

# Filing Receipt

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

**APPLICATION OF ENTERGY TEXAS,** § § **INC. FOR AUTHORITY TO CHANGE** RATES Ş

#### **STATE OFFICE** OF **ADMINISTRATIVE HEARINGS**

## **RESPONSE OF ENTERGY TEXAS, INC. TO TIEC'S NINTH REQUEST FOR INFORMATION: TIEC 9:1**

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to TIEC's Ninth Request for Information. The response to such request is attached and is numbered as in the request. An additional copy is available for inspection at the Company's office in Austin, Texas.

ETI believes the foregoing response is correct and complete as of the time of the response, but the Company will supplement, correct or complete the response if it becomes aware that the response is no longer true and complete, and the circumstance is such that failure to amend the answer is in substance misleading. The parties may treat this response as if it were filed under oath.

Respectfully submitted,

<u>Kristen F. Gates</u> Kristen Yates

ENTERGY SERVICES, LLC 919 Congress Avenue, Suite 701 Austin, Texas 78701 Office: (512) 487-3962 Facsimile: (512) 487-3958

Attachments: **TIEC 9:1** 

#### CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to TIEC's Ninth Request for Information has been sent by either hand delivery, electronic delivery, facsimile, overnight delivery, or U.S. Mail to the party that initiated this request in this docket on this the 29<sup>th</sup> day of November 2022.

<u>Kristen F. Gates</u> Kristen Yates

## ENTERGY TEXAS, INC. PUBLIC UTILITY COMMISSION OF TEXAS DOCKET NO. 53719

Response of: Entergy Texas, Inc.Prepared By: Ryan Gayto the Ninth Set of Data Requests<br/>of Requesting Party: Texas Industrial Energy<br/>ConsumersSponsoring Witness: Andrew L. Dornier<br/>Beginning Sequence No. PI2254Ending Sequence No. PI2255

Question No.: TIEC 9-1

Part No.: Addendum:

Question:

Please refer to Mr. Dickens rebuttal testimony at page four regarding the claimed reduction in fuel cost from completing MCPS ahead of schedule:

- a. Please provide, by hour, from January 1, 2021 June 1, 2021 the MWh production from MCPS.
- b. Please provide the daily price of natural gas for MCPS from January 1, 2021– June 1, 2021.
- c. Please provide the output data, by hour, for each of ETI's generation facilities from February 14 February 21, 2021.

# Response:

Information included in the response contains highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

- a. See the highly sensitive attachment (TP-53719-00TIE009-X001-001 HSPM).
- b. See the highly sensitive attachment (TP-53719-00TIE009-X001-002\_HSPM).
- c. See the highly sensitive attachment provided in response to subpart a.

Highly sensitive materials have been included on the secure ShareFile site provided to the parties that have executed protective order certifications in this proceeding.

# DESIGNATION OF PROTECTED MATERIALS PURSUANT TO PARAGRAPH 4 OF DOCKET NO. 53719 PROTECTIVE ORDER

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101 and/or 552.110. ETI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

> Kristen F. Yates Entergy Services, LLC.