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Received - 2022-08-18 01:57:34 PM

Control Number - 53719

ItemNumber - 66

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

APPLICATION OF ENTERGY TEXAS, § BEFORE THE STATE OFFICE OF
INC. FOR AUTHORITY TO CHANGE § ADMINISTRATIVE HEARINGS
RATES §

CITIES' SECOND REQUEST FOR INFORMATION

Pursuant to §22.144 of the Commission's Procedural Rules, the 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"), request that Entergy Texas, Inc. ("ETI" or "Company"), by and through its attorneys of record, provide all information requested on the attached Exhibit "A" pursuant to Tex. Admin. Code ("TAC") § 22.144.

Pursuant to TAC § 22.144(c)(2), Cities further request that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be a change in circumstances, which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to TAC § 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request.

All information responsive to the requests on the attached Exhibit "A" should be sent to the following:

E-mail:

danlawtonlawfirm@gmail.com
molly@mayhallvandervoort.com

Physical Delivery:

Daniel J. Lawton
12600 Hill Country Blvd., Suite R-275
Austin, Texas 78738
(512) 322-0019
(512) 329-2604 – fax

DEFINITIONS AND INSTRUCTIONS

A. “ETI,” “the Company” or “you” refers to Entergy Texas, Inc., and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The terms “document” or “documents” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, but you if necessary, into reasonably useable form. “Document” or “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Cities specifically request that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced by email (preferred) or on CD-ROM or flash drive in a format that is compatible with Microsoft Office applications and be produced with your response to these requests.

D. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting;

contradicting; in any way legal, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

L. Pursuant to TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

Respectfully submitted,
LAWTON LAW FIRM, P.C.



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(512) 322-0019
(512) 329-2604 Fax
ATTORNEY FOR CITIES

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record in this proceeding on this the 18th day of August, 2022, in accordance with the Order Suspending Rules issued in Project No. 50664.



Molly Mayhall Vandervoort

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CITIES' SECOND REQUEST FOR INFORMATION

- Cities 2-1. **Payroll related expenses:** Please provide a narrative description of all programs that the Company or its parent company has instituted which resulted in a decrease to its number of employees since the beginning of the test year.
- Cities 2-2. **Payroll related expenses:** Please provide a narrative description of all programs that the Company or its parent company plans to institute which could result in a decrease to its number of employees after the end of the test year.
- Cities 2-3. **Payroll related expenses:** Please quantify the savings which have been achieved or that are expected to be achieved from programs to reduce the number of employees of the Company or its parent company.
- Cities 2-4. **Payroll-related expenses:** Please refer to Schedule G-1.6 titled "Payments Other Than Standard Pay." Identify and define the types of employee related payments shown on this schedule.
- Cities 2-5. **Payroll:** Please provide the payroll expense percentages for the test year and each of the three years prior to the test year for ETI and for each affiliated company with payroll included in the revenue requirement.
- Cities 2-6. **Payroll:** Please provide the payroll by pay period for the test year for each employee group with a separate payroll annualization calculation in the Company's exhibits and showing for each pay period the number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for ETI and for each affiliate of ETI. Please provide this response in Excel compatible format with all formulas fully functional and intact.
- Cities 2-7. **Payroll:** Please provide the payroll by pay period for each pay period subsequent to the test year through July 2022 for each employee group with a separate payroll annualization calculation in the Company's exhibits and showing for each pay period the number of employees, the amount of base pay, the amount of overtime

pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for ETI and for each affiliate of ETI. Please provide this response in Excel compatible format with all formulas fully functional and intact.

Cities 2-8. **Payroll:** Please provide the pro forma payroll for each employee group with a separate payroll annualization calculation in the Company's exhibits, and showing for each payroll group the number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for ETI and for each affiliate of ETI. Please provide this response in Excel compatible format with all formulas fully functional and intact.

Cities 2-9. **Payroll:** Please provide the payroll for the test year and each of the three years preceding the test year, showing for average number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for ETI and for each affiliate of SPS. Please provide this response in Excel compatible format with all formulas fully functional and intact.

Cities 2-10. **Payroll:** Please provide the Company's policy regarding pay increases, and explain if the Company grants general pay increases, if the general pay increases are granted on the same date for all qualifying employees, an explanation of the alternative dates if that is used instead of a uniform increase date, if the individual increases are based on merit, and the different methods are used to determine the amount pay increases for each payroll group (contract, management's decision, etc.).

Cities 2-11. **Payroll:** If pay increases are granted on a uniform date for groups of employees, please provide the dates each general pay increase was granted during the test year, identify the applicable payroll groups for each pay increase, and for each identified payroll group provide the number of employees and base pay by payroll period in the test year and for each pay period following the test year through the latest available date.

Cities 2-12. **Payroll:** If pay increases are granted on a uniform date for groups of employees, please provide the dates each general pay increase was granted in each of the three years preceding the test year, and for each applicable payroll group provide the base pay in the twelve months preceding and following each pay increase.

- Cities 2-13. **Retirement plans:** Please provide a narrative describing any changes to the Company's retirement plans or post-retirement benefits after the beginning of the test year and continuing through the latest date after the end of the test year.
- Cities 2-14. **Retirement plans:** Please provide a narrative describing any changes the Company plans to make to any of its retirement plans or post-retirement benefits within the two years after the end of the test year.
- Cities 2-15. **Retirement plans:** Please quantify the savings which have been achieved or that are expected to be achieved from changes to Company's retirement plans or post-retirement benefits.
- Cities 2-16. **Retirement plans:** Please provide copies of the actuary reports supporting the test year level of pension costs for each retirement plan or post-retirement benefits. Please also provide the most recent actuarial reports available.
- Cities 2-17. **Retirement plans:** Please provide the amounts included in test year operating expenses for each retirement plan and post-retirement benefits.
- Cities 2-18. **Retirement plans:** Please provide the amounts included in pro forma operating expenses for each retirement plan and post-retirement benefits.
- Cities 2-19. **Retirement plans:** Please provide a copy of the full document(s) provided by the Company's actuary supporting the level of pension costs and post-retirement benefits included in the revenue requirement.
- Cities 2-20. **Retirement plans:** Please identify each non-qualified retirement plan and provide the amount of each included in the revenue requirement by FERC account.
- Cities 2-21. **Employee Benefits:** Please provide narrative description of any changes to the Company's employee benefits during the test year and continuing through the latest date after the end of the test year.
- Cities 2-22. **Employee Benefits:** Please provide a narrative describing any changes the Company plans to make to any of its employee benefits within the two years after the end of the test year.
- Cities 2-23. **Employee Benefits:** Please quantify the savings, if any, which have been achieved or that are expected to be achieved from changes to Company's employee benefits.
- Cities 2-24. **Employee Benefits:** Please provide copies of the documents supporting the pro forma level of employee benefits.
- Cities 2-25. **Employee Benefits:** Please provide the amount of each employee benefit in each of the three years preceding the test year.
- Cities 2-26. **Payroll related expenses:** Please provide the following information for the years 2017, 2018, 2019, 2020 and 2021: (1) total payroll costs, (2) total payroll expense,

(3) the date of each pay raise awarded each year and (4) the amount of each raise as a percentage of payroll costs.

Cities 2-27. **Affiliate costs:** Please provide the amount of affiliate costs allocated to ETI for the years 2017, 2018, 2019, 2020 and 2021.

Cities 2-28. **Operating expenses:** For each operating expense account, including all Operating and Maintenance accounts and General and Administrative accounts, please provide by FERC account the following information:(1) the monthly balance in each account for each month of the test year and for each month after test year end through June 2022, and (2) the annual balance in each account for the years 2017 through 2021. Please provide the information in excel format with formulas intact.