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SOAH DOCKET NO. 473-22-04394
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APPLICATION OF ENTERGY TEXAS, § STATE OFFICE
INC. FOR AUTHORITY TO CHANGE § OF
RATES § ADMINISTRATIVE HEARINGS

RESPONSE OF ENTERGY TEXAS, INC.
TIEC'S SECOND REQUEST FOR INFORMATION:
TIEC 2:25 ADDENDUM 2

Entergy Texas, Inc. ("ETI" or the "Company") files this Addendum to its Response to TIEC's Second 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
ENERGY SERVICES, LLC
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Attachments: TIEC 2:25 ADDENDUM 2

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to TIEC's Second 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 21st 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 Second Set of Data Requests

of Requesting Party: Texas Industrial Energy
Consumers

Prepared By: Mukund Chander, Khamsune
Vongkhamchanh, Mark Hunter
Sponsoring Witness: Khamsune
Vongkhamchanh
Beginning Sequence No. LR928
Ending Sequence No. LR930

Question No.: TIEC 2-25

Part No.:

Addendum: 2

Question:

The following discovery requests pertain to the Direct Testimony of Khamsune Vongkhamchanh.

Referring to Schedule O-6.3, please provide a complete copy of ETI's line loss study supporting the proposed peak demand and energy loss factors and supporting workpapers in "live" EXCEL format.

Response:

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

Please see the highly sensitive attachments (TP-53719-00TIE002-X025-001_HSPM through TP-53719-00TIE002-X025-003_HSPM). Highly sensitive materials have been included on the secure ShareFile site provided to the parties that have executed protective order certifications in this proceeding.

Addendum 1:

Information included in the response contains highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101 and/or 552.110.

Please see the highly sensitive attachments intended to be included in the Company's initial response (TP-53719-00TIE002-X025-004_HSPM and TP-53719-00TIE002-X025-005_HSPM). Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Addendum 2:

Information included in the response contains highly sensitive protected (“highly sensitive”) materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101 and/or 552.110.

Please see the highly sensitive attachments (TP-53719-00TIE002-X025-006_HSPM and TP-53719-00TIE002-X025-009_HSPM), which are supporting workpapers to the Company’s initial response. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

**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.