



## Filing Receipt

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

APPLICATION OF ENTERGY TEXAS, ) BEFORE THE STATE OFFICE  
INC. FOR AUTHORITY TO CHANGE ) OF  
RATES ) ADMINISTRATIVE HEARINGS

**RESPONSE TO ENTERGY TEXAS, INC.'S  
FIRST REQUEST FOR INFORMATION TO WALMART INC.**

Walmart Inc. ("Walmart") submits the following responses to Entergy Texas, Inc.'s First Request For Information To Walmart Inc. ("RFIs"). The RFIs were filed with the Commission and transmitted to the undersigned via electronic mail on or about November 1, 2022. Walmart's response is timely filed pursuant to the procedural schedule in this case. Walmart's responses to specific RFIs are attached hereto on separate pages. Pursuant to P.U.C. Proc. R. 22.144(c)(2)(F), these responses may be treated as if filed under oath.

Respectfully submitted,

By: /s/ Rick D. Chamberlain

Rick D. Chamberlain  
State Bar Of Texas #24081827  
P.O. Box 21866  
Oklahoma City, OK 73156-2186  
Tel.: (405) 229-4154  
Fax: (870) 617-1485  
E-mail: rick@chamberlainlawoffices.com

ATTORNEY FOR INTERVENOR,  
WALMART INC.

**CERTIFICATE OF SERVICE**

I certify that I have served a copy of the above and foregoing upon all known parties of record by facsimile, first class mail and/or electronic mail on this the 8th day of November 2022.

/s/ Rick D. Chamberlain

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**RESPONSE TO ENTERGY TEXAS, INC.'S  
FIRST REQUEST FOR INFORMATION TO WALMART INC.**

- 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 Workpapers supporting the Direct Testimony and Exhibits of Alex J. Kronauer on Behalf of Walmart Inc. ("Kronauer Direct") were simultaneously filed with the testimony and are available from the Commission's website. Workpapers supporting the Direct Testimony and Exhibits on Cost Allocation and Rate Design Issues of Lisa V. Perry on Behalf of Walmart Inc. ("Perry Direct") are submitted herewith.

- 1-2 For each testifying expert, please provide:
- A list of all cases in which the testifying expert has submitted testimony, from 2015 to the present;
  - Copies of all prior testimony, articles, speeches, published materials, and peer review materials written by the testifying expert, from 2015 to the present;
  - The testifying expert's billing rate for this proceeding; and
  - 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

- See Exhibit AJK-1 to Kronauer Direct and Exhibit LVP-1 to Perry Direct.
- See Exhibits AJK-1 and LVP-1 for a list of responsive documents. Copies are not retained by Walmart or the witnesses and are publicly available from the sources cited therein.
- Not applicable; both witnesses are Walmart employees.
- The witnesses were given access to copies of the documents filed of record in this case prior to preparing and filing their testimony.

Preparer: Rick D. Chamberlain

Sponsors: Alex J. Kronauer; Lisa V. Perry

The following files are not convertible:

WP for Tables 1 and 2.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.