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Received - 2022-11-14 01:52:36 PM
Control Number - 53719
ItemNumber - 314

**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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**COMMISSION STAFF'S RESPONSE
TO SOUTHWESTERN PUBLIC SERVICE COMPANY'S
FIRST REQUEST FOR INFORMATION
QUESTION NOS. SPS-STAFF 1-1 THROUGH SPS-STAFF 1-6**

The Staff (Staff) of the Public Utility Commission of Texas (Commission) stipulates that the following responses to requests for information may be treated by all parties as if the answers were filed under oath.

Dated: November 14, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Keith Rogas
Division Director

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/s/ Scott Miles

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CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on November 14, 2022 in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Scott Miles
Scott Miles

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SPS-Staff 1-1 Referencing page 8, lines 5 through 16, provide all analyses conducted or reviewed, materials reviewed, or other resources relied upon which establish that reasonable and adequate service in relation to electric vehicle charging infrastructure and equipment is being provided by the competitive market in Texas.

Response: See the Direct Testimony of ETI witness Samantha F. Hill at 8. Mr. Abbott is also aware that significant federal and state funding has been made available to provide reasonable and adequate service in relation to electric vehicle charging and infrastructure and equipment in Texas, obviating the need to do so via mechanisms such as ETI's proposed TECI and TECDA riders, including funding available through the VW-EPA "dieselgate" settlement and the Inflation Reduction Act.

Prepared by: William Abbott
Sponsored by: William Abbott

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SPS-Staff 1-2 Referencing page 8, lines 5 through 16, provide all analyses conducted or reviewed, materials reviewed, or other resources relied upon which establish that reasonable and adequate service in relation to electric vehicle charging and infrastructure and equipment is being provided or is planned to be provided by the competitive market in rural and low/moderate income counties in Texas.

Response: See the Direct Testimony of ETI witness Samantha F. Hill at 8. Mr. Abbott is also aware that significant federal and state funding has been made available to provide reasonable and adequate service in relation to electric vehicle charging infrastructure and equipment in rural and low/moderate income counties in Texas, obviating the need to do so via mechanisms such as ETI's proposed TECI and TECDA riders including funding available through the VW-EPA "dieselgate" settlement and the Inflation Reduction Act.

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SPS-Staff 1-3 Please provide all analyses conducted or reviewed, materials reviewed, or other resources relied upon which establish that utility ownership of electric vehicle charging infrastructure and equipment precludes competitive market investment in similar equipment.

Response: See Mr. Abbott's direct testimony in this proceeding. His opinion on this issue is also informed by his years of education and experience in the regulated utility industry. He is also aware that significant federal and state funding has been made available to provide reasonable and adequate service in relation to electric vehicle charging and infrastructure and equipment in Texas, obviating the need to do so via mechanisms such as ETI's proposed TECI and TECDA riders including funding available through the VW-EPA "dieselgate" settlement and the Inflation Reduction Act.

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SPS-Staff 1-4 Referencing page 7, lines 14 through 17, provide the definition of transportation electrification and charging infrastructure as used by Mr. Abbott in his testimony.

Response: See the Direct Testimony of ETI witness Samantha F. Hill.

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SPS-Staff 1-5 Is it Mr. Abbott's position that ownership by the vertically integrated utility of the distribution equipment necessary to supply service to a third-party owned electric vehicle charging station (Electric Vehicle Supply Infrastructure (EVSI)) is inappropriate? If the answer is anything other than no, please provide a full explanation.

Response: Mr. Abbott has not taken a position in this proceeding on the appropriateness of any distribution equipment necessary to supply service to a third-party owned electric vehicle charging station (Electric Vehicle Supply Infrastructure (EVSI)), except insofar as implicated in ETI's proposed TECI and TECDA riders.

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SPS-Staff 1-6 Referencing pages 9 and 10, starting at line 13, is it Mr. Abbott's position that bad debt, or uncollectible expense, related to electric vehicle charging infrastructure or transportation electrification infrastructure should be treated differently than other bad debt/uncollectible expense incurred by the utility?

Response: Mr. Abbott's position is that ETI's proposed Rider TECI and Rider TECDA are not just and reasonable, and should be rejected, and therefore that ETI should incur no bad debt or uncollectible expense related to electric vehicle charging infrastructure or transportation electrification infrastructure.

Prepared by: William Abbott
Sponsored by: William Abbott