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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 TIEC'S THIRD REQUEST FOR INFORMATION:
TIEC 3:4 ADDENDUM 1

Entergy Texas, Inc. ("ETI" or the "Company") files this Addendum to its Response to TIEC'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: TIEC 3:4 ADDENDUM 1

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to TIEC'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 28th 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: Texas Industrial Energy
Consumers

Prepared By: Hunter Leland
Sponsoring Witness: N/A
Beginning Sequence No. EV2905

Ending Sequence No. EV2906

Question No.: TIEC 3-4

Part No.:

Addendum: 1

Question:

Provide documentation for each instance listed in the response to TIEC 3-3 when a Schedule IS customer failed to curtail load down to the Firm Contract Power as specified in VI. B. of the otherwise applicable firm tariff.

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 attachment (TP-53719-00TIE003-X005_HSPM). for documentation of customers who failed to curtail down to the Firm Contract Power during in an off-peak period. 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. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Please see the highly sensitive attachment (TP-53719-00TIE003-X004-001_HSPM), which corrects an error included in the initial response. On tab “01182018,” in the highly sensitive attachment (TP-53719-00TIE003-X004_HSPM, incorrectly referenced as TP-53719-00TIE003-X005 in the initial response), the Firm Contract Power amount included in cell D5 should have been 11200kW instead of 12100kW. This correction is reflected in the highly sensitive attachment (TP-53719-00TIE003-X004-001_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.

**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.