



Filing Receipt

Received - 2022-09-01 12:24:42 PM

Control Number - 53719

ItemNumber - 85

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

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

RESPONSE OF ENTERGY TEXAS, INC.
TO STAFF'S THIRD REQUEST FOR INFORMATION:
STAFF 3:1 THROUGH 2

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to STAFF's Third 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 Yates

ENTERGY SERVICES, LLC

919 Congress Avenue, Suite 701

Austin, Texas 78701

Office: (512) 487-3962

Facsimile: (512) 487-3958

Attachments: STAFF 3:1 THROUGH 2

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Staff's Third 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 1st day of September 2022.

Kristen F. Yates

Kristen Yates

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

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

Prepared By: Meghan E. Griffiths
Sponsoring Witness: Meghan E. Griffiths
Beginning Sequence No. LC69
Ending Sequence No. LC69

Question No.: STAFF 3-1

Part No.:

Addendum:

Question:

Did Meghan Griffiths review of the legal fees include a determination as to whether the rates charged to ETI are the normal billing rates charged by each firm? If yes, please explain. If no, please explain. Please describe measures the expert performed, if any.

Response:

Meghan E. Griffiths' review of the legal fees included a review of whether the billing rates charged by each firm were reasonable based on the factors identified in PURA §§ 36.051 and 36.061, 16 TAC § 25.245, Commission precedent, and Texas jurisprudence related to the recovery of attorneys' fees and costs of litigation. The measures Ms. Griffiths performed to conduct her analysis are described in Sections IV and V of her Direct Testimony. These measures included, among others, whether the billing rates charged by each firm are within the range of rates customarily charged for similar legal services. Subsequently, Ms. Griffiths has also confirmed that the rates charged to ETI in this rate case are either at or below the standard billing rates charged by each firm, including services to nonregulated entities.

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

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

Prepared By: Meghan E. Griffiths
Sponsoring Witness: Meghan E. Griffiths
Beginning Sequence No. LC70
Ending Sequence No. LC70

Question No.: STAFF 3-2

Part No.:

Addendum:

Question:

Did Meghan Griffith's review of the legal fees include a determination as to whether the rates charged to ETI are the normal billing rates charged for services to non-regulated entities? Please describe measures the expert performed, if any.

Response:

Please see the Company's response to Staff 3-1.