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Received - 2022-08-09 03:43:23 PM
Control Number - 53719
ItemNumber - 41

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

APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES	§ § §	STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**RESPONSE OF ENTERGY TEXAS, INC.
TO STAFF’S FIRST REQUEST FOR INFORMATION:
STAFF 1: 1, 40, AND 57**

Entergy Texas, Inc. (“ETI” or the “Company”) files its Response to Staff’s First 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,

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

Attachments: **STAFF 1: 1, 40, AND 57**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Staff’s First 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 9th day of August 2022.

Kristen F. Yates
Kristen F. Yates

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

Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Richard E. Lain, John H.
Bearden, Tuyen Dang
Sponsoring Witness: Richard E. Lain
Beginning Sequence No. LC40
Ending Sequence No. LC42

Question No.: STAFF 1-1

Part No.:

Addendum:

Question:

RATE-CASE EXPENSES

Please provide the following information for all requested rate-case expenses, whether directly or indirectly incurred. If provided previously, please provide a cross-reference identifying the page number of the filing which contains this information.

Please provide for ETI:

- a) A summary schedule showing total rate-case expenses by vendor within each discipline (legal, engineering, accounting, etc.) with subtotals for each month for which rate-case expense reimbursement is sought, broken down as follows: estimated expenses, expenses incurred and paid to date, expenses incurred and not paid to date, remaining estimated expenses, and specific areas of work by vendor.
- b) An explanation of the basis for any estimated rate-case expenses requested and when the estimated expenses are expected to be incurred.
- c) Assurance that the total amounts provided in response to item (a) equal ETI's total requested rate-case expenses.
- d) Please provide supporting documentation, including but not limited to paid invoices, receipts, timesheets, work descriptions, etc. to support all of the rate-case expenses that ETI seeks to recover in this case.

Response:

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

- a. Please see the attachment (TP-53719-00PUC001-X001-082). For the specific areas of work by vendor, please see the Direct Testimony of Meghan Griffiths.
- b. ETI is only seeking recovery of the rate case expenses it has or will actually incur and intends to provide supplemental testimony or affidavits to support additional rate case expenses incurred in Docket No. 53719 as the case progresses. The estimates contained in Schedule G-14.1 are provided on an informational basis only. Please refer to the Direct Testimony of Richard Lain at pages 25-26.
- c. See the Company’s response to subpart b.
- d. Please see the confidential attachment (TP-53719-00PUC001-X001-083 Prt d_CONF) which includes all related invoices and timesheet information incurred through June 2022. Confidential materials have been included on the secure ShareFile site provided to the parties that have executed the protective order certifications in this proceeding.

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO
PARAGRAPH 4 OF DOCKET NO. 52487 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.

<u>Vendor</u>	Estimate	November 2021	December 2021	January 2022	February 2022	March 2022	April 2022	May 2022	June 2022	Total
Legal										
Estimated expenses and timing ¹	\$ 4,200,000									
Incurring and Paid:										
DUGGINS WREN MANN & ROMERO LLP			\$ 16,347	\$ -	\$ 1,267	\$ 22,004	\$ 53,361	\$ 82,400	\$ 89,567	\$ 264,945
EVERSHEDS SUTHERLAND US LLP								\$ 18,251	\$ 17,404	\$ 35,655
JAGER SMITH JR DBA JAGER SMITH LLC						\$ 1,683	\$ 1,617	\$ 2,673	\$ 2,706	\$ 8,679
TAGGART MORTON LLC							\$ 153	\$ -	\$ 9,913	\$ 10,065
Remaining Est. expenses and timing										\$ 3,880,656
Areas of work	Legal									
Engineering										
Estimated expenses and timing ²	\$ -									
Incurring and Paid										\$ -
Remaining Est. expenses and timing										\$ -
Areas of work	N/A									
Accounting										
Estimated expenses and timing ³	\$ 150,000									
Incurring and Paid										
DELOITTE AND TOUCHE LLP								\$ 150,000		\$ 150,000
Remaining Est. expenses and timing										\$ -
Areas of work	Accounting									
Other										
Estimated expenses and timing ⁴	\$ 870,000									
Incurring and Paid										
ALLIANCE CONSULTING GROUP						\$ 3,465	\$ 11,129	\$ 19,111	\$ 6,850	\$ 40,555
EXPERGY							\$ 11,020	\$ 23,555	\$ 3,625	\$ 38,200
JACKSON WALKER LLP									\$ 9,329	\$ 9,329
KFG INC							\$ 15,600	\$ 9,555	\$ 20,475	\$ 45,630
LEWIS AND ELLIS, INC.								\$ 980	\$ 6,615	\$ 7,595
Remaining Est. expenses and timing										\$ 728,691
Areas of work	External Support									
Company Expenses										
Estimated expenses and timing ⁵	2,682,000									
Incurring and Paid										
Employee		\$ 24,068	\$ 43,294	\$ 71,134	\$ 198,153	\$ 245,376	\$ 261,767	\$ 268,874	\$ 323,463	\$ 1,436,130
Other		\$ 1,330	\$ 2,732	\$ 3,299	\$ 10,143	\$ 11,982	\$ 11,734	\$ 11,903	\$ 13,014	\$ 66,137
Remaining Estimates										1,179,734
Areas of Work	Internal Expenses									
Intervenor Expenses										
Estimated expenses and timing ⁶	533,000									
Incurring and Paid										0
Remaining Estimates										533,000
Areas of Work	Cities Legal Support									
Prior Rate Case Expenses ⁷										804,731
Total										9,239,731

Notes

1) Reference G-14.1 Ln 4

2) Reference G-14.1 Ln 3

3) Reference G-14.1 Ln 2

4) Reference G-14.1 Ln 5

5) Reference G-14.1 Ln 11

6) Reference G-14.1 Ln 14

7) Reference Staff 1-1.2

[illegible]

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

Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Michelle Sens
Sponsoring Witness: Stacey Whaley
Beginning Sequence No. LR833
Ending Sequence No. LR837

Question No.: STAFF 1-40

Part No.:

Addendum:

Question:

TAXES OTHER THAN INCOME TAXES

Has the Company or its affiliates protested property tax valuations in Texas in the past five years? If yes, provide the results of such protests and any documents related to the result.

Response:

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

Protests are filed annually to protect Entergy Texas, Inc.'s administrative rights while the Company works with appraisal companies to negotiate the values. All protests are negotiated and settled. None have resulted in administrative hearings. Attached is a representative example of a protest form. Please see the confidential attachment (TP-53719-00PUS001-X040). Confidential materials have been included on the secure ShareFile site provided to the parties that have executed the 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.

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

Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Commission Staff

Prepared By: Haley Roser, Cheryl
Piccininni, Lynsi Oster
Sponsoring Witnesses: Allison P. Lofton,
Jennifer A. Raeder
Beginning Sequence No. EV64
Ending Sequence No. EV64

Question No.: STAFF 1-57

Part No.:

Addendum:

Question:

PAYROLL

Does the Company's requested revenue requirement include amounts for executive perquisites such as financial planning and tax gross-ups? If so, please provide an explanation of the types of perquisites included, a copy of the Company's policies regarding the payment of such perquisites, and the amount of such payments included in the revenue requirement by FERC account.

Response:

The Company is not including any amounts for executive financial planning or executive tax gross-ups in its requested revenue requirement.

The following files are not convertible:

TP-53719-00PUS001-X001-082.xlsx

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.