



## Filing Receipt

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**SOAH DOCKET NO. 473-22-04394**  
**PUC DOCKET NO. 53719**

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

**CITIES' RESPONSE TO STAFF'S FIRST RFI TO INTERVENORS**

The Cities of Anahuac, Beaumont, Bridge City, Cleveland, Dayton, Groves, Houston, Huntsville, Liberty, Montgomery, Navasota, Nederland, Oak Ridge North, Orange, Pine Forest, Pinehurst, Port Arthur, Port Neches, Roman Forest, Rose City, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor, West Orange, and Willis ("Cities") hereby file their response to Commission Staff's ("Staff") First Request for Information ("RFI") to Intervenors. Cities' response to the RFI is attached hereto and numbered as it was numbered in Staff's Request. Cities' response is timely filed pursuant to Tex. Admin. Code § 22.144(c) and SOAH Order No. 2. All parties to the above captioned proceeding may treat these responses as if they were filed under oath.

Respectfully submitted,  
LAWTON LAW FIRM, P.C.



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**ATTORNEY FOR CITIES**

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this document was served on all parties of record in this proceeding on this the 17th day of November, 2022, in accordance with the Order Suspending Rules issued in Project No. 50664.

A handwritten signature in black ink, appearing to read "Molly Mayhall Vandervoort". The signature is written in a cursive, flowing style.

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Molly Mayhall Vandervoort

Responding Party: Cities  
Requesting Party: Staff

Docket No.: 53719  
Question No.: STAFF-INTERVENORS 1-1

Prepared by: Karl Nalepa  
Sponsoring Witness: Karl Nalepa

**REQUEST:**

STAFF-INTERVENORS 1-1

To the extent each INTERVENOR recommended adjustments to Entergy' s requested revenue requirement and presented such adjustments in its direct or cross rebuttal testimony in this proceeding, please provide the amounts by FERC account (or subaccount). In order to facilitate the State Office of Administrative Hearings and the Commission in number running, please answer this question with a level of specificity that is at least at the level of granularity in Entergy' s application (Schedules A through O).

**RESPONSE:**

Please see the attachment. The FERC Accts are underlined and embedded in the column labeled "Alloc Model Line Item/FERC Account."

Consultant	Line #	Alloc Model Line Item/FERC Account	Amount	Reference
K. Nalepa	33	RSRCALC: RATE SCHEDULE REVENUES	\$ (1,036,599)	Weather Normalization
	775	DXGESI: ESI DEPRECIATION/AMORTIZATION	\$ (8,241,486)	AMS Amortization & Recovery of Claimed Disallowance
	1976	182LR: <u>182</u> REGULATORY ASSET – DIC Rev Req	\$ (8,019,571)	DIC Regulatory Asset
M. Garrett	27	BDDDEF: INCREMENTAL BAD DEBT EXPENSE	\$ (978,016)	MG-2.11
	910	OMAG920: <u>920</u> SALARIES	\$ (107,779)	MG-2.3
			\$ (1,557,994)	MG-2.3
			\$ (1,056,454)	MG-2.4
			\$ (1,220,379)	MG-2.5
	923	OMAG925: <u>925</u> INJURIES & DAMAGES	\$ (65,844)	MG-2.9
	925	OMAG926: <u>926</u> PENSIONS & BENEFITS	\$ (39)	MG-2.3
			\$ 2,645	MG-2.3
			\$ (1,771,330)	MG-2.1
			\$ (1,946,111)	MG-2.2
			\$ (1,329,421)	MG-2.6
			\$ (1,532,659)	MG-2.6
	1220	TOFE: <u>408,110</u> EMPLOYMENT TAXES	\$ (158,711)	MG-2.1
			\$ (174,372)	MG-2.2
			\$ (206,922)	MG-2.3
			\$ (146,425)	MG-2.4
			\$ (174,026)	MG-2.5
	1702	PIR228: <u>228</u> PROPERTY INSURANCE RESERVE	\$ (4,939,235)	MG-2.8
	2431	LCA901: <u>901</u> SUPERVISION	\$ (47,882)	MG-2.3
			\$ (1,260)	MG-2.3
	2462	LD580: <u>580</u> OPER SUPVSN & ENGINEERING	\$ (58,256)	MG-2.3
			\$ (37,936)	MG-2.3
	2531	LP514: <u>514</u> MAINT OF MISC STEAM PLANT	\$ (328,871)	MG-2.3
	2532	LP500: <u>500</u> OPERATION SUPVSN & ENGINEERING	\$ (16,594)	MG-2.3
			\$ (74,086)	MG-2.3
	2568	LT560: <u>560</u> OPER SUPVSN & ENGINEERING	\$ (7,116)	MG-2.3
			\$ (74,224)	MG-2.3
D. Garrett	706	DXD361: <u>361</u> STRUCTURES & IMPROVEMENTS	\$ (20,765)	
	708	DXD362: <u>362</u> STATION EQUIPMENT	\$ (903,473)	
	710	DXD364: <u>364</u> POLES, TOWERS, & FIXTURES	\$ (1,675,432)	
	712	DXD365: <u>365</u> OVERHEAD CONDUCTORS & DEVICES	\$ (770,722)	
	718	DXD366: <u>366</u> UNDERGROUND CONDUIT	\$ (506,829)	
	720	DXD367: <u>367</u> UNDGC CONDUCT & DEVICES	\$ (1,247,959)	
	722	DXD368: <u>368</u> LINE TRANSFORMERS	\$ (1,312,348)	
	724	DXD3691: <u>369,1</u> OVERHEAD SERVICES	\$ (418,086)	
	726	DXD3692: <u>369,2</u> UNDERGROUND SERVICES	\$ (152,841)	
	732	DXD371L: <u>371</u> INSTALL ON CUST PREMISES - LIGHTING	\$ (89,605)	
	740	DXD373R: <u>373</u> ST LIGHT & SIGNAL SYS - ROADWAY	\$ (77,897)	
	801	DXP311: <u>311</u> STRUCTURES & IMPROVEMENTS	\$ (6,073,010)	
	803	DXP312: <u>312</u> BOILER PLANT EQUIPMENT	\$ (26,480,783)	
	804	DXP3121: <u>312,1</u> BOILER PLANT RAILCARS	\$ (82,178)	
	807	DXP314: <u>314</u> TURBOGENERATOR UNITS	\$ (17,245,258)	
	809	DXP315: <u>315</u> ACCESSORY ELECTRIC EQUIP	\$ (5,841,269)	
	811	DXP316: <u>316</u> MISC POWER PLANT EQUIP	\$ (356,503)	
	842	DXP341: <u>341</u> STRUCTURES & IMPROVEMENTS	\$ (48,484)	
	845	DXP342: <u>342</u> FUEL HOLDRS, PRODUCRS & ACCESS	\$ (13,552)	
	847	DXP343: <u>343</u> PRIME MOVERS	\$ (407,733)	
	849	DXP344: <u>344</u> GENERATORS	\$ (273,062)	
	851	DXP345: <u>345</u> ACCESSORY ELECTRIC EQUIPMENT	\$ (87,276)	
	854	DXP346: <u>346</u> MISCELLANOUS POWER PLANT EQUIP	\$ (9,625)	
	864	DXT352: <u>352</u> STRUCTURES & IMPROVEMENTS	\$ (83,150)	
	866	DXT353: <u>353</u> STATION EQUIPMENT	\$ (1,783,732)	
	872	DXT354: <u>354</u> TOWERS & FIXTURES	\$ (60,384)	
	874	DXT355: <u>355</u> POLES & FIXTURES	\$ (2,322,245)	
	876	DXT356: <u>356</u> OVERHEAD CONDUCTORS & DEVICES	\$ (526,393)	

The following files are not convertible:

53719 Att to Resp to Staff 1-1 (Cities  
Adj by FERC Acct).xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.