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December 2, 2022

Central Records
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

Re: SOAH Docket No. 473-22-04394; PUC Docket No. 53719 – *Application of Entergy Texas, Inc. for Authority to Change Rates – Errata No. 2*

Dear Central Records Staff:

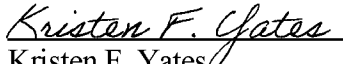
Entergy Texas, Inc. (“ETI”) submits this Errata No. 2, which provides corrections to ETI’s rebuttal testimony filed in this docket on November 16, 2022.

Specifically, attached to this letter, please find the corrected workpaper to the Rebuttal Testimony of Allen J. Becker. In tab “2021 Test Yr Actuals,” the corrected workpaper, “Becker Rebuttal_WP_AJB Testimony_2_Revised,” utilizes billing month values for average temperature consistent with the Direct Testimony of Kristin Sasser instead of calendar month values as provided in the originally filed workpaper, “Becker Rebuttal_WP_AJB Testimony_2.” The change to this workpaper does not have a substantive impact on the Rebuttal Testimony of Mr. Becker.

Also, as an attachment to this errata, ETI provides corrected pages 18 and 19 to the Rebuttal Testimony of Anastasia R. Meyer removing Question 25 and its response.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact the undersigned counsel.

Sincerely,


Kristen F. Yates
Attorney for Entergy Texas, Inc.

Enclosures

cc: All parties of record

Becker Rebuttal_WP_AJB Testimony_2_Revised

DT	Avg Temp	CDD65	HDD60
1/1/2001	46.47	5.70	447.00
2/1/2001	51.48	17.52	301.06
3/1/2001	59.27	47.97	137.12
4/1/2001	62.93	114.55	101.96
5/1/2001	71.67	232.08	14.97
6/1/2001	77.11	376.53	1.28
7/1/2001	80.26	466.54	-
8/1/2001	82.79	529.32	-
9/1/2001	80.60	492.65	0.01
10/1/2001	72.27	263.46	16.86
11/1/2001	66.17	139.73	51.31
12/1/2001	61.48	86.40	116.85
1/1/2002	52.30	27.56	320.56
2/1/2002	54.63	37.51	237.48
3/1/2002	54.75	44.35	253.74
4/1/2002	65.72	125.53	55.54
5/1/2002	75.77	327.64	2.64
6/1/2002	77.23	386.62	2.28
7/1/2002	81.08	488.59	-
8/1/2002	82.98	535.05	-
9/1/2002	81.57	505.79	-
10/1/2002	77.17	377.87	2.90
11/1/2002	67.01	134.29	34.17
12/1/2002	56.78	42.56	192.16
1/1/2003	53.05	27.13	311.93
2/1/2003	51.27	14.72	301.69
3/1/2003	56.29	29.55	186.49
4/1/2003	63.88	91.51	63.22
5/1/2003	73.88	283.54	10.39
6/1/2003	79.75	453.28	-
7/1/2003	81.16	474.70	-
8/1/2003	82.26	507.04	-
9/1/2003	80.21	525.24	-
10/1/2003	74.07	260.44	3.35
11/1/2003	69.31	192.62	23.59
12/1/2003	59.91	85.50	158.57
1/1/2004	53.96	25.37	268.69
2/1/2004	52.50	10.19	257.08
3/1/2004	58.61	45.38	146.71
4/1/2004	66.62	120.45	31.36
5/1/2004	70.48	202.33	16.24
6/1/2004	78.46	413.68	0.65
7/1/2004	80.83	484.68	-
8/1/2004	82.59	525.21	-
9/1/2004	81.02	505.06	-
10/1/2004	77.74	388.56	1.51
11/1/2004	72.04	259.13	25.27
12/1/2004	60.68	70.53	121.84

Becker Rebuttal_WP_AJB Testimony_2_Revised

1/1/2005	54.63	39.73	273.26
2/1/2005	55.01	32.10	233.47
3/1/2005	58.97	40.80	130.02
4/1/2005	64.69	106.48	60.83
5/1/2005	69.69	187.48	18.58
6/1/2005	78.88	430.29	1.20
7/1/2005	82.77	544.09	-
8/1/2005	82.33	514.14	-
9/1/2005	82.67	536.85	-
10/1/2005	79.61	444.53	2.33
11/1/2005	67.56	188.60	62.21
12/1/2005	58.41	79.44	190.17
1/1/2006	55.78	39.02	223.86
2/1/2006	57.21	32.50	166.82
3/1/2006	60.38	81.01	140.72
4/1/2006	67.56	163.14	48.41
5/1/2006	73.84	277.85	4.26
6/1/2006	77.97	405.57	1.83
7/1/2006	80.96	483.27	-
8/1/2006	82.65	542.92	-
9/1/2006	81.85	499.16	-
10/1/2006	76.56	354.88	1.66
11/1/2006	67.46	165.69	47.92
12/1/2006	58.06	69.31	195.85
1/1/2007	54.81	31.52	252.06
2/1/2007	50.18	14.71	328.46
3/1/2007	58.76	56.90	157.85
4/1/2007	66.79	144.13	48.60
5/1/2007	70.74	216.43	22.44
6/1/2007	77.39	384.88	0.16
7/1/2007	80.87	483.05	-
8/1/2007	82.06	506.81	-
9/1/2007	82.08	521.26	-
10/1/2007	78.40	401.30	0.90
11/1/2007	68.35	182.58	40.01
12/1/2007	60.98	88.37	134.84
1/1/2008	55.26	51.23	259.90
2/1/2008	54.44	35.34	249.27
3/1/2008	59.56	57.58	134.44
4/1/2008	66.39	149.87	60.21
5/1/2008	71.47	237.12	22.02
6/1/2008	79.86	461.23	0.86
7/1/2008	82.18	521.80	-
8/1/2008	83.07	539.42	-
9/1/2008	80.89	484.86	-
10/1/2008	75.17	315.26	2.22
11/1/2008	65.89	144.73	60.22
12/1/2008	58.18	58.83	177.52
1/1/2009	56.48	54.62	229.16

Becker Rebuttal_WP_AJB Testimony_2_Revised

2/1/2009	55.25	34.98	220.56
3/1/2009	60.79	74.72	123.85
4/1/2009	63.65	102.91	81.46
5/1/2009	72.20	245.21	14.71
6/1/2009	77.50	391.04	1.00
7/1/2009	84.52	605.30	-
8/1/2009	84.53	597.93	-
9/1/2009	81.84	507.76	-
10/1/2009	76.66	356.12	1.82
11/1/2009	67.37	165.02	45.19
12/1/2009	57.16	41.43	178.55
1/1/2010	47.61	9.66	422.89
2/1/2010	49.73	11.63	349.82
3/1/2010	51.56	11.55	282.52
4/1/2010	62.34	77.27	86.50
5/1/2010	72.15	248.94	10.86
6/1/2010	80.71	481.23	0.17
7/1/2010	83.20	557.12	-
8/1/2010	84.13	570.16	-
9/1/2010	83.97	571.88	-
10/1/2010	76.14	372.06	9.47
11/1/2010	68.60	200.21	47.44
12/1/2010	58.97	77.74	174.27
1/1/2011	53.02	26.43	303.77
2/1/2011	49.34	15.48	362.19
3/1/2011	61.49	83.37	126.29
4/1/2011	69.09	178.71	29.00
5/1/2011	74.43	308.90	13.01
6/1/2011	80.83	491.77	2.33
7/1/2011	85.04	615.40	-
8/1/2011	85.90	621.09	-
9/1/2011	85.29	615.12	0.06
10/1/2011	77.84	399.33	4.09
11/1/2011	68.38	186.42	47.06
12/1/2011	60.73	92.78	143.24
1/1/2012	55.97	37.94	222.18
2/1/2012	59.46	54.00	135.08
3/1/2012	62.33	86.46	93.03
4/1/2012	70.30	194.72	13.36
5/1/2012	73.55	280.52	6.15
6/1/2012	79.49	470.21	-
7/1/2012	81.83	512.12	-
8/1/2012	82.85	530.27	-
9/1/2012	81.89	516.21	0.00
10/1/2012	75.27	321.72	4.08
11/1/2012	67.85	183.35	54.73
12/1/2012	61.16	86.04	125.70
1/1/2013	54.75	44.35	261.76
2/1/2013	57.09	42.64	185.01

Becker Rebuttal_WP_AJB Testimony_2_Revised

3/1/2013	57.81	34.81	154.16
4/1/2013	62.74	88.87	90.20
5/1/2013	67.79	172.56	46.21
6/1/2013	78.14	416.43	4.85
7/1/2013	83.13	550.89	-
8/1/2013	83.38	546.92	-
9/1/2013	82.71	540.49	-
10/1/2013	78.33	404.99	2.29
11/1/2013	67.78	162.03	36.12
12/1/2013	56.30	69.91	239.84
1/1/2014	50.61	25.08	369.18
2/1/2014	49.78	15.78	351.29
3/1/2014	55.87	41.50	223.88
4/1/2014	62.98	87.15	80.64
5/1/2014	70.32	209.84	24.30
6/1/2014	76.66	369.06	3.40
7/1/2014	81.45	498.97	-
8/1/2014	82.51	547.76	-
9/1/2014	82.50	514.07	-
10/1/2014	77.29	367.94	1.89
11/1/2014	67.60	185.48	58.22
12/1/2014	57.92	44.30	167.31
1/1/2015	52.90	21.81	288.89
2/1/2015	52.15	23.61	290.83
3/1/2015	54.86	40.05	241.58
4/1/2015	67.42	146.08	35.19
5/1/2015	72.93	251.18	3.81
6/1/2015	78.22	408.20	0.47
7/1/2015	82.39	528.45	-
8/1/2015	85.16	601.80	-
9/1/2015	81.48	497.38	0.02
10/1/2015	76.86	364.25	1.26
11/1/2015	70.73	214.81	11.81
12/1/2015	61.17	83.15	119.48
1/1/2016	57.30	76.79	223.79
2/1/2016	54.57	28.13	230.69
3/1/2016	62.16	78.03	96.92
4/1/2016	65.97	120.26	48.42
5/1/2016	71.59	218.75	7.83
6/1/2016	76.47	353.45	0.57
7/1/2016	83.22	557.90	-
8/1/2016	84.58	584.74	-
9/1/2016	82.12	516.77	-
10/1/2016	79.13	427.84	0.84
11/1/2016	71.96	251.23	13.68
12/1/2016	62.37	98.94	103.92
1/1/2017	59.95	91.58	177.75
2/1/2017	62.07	88.13	109.93
3/1/2017	65.45	123.53	56.15

Becker Rebuttal_WP_AJB Testimony_2_Revised

4/1/2017	69.87	190.99	19.68
5/1/2017	72.56	254.68	11.17
6/1/2017	77.34	385.51	1.96
7/1/2017	81.56	507.71	-
8/1/2017	82.91	533.18	-
9/1/2017	80.23	461.35	0.03
10/1/2017	78.17	398.71	1.10
11/1/2017	69.89	226.53	40.07
12/1/2017	60.88	93.34	138.55
1/1/2018	50.10	29.54	390.19
2/1/2018	53.39	27.78	271.59
3/1/2018	64.55	121.11	76.94
4/1/2018	66.98	147.54	46.18
5/1/2018	71.01	233.21	24.68
6/1/2018	81.27	502.60	0.10
7/1/2018	83.31	557.09	-
8/1/2018	84.21	576.32	-
9/1/2018	82.62	558.00	-
10/1/2018	78.22	399.25	1.48
11/1/2018	66.85	163.87	58.55
12/1/2018	57.20	54.00	193.24
1/1/2019	55.54	21.19	197.41
2/1/2019	55.40	33.19	213.36
3/1/2019	59.73	64.21	139.60
4/1/2019	64.69	121.05	75.45
5/1/2019	72.62	251.07	12.67
6/1/2019	80.23	470.55	0.01
7/1/2019	82.72	538.46	-
8/1/2019	84.03	566.44	-
9/1/2019	84.39	591.80	-
10/1/2019	80.18	459.45	2.28
11/1/2019	65.47	169.55	93.15
12/1/2019	59.59	81.96	164.51
1/1/2020	58.02	59.60	186.68
2/1/2020	57.86	45.78	158.09
3/1/2020	61.06	82.33	125.73
4/1/2020	70.18	195.71	17.59
5/1/2020	72.16	242.10	10.84
6/1/2020	78.02	403.07	0.42
7/1/2020	82.33	526.38	-
8/1/2020	83.27	545.55	-
9/1/2020	83.61	561.02	-
10/1/2020	76.46	357.31	3.55
11/1/2020	68.71	199.76	43.15
12/1/2020	61.14	87.71	125.63

Becker Rebuttal_WP_AJB Testimony_2_Revised

Month	20 Yr Normal Temp	CDD65	HDD60
January	54.23817756	39.08714	278.903
February	54.21189246	30.86523	245.1781
March	59.14132391	62.01358	153.398
April	66.06996957	132.6504	53.66322
May	72.03533995	242.3685	14.79968
June	78.53372088	417.5835	1.196722
July	82.24131454	527.9169	0
August	83.38008852	548.7818	0
September	82.22816877	520.3511	0.005421
October	77.26776709	378.054	2.942687
November	68.29241165	191.4633	45.36489
December	59.38459014	74.34298	159.4458

20 year normal time period January 2001 - December 2020

Becker Rebuttal_WP_AJB Testimony_2_Revised

Month	10 Yr Normal Temp	CDD65	HDD60
January	54.87025473	43.98571	264.2462
February	55.18351164	37.38626	227.7892
March	60.48690764	75.0386	134.1841
April	67.1175412	148.2256	44.31587
May	71.94014236	241.4094	15.8916
June	78.67773531	421.9579	1.355143
July	82.70552436	542.1293	0
August	83.86066959	563.1257	0
September	82.69781414	534.6615	0.010841
October	77.88235559	394.5078	2.184659
November	68.47143827	197.2067	46.7036
December	59.70854982	78.48425	155.1456

10 year normal time period January 2011 - December 2020

DT		Avg Temp	CDD65	HDD60
	1/1/2021	53.89	27.6	273.6
	2/1/2021	53.87	25.1	251.3
	3/1/2021	56.18	65.0	245.9
	4/1/2021	65.80	127.9	55.4
	5/1/2021	71.17	222.6	17.3
	6/1/2021	77.29	376.9	0.1
	7/1/2021	81.69	510.9	0.0
	8/1/2021	83.02	538.0	0.0
	9/1/2021	82.43	526.3	0.0
	10/1/2021	76.57	357.1	2.3
	11/1/2021	69.11	216.7	46.5
	12/1/2021	62.21	89.5	97.9

ALLEN work below:					Analysis by season:									
Deviation of 2021 from 10-year and 20-year normals:					Deviation of 2021 from 10-year and 20-year normals:					Seasonal difference results (which avg period was closest to 2021's)				
10-year:					10-year:									
DT		Avg Temp	CDD65	HDD60		Avg Temp	CDD65	HDD60		Avg Temp	CDD65	HDD60	Conclusion: for the warm and cold seasons, the 20-year averages were a closer match, seasonally, than the 10-year averages. Annually , the 20-year averages were a closer match than the 10-year averages.	
	1/1/2021	-1.0	-16.4	9.4	JFM	-2.2	-12.9	48.2	JFM	20	20			
	2/1/2021	-1.3	-12.3	23.5	AMJ	-1.2	-28.1	3.7	AMJ	20	20			
	3/1/2021	-4.3	-10.1	111.7	JAS	-0.7	-21.6	0.0	JAS	20	20			
	4/1/2021	-1.3	-20.4	11.1	OND	0.6	-2.3	-19.1	OND	10	10			
	5/1/2021	-0.8	-18.8	1.4										
	6/1/2021	-1.4	-45.1	-1.3										
	7/1/2021	-1.0	-31.2	0.0										
	8/1/2021	-0.8	-25.1	0.0										
	9/1/2021	-0.3	-8.3	0.0										
	10/1/2021	-1.3	-37.4	0.1										
	11/1/2021	0.6	19.5	-0.2										
	12/1/2021	2.5	11.0	-57.3										
SQRT(SumSquares):		6.0	83.1	128.6										
SUM:		-10.4	-194.6	98.5										
20-year:					20-year:									
DT		Avg Temp	CDD65	HDD60		Avg Temp	CDD65	HDD60						
	1/1/2021	-0.3	-11.5	-5.3	JFM	-1.2	-4.8	31.1						
	2/1/2021	-0.3	-5.8	6.2	AMJ	-0.8	-21.8	1.0						
	3/1/2021	-3.0	2.9	92.5	JAS	-0.2	-7.3	0.0						
	4/1/2021	-0.3	-4.8	1.7	OND	1.0	6.5	-20.4						
	5/1/2021	-0.9	-19.8	2.5										
	6/1/2021	-1.2	-40.7	-1.1										
	7/1/2021	-0.6	-17.0	0.0										
	8/1/2021	-0.4	-10.8	0.0										
	9/1/2021	0.2	6.0	0.0										
	10/1/2021	-0.7	-21.0	-0.6										
	11/1/2021	0.8	25.2	1.2										
	12/1/2021	2.8	15.2	-61.6										
SQRT(SumSquares):		4.6	63.2	111.5										
SUM:		-3.8	-81.9	35.5										

1 Q24. PLEASE DESCRIBE THE BASIS FOR THE 30-YEAR USEFUL LIFE
2 ASSIGNED TO MCPS.

3 A. The determination to adopt a 30-year useful life for MCPS is based on the
4 equipment manufacturer Mitsubishi's position on the lifespan of its combined
5 cycle units, the Electric Power Research Institute's ("EPRI") Technology
6 Summary Report for Combined Cycle Gas Turbine ("CCGT") technologies
7 (including the 2x1 Mitsubishi 501GAC technology used at MCPS),¹⁷ and
8 Entergy's experience with owning and operating natural gas plants.¹⁸ In addition
9 to MCPS, the Entergy Operating Companies have built three other combined cycle
10 gas turbine plants (Ninemile 6, J. Wayne Leonard, and Lake Charles), all of which
11 are assumed to have 30-year lives.¹⁹ The operating performance (e.g., reliability and
12 plant utilization) of each plant has been and continues to be consistent with this
13 assumption.²⁰

14
15 ~~Q25. IS THE 30-YEAR LIFE WITHIN THE RANGE OF LIFESPANS IDENTIFIED~~
16 ~~BY MR. POLLOCK?~~

17 ~~A. Yes, as demonstrated in Mr. Pollock's Exhibit JP-3, CCGTs have used 30-year~~
18 ~~lifespans.²¹ Moreover, Mr. Pollock has previously offered testimony~~

¹⁷ This report is included in my HSPM workpapers.

¹⁸ ETI Response to TIEC 2-2 (Oct. 3, 2022).

¹⁹ ETI Response to TIEC 2-3 (Oct. 3, 2022).

²⁰ *Id.*

²¹ ~~Pollock Direct at Exhibit JP-3; TIEC Response to ETI 3-5 (Nov. 11, 2022).~~

1 ~~recommending that the useful life for assets should be based on a manufacturer's~~
2 ~~warranty, including in Docket No. 51215.²² As stated above, the manufacturer's~~
3 ~~warranty in this case supports the assigned 30-year life for MCPS.~~

4

5 Q26. DO YOU HAVE ADDITIONAL SUPPORT FOR THE 30-YEAR USEFUL
6 LIFE FOR MCPS?

7 A. Yes. In addition to the EPRI report mentioned above, there are other third-party
8 sources that provide additional support for a lifespan of 30 years or less for
9 CCGTs. Specifically, Lazard's Levelized Cost of Energy Analysis dated October
10 20 assumes lifespans of 20 years for CCGTs.²³ The National Renewable Energy
11 Laboratory 2022 Electricity Annual Technology Baseline also assumes a lifespan
12 of 20 years for CCGTs.²⁴ And Sargent & Lundy's Combined-Cycle Plant Life
13 Assessments provides, "25 to 30 years is a typical expected operating life for a
14 combined-cycle power plant."²⁵

²² ~~THEC Response to ETI 3-2 (Nov. 11, 2022).~~

²³ Lazard's Levelized Cost of Energy Analysis—Version 15.0 at 18-19 (Oct. 2021), available at <https://www.lazard.com/media/451881/lazards-levelized-cost-of-energy-version-150-vf.pdf>.

²⁴ See 2022 v1 Annual Technology Baseline Workbook Original 6-14-22 at "Natural Gas_FE" tab row 18 columns J through O provided with my public workpapers.

²⁵ *Combined-Cycle Plant Life Assessments*, Sargent & Lundy, available at <https://sargentlundy.com/wp-content/uploads/2017/05/Combined-Cycle-PowerPlant-LifeAssessment.pdf>.

The following files are not convertible:

Testimony_2_Revised.xlsx	Becker Rebuttal_WP_AJB
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Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.