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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 Ş **ADMINISTRATIVE HEARINGS**

RESPONSE OF ENTERGY TEXAS, INC. TO OPUC'S ELEVENTH REQUEST FOR INFORMATION: OPUC 11:1 THROUGH 7

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

<u>Kristen F. G</u>ates Kristen Yates

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

Attachments: OPUC 11:1 THROUGH 7

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to OPUC's Eleventh 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 28th day of October 2022.

<u>Kristen F. Gat</u>es Kristen Yates

Response of: Entergy Texas, Inc.Prepared By: Jeff Dicharryto the Eleventh Set of Data RequestsSponsoring Witness: Melanie L. Taylorof Requesting Party: Office of Public UtilityBeginning Sequence No. EV2880CounselEnding Sequence No. EV2895

Question No.: OPUC 11-1

Part No.:

Addendum:

Question:

Does ETI differentiate between summer and winter peak loadings in their distribution planning or distribution construction standards? If so, please provide a detailed explanation of any differentiation. If not, please provide a detailed justification for not differentiating between the maximum loading capability between summer and winter conditions for distribution facilities.

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.

Yes. The Company differentiates between summer and winter peak loadings within distribution planning. This differentiation is important for circuits with a large volume of customers utilizing all electric heating whose load profiles differ than that of customers utilizing natural gas or propane heating. The Company plans the distribution system considering fundamental differences in daily peak load shapes for summer peaking facilities as compared to winter peaking facilities. Please see the confidential attachment (TP-53719-00OPC011-X001_CONF). 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.

Response of: Entergy Texas, Inc.	Prepared By: Jeff Dicharry
to the Eleventh Set of Data Requests	Sponsoring Witness: Melanie L. Taylor
of Requesting Party: Office of Public Utility	Beginning Sequence No. EV2896
Counsel	Ending Sequence No. EV2897

Question No.: OPUC 11-2

Part No.:

Addendum:

Question:

Does ETI recognize that the maximum load carrying capability for distribution substation transformers, distribution conductors and line transformers can vary due to differences in ambient temperature, wind speed and other climate factors? If so, please provide a detailed explanation of how ETI believes ambient temperature, wind speed and other identified climate factors, separately, impact load carrying capabilities of distribution substation transformers, distribution conductors and line transformers.

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.

Yes. Entergy Texas, Inc. recognizes distribution infrastructure thermal limits associated with variations in ambient temperature, wind speed, and other climate factors. Consistent with widely utilized industry standards such as the Institute of Electrical and Electronics Engineers ("IEEE") 738, these factors can affect load current capability of distribution conductors. Similarly, in alignment with IEEE C57.91, both distribution substation and distribution line (overhead/underground) transformers can typically be loaded higher above nameplate in winter conditions than summer due to differences in ambient temperature. Please see the confidential attachment (TP-53719-000PC011-X002_CONF). 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.

Response of:Entergy Texas, Inc.Preparto the Eleventh Set of Data RequestsSponseof Requesting Party:Office of Public UtilityCounselEnding

Prepared By: Jeff Dicharry Sponsoring Witness: Melanie L. Taylor Beginning Sequence No. EV2898 Ending Sequence No. EV2898

Question No.: OPUC 11-3

Part No.:

Addendum:

Question:

Please provide any of ETI's distribution construction standards, planning manuals, or other documents that address or discuss any distribution planning or design standard differences between summer and winter peak load capabilities for distribution facilities.

Response:

Please see the confidential attachments provided in response to OPUC 11-1 and OPUC 11-2 (TP-53719-00OPC011-X001_CONF and TP-53719-00OPC011-X002_CONF). Confidential materials have been included on the secure ShareFile site provided to the parties that have executed protective order certifications in this proceeding.

Response of: Entergy Texas, Inc.Prepared By: Jeff Dicharryto the Eleventh Set of Data RequestsSponsoring Witness: Melanie L. Taylorof Requesting Party: Office of Public UtilityBeginning Sequence No. EV2899CounselEnding Sequence No. EV2899

Question No.: OPUC 11-4

Part No.:

Addendum:

Question:

Based on the average daily high temperatures each month on ETI's system, please state for each of the types of distribution equipment listed below whether ETI would expect equipment would be able to carry higher kVA loading during a typical system peak day during the months of June through September compared to a typical system peak day during months of December through February:

a.	Distribution substation transformers (AC 362)
b.	Overhead primary distribution conductors (AC 365)
c.	Overhead secondary distribution conductors (AC 365)
d.	Underground primary distribution conductors (AC 367)
e.	Underground secondary distribution conductors (AC 367)
f.	Distribution line transformers (AC 368)
g.	Services (AC 369)

Response:

No. Entergy Texas, Inc. would not expect to be able to carry higher kVA loading, for any of the equipment listed in this request (subparts a. through g.), during a typical summer day compared to a typical winter day.

Response of: Entergy Texas, Inc. to the Eleventh Set of Data Requests of Requesting Party: Office of Public Utility Counsel Prepared By: Gareth Hutchinson Sponsoring Witness: Crystal K. Elbe Beginning Sequence No. EV2900 Ending Sequence No. EV2900

Question No.: OPUC 11-5

Part No.:

Addendum:

Question:

Please provide Maximum Diversified Demands ("MDD") and Coincident Peak ("CP") demands by month for each month available since December 2021 for each customer class shown in Schedule 0-1.3. Please provide this information in functioning Excel format.

Response:

Entergy Texas, Inc. ("ETI") had not developed Maximum Diversified Demands ("MDD") and Coincident Peak ("CP") demands by month for the period requested, and, therefore, does not have the requested data in its possession. However, ETI did make year-end customer adjustments and weather normalization adjustments to Test Year kWh, Maximum Diversified Demands ("MDD"), and Coincident Peak ("CP") and these adjustments were reflected in Schedules P-7.2 and its accompanying workpapers. Please see the Company's response to OPUC 7-1.

Response of: Entergy Texas, Inc.	Prepared By: Jeff Dicharry
to the Eleventh Set of Data Requests	Sponsoring Witness: Melanie L. Taylor
of Requesting Party: Office of Public Utility	Beginning Sequence No. EV2901
Counsel	Ending Sequence No. EV2901

Question No.: OPUC 11-6

Part No.:

Addendum:

Question:

For each ETI distribution substation please provide the monthly peak load for each month for the most recent twelve months available. Please provide this information in a functioning Excel worksheet file.

Response:

Entergy Texas, Inc. ("ETI") does not specifically track individual substation peak loads on a monthly basis. ETI has not performed monthly analyses of distribution substation peak loads. Therefore, the requested data is not in ETI's possession. Distribution system capacity is planned using historical and forecasted peak load conditions.

Response of: Entergy Texas, Inc.Prepared By: Jeff Dicharryto the Eleventh Set of Data RequestsSponsoring Witness: Melanie L. Taylorof Requesting Party: Office of Public UtilityBeginning Sequence No. EV2902CounselEnding Sequence No. EV2902

Question No.: OPUC 11-7

Part No.:

Addendum:

Question:

For each ETI distribution primary feeder please provide the monthly peak load for each month for the most recent twelve months available. Please provide this information in a functioning Excel worksheet file.

Response:

Entergy Texas, Inc. ("ETI") does not specifically track individual feeder peak loads on a monthly basis. ETI has not performed monthly analyses of distribution primary feeder peak loads. Therefore, the requested data is not in ETI's possession. Distribution system capacity is planned using historical and forecasted peak load conditions.