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**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 TIEC'S ELEVENTH REQUEST FOR INFORMATION:
TIEC 11:1 THROUGH 6**

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to TIEC's Eleventh 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.

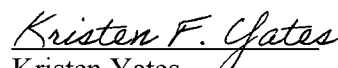
Respectfully submitted,


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

Attachments: **TIEC 11:1 THROUGH 6**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to TIEC's Eleventh 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 5th day of December 2022.


Kristen Yates

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

Response of: Entergy Texas, Inc.
to the Eleventh Set of Data Requests
of Requesting Party: Texas Industrial Energy
Consumers

Prepared By: Phong Nguyen
Sponsoring Witness: Anastasia R. Meyer
Beginning Sequence No. PI2256

Ending Sequence No. PI2256

Question No.: TIEC 11-1

Part No.:

Addendum:

Question:

The following RFIs refer to the Rebuttal Testimony of Anastasia Meyer.

To the extent not already provided, please provide all assumptions used in the referenced deactivation studies for Nelson 6 and Big Cajun 2 Unit 3.

Response:

See the Company's responses to Sierra Club 1-4, 1-5, 1-6, and 3-8.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the Eleventh Set of Data Requests
of Requesting Party: Texas Industrial Energy
Consumers

Prepared By: Phong Nguyen
Sponsoring Witness: Anastasia R. Meyer
Beginning Sequence No. PI2257

Ending Sequence No. PI2257

Question No.: TIEC 11-2

Part No.:

Addendum:

Question:

The following RFIs refer to the Rebuttal Testimony of Anastasia Meyer.

Did the deactivation studies for Nelson 6 and Big Cajun 2 Unit 3 include revenue requirements for those plants that reflect accelerated depreciation from the new assumed deactivation dates? If so, please explain how these assumptions were developed and identify where they can be located in the studies. If not, please explain why not.

Response:

The Big Cajun 2 Unit 3 assessment was not a deactivation study but rather an assessment of whether economics would be favorable should the unit deactivate at different assumed dates.

For Nelson 6, yes, the revenue requirements reflect accelerated depreciation for the relevant incremental capital additions. The depreciation rate assumption is based on the remaining useful life assumption and can be found on the "Build Operating" tab in the highly sensitive attachment (TP-53719-00SIE001-X006-006_HSPM) provided in the Company's response to Sierra Club 1-6.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the Eleventh Set of Data Requests
of Requesting Party: Texas Industrial Energy
Consumers

Prepared By: Deborah Saxton
Sponsoring Witness: Anastasia R. Meyer
Beginning Sequence No. PI2258

Ending Sequence No. PI2259

Question No.: TIEC 11-3

Part No.:

Addendum:

Question:

The following RFIs refer to the Rebuttal Testimony of Anastasia Meyer.

Referring to pages 2-3, please identify each environmental regulation that ETI assumed would cause the referenced environmental compliance costs and explain the status of each assumed environmental regulation with respect to whether it is in effect, proposed, or otherwise.

Response:

Regional Haze Rule 1999 Final Rule 64 Federal Register (FR) 35714, as amended in 70 FR 39156, July 6, 2005, 71 FR 60631, October 13, 2006 and 77 FR 33656, June 7, 2012). The Regional Haze Rule is currently in effect and was initially promulgated in July 1999. The rule was implemented to improve visibility, or visual air quality, in 156 national parks and wilderness areas across the country. The rule requires the states to develop and implement air quality protection plans to reduce the pollution that causes visibility impairment.

Cross-State Air Pollution Rule (“CSAPR”) (2011 Final Rule, 76 FR 48208, 48248–48249 Aug. 8, 2011, CSAPR Update, Final Rule, 81 FR 74504, 74517–74521 Oct. 26, 2016, Revised CSAPR Update, Final Rule, 86 FR 23054, 23054-23235 Apr 30, 2021). CSAPR is currently in effect and was initially promulgated in July 2011. The CSAPR program regulates interstate transport of sulfur dioxide (SO₂) and oxides of nitrogen (NO_x) in the states covered by the program. The Environmental Protection Agency (“EPA”) operates a national cap-and-trade program to limit NO_x emissions from electric generating units during the ozone season (May 1 to September 30) of each year. This rule addresses the interstate transport, or “Good Neighbor” provisions of the Clean Air Act, which requires that states regulate emissions from within their borders which cause or contribute to nonattainment or maintenance of the national ambient air quality standards (“NAAQS”) in one or more areas in other states. Subsequent modifications to the CSAPR rule require further NO_x emission reductions from certain states.

Federal Implementation Plan (“FIP”) Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard (Proposed “Good Neighbor” Plan, 87 FR 20036, 20036-20216 Apr 6, 2022).

On April 6, 2022, EPA proposed a FIP to address the “Good Neighbor” requirements of the Clean Air Act for the 2015 ozone standard for all states for which EPA proposed to disapprove the corresponding SIP. EPA’s proposal is to address NO_x emission impacts on nonattainment and maintenance areas for the more stringent 2015 ozone standard of 70 parts per billion. This proposal, if finalized, would significantly increase the stringency of the cap-and-trade ozone season emission trading program for EGUs and would also include short-term (24-hour) NO_x emission limitations for coal-fired EGUs and for certain industrial source categories.

Starting with the 2026 ozone season, EPA’s proposed “dynamic approach” would adjust allowance allocations based on a presumption that selective catalytic reduction (“SCRs”) will be installed by May 1, 2026 on all coal-fired EGUs and on all high-emitting (>150 tons of NO_x per ozone season) oil and gas-fired EGUs. SCR retrofits would not be explicitly required for these units, but emission rates corresponding to a SCR retrofit would be used to establish the overall state-level allowance budgets and unit-specific allowance allocations beginning with the 2026 ozone season.

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PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the Eleventh Set of Data Requests
of Requesting Party: Texas Industrial Energy
Consumers

Prepared By: Deborah Saxton
Sponsoring Witness: Anastasia R. Meyer
Beginning Sequence No. PI2260

Ending Sequence No. PI2260

Question No.: TIEC 11-4

Part No.:

Addendum:

Question:

The following RFIs refer to the Rebuttal Testimony of Anastasia Meyer.

Referring to page 2, lines 17-19, please provide the probability ETI has assigned to a Selective Catalytic Reduction retrofit being required and provide all underlying analyses supporting this determination, in live EXCEL format where applicable.

Response:

Entergy Texas, Inc. has not assigned a probability to the requirement of a Selective Catalytic Reduction retrofit.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the Eleventh Set of Data Requests
f Requesting Party: Texas Industrial Energy
Consumers

Prepared By: Daniel Boratko
Sponsoring Witness: Anastasia R. Meyer
Beginning Sequence No. EV2997

Ending Sequence No. EV2997

Question No.: TIEC 11-5

Part No.:

Addendum:

Question:

The following RFIs refer to the Rebuttal Testimony of Anastasia Meyer.

Referring to pages 23-24, please provide the amount of capacity that ETI has purchased through the Planning Resource Auction (PRA) or through short-term purchases in the Midcontinent Independent System Operator (MISO) market for each of the last five years.

Response:

Please see the table below.

Planning Year	Surplus/(Deficit) in MW
18/19	(119)
19/20	(287)
20/21	(787)
21/22	71
22/23	(330.5)

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

Response of: Entergy Texas, Inc.
to the Eleventh Set of Data Requests
of Requesting Party: Texas Industrial Energy
Consumers

Prepared By: Phong Nguyen
Sponsoring Witness: Anastasia R. Meyer
Beginning Sequence No. EV2995

Ending Sequence No. EV2996

Question No.: TIEC 11-6

Part No.:

Addendum:

Question:

The following RFIs refer to the Rebuttal Testimony of Anastasia Meyer.

Referring to pages 23-24, please provide ETI's most recent forecast of PRA prices.

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.

Please see the highly sensitive attachment (TP-53719-00TIE011-X006_HSPM). 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.