



## 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</b>
<b>INC. FOR AUTHORITY TO CHANGE</b>	<b>§</b>	<b>OF</b>
<b>RATES</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**OFFICE OF PUBLIC UTILITY COUNSEL'S  
RESPONSE TO SIERRA CLUB'S  
FIRST REQUEST FOR INFORMATION**

The Office of Public Utility Counsel (“OPUC”) submits this response to Sierra Club’s First Request for Information that was received on November 16, 2022. Pursuant to State Office of Administrative Hearings Order No. 2, OPUC’s response is timely filed within five business days of receipt of SPS’s discovery request. From November 23, 2022 through November 25, 2022, the Public Utility Commission of Texas was closed for the Thanksgiving holiday. Therefore, this response is timely filed. OPUC stipulates that all parties may treat this response as if it were filed under oath.

Date: November 28, 2022

**SOAH Docket No. 473-22-04394**  
**PUC Docket No. 53719**  
**OPUC's Response to Sierra Club's**  
**First Request for Information**

**The following requests pertain to the direct testimony of Constance D. Cannady**

**SIERRA CLUB-OPUC 1-1:**

Please refer to Constance Cannady's Direct Testimony at page 15. Please provide a list, including description and quantification, of all possible attendant impacts that could be quantified by the Company in the case of OPUC's proposed rate treatment for Nelson Unit 6 and Big Cajun 2.

**RESPONSE:**

Ms. Cannady has not conducted an analysis of the possible attendant impacts that could be quantified by the Company concerning Ms. Cannady's recommended treatment of Big Cajun 2, Unit 3, and Nelson Unit 6.

Prepared by: Constance T. Cannady

Sponsored by: Constance T. Cannady

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**SIERRA CLUB-OPUC 1-2:**

Please provide calculations and descriptions of the O&M expense and depreciation expenses as calculated in workpapers part h and i.

**RESPONSE:**

Ms. Cannady's workpaper part h and i were provided by the Company in response to OPUC's Third RFI to ETI, No. 3-6.

Prepared by: Constance T. Cannady

Sponsored by: Constance T. Cannady

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**SIERRA CLUB-OPUC 1-3:**

Has Ms. Cannady, OPUC, or any employee, contractor, or consultant for OPUC 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:**

No. Ms. Cannady does not address or make any recommendation with respect to the physical retirement of either of these generating facilities. Her testimony and recommendations only relate to the recovery of costs during the time the plants continue to provide service and the undepreciated asset balances at the time of retirement.

Prepared by: Constance T. Cannady

Sponsored by: Constance T. Cannady

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**OPUC's Response to Sierra Club's**  
**First Request for Information**

**SIERRA CLUB-OPUC 1-4:**

Has Ms. Cannady, OPUC, or any employee, contractor, or consultant for OPUC 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:**

No. See OPUC's response to SIERRA CLUB-OPUC 1-3.

Prepared by: Constance T. Cannady

Sponsored by: Constance T. Cannady

Date: November 28, 2022

Respectfully submitted,

Chris Ekoh  
Interim Chief Executive and Public Counsel  
State Bar No. 06507015

/S/ Renee Wiersema

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Renee Wiersema  
Assistant Public Counsel  
State Bar No. 24094361  
Justin Swearingen  
Assistant Public Counsel  
State Bar No. 24096794  
1701 N. Congress Avenue, Suite 9-180  
P.O. Box 12397  
Austin, Texas 78711-2397  
512-936-7500 (Telephone)  
512-936-7525 (Facsimile)  
renee.wiersema@opuc.texas.gov (Service)  
justin.swearingen@opuc.texas.gov (Service)  
opuc\_eservice@opuc.texas.gov (Service)

ATTORNEYS FOR THE  
OFFICE OF PUBLIC UTILITY COUNSEL

**CERTIFICATE OF SERVICE**  
SOAH DOCKET NO. 473-22-04394  
PUC DOCKET NO. 53719

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 28<sup>th</sup> day of November 2022 by facsimile, electronic mail, and/or first class, U.S. Mail.

/S/ Renee Wiersema

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Renee Wiersema