



## Filing Receipt

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

<b>APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**TEXAS INDUSTRIAL ENERGY CONSUMERS RESPONSE TO COMMISSION  
STAFF’S FIRST REQUEST FOR INFORMATION**

Texas Industrial Energy Consumers (“TIEC”) files the following responses to the First Requests for Information (“RFI”) to TIEC filed by the Staff (“Staff”) of the Public Utility Commission of Texas (“Commission”). The request was filed at the Commission and received by TIEC at 3:48pm on November 10, 2022. Accordingly, pursuant to the procedural schedule entered in this case and the Commission’s procedural rules, TIEC’s response is timely filed. Pursuant to an agreement with Staff counsel, TIEC will supplement this response with information relating to the direct testimony of Jeffry Pollock by November 28, 2022. TIEC’s responses to specific questions are set forth as follows, in the order of the questions asked. Pursuant to P.U.C. Proc. R. 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

Rex D. VanMiddlesworth  
State Bar No. 20449400  
Benjamin B. Hallmark  
State Bar No. 24069865  
Christian Rice  
State Bar No. 24122294  
303 Colorado St., Suite 2750  
Austin, TX 78701  
(737) 204-4720  
[rexvanm@omm.com](mailto:rexvanm@omm.com)  
[bhallmark@omm.com](mailto:bhallmark@omm.com)  
[crice@omm.com](mailto:crice@omm.com)  
[OMMeservice@omm.com](mailto:OMMeservice@omm.com)

**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 21<sup>st</sup> 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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**TEXAS INDUSTRIAL ENERGY CONSUMERS RESPONSE TO COMMISSION  
STAFF’S FIRST REQUEST FOR INFORMATION**

**STAFF 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:**

See Attachment Staff 1-1. Mr. Gorman’s proposal to adjust ETI’s authorized rate of return and related income tax expense will impact FERC Accounts: “Utility Operating Income” net income from accounts 400-435, and 409.1, Income Tax. Mr. Gorman’s recommendation to reduce ETI’s proposed return on equity (ROE) from 10.8% to 9.4% will reduce its claimed revenue deficiency by \$40,043,997.

Mr. Griffey’s recommendation to deny ETI’s requested ROE adder of 30 basis points would, based on Mr. Gorman’s quantification, reduce ETI’s claimed revenue deficiency by \$8,580,857 and would impact FERC Accounts: “Utility Operating Income” net income from accounts 400-435, and 409.1, Income Tax.

**Preparer:** Michael P. Gorman, Charles S. Griffey

**Sponsor:** Michael P. Gorman, Charles S. Griffey

The following files are not convertible:

Attachment Staff 1-1.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.