



Filing Receipt

Received - 2022-12-16 04:47:26 PM

Control Number - 53719

ItemNumber - 438

**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
---	-------------	--

JOINT MOTION TO ADMIT EVIDENCE

Entergy Texas, Inc. (“ETI”) respectfully files this Joint Motion to Admit Evidence (“Motion”) on behalf of itself; Staff of the Public Utility Commission of Texas (“Staff”); the Office of Public Utility Counsel; Cities;¹ Texas Industrial Energy Consumers; Sierra Club; the Kroger Co.; Federal Executive Agencies; Walmart Inc.; FlashParking, Inc.; Southwestern Public Service Company; ChargePoint, Inc.; Sempra Infrastructure Partners, L.P.; Americans for Affordable Clean Energy; and El Paso Electric Company. ETI is authorized to represent that all parties to this proceeding support the relief requested in this Motion.

I. JOINT MOTION TO ADMIT EVIDENCE

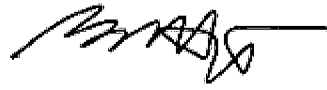
On behalf of the parties, ETI respectfully requests that the documents identified in Exhibit A to this Motion be admitted into evidence in this matter. ETI anticipates additional testimony and/or affidavits will be filed at the time a final settlement agreement is filed in this docket. ETI will file an additional motion to admit evidence at that time.

II. CONCLUSION

ETI, on behalf of itself and the parties to this proceeding, respectfully requests that the Administrative Law Judges grant this Joint Motion to Admit Evidence. ETI also requests all other relief to which it may be entitled.

¹ Cities of Anahuac, Beaumont, Bridge City, Cleveland, Dayton, Groves, Houston, Huntsville, Liberty, Montgomery, Navasota, Nederland, Oak Ridge North, Orange, Pine Forest, Pinehurst, Port Arthur, Port Neches, Roman Forest, Rose City, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor, West Orange, and Willis (“Cities”).

Respectfully submitted,



George G. Hoyt, SBN: 24049270
Laura B. Kennedy
Kristen Yates
Entergy Services, LLC
919 Congress Avenue, Suite 701
Austin, Texas 78701
(512) 487-3945

ghoyt90@entergy.com
lkenn95@entergy.com
kyates1@entergy.com

Lino Mendiola III
Michael A. Boldt
Cathy Garza
EVERSHEDS SUTHERLAND (US) LLP
600 Congress Avenue, Suite 2000
Austin, Texas 78701
(512) 721-2700
(512) 721-2656 (fax)

linomendiola@eversheds-sutherland.com
michaelboldt@eversheds-sutherland.com
cathygarza@eversheds-sutherland.com

Scott R. Olson
Patrick Pearsall
Stephanie Green
DUGGINS WREN MANN & ROMERO, LLP
600 Congress, Suite 1900
Austin, Texas 78701
(512) 744-9300
(512) 744-9399 (fax)

solson@dwmlaw.com
ppersall@dwmlaw.com
sgreen@dwmlaw.com

ATTORNEYS FOR ENTERGY TEXAS, INC.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading and attachment was served on all parties of record via email on December 16, 2022 pursuant to the Second Order Suspending Rules issued in Project No. 50664.

A handwritten signature in black ink, appearing to read "George Hoyt", written over a horizontal line.

George Hoyt

Entergy Texas, Inc. (ETI)

ETI EXHIBIT NO.	DESCRIPTION	DATE FILED
1	ETI's Statement of Intent and Application for Authority to Change Rates at pp. 7-9	7/1/2022
4	Direct Testimony of Eliecer Viamontes at pp. 14-15	7/1/2022
37	Direct Testimony of Crystal K. Elbe at pp. 46-47	7/1/2022
40	Direct Testimony, Exhibits, and Workpapers of Samantha F. Hill	7/1/2022
53	Rebuttal Testimony and Exhibits of Samantha F. Hill	11/16/2022
53A	(Highly Sensitive) Workpapers to the Rebuttal Testimony and Exhibits of Samantha F. Hill	11/17/2022

Staff of the Public Utility Commission of Texas (Staff)

STAFF EXHIBIT NO.	DESCRIPTION	DATE FILED
4	Direct Testimony and Attachment of William Abbott	11/2/2022

Office of Public Utility Counsel (OPUC)

OPUC EXHIBIT NO.	DESCRIPTION	DATE FILED
47	Direct Testimony and Workpapers of Evan D. Evans (Includes Errata)	10/26/2022
48	Attachment EDE-2 - ETI's Response to OPUC's Seventh Request for Information, Question No. 7-21	10/26/2022
49	Attachment EDE-3 – Residential Service Monthly NCP kW with no Weather Adjustment (Graph)	10/26/2022
50	Attachment EDE-4 – Comparison of Residential Service MDD with Weather Adjustment vs. with No Weather Adjustment (Graph)	10/26/2022
51	Attachment EDE-5 – ETI's Forecasted Residential Service Monthly NCP kW for 2023-2025 from Schedule O-7.1	10/26/2022
52	Attachment EDE-6 OPUC's Development of Distribution Demand Allocators	10/26/2022
53	Attachment EDE-7 OPUC's Alternative Distribution Demand Allocators	10/26/2022
54	Attachment EDE-8 ETI's Response to OPUC's Eighth Request for Information, Question No. 8-9	10/26/2022

55	Attachment EDE-9 – Distribution Rate Base Supported by Proposed Rates by Class (Includes Errata)	10/26/2022
56	Attachment EDE-10 – Non-Native Workpapers	10/26/2022
57	Cross-Rebuttal Testimony of Evan D. Evans	11/16/2022

Charge Point, Inc.

CHARGE POINT EXHIBIT NO.	DESCRIPTION	DATE FILED
1.0	Direct Testimony of Justin D. Wilson	10/26/2022
2.0	Justin Wilson CV	10/26/2022
3.0	ETI Response to Charge Point RFI 1:1	10/26/2022
4.0	Cross-Rebuttal Testimony of Justin D. Wilson	11/16/2022

Flash Parking, Inc.

FLASH PARKING EXHIBIT NO.	DESCRIPTION	DATE FILED
1	Direct Testimony of Matthew McCaffree	11/1/2022

Southwestern Public Service Company (SPS)

SPS EXHIBIT NO.	DESCRIPTION	DATE FILED
1	Direct Testimony and Attachments of Jeremiah W. Cunningham	10/26/2022
1A	Workpapers to the Direct Testimony of Jeremiah W. Cunningham	10/27/2022
2	Cross-Rebuttal Testimony of Jeremiah W. Cunningham	11/16/2022