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

APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**OFFICE OF PUBLIC UTILITY COUNSEL’S
FOURTH REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC. – REDACTED**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Fourth Request for Information to Entergy Texas, Inc. (“ETI”). OPUC requests that ETI provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that ETI provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. “ETI,” the “Company,” “Applicant,” “You,” and “Your” refer to Entergy Texas, Inc. and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
2. “Document” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, summaries of interviews, reports of consultants, appraisals,

forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or 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 to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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- 4-1.** Please refer to the Direct Testimony of Ms. Dawn Renton, Exhibit DDR-2 (HSPM). Please provide a detailed description of project [REDACTED]. Please include in your response a description of the affiliate charges. Please also provide the proposed useful life/amortization period for this project.
- 4-2.** Please refer to the Direct Testimony of Ms. Elizabeth Hunter, Exhibit ESH-4 (HSPM). Please provide the [REDACTED] for 2025 through 2045. Please include in your response a reconciliation between these [REDACTED] and those shown in Exhibit ESH-2 (HSPM) for the same annual periods.
- 4-3.** Please refer to ETI's Response to Commission Staff RFI No. 1-28, Attachment TP-53719-00PUS001-X028, Tab "WP." Please provide an explanation as to why the average number of storms is calculated using storms that are less than \$50,000. Please provide the impact to the Monte Carlo Simulation model where only storms greater than \$50,000 were used to determine the variables for average number of storms, average natural logs, and the standard deviation.
- 4-4.** Please refer to ETI's Response to OPUC RFI No. 1-1. Please provide an explanation as to why the Average of LN for Claims >50K includes the natural logs for claims that are less than 50K.
- 4-5.** Please refer to WP/Schedule G-2.2. Please provide copies of the actuarial studies for the qualified pension plans, the non-qualified pension plans, and the OPEB plans for the 2022 Plan year (January 1, 2022-December 31, 2022).
- 4-6.** Please refer to ETI's Response to OPUC RFI No. 1-3. Please provide an explanation as to why Mr. Gregory Wilson's analysis continues to include \$15.8 million in expenses related to Hurricane Laura along with a brief description of the expenses. Please also confirm or deny that the Company intends to securitize these expenses.
- 4-7.** Please refer to Schedule G-1.6. With respect to the Total Incentive Compensation for the test year of \$6,640,167, please provide the following:
- a. Breakdown of the amounts related to each of the annual incentive plans for the ETI employees;
 - b. Breakdown of the amounts related to each of the long-term incentive plans for the ETI employees; and
 - c. Confirmation or denial that these amounts include any incentive compensation allocated from ESI.

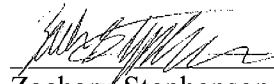
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- 4-8.** Please refer to WP/Schedule P, page 107. Please provide the following information:
- a. The total Executive Annual Incentive Plan amount before allocation to ETI;
 - b. Calculation of \$955,026 total Executive Annual Incentive Plan amount, including basis of allocation;
 - c. The total long-term incentive amounts by plan before allocation to ETI;
 - d. Calculation of the allocation of the long-term incentive plan totals to ETI; and
 - e. Description of how the total adjustment was determined for each FERC account.
- 4-9.** Please refer to ETI's HSPM Response to OPUC RFI No. 1-10. Please provide the total amount of the annual incentive compensation by plan that has been allocated to ETI from ESI.
- 4-10.** Please refer to the Direct Testimony of Ms. Jennifer Raeder, HSPM Exhibit JAR-2. Please reconcile the amount noted as EAIP on Ms. Raeder' HSPM Exhibit JAR-2 and the \$98,118 amount noted on WP/Schedule P, page 104.
- 4-11.** Please refer to the Direct Testimony of Ms. Raeder, HSPM Exhibit JAR-2. Please provide the information contained in this exhibit for the Annual Incentive Payout for the 2018 performance, the 2019 performance, and the 2020 performance. Please also include the percentage of each of the ESI plans that were allocated to ETI.

Date: August 19, 2022

Respectfully submitted,

Chris Ekoh
Interim Chief Executive and Public Counsel
State Bar No. 06507015

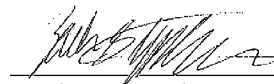


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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
SOAH DOCKET NO. 473-22-04394
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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 19th day of August 2022 by facsimile, electronic mail, and/or first class, U.S. Mail.



Zachary Stephenson