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Received - 2022-11-28 02:49:41 PM
Control Number - 53719
ItemNumber - 381

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

Texas Industrial Energy Consumers (“TIEC”) files the following responses to the First Requests for Information (“RFI”) to TIEC filed by Sierra Club (“Sierra”). The request was filed at the Commission and received by TIEC on November 16, 2022. Accordingly, pursuant to the procedural schedule entered in this case, TIEC’s response is timely filed. TIEC’s responses to specific questions are set forth as follows, in the order of the questions asked. Pursuant to 16 T.A.C. § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

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CERTIFICATE OF SERVICE

I, Christian E. Rice, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 28th day of November 2022 by facsimile, electronic mail and/or first Class, U.S. Mail, Postage Prepaid.

/s/ *Christian E. Rice*

Christian E. Rice

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

**APPLICATION OF ENTERGY TEXAS, § BEFORE THE STATE OFFICE
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**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE TO SIERRA CLUB'S
FIRST REQUEST FOR INFORMATION**

SIERRA 1-1:

Please refer to Jeffry Pollock's Direct Testimony at pages 12-14. Provide all analyses, assessments, and supporting workpapers used to support Mr. Pollock's opinions about ETI's deactivation assessment, the Company's proposed new, earlier retirement dates, and/or the "dramatically change[d]" costs to ratepayers.

RESPONSE:

All analyses supporting Mr. Pollock's opinions about ETI's deactivation assessment, proposed deactivation dates, and resultant costs to ratepayers were previously provided with Mr. Pollock's workpapers. Specifically, refer to the following files:

- Analysis SIE-1-5_HSPM-BigCajun_CustomerNetBenefits_210224_HSPM;
- Analysis of SIE-1-6-HSPM Preliminary ETI Nelson 6 Deactivation Analysis 210611 (QRA); and
- Analysis of Depreciation Study (Appendix A HSPM).

Preparer: Jeffry Pollock

Sponsor: Jeffry Pollock

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SIERRA 1-2:

Provide all analyses, assessments and supporting workpapers used to calculate the percent of projected benefits of deactivation and/or Mr. Pollock's assertion that projected benefits of deactivating Nelson 6 and Big Cajun 2 are "less than 1% of the costs associated with continued operation" at page 12.

RESPONSE:

See TIEC's Response to Sierra 1-1.

Preparer: Jeffry Pollock

Sponsor: Jeffry Pollock

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FIRST REQUEST FOR INFORMATION**

SIERRA 1-3:

Has Mr. Pollock, TIEC, or any employee, contractor, or consultant for TIEC conducted or reviewed a retirement study, economic analysis, or any assessment of the costs or benefits of retiring or continuing to operate the Nelson and Big Cajun II plants. If so, provide copies of all of these studies. If not, why?

RESPONSE:

TIEC has filed an objection to this request. Subject to and without waiving that objection, TIEC responds as follows:

No. No such study, analysis, or assessment was provided by ETI. A full retirement study of Nelson and Big Cajun II should include an evaluation of the continued operation of each plant through the end of their useful lives as well as the costs for environmental compliance required for continued operation. As ETI has not provided the retirement studies necessary to conduct this review, Mr. Pollock has not conducted such a review himself.

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SIERRA 1-4:

Has Mr. Pollock, TIEC, or any employee, contractor, or consultant for TIEC conducted or reviewed any analysis of the environmental compliance risks or costs associated with continuing to operate Nelson or Big Cajun 2? If so, please provide copies of all these studies. If not, why?

RESPONSE:

TIEC has filed an objection to this request. Subject to and without waiving that objection, TIEC responds as follows:

No. ETI has not provided the information necessary to conduct such a review.

Preparer: Jeffry Pollock

Sponsor: Jeffry Pollock