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**SOAH DOCKET NO. 473-22-04394
PUC DOCKET NO. 53719**

APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**OFFICE OF PUBLIC UTILITY COUNSEL’S
RESPONSE TO ENTERGY TEXAS, INC.’S
FIRST REQUEST FOR INFORMATION**

The Office of Public Utility Counsel (“OPUC”) submits this response to Entergy Texas, Inc.’s (“ETI”) First Request for Information that was received on November 1, 2022. Pursuant to State Office of Administrative Hearings Order No. 2, OPUC’s response is timely filed within five business days of receipt of ETI’s discovery request. OPUC stipulates that all parties may treat this response as if it were filed under oath.

Date: November 7, 2022

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First Request for Information

ETI-OPUC 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 all formula and cells are intact.

RESPONSE:

Evan D. Evans

All of Mr. Evans's workpapers and documents supporting the testimony were provided to the parties and were posted on the PUC Interchange in this docket under item No. 230. All items were provided in functioning electronic format, if available.

Prepared by: Evan D. Evans

Sponsored by: Evan D. Evans

Constance T. Cannady

All of Ms. Cannady's workpapers and documents supporting her direct testimony were included in the non-confidential, confidential and highly sensitive schedules, workpapers and attachments included in Item Nos. 240, 243 and 244 on the PUC Interchange.

Prepared by: Constance T. Cannady

Sponsored by: Constance T. Cannady

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ETI-OPUC 1-2:

For each testifying expert, please provide:

- a. A list of all cases in which the testifying expert has submitted testimony, from 2015 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:

Evan D. Evans

- a. Attachment EDE-1 to the Direct Testimony of Evan D. Evans contains a list of the proceedings in which Mr. Evans has filed testimony since January 1, 2012.
- b. Testimony submitted before the Public Utility Commission of Texas is available from the PUC Interchange. Testimony submitted before the New Mexico Public Regulation Commission ("NMPRC") is available at the NMPRC's E-Docket site at: <https://edocket.nmprc.state.nm.us/>.
- c. Mr. Evans's billing rate for this proceeding is \$200 per hour.
- d. The documents provided to or reviewed by Mr. Evans included ETI's filing and ETI's responses to discovery in this case. In addition, Attachment EDE-10 to Mr. Evans's direct testimony contains additional documents he reviewed in anticipation of filing testimony in this proceeding. The documents prepared by or for Mr. Evans are his direct testimony and the attachments to his direct testimony.

Prepared by: Evan D. Evans

Sponsored by: Evan D. Evans

Constance T. Cannady

- a. The regulatory proceedings in which Ms. Cannady provided expert testimony are included in Attachment A to her Redacted Direct Testimony.
- b. Copies of Ms. Cannady's testimonies submitted since 2015 can be found at the PUC Interchange website, the Indiana Utility Regulatory Commission website, the North Carolina Utilities Commission website, the Railroad Commission of Texas's website and

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the Federal Energy Regulatory Commission website and electronic library. All documents filed by Ms. Cannady in Civil Action No. 4:19-CV-00458 and Case No. 6:19-cv-345-ADA-JCM have been designated as confidential by the respective courts.

Since 2015, Ms. Cannady has conducted or participated in a two-day training conference on behalf of Electric Utility Consultants, Inc. on four different occasions. A copy of the presentation materials is attached. Ms. Cannady co-authored an article in the *NewGen News*, Issue 9, April 2018 titled "Hooray for Refunds? But, When?" A copy of the article is attached.

- c. Ms. Cannady's hourly billing rate for this proceeding is \$265.
- d. Ms. Cannady reviewed ETI's application, responses to request for information and other materials filed by ETI during this proceeding. Ms. Cannady reviewed Entergy's shareholder Proxy Statements for the period 2019 through 2022. Ms. Cannady also reviewed PUC Interchange documents related to various dockets that included Docket No. 51997, Docket No. 41791, Docket No. 48371, Docket No. 51415, Docket No. 51802, Docket No. 46449, Docket No. 43695, Docket No. 40295, Docket No. 40443, Docket No. 39896, Docket No. 33309. Specific references to each are included in Ms. Cannady's Redacted Direct Testimony.

Prepared by: Constance T. Cannady

Sponsored by: Constance T. Cannady

Date: November 7, 2022

Respectfully submitted,

Chris Ekoh
Interim Chief Executive and Public Counsel
State Bar No. 06507015



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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE

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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 7th day of November 2022 by facsimile, electronic mail, and/or first class, U.S. Mail.



Renee Wiersema