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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**

**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE TO
ENTERGY TEXAS, INC.'S SECOND REQUEST FOR INFORMATION**

Texas Industrial Energy Consumers (“TIEC”) files the following responses to the First Request for Information (“RFI”) to TIEC filed by Entergy Texas, Inc. (“ETI”). The request was filed at the Commission and received by TIEC on November 2, 2022. TIEC’s responses to specific questions are set for as follows, in the order of the questions asked. Pursuant to 16 T.A.C. § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

O’MELVENY & MYERS LLP

/s/ Christian E. Rice

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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, Christian E. Rice, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 9th day of November 2022 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Christian E. Rice

Christian E. Rice

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ETI-TIEC 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.”

Response:

Pursuant to an agreement with counsel for ETI, ETI-TIEC 2-1 has been amended as follows:

Referencing page 24, lines 10-12, provide all analyses conducted and materials reviewed by Mr. Griffey *in anticipation of his testimony in this case* related to “the number of outages and mobilized response” for “other storms and other utilities.”

Please refer to the data cited on page 23 of the Direct Testimony of Charles S. Griffey, including footnotes 26-31. Mr. Griffey also reviewed ETI’s responses to TIEC 3-15, 3-17, 3-18, and 3-20, various Entergy Corporation press releases regarding Hurricanes Laura and Delta that can be found on Entergy Corporation’s website, news articles on Hurricanes Ian, Harvey, and Ike, and outage data found on the website of poweroutage.us and various tweets from poweroutage.us. Mr. Griffey periodically reviews articles and other materials related to outages and responses (and has throughout his career) but does not maintain a list of all of materials reviewed. Please see Attachment ETI-TIEC 2-1 for a list of materials reviewed by Mr. Griffey.

Preparer: Charles S. Griffey

Sponsor: Charles S. Griffey

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**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE TO
ENTERGY TEXAS, INC.'S SECOND REQUEST FOR INFORMATION**

ETI-TIEC 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.”

Response:

Pursuant to an agreement with counsel for ETI, ETI-TIEC 2-2 has been amended as follows:

ETI-TIEC 2-2: Referencing page 24, lines 13-14, provide all analyses conducted and materials reviewed by Mr. Griffey *in anticipation of his testimony in this case* related to the “percent restoration” for “other Entergy operating companies or other utilities.”

Please see the response to ETI-TIEC 2-1.

Preparer: Charles S. Griffey

Sponsor: Charles S. Griffey

<https://www.tdworld.com/disaster-response/article/21214460/entergy-corporation-earns-eei-emergency-response-award-for-power-restoration-after-hurricane-ida>

<https://www.tdworld.com/electric-utility-operations/media-gallery/20970796/storm-snapshot-honoring-excellence-in-power-restoration>

<https://www.utilitydive.com/news/utilities-receive-eei-award-for-power-restoration-efforts/19449/>

<https://newsroom.nexteraenergy.com/FPL-and-Gulf-Power-win-Edison-Electric-Institute-Awards-for-2020-hurricane-season-assistance-and-recovery-efforts>

<https://www.peco.com/News/Pages/Press%20Releases/PECO-Receives-National-Recognition-for-Emergency-Restoration-Efforts-After-Hurricane-Ida011422.aspx>

<https://www.power-grid.com/executive-insight/eei-honors-hurricane-hit-utilities-for-their-service-during-storm-season/#gref>

<https://www.tdworld.com/disaster-response/article/21152475/eei-recognizes-2020-emergency-response-award-recipient>

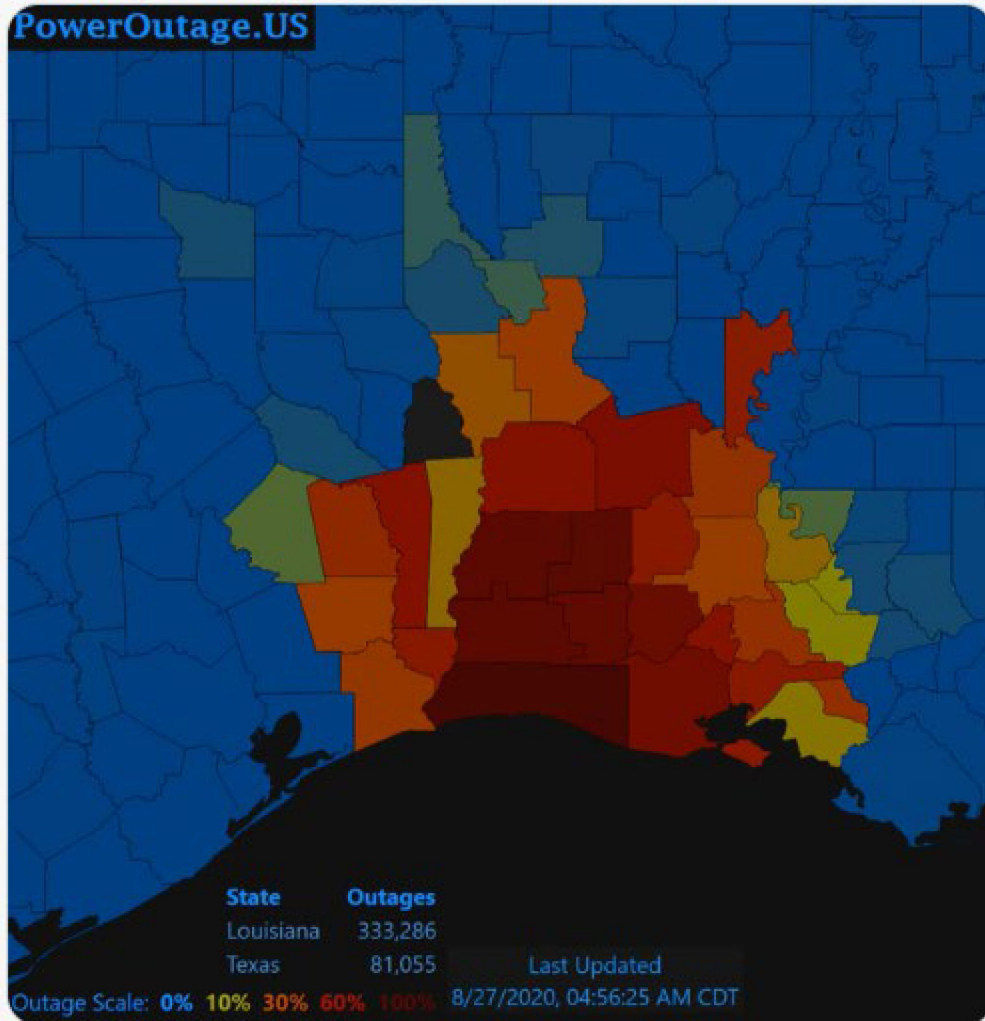
<https://www.hcfd.org/About/Harris-Countys-Flooding-History/Hurricane-Ike-2008>



PowerOutage.us @PowerOutage_us · Aug 27, 2020



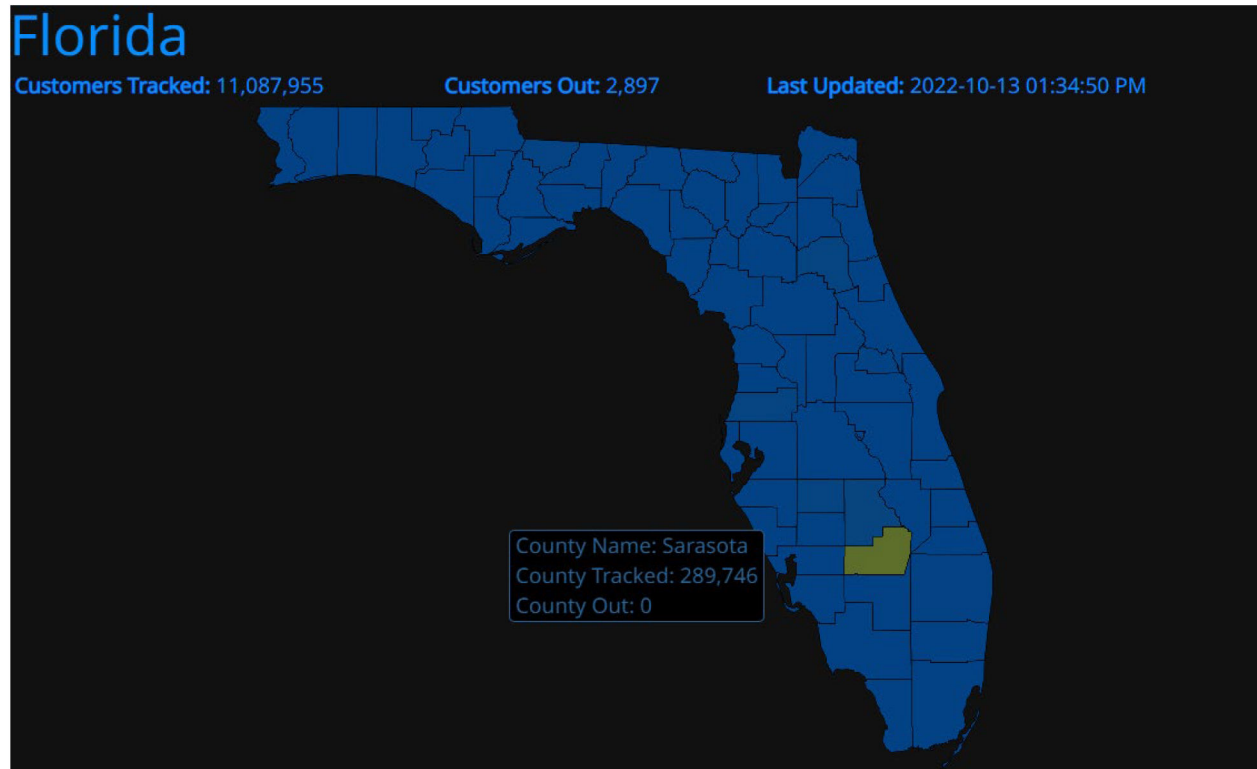
Over 410k electric customers are without power due to [#HurricaneLaura](#). With 333k out in [#Louisiana](#) and 81k out in [#Texas](#). Check out poweroutage.us for detailed [#PowerOutage](#) information. [2020-08-27 4:56AM CDT]



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<https://www.tdworld.com/disaster-response/article/21144554/entergy-restores-power-to-more-than-75-of-customers-following-hurricane-delta>