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

REBUTTAL TESTIMONY

OF

WILLIE M. WILSON

ON BEHALF OF

ENTERGY TEXAS, INC.

NOVEMBER 2022

ENTERGY TEXAS, INC.
REBUTTAL TESTIMONY OF WILLIE M. WILSON
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I. INTRODUCTION AND QUALIFICATIONS

Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND TITLE.

A. My name is Willie M. Wilson. My business address is Entergy Tulane Service Center, 3700 Tulane Avenue, New Orleans, Louisiana 70119. I am employed by Entergy Services, LLC ("Entergy Services") as Vice President of Storm Operations.

Q2. ON WHOSE BEHALF ARE YOU SUBMITTING TESTIMONY?

A. I am submitting this Rebuttal Testimony to the Public Utility Commission of Texas ("Commission") on behalf of Entergy Texas, Inc. ("ETI").

Q3. PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I have a bachelor of electrical engineering and master of business administration from the University of New Orleans and a power systems certificate from Georgia Tech continuous learning program.

I joined Entergy Services in May 1999 in the transmission group where I designed substation projects to support system operations and power delivery for the Entergy Operating Companies. In April 2006, I moved into Distribution Asset Planning with Entergy Louisiana, LLC ("Entergy Louisiana") and was responsible for providing technical support and portfolio development to optimize system performance. In January 2007, I moved into Distribution Operations

where I was responsible for performing short-term load flow analysis to reduce the impact on customers due to scheduled and unscheduled switching.

In November 2007, I became the Reserve Line Supervisor with Entergy Louisiana, where I managed network operations across meter, lighting, line, and construction services to oversee that activities were completed in a safe and reliable manner. In November 2010, I moved into Gas Operations as Manager of Business and Operations Support. My job responsibilities included oversight of compliance and training, damage prevention, meter and inventory management, and performance management efforts to support the delivery of gas service in the New Orleans and Baton Rouge areas. In June 2012, I became the Senior Manager Customer Service for Entergy New Orleans, LLC ("Entergy New Orleans"). My job duties included oversight of distribution operations for the New Orleans and Chalmette areas, complaint management and resolution, community development, commercial and industrial account management, storm logistics, storm restoration, marketing of company programs, low-income initiatives, and media relations. In April 2016, I moved into the Director of Transmission Engineering role with the responsibility of leading substation and relay design, relay settings, standards, and material procurement workgroups to support system operations and power delivery for the Entergy Operating Companies.

In October 2017, I was named Vice President of Power Plant Operations with Entergy New Orleans. In that role, I was responsible for overseeing plant operations, resource allocation, and environmental and compliance adherence.

This also included development and execution of start-up planning to bring new generation technologies online. In 2018, I assumed the System Storm Incident Commander role to lead storm response efforts, which included risk and scenario planning with business units across the enterprise, collaborating with industry partners, engaging with external stakeholders, and overseeing the safe and timely completion of restoration activities. In May 2022, I transitioned into the Vice President of Storm Operations role, responsible for co-leading the restoration strategy group to oversee efficient and effective restoration planning and execution across the life cycle of an event.

II. PURPOSE OF TESTIMONY

Q4. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. I respond to comments made by Texas Industrial Energy Consumers ("TIEC") witness Charles S. Griffey regarding ETI's storm response management.

III. STORM RESTORATION MANAGEMENT REBUTTAL

Q5. TIEC WITNESS GRIFFEY COMPARES ETI'S STORM RESTORATION EFFORTS TO OTHER UTILITIES AND OTHER STORMS TO DRAW CONCLUSIONS ABOUT ETI'S STORM RESTORATION EFFICIENCY AND EFFECTIVENESS.[1] HOW DO YOU RESPOND?

[1] Direct Testimony of Charles S. Griffey at 20-24.

A. Mr. Griffey's comparisons among storms, other Entergy Operating Companies, and other utilities based on relationships between the number of outages and restoration workers and between the number of outages and the pace of restoration excludes other important components of efficient and effective storm restoration management.

Q6. WHY IS THAT?

A. No two storms are the same, no two service areas are the same, and no two restorations are the same. For example, Hurricane Laura sustained Category 2 strength well north into Louisiana from where it made landfall in Calcasieu Parish, and it impacted all the Entergy Operating Companies. Then, with Hurricane Laura's restoration efforts still ongoing, Hurricane Delta made landfall six weeks later along a similar path as Hurricane Laura, placing a further strain on already scarce resources. ETI's damages from Hurricanes Laura and Delta were more significant and widespread than Entergy Arkansas, LLC ("Entergy Arkansas") and Entergy Mississippi, LLC ("Entergy Mississippi"), and the ETI restoration work required specialized equipment to complete repairs in more wooded and marsh areas. Those circumstances largely account for the shorter restoration time frames for Entergy Arkansas and Entergy Mississippi in comparison to ETI. However, even with more damages, ETI was still able to restore almost all of the remaining customers that could take power by the end of day twelve for Hurricane Laura and by the end of day eight for Hurricane Delta

amid a pandemic, bulk electrical system connectivity and load flow issues, and back-to-back hurricane impacts.

Q7. HOW DO YOU EVALUATE THE EFFICIENCY AND EFFECTIVENESS OF A UTILITY'S STORM RESTORATION EFFORTS?

A. I evaluate the effectiveness and efficiency of storm restoration efforts beginning with the training and planning that occurs even before a storm strikes in conjunction with the management of restoration efforts following any particular storm.

Q8. PLEASE EXPLAIN.

A. In order to comprehensively plan, prepare for, and respond to any event, several things must occur before, during, and after each crisis. Entergy created a comprehensive set of incident response plans and incident specific plans that outlay business unit's and employee's responsibilities during hazards we may face. In order to assure that these plans are properly adhered to, properly trained on, and will be effectively carried out in crisis circumstances, we conduct multi-tiered training and exercises with the appropriate leadership and response personnel. At the conclusion of the training we evaluate our strengths and areas for improvement and take specific actions to improve all areas we identify.

In conjunction with this preparedness we coordinate with our peer utilities and contract partners throughout the year so that that we will be able to secure

additional resources, in both human capital and equipment, when an event impacts us. We do this through mutual assistance, participation in the Edison Electric Institute ("EEI") major event management programs, and coordinated nationwide preparedness exercises.

During an event, work streams across our incident command structure have daily calls to coordinate the response so that we are responding in not only a coordinated and well thought out manner, but that our activities are first focused on life safety for our customers and employees. Our incident command structure is specifically designed to optimize our response activities for our customers and the communities we serve. Finally, we look to continuously improve our storm response management year-round, and after each event, we have built into our culture an imperative to review how we performed after each response, and we hold open and honest dialogue with each other to identify areas for improvement.

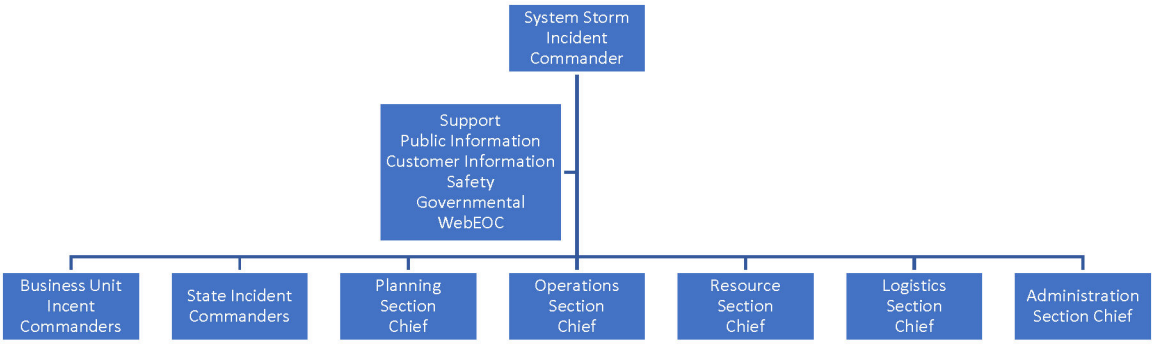
Q9. PLEASE DESCRIBE THE ENTERGY STORM PLAN IN MORE DETAIL.

A. Entergy maintains a thorough and comprehensive storm plan (The Incident Response Plan ("IRP")) and conducts refresher training primarily in conjunction with an annual system-level drill to test processes and abilities. The overall Entergy storm plan is comprised of smaller, but well-coordinated and tested incident response plans at the department, business unit, state, and overall system levels. These plans, including the IRP, are updated on an ongoing basis. The IRP is accessible by all employees via an internal company web site.

Q10. PLEASE DESCRIBE THE ORGANIZATIONAL STRUCTURE FOR MANAGING THE IRP AS IT EXISTED THROUGH 2021.

A. The System Command Center ("SCC") is a functional organizational structure based on the National Incident Management System. All functions are completely integrated within this command structure. The SCC organizational structure is shown in Figure 1.

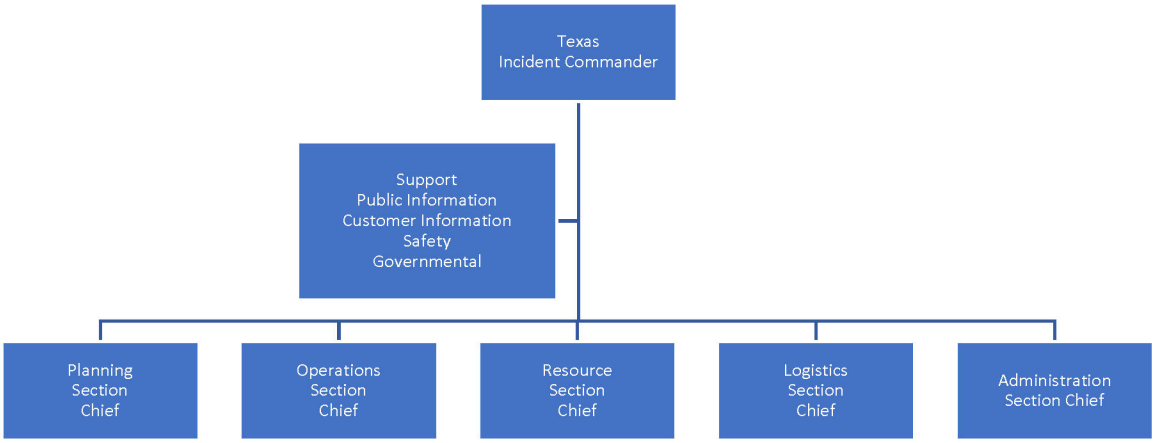
Figure 1



As illustrated in Figure 1 (above), the System Storm Incident Commander is responsible for coordinating the response among all applicable organizations and functions, including ensuring communications with customers, as well as key governmental, regulatory and incident management contacts. I am the System Storm Incident Commander and had that role during Hurricanes Laura and Delta. In my storm role, I report to the Chief Operations Officer and facilitate overall internal and external resource procurement and allocation among the Entergy Operating Companies and oversee prioritization decisions at the system level to facilitate the success of the overall storm response and restoration effort.

The State Command Centers, including the Texas Command Center under the leadership of ETI President and CEO Eliecer Viamontes, direct prioritization and restoration efforts within their respective Entergy Operating Company, as shown in Figure 2 (below).

Figure 2

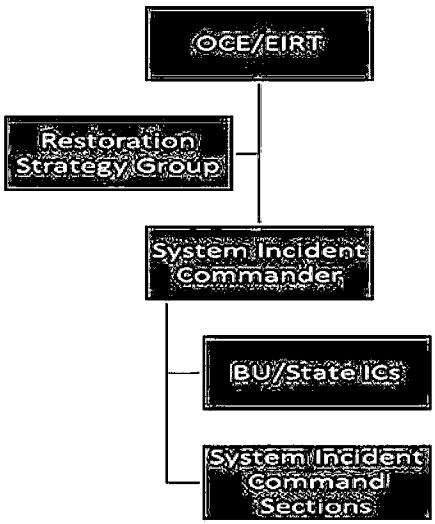


Q11. HAS ENTERGY'S STORM RESTORATION PLAN BEEN MODIFIED SINCE 2021?

A. Yes. As part of our lessons learned process from events in 2022 and 2021, we continue to refine our restoration process and enhanced our response organization with the establishment of the restoration strategy group. The restoration strategy group meets to establish restoration goals and an overall strategy that balances multiple objectives to optimize restoration governance and strategic decision-making, integration of resilience and hardening opportunities, stakeholder engagement and communications, cost controls and transparency, and overall

response efficiency. The restoration strategy group consists of senior business unit leaders across the enterprise who will be in direct and daily communications with the executive leadership, system, state, and business unit command teams throughout an event. The restoration strategy group organizational structure is shown in Figure 3.

Figure 3



Q12. DOES ENTERGY CONDUCT PERIODIC DRILLS FOR STORM PLANNING AND PREPAREDNESS?

A. Yes, Entergy conducts a comprehensive system drill each year. Entergy tests its storm plan and communication links with an annual hurricane drill that includes the System Command Center, the Entergy Operating Companies and other business organizations, and corporate support groups. The drill is not only a test of our readiness, but is also used as a training tool and incorporates lessons learned and process improvements from previous events. The drill allows participants an opportunity for "hands-on" experience in incident response and,

therefore, is an opportunity to practice and improve the performance of incident response personnel and to test response processes. The drill usually consists of multiple days of hurricane simulation with many other days of preparation and post-drill critiquing. The drill is comprised of realistic and challenging simulations where the participants' actions are observed by evaluators. Also, there are separate functions that may conduct their own drills independent of the system drill (e.g., Business Continuity, Corporate Communications).

We have found these hurricane drills to be useful in many ways: (1) employees are thoroughly trained on their assigned roles and duties; (2) they practice using the resources, data and tools they will need during an actual storm; and (3) we are able to test and refine the reporting and communication processes. We have also conducted annually a general review of incident plans with regulators and government officials, including a tour of our dispatch centers.

Q13. WHAT ELSE DOES ENTERGY DO IN REGARD TO STORM PLANNING?

A. Entergy annually reviews and adjusts its incident response plans in order to include new information and lessons learned from supporting other companies (in a mutual assistance role) as well as from its own activities in storm restoration. Entergy conducts pre-hurricane season meetings with local leaders and the media so that communication links are in place. Entergy is an active participant in several mutual-assistance groups, including the EEI, the Southeastern Electric Exchange ("SEE"), Texas Mutual Assistance Group, and the Midwest Mutual

Assistance Group. Entergy also participates in national professional meetings on hazard mitigation, including the National Hurricane Conference. We are constantly refining our incident response plans based upon experiences gained from frequent, more common events such as severe thunderstorms. We also learn from experiences with other utilities, as we routinely (several times each year) provide mutual assistance to other utilities affected by significant storms and participate in regional and national mutual-assistance groups.

Q14. HOW DID HURRICANES LAURA AND DELTA DEMONSTRATE THE EFFECTIVENESS AND EFFICIENCY OF ETI'S AND ENTERGY'S STORM TRAINING, PLANNING, AND MANAGEMENT?

A. When Hurricane Laura made landfall, other regional utilities were still recovering from the numerous hurricanes that impacted the U.S. in 2020, which presented a limited supply of and extreme demand for personnel, material, and logistical resources required for the restoration effort ongoing in Texas and Louisiana. The high demand for available resources required us to acquire help from ten different states – Texas, Florida, Alabama, Virginia, North Carolina, Tennessee, Missouri, Kansas, Oklahoma, and Georgia. Obtaining sufficient food and lodging were also challenges due to the widespread damage in Louisiana and ongoing restoration work in other areas. Additional challenges around providing these logistical support functions had to be overcome given the ongoing health requirements and protocols associated with the response to COVID-19.

Q15. PLEASE DESCRIBE THE COMPANY'S RESPONSE AND PROTOCOLS TO ADDRESS THE COVID-19 PANDEMIC DURING THE HURRICANE RESTORATIONS.

A. ETI's pandemic response has been driven by robust business continuity planning, incorporating the latest federal and state health official guidance. Entergy's pandemic response plan has been in place since 2007 and is evaluated each year by Entergy's incident response team. Specific risk-based measures taken in response to COVID-19 include the adoption of new health and safety protocols concerning face-to-face interactions; transitioning personnel to remote work to optimize social distancing; implementing trainings to address travel restrictions, use of personal protective equipment ("PPE"), industrial hygiene, self-screening and temperature checks for on-site and field workers; establishing a 24-7 contact tracing program; and continual monitoring to identify and mitigate potential business continuity risks.

Similarly, ETI adjusted its incident response planning process to address the unique risks associated with responding to major weather events during a pandemic. Many of our normal storm response protocols have been modified with the aim of preventing COVID-19 infections among our restoration workforce. These measures include proactive changes to training and communication of COVID-19 protocols to all storm personnel, utilization of digital orientation processes to limit exposure risks, and conducting safety orientations with appropriate social distancing. Social-distancing measures were

adopted with respect to lodging for restoration workers and meal service at staging sites. Vehicles used to transport restoration workers operated with capacity limits to enable social distancing. Interactions between crews was minimized, and modifications to how restoration work was performed were undertaken to reduce exposure risk and enable social distancing. Increased cleaning supplies and additional hand-wash stations were made available to enable workers to practice good hygiene. Additionally, increased cleaning was performed at staging sites and in vehicles. COVID-specific signage was displayed at all staging sites. Finally, ETI utilized personnel tasked solely with COVID-19 protocol compliance. ETI always has been committed to ensuring the guidelines of both the Texas Department of Health and Human Services and the federal Centers for Disease Control ("CDC") are followed.

Q16. WERE ETI'S COVID-19 PROTOCOLS EFFECTIVE?

A. Yes. There were zero COVID-19 cases reported for the ETI restorations for Hurricanes Laura and Delta.

Q17. HOW DID ENTERGY'S TRAINING, PLANNING, AND MANAGEMENT FACILITATE OVERCOMING THE CHALLENGES ASSOCIATED WITH LIMITED RESOURCES AND MATERIALS DURING HURRICANES LAURA AND DELTA RESTORATIONS?

A. As a result of Entergy's extensive planning, training, and execution of its incident response plans, ETI was successfully able to utilize its industry contacts and pre-stage a substantial amount of materials and workers so that restoration could begin as soon as it was safe to proceed. To restore service as quickly as possible, ETI used every available resource to the maximum extent, which included extended working hours per day and workdays per week by every worker and expedited delivery of materials from every source reasonably available.

Q18. PLEASE EXPLAIN IN MORE DETAIL HOW ETI'S AND ENTERGY'S TRAINING, PLANNING, AND MANAGEMENT FACILITATED THE ACQUISITION OF SCARCE RESOURCES TO AID IN THE RESTORATION.

A. Pre-planning activities with our mutual assistance and contract partners allowed for the agreements to be in place prior to storm season, resulting in our ability to stage restoration workforce in advance of impacts from Hurricanes Laura and Delta and immediately begin post-impact restoration efforts when it was safe to do so. We also conducted resource-logistic-planning readiness activities and response calls with internal and external stakeholders so that resources were secured and mobilized in a timely and prudent manner. Additionally, dual event

planning with EEI and health officials allowed us to establish, clarify, and refine COVID-19 protocols to maximize resource availability so that we could restore power and prevent the spread of the pandemic. Furthermore, our stakeholder engagement with local, state, and federal government agencies increased our response alignment and communications across the end-to-end response process.

In conjunction with our preparedness efforts, we also coordinate with our peer utilities and contract partners throughout the year so that we will be able to get additional resources, in both human capital and equipment, when an event impacts us. We do this through mutual assistance, (SEE for Entergy), participation in the Edison Electric Institute major event management programs (NREC), and coordinated nationwide preparedness exercises that practice the implementation of those collaborative agreements and plans. This is a practice that has been in place for decades and has been effectively used on hundreds of actual events - a bonafide tried and true program, which is depended on and used across the nation in the utility industry.

In addition, Entergy retains several key vendors to supply materials on an ongoing basis. These vendors are selected based upon price bidding and performance evaluations. Based on the results, Entergy contractually binds selected suppliers for a minimum of three years. Material supply partners are expected to maintain predetermined emergency stock for contingent situations such as storm reconstruction. The impacts of Hurricanes Laura and Delta on the Entergy Operating Companies depleted the strategic reserves and required

additional materials, which were supplied by established suppliers and, in some cases, neighboring utilities. In addition, there were instances requiring expedited manufacturing and delivery services. The materials and resources that would normally have been stockpiled and available were limited, primarily as a result of Hurricane Laura, but also due to the overall effect of the record 2020 hurricane season and COVID-19 pandemic effects on the suppliers and capacity of manufacturers. ETI leveraged existing supplier agreements when possible but had to turn to alternate suppliers in order to obtain some essential supplies. For example, Entergy engaged additional suppliers to supplement poles and transformers in responding to the historic storm season.

Q19. WOULD THE RESTORATION EFFORTS HAVE TAKEN LONGER WITHOUT ENTERGY'S AND ETI'S EFFICIENT AND EFFECTIVE STORM TRAINING, PLANNING, AND MANAGEMENT?

A. Yes. Had ETI only utilized Entergy personnel and our contractors who are contractually committed to provide resources, service restoration would have taken months longer. Even with the engagement of our mutual-aid utility partners and our normal emergency line/vegetation contractors, it still would have taken weeks to reconstruct our electric facilities because of the significant damage. Some resources, such as line, vegetation, materials, and logistics support, were not available in close proximity due to the concurrent need for those resources by Entergy Louisiana, and due to the fact that Hurricanes Laura and Delta occurred

in proximate time and location. So, for timely restoration, Entergy and ETI were able to draw on additional line contractors and vendors who were not part of the normal pool of resources.

Q20. IS THERE ANY OTHER EXTERNAL EVIDENCE OF ETI'S EFFECTIVE AND EFFICIENT STORM RESPONSE?

A. Entergy has won an EEI Emergency Response Award for the last 24 consecutive years. As explained by EEI, those awards "recognize EEI member companies that put forth outstanding efforts to restore service promptly to the public following a storm or disaster."[2] Awards are based on the utility's "ability to respond to a crisis swiftly and efficiently, overcome difficult circumstances, utilize unique or innovative recovery techniques, communicate effectively with customers, and restore service promptly."[3] To my knowledge, Entergy is the only company to have received an EEI Emergency Response Award every year since the awards were created in 1998.

Q21. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

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[2] https://www.eei.org/-/media/Project/EEI/Documents/About/EEI_Emergency_Response_Awards_Guidelines.pdf?la=en&hash=A0EF7028032598976CB7A1C5800AF778644657C2.

[3] *Id.*

AFFIDAVIT OF WILLIE M. WILSON

THE STATE OF TEXAS)
)
COUNTY OF Montgomery)

This day, Willie Wilson the affiant, appeared in person before me, a notary public, who knows the affiant to be the person whose signature appears below. The affiant stated under oath:

My name is Willie M. Wilson. I am of legal age and a resident of the State of Texas. The foregoing testimony and exhibits offered by me are true and correct, and the opinions stated therein are, to the best of my knowledge and belief, accurate, true and correct.

Willie M. Wilson

SUBSCRIBED AND SWORN TO BEFORE ME, notary public, on this the 15 day of November 2022.

Donna W. Robert
Notary Public, State of Texas

My Commission expires:

DONNA W. ROBERT
Notary Public, State of Texas
Comm. Expires 03-14-2023
Notary ID 3784202