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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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**SIERRA CLUB’S RESPONSES AND OBJECTIONS TO
ENTERGY TEXAS, INC.’S
FIRST SET OF REQUESTS FOR INFORMATION**

Sierra Club hereby provides its responses and objections to Entergy Texas, Inc.’s (“ETI’s” or the “Company’s”) First Request for Information (“RFI”) to Sierra Club.

I. GENERAL OBJECTIONS & RESPONSES

Sierra Club objects to ETI’s First Request for Information insofar as the questions seek: (A) to impose more burdensome requirements for discovery than the applicable requirements of 16 Texas Administrative Code (“TAC”) Chapter 22, the Texas Rules of Civil Procedure, the Texas Administrative Procedure Act, Tex. Gov’t Code Ann. Chapter 2001, or Commission precedent; (B) disclosure of privileged communications and information pursuant to the attorney-client privilege or disclosure of communications and information protected from discovery under the attorney work product doctrine; or (C) information that has no tendency to make a fact more or less probable than it would be without the evidence or that has no relevance to any fact is of consequence in determining the action. Subject to, and without waiving these general objections, Sierra Club responds to ETI’s First Request for Information to Sierra Club, expressly reserving all evidentiary and other objections concerning Sierra Club’s responses and any related documents that ETI may seek to offer into evidence in this case. Sierra Club’s responses are made in the spirit of cooperation without waiving Sierra Club’s right to contest the admissibility of any

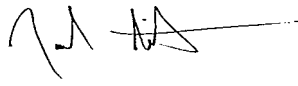
of these matters at hearing. When Sierra Club provides certain information sought by the request while objecting to the provision of other information, it does so without prejudice to its objection in the interests of narrowing discovery disputes under 16 TAC § 22.144(d)(5). Pursuant to 16 TAC § 22.144(c)(2)(F), Sierra Club stipulates that its responses may be treated by all parties as if they were made under oath.

II. SPECIFIC RESPONSES

Sierra Club's written responses to ETI's First Request for Information are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. In accordance with 16 TAC § 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness.

Dated: November 4, 2022

Respectfully submitted,



Joshua Smith
Tony Mendoza
Dru Spiller
Sierra Club Environmental Law Program
2101 Webster St., Suite 1300
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dru.spiller@sierraclub.org

Counsel for Sierra Club

ETI-SIERRA CLUB 1-1

Please provide, in native format, all workpapers and documents supporting the testimony of each witness filing testimony on your behalf in this proceeding. Please ensure that all formulas and cells are intact.

RESPONSE:

Sierra Club filed all of the workpapers associated with the Direct Testimony of Devi Glick and served them to each of the parties of record on October 27, 2022.

ETI-SIERRA CLUB 1-2

For each testifying expert, please provide:

- a. A list of all cases in which the testifying expert has submitted testimony, from 2011 to the present;
- b. Copies of all prior testimony, articles, speeches, published materials, and peer review materials written by the testifying expert, from 2015 to the present;
- c. The testifying expert's billing rate for this proceeding; and
- d. All documents provided to, reviewed by, or prepared by or for the testifying expert in anticipation of the testifying expert filing testimony in this proceeding.

RESPONSE:

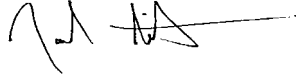
Sierra Club objects to this question to the extent it seeks information that is irrelevant to this proceeding. Sierra Club further objects to the extent that ETI is asking that Sierra Club collect documents for ETI that are publicly available and equally available to ETI as to Sierra Club. Sierra Club further objects to the extent that ETI seeks competitively sensitive information without first having executed an appropriate non-disclosure agreement.

Subject to, and without waiving any objections, Sierra Club answers as follows:

- a. Refer to Exhibit DG-1, the Resume of Devi Glick, attached to the Direct Testimony of Devi Glick, filed on March 18, 2022.
- b. Refer to Exhibit DG-1, the Resume of Devi Glick, attached to the Direct Testimony of Devi Glick. Copies of direct testimonies are available on websites of the various government bodies before which Ms. Glick has testified. Copies of other materials referenced in the Resume of Ms. Glick are available on the internet.
- c. Ms. Glick considers her billing rate to be competitively sensitive information and does not disclose it in public. Sierra Club will produce Ms. Glick's billing rate to ETI under a non-disclosure agreement only.
- d. Refer to the Direct Testimony of Devi Glick, filed on October 26, 2022, and the references cited.

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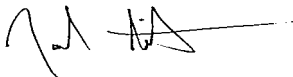


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Counsel for Sierra Club

CERTIFICATE OF SERVICE

I, Joshua Smith, certify that a copy of the foregoing Sierra Club submission was served upon all parties of record in this proceeding on November 4, 2022 by First-class U.S. mail, hand delivery, and/or e-mail, as permitted by the presiding officer.



Joshua Smith
Sierra Club Environmental Law Program

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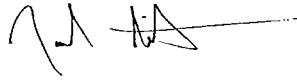
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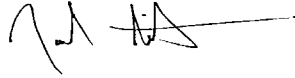
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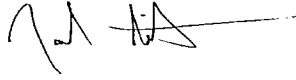


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A handwritten signature in black ink, appearing to read 'Joshua Smith', is written above a horizontal line.

Joshua Smith
Sierra Club Environmental Law Program