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

ENTERGY TEXAS, INC.'S
SECOND REQUEST FOR INFORMATION TO COMMISSION STAFF

TO: Staff of the Public Utility Commission ("Commission") of Texas ("Staff") by and through its attorneys of record, Mildred Anaele, Scott Miles, and Margaux Fox, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Entergy Texas, Inc. ("ETI" or "the Company") requests that the Commission Staff 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,

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By: /s/ Lino Mendiola
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ATTORNEYS FOR ENTERGY TEXAS, INC.

CERTIFICATE OF SERVICE

I certify that 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.

/s/ Sarah Merrick
Sarah Merrick

INSTRUCTIONS

1. Reference to “Commission Staff” or “your” means Commission Staff and its agents, consultants, and all witnesses whose testimony Commission Staff intend to present to the Public Utility Commission of Texas, and all persons acting or purporting to act for or on behalf of Commission Staff.
2. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”
3. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”
4. The terms “document” and “documents” are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description and all attachments and appendices thereto. Without limiting the foregoing, the terms “document” and “documents” shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, records of personal conversations, minutes or summaries or other records of meetings and conferences, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work tables, accounts, analytical records, consultants’ reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing, and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer stored, electronically stored matter, however band by whomever produced, prepared, reproduced, disseminated, or made).
5. Words used in the plural shall be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
6. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
7. If any document is withheld under any claim of privilege, please furnish a privilege log identifying each document for which a privilege is claimed, together with the following information: date and title of the document; the preparer or custodian of the information; to whom the document was sent and from whom it was received; the subject matter of the document; and the basis upon which the privilege is claimed.
8. If there is any question regarding the meaning or intent of a word or words in these requests, please contact counsel of record for Entergy Texas, Inc. for clarification.

SECOND REQUEST FOR INFORMATION TO COMMISSION STAFF

- 2-1. Is it Ms. Stark's position that a utility should be required to reveal privileged information in order to secure recovery of reasonable outside counsel costs as rate case expenses? If so, provide all support for her position.
- 2-2. With respect to Ms. Stark's testimony regarding redacted invoices, through what means may a utility both preserve privileged information and obtain a reasonable opportunity to recover its rate case expenses?
- 2-3. Is it Ms. Stark's position that the Commission's rules or applicable law requires a utility to waive the privilege as to information contained in outside counsel invoices in order to secure recovery of the outside counsel costs shown in those invoices? If so, provide all support for her position.