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APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**ENERGY TEXAS, INC.’S SECOND REQUEST FOR INFORMATION
TO TEXAS INDUSTRIAL ENERGY CONSUMERS**

TO: Texas Industrial Energy Consumers (“TIEC”) by and through its attorney of record, Rex D. VanMiddlesworth, O’Melveny & Myers, LLP, 303 Colorado Street, Suite 2750, Austin, Texas 78701.

Entergy Texas, Inc. (“ETI” or “the Company”) requests that TIEC provide the following information and answer the following questions under oath within five working days of receipt, or sooner if practicable. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. For each response, please state the Request for Information and identify the individuals responsible for preparing and sponsoring the response by name and title.

Respectfully submitted,

George G. Hoyt
Laura B. Kennedy
Kristen Yates
Entergy Services, LLC
919 Congress Avenue, Suite 701
Austin, Texas 78701
(512) 487-3945
(512) 487-3958 (fax)
ghoyt90@entergy.com
lkenn95@entergy.com
kyates1@entergy.com

Lino Mendiola III
Michael A. Boldt
Cathy Garza
EVERSHEDS SUTHERLAND (US) LLP
600 Congress Avenue, Suite 2000

Austin, Texas 78701
(512) 721-2700
(512) 721-2656 (fax)
linomendiola@eversheds-sutherland.com
michaelboldt@eversheds-sutherland.com
cathygarza@eversheds-sutherland.com

Scott R. Olson
Patrick Pearsall
Stephanie Green
DUGGINS WREN MANN & ROMERO, LLP
600 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 744-9300
(512) 744-9399 (fax)
solson@dwmrlaw.com
ppearsall@dwmrlaw.com
sgreen@dwmrlaw.com

By: *Stephanie Green*
Stephanie Green
State Bar No. 24089784

ATTORNEYS FOR ENTERGY TEXAS, INC.

CERTIFICATE OF SERVICE

I certify that on November 2, 2022, a true and correct copy of the foregoing document was served on all parties of record in accordance with the Commission's Second Order Suspending Rules in Project No. 50664.

Stephanie Green
Stephanie Green

General Instructions

1. In responding to each request, please provide information available from all corporate and individual files, as well as from all past and present employees, officers, and board members and all predecessors and affiliates, as defined below.
2. These requests are continuing in nature, and require supplemental responses in accordance with 16 Tex. Admin. Code § 22.144(i).
3. If any information is not available in the exact form requested, provide whatever information or documents that best respond to the request.
4. If the requested information or data is available for only part of the period requested or are otherwise incomplete, please provide such data as is available.
5. If any request appears unclear or ambiguous, please contact counsel for ETI as soon as possible to obtain clarification.
6. Each document of more than one page should be stapled or otherwise bound, and the individual pages numbered consecutively.
7. If, in the case of any request seeking documents, there are no responsive documents, so state and provide a narrative answer to the request.
8. The terms “and” and “or” should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each request information or documents which might otherwise be considered to be beyond its scope.
9. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate, in order to bring within the scope of each RFI information or documents that might otherwise be considered to be beyond its scope.
10. When the recipient of the RFI is requested to provide a study, schedule, or analysis, it should also provide the workpapers, underlying facts, inferences, suppositions, estimates, and conclusions necessary to support each study, schedule, or analysis.
11. If the actual data is unavailable, but estimates or approximations are available, provide the estimates or approximations that are the best available information and explain the procedure for developing the information supplied.
12. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, ETI specifically requests that any electronic or magnetic information (which is included in the definition of “document”) that is responsive to a request herein be produced in a format that is compatible with Adobe Acrobat, Microsoft, and/or Macintosh and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable PDF copy of the entire email string. Attachments to emails should be provided with the email in searchable PDF form, unless it is stored in a different format, in which case the attachment should be produced in its native format.

Definitions

1. “Texas Industrial Energy Consumers” (“TIEC”) refers to, for purposes of these RFIs, TIEC and its acting under contractual arrangements employees, officers, directors, agents, attorneys, consultants, and all persons with TIEC, or purporting to act on its behalf.
2. “Date” shall mean the exact day, month, and year if ascertainable, or if not, the best approximation thereof in relation to other events.
3. To “describe,” “detail,” or “state” shall mean to relate as completely as possible each and every act, omission, incident, event, condition, circumstance, or thing relating directly or indirectly to the subject of the description, including all pertinent dates. These terms call for answers independent from any documents that are required in response to requests. Such answers should be in a form (*e.g.*, narrative, tabular) appropriate to a complete response to the request.
4. The terms “document” or “documents” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description, whether printed, produced, or reproduced by any process, whether visually, magnetically, mechanically, electronically, or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, emails, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche, and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. “Document” or “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.
5. “Each” shall be construed to include the word “every,” and “every” shall be construed to include the word “each.”
6. To “explain” means to make known in detail, to make clear the cause or reason of and account for each act, omission, incident, event, condition, circumstance, decision, and/or thing relating directly or indirectly to the subject of the explanation, including all pertinent dates. This term calls for answers independent from any documents that are required in response to requests. Such answers should be in a form (*e.g.*, narrative, tabular) appropriate to a complete response to the request.
7. To “identify” a person means to include his or her full name, including middle name or initial, his or her employer or other organizational affiliation at the date of the relevant transaction or event and at the present, his or her title and duties in the company or other organization with which he or she was then affiliated and is now affiliated, and his or her last known business address and telephone number, or if not available, last known residence address and telephone number.
8. “Identification” of, or to “identify,” a document means to provide facts sufficient to establish the identity of the document or other thing(s) at issue, such as (a) the type or

nature of the document (*e.g.*, letter, memorandum, corporate minutes), (b) the data, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who wrote, dictated, or otherwise participated in the writing of the document, (h) the identity of each person who signed or initialed the document, (i) the identity of each person to whom the document was addressed, (j) the present location of the document; and (k) the identity of each person having custody of, or control over, the document. Identification of the document includes identifying all documents known or believed to exist, whether or not in the custody of its attorneys or other representatives. The final version and each draft of each document should be identified and produced separately. If a document is no longer in your possession or control, state what disposition was made of it. A document need not be identified if it is produced.

9. The term “including,” or one of its inflections, means and refers to “including but not limited to.”
10. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or *ad hoc*), joint venture, cooperative, municipality, commission, or governmental body or agency.
11. “Relating to” or “relates to” means comprising, embodying, addressing, presenting, discussing, concerning, referring to, pertaining to, regarding, containing, reflecting, evidencing, describing, showing, identifying, providing, disproving, consisting of, supporting, contradicting, commenting upon, analyzing, or mentioning in any way.

SECOND REQUEST FOR INFORMATION TO TIEC

The following requests pertain to the direct testimony of Charles S. Griffey

- 2-1. Referencing page 24, lines 10-12, provide all analyses conducted and materials reviewed by Mr. Griffey related to “the number of outages and mobilized response” for “other storms and other utilities.”
- 2-2. Referencing page 24, lines 13-14, provide all analyses conducted and materials reviewed by Mr. Griffey related to the “percent restoration” for “other Entergy operating companies or other utilities.”