 and 2021 (see Exhibit RDS-4). ETI's estimated fuel revenues increased from $468.5 million in 2020 to $674.7 in 2021, clearly impacting total revenues (*i.e.*, the level of utility rates) in 2021.

Determining whether ETI management had any measurable impact on the level of natural gas prices during the period 2017-2021 is outside the scope of Mr. Starkweather's analysis.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Richard D. Starkweather Sponsoring Witness: Richard D. Starkweather Beginning Sequence No. EV2346 Ending Sequence No. EV2346

Question No.: TIEC 5-12 Part No.: Addendum:

Question:

Please explain why Mr. Starkweather chose all utilities in SERC to be part of a peer group. In your explanation, please explain what similar characteristics all utilities in SERC share with ETI.

Response:

As explained in the Direct Testimony of Richard D. Starkweather, page 11, "…a Texas (only) peer group would have only included four utilities, including [Entergy Texas, Inc.]. It is often very difficult to draw meaningful conclusions about the relative performance of different utilities in such small peer groups."

While Mr. Starkweather's analysis includes a national peer group, he also wanted to include a more regional view of average retail prices in his analysis. As a result, a peer group was formed including the investor-owned utility members of the SERC Reliability Corporation ("SERC"), as well as the utilities operating outside of the Electric Reliability Council of Texas ("ERCOT") region (the four "non-ERCOT" Texas companies).

In addition to being members of SERC, the companies included in the SERC_Texas peer group share the following characteristics, as explained on page 10 of Mr. Starkweather's Direct Testimony:

a. The company must be of sufficient size to warrant comparison. For the purposes of this effort, companies with less than 10,000 customers were eliminated.

b. The company must be regulated and provide electric service (directly or indirectly) to retail end-use customers. This criterion eliminated generation-only companies, transmission-only companies, and generation and transmission-only companies; however, distribution-only, transmission and distribution, and generation and distribution companies are included in the peer groups.

c. The company must have comparative Federal Regulatory Commission Form 1 data to enable the development of the metrics used in the benchmarking analysis.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Richard D. Starkweather Sponsoring Witness: Richard D. Starkweather Beginning Sequence No. EV2419 Ending Sequence No. EV2419

Question No.: TIEC 5-13 Part No.: Addendum:

Question:

Please explain how utilities with between 10,000 and 50,000 customers are similar to ETI.

Response:

The purpose of the benchmarking analysis was to compare Entergy Texas, Inc.'s ("ETI") retail rates to those of other utilities in Texas, the investor-owned utility members of SERC Reliability Corporation, and other utilities across the United States. The peer groups included companies with varying customer counts in order to compare ETI to a broad population of other utilities. However, the study does not suggest that companies with between 10,000 and 50,000 customers are similar to ETI based on that characteristic alone.

As explained in the Direct Testimony of Richard D. Starkweather, at page 10, the following additional characteristics were considered in developing the peer groups:

- The company must be regulated and provide electric service (directly or indirectly) to retail end-use customers. This criterion eliminated generation-only companies, transmission-only companies, and generation and transmission-only companies; however, distribution-only, transmission and distribution, and generation and distribution companies are included in the peer groups.
- The company must have comparative Federal Energy Regulatory Commission Form 1 data to enable the development of the metrics used in the benchmarking analysis.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Richard D. Starkweather Sponsoring Witness: Richard D. Starkweather Beginning Sequence No. EV2347 Ending Sequence No. EV2347

Question No.: TIEC 5-14 Part No.: Addendum:

Question:

Please state whether Mr. Starkweather made any attempt to account for the proportion of industrial customers in a utility's customer mix in evaluating the total rate benchmarking?

Response:

Richard D. Starkweather did not evaluate the proportion of industrial customers in a utility's customer mix in evaluating the total rate benchmarking.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Richard D. Starkweather Sponsoring Witness: Richard D. Starkweather Beginning Sequence No. EV2348 Ending Sequence No. EV2348

Question No.: TIEC 5-15 Part No.: Addendum:

Question:

Given that Southwestern Public Service Company and Southwestern Electric Power Company were included in the smaller benchmarking group, please explain why Mr. Starkweather did not include Public Service Company of Oklahoma and Oklahoma Gas & Electric in his peer group. Does Mr. Starkweather believe that Public Service Company of Oklahoma is not a peer to ETI? Does Mr. Starkweather believe that Oklahoma Gas & Electric is not a peer to ETI?

Response:

Richard D. Starkweather did not include the Public Service Company of Oklahoma and Oklahoma Gas & Electric in the SERC_Texas peer group, because they are not members of the SERC Reliability Corporation.

Both the Public Service Company of Oklahoma and Oklahoma Gas & Electric were included in the national peer group as they are considered peers to Entergy Texas, Inc. See the national peer group criteria shown in the Direct Testimony of Richard D. Starkweather, page 10.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests	Prepared By: Bobby R Sperandeo Jr.
	Sponsoring Witness: Bobby R Sperandeo Jr.
of Requesting Party: Texas Industrial Energy Consumers	Beginning Sequence No. EV2349
	Ending Sequence No. EV2349

Question No.: TIEC 5-16 Part No.: Addendum:

Question:

Regarding Mr. Sperandeo's benchmarking analysis, please describe what specific functions are carried out by ETI employees as opposed to Entergy Services employees, other holding company employees, or holding company contracted employees (e.g., procurement, call center, transmission maintenance, production maintenance). In your explanation, please describe how ETI takes advantage (or not) of economies of scale as a result of ETI being a subsidiary of Entergy Corp.

Response:

The benchmarking analysis was performed for the purpose of comparing Entergy Texas, Inc.'s ("ETI") operations and maintenance ("O&M") costs to the O&M costs of other utilities in the national group. The analysis does not consider whether the ETI employees or Entergy Corporation employees perform certain tasks, nor does it consider the same attributes of the national group.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Bobby R Sperandeo Jr. Sponsoring Witness: Bobby R Sperandeo Jr. Beginning Sequence No. EV2350 Ending Sequence No. EV2350

Question No.: TIEC 5-17 Part No.: Addendum:

Question:

Please explain why Mr. Sperandeo's distribution cost benchmarking calculations divide distribution cost by total company sales rather than distribution level sales.

Response:

The source data for Bobby R. Sperandeo's calculations (S&P Global database sourced by Federal Energy Regulatory Commission Form No. 1 data) provides total company sales, not distribution level sales.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Bobby R Sperandeo Jr. Sponsoring Witness: Bobby R Sperandeo Jr. Beginning Sequence No. PI2035 Ending Sequence No. PI2035

Question No.: TIEC 5-18 Part No.: Addendum:

Question:

Please provide distribution levels sales for the period 2018 - 2021 for the utilities in the benchmarking study.

Response:

Please see the Company's response to TIEC 5-17. Entergy Texas, Inc. does not have in its possession the requested distribution level sales for the period of 2018 through 2021 for the utilities in the benchmarking study.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Bobby R Sperandeo Jr. Sponsoring Witness: Bobby R Sperandeo Jr. Beginning Sequence No. EV2351 Ending Sequence No. EV2351

Question No.: TIEC 5-19 Part No.: Addendum:

Question:

Referring to page five, please explain why Mr. Sperandeo believes that utilities with a customer count of 20,000 are similar to ETI.

Response:

The operations and maintenance ("O&M") benchmarking study was performed to compare Entergy Texas, Inc.'s ("ETI") productivity efficiency to a national group. The peer group includes companies with varying customer counts in order to compare against a broad population. The study does not suggest that a company with 20,000 customers is similar to ETI based on that characteristic alone.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Bobby R Sperandeo Jr. Sponsoring Witness: Bobby R Sperandeo Jr. Beginning Sequence No. EV2352 Ending Sequence No. EV2352

Question No.: TIEC 5-20 Part No.: Addendum:

Question:

At what number of customers does Mr. Sperandeo believe economies of scale are not a major factor in O&M cost?

Response:

Bobby R. Sperandeo does not have an opinion as to what number of customers render economies of scale not a major factor in operations and maintenance ("O&M") cost. The comparison was not designed around assumptions on economies of scale. The study compared Entergy Texas, Inc. ("ETI") to the national group without regard to a company's ability to achieve or actual achievement of economies of scale.

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

Response of: Entergy Texas, Inc. to the Fifth Set of Data Requests of Requesting Party: Texas Industrial Energy Consumers	Prepared By: Bobby R Sperandeo Jr. Sponsoring Witness: Bobby R Sperandeo Jr. Beginning Sequence No. EV2353 Ending Sequence No. EV2353

Question No.: TIEC 5-21 Part No.: Addendum:

Question:

What facets of O&M costs does Mr. Sperandeo believe are not subject to economies of scale (e.g., customers service, distribution O&M, transmission O&M, A&G costs).

Response:

Aside from costs that are fixed on a per unit basis (*e.g.* per customer or per MWh), generally all operations and maintenance ("O&M") costs can be subject to economies of scale. The extent to which any given company can work to achieve economies of scale may vary.

The following files are not convertible:

TP-53719-00TIE005-X007-001 Exhibit RDS-2.xlsx

TP-53719-00TIE005-X007-002 Exhibit RDS-4.xlsx

TP-53719-00TIE005-X007-003 Exhibit RDS-5.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.