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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
SECOND REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC.**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Second Request for Information to Entergy Texas, Inc. (“ETI”). OPUC requests that ETI provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding or within 20 days pursuant to 16 TAC § 22.144(c)(1) if a procedural schedule has not been adopted. OPUC further requests that ETI provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. “ETI,” the “Company,” “Applicant,” “You,” and “Your” refer to Entergy Texas, Inc. and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
2. “Document” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial

practice manuals, reports, summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other

than by providing clerical assistance, in the preparation of the answer to the question. If the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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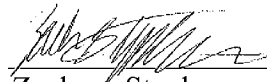
- 2-1.** Please refer to the Direct Testimony of Ms. Beverley Gale, page 7. Please confirm or deny that Ethos Energy Power Plant Services, LLC (Ethos Energy) was operating the Hardin County facility at the time that ETI acquired the generation facility. If deny, provide the date that Ethos Energy began operating the generation facility. Please include in your response a copy of the contract with Ethos Energy concerning the annual cost to operate the Hardin County facility.
- 2-2.** Please refer to Schedule E-2.1, sponsored by Mr. Andrew Dornier and Schedule E-2.5, sponsored by Ms. Gale. Please reconcile the statement in Schedule E-2.1 that the Spindletop Gas Storage facility is for serving the Sabine generating plants with the statement in Schedule E-2.5 that the Spindletop Gas Storage facility serves both the Sabine and Lewis Creek stations.
- 2-3.** Please refer to Schedule H-12.3a, sponsored by Ms. Gale. Please provide the information contained in this schedule for each generating plant by month for the period January 2018 through December 2020.
- 2-4.** Please refer to Schedule E-2.3, sponsored by Mr. Dornier. Please provide the actual monthly natural gas burns at the Sabine generating facility for the period January 2018 through the latest information available.
- 2-5.** Please refer to Schedule E-2.3, sponsored by Mr. Dornier. Please provide a detailed breakdown of the "Daily Burn on Full Load" by generating plant.
- 2-6.** Please refer to Schedule G-6, sponsored by Mr. Ryan Dumas. Please provide the same information that is included in this schedule for the calendar years 2018, 2019 and 2020.
- 2-7.** Please refer to Schedule H-5.2b, sponsored by Ms. Gale. Please reconcile the capital additions shown on Schedule H-5.2b by plant to Table 1 of Ms. Gale's direct testimony. For projects costing less than \$100,000, provide the total amount for these projects by year and a description of the various projects for each plant. Please also show any retirements that were considered to arrive at the Table 1 amounts.
- 2-8.** Please refer to Schedule E-2.4, sponsored by Mr. Dornier. Please provide the monthly inventory levels for each type of fuel shown on this schedule for the period January 2018 through December 2020.

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- 2-9.** Please refer to Schedule H-1.2a2, sponsored by Ms. Gale and Ms. Alison Lofton. Please confirm or deny that the O&M expenses included for the Hardin County Peaking Facility include the operating expenses of Ethos Energy billed to ETI. If not, please provide the monthly expenses paid to Ethos Energy for operating the Hardin County Peaking Facility.
- 2-10.** Please refer to Mr. Dornier's Direct Testimony, page 7. Please provide a listing of each month during the period January 2018 through the latest information available where all units at the Sabine generating facility were operating at a combined 70% capacity for the month. Please include the combined capacity percentage for each month identified.

Date: August 1, 2022

Respectfully submitted,
Chris Ekoh
Interim Chief Executive & Public Counsel
State Bar No. 06507015

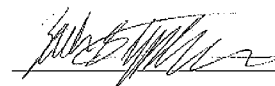


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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

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 1st day of August 2022 by facsimile, electronic mail, and/or First class, U.S. Mail.



Zachary Stephenson