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PROCEEDING TO RESOLVE	§	STATE OFFICE OF
ISSUES IN DOCKET NO. 53719	§	
RELATED TO TRANSPORTATION	§	
ELECTRIFICATION AND	§	
CHARGING INFRASTRUCTURE	§	ADMINISTRATIVE HEARINGS

SUPPLEMENTAL REBUTTAL TESTIMONY AND EXHIBIT

OF

SAMANTHA F. HILL

ON BEHALF OF

ENTERGY TEXAS, INC.

MARCH 2024

ENTERGY TEXAS, INC.
SUPPLEMENTAL REBUTTAL TESTIMONY OF SAMANTHA F. HILL
SOAH DOCKET NO. 473-24-07154
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Exhibit

I. INTRODUCTION AND PURPOSE

Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Samantha F. Hill. My business address is 639 Loyola Ave., New Orleans, Louisiana 70113. I am employed by Entergy Services, LLC ("ESL").[1] My present position is Manager, Regulatory Rate Strategy.

Q2. ARE YOU THE SAME SAMANTHA F. HILL WHO FILED SUPPLEMENTAL DIRECT TESTIMONY IN THIS CASE ON BEHALF OF ENTERGY TEXAS, INC.?

A. Yes. I am now submitting Supplemental Rebuttal Testimony to the Public Utility Commission of Texas ("PUCT" or the "Commission") on behalf of Entergy Texas, Inc. ("Entergy Texas," "ETI," or the "Company").

Q3. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to address the arguments put forward by Commission Staff witness William B. Abbott in his Supplemental Direct Testimony, which was filed on March 5, 2024. Where I do not address a specific issue, any lack of discussion should not be considered as an endorsement of a

[1] ESL is a subsidiary of Entergy Corporation that provides technical and administrative services to all of the Entergy Operating Companies ("EOCs"). The EOCs include Entergy Arkansas, LLC; Entergy Louisiana, LLC; Entergy Mississippi, LLC; Entergy New Orleans, LLC; and Entergy Texas, Inc.

position.

II. RESPONSE TO STAFF

Q4. DID MR. ABBOTT MODIFY HIS PRIOR DIRECT TESTIMONY FILED IN DOCKET NO. 53719 REGARDING ETI'S PROPOSED TECI[2] AND TECDA[3] RIDERS IN LIGHT OF THE TEXAS LEGISLATURE'S ENACTMENT OF PUBLIC UTILITY REGULATORY ACT ("PURA") CHAPTER 42?

A. Not in any material way. While Mr. Abbott was forced to retract his prior testimony that it is not appropriate for a vertically integrated utility to own transportation electrification ("TE") and charging infrastructure generally, his position regarding ETI's proposed riders has not changed. Mr. Abbott simply rehashes his prior reasons for recommending that the TECI and TECDA Riders be denied.

Mr. Abbott's testimony urging denial of the TECI Rider is particularly surprising, given that the new legislation expressly authorizes ETI to contract with customers to build and own TE infrastructure and to recover such costs under a tariff, just as ETI proposes with the TECI Rider. Rather than acknowledging that the Texas Legislature has now expressly authorized ETI's customer-oriented proposal, Mr. Abbott maintains his opposition through a series of contradictory arguments that suggest transportation electrification ("TE") solutions are both so standardized that ETI should have proposed a set of standard rates (similar to

[2] TECI = Transportation Electrification and Charging Infrastructure.

[3] TECDA = Transportation Electrification and Charging Demand Adjustment.

lighting rates for light bulbs),[4] but also so "customer-specific" and "potentially numerous" that it will be "incredibly burdensome" to verify that ETI is appropriately recovering its costs.[5]

Mr. Abbott's testimony in opposition to the proposed TECDA Rider based on purported cost-shifting concerns again wholly ignores the Ratepayer Impact Measure ("RIM") test included in my Rebuttal Testimony, which shows that the proposed TECDA Rider is not expected to result in net costs to be borne by anyone, but instead to generate incremental revenues that will *lower* costs to other customers. That evidence is unrebutted and is the only evidence on the matter, apart from Mr. Abbott's conclusory statements regarding cost-shifting. Mr. Abbott's testimony opposing the TECDA Rider similarly ignores the State policy now enshrined in PURA § 42.0101, which provides that "encouraging investment in the deployment of public electric vehicle charging stations is essential to foster the rapid installation and widespread use of public electric vehicle charging stations"[6] and that "electric utilities" and others "have important roles to fill in supporting the installation and use of infrastructure for electric vehicle charging."[7] This State policy is precisely what the TECI Rider advances by eliminating obstacles to host customer installation, operation, and maintenance of electric vehicle ("EV") charging infrastructure and what the TECDA Rider advances by

[4] Supplemental Direct Testimony of William B. Abbott at 7, 9-11, and 13-15.

[5] *Id.* at 10.

[6] Tex. Util. Code § 42.0101(b).

[7] Tex. Util. Code § 42.0101(c).

temporarily addressing a recognized rate design challenge during the early phase of EV adoption.

Q5. DID MR. ABBOTT RECOMMEND ANY SPECIFIC CHANGES TO THE TECI RIDER AND CONTRACT THAT WOULD, IN HIS VIEW, BRING IT IN LINE WITH PURA CHAPTER 42?

A. No. Instead of pointing to specific items that might be revised in order comply with the new legislation, Mr. Abbott recommends simply rejecting the TECI Rider for the same reasons he originally put forward prior to PURA Chapter 42's enactment. My Supplemental Direct Testimony, filed on September 20, 2023, discusses each statutory requirement applicable to ETI's proposal, and demonstrates that the TECI Rider satisfies the legislation's specific, detailed requirements. Mr. Abbott does not contradict that testimony; instead, he interprets Chapter 42 through his prior lens that vertically integrated utilities should not be participating the in the EV charging space. Mr. Abbott goes so far as to invent a "heightened scrutiny"[8] standard for ETI's request and assert that an ill-defined set of "standardized" EV rates would be superior to the ETI proposal before the Commission. Mr. Abbott appears to simply disagree with the State policy as reflected in new PURA Chapter 42, which (a) recognizes electric utilities' important role in encouraging the deployment of EV charging facilities,[9] and (b) permits the very type of rider and

[8] Supp. Direct Testimony of William B. Abbott at 8.

[9] Tex. Util. Code § 42.0101(c).

associated contractual agreement being presented to the Commission in this case.[10] Mr. Abbott's recommendation, if adopted, would thwart the carefully crafted legislative design reflected in PURA Chapter 42 and impede the deployment of EV charging facilities.

Q6. DID ANY OTHER PARTIES WEIGH IN ON THESE ISSUES IN THIS REMAND PROCEEDING?

A. Yes. Walmart Inc. ("Walmart") filed the Direct Testimony of Eric S. Austin in support of the TECDA Rider. Mr. Austin describes Walmart's experience providing EV charging service to its customers across the United States, and testifies that Walmart "understands the economic importance of limiting the potentially high monthly operating costs of public EV charging stations in low utilization times" that the TECDA Rider addresses on a limited and temporary basis.[11] Mr. Austin urges the Commission to approve the TECDA Rider to support the "ramp up to sufficient EV adoption to support an extensive EV charging network."[12] This position is directly in line with the State policy set forth in PURA § 42.0101(b) and (c) and discussed above.

[10] Tex. Util. Code § 42.0103(o).

[11] Direct Testimony of Eric S. Austin at 7.

[12] *Id.* at 8.

Q7. DOES MR. ABBOTT ACKNOWLEDGE THAT THE PROPOSED TECDA RIDER FACILITATES STATE POLICY?

A. No. Mr. Abbott ignores the Texas Legislature's policy pronouncement and repeats his unfounded position that the TECDA Rider will result in cost-shifting to other customers that "would likely far exceed the costs of any relevant make-ready infrastructure . . . ."[13] However, as my prior Rebuttal Testimony demonstrates, the TECDA Rider will not result in cost-shifting, but rather is expected to produce ***net benefits*** to other customers through incremental revenues that will reduce ETI's overall revenue requirement.[14] Mr. Abbott similarly fails to acknowledge or attempt to rebut my prior testimony on this issue.

Q8. MR. ABBOTT ARGUES THAT ETI'S PROPOSED RIDERS ARE NOT NECESSARY FOR ITS PROVISION OF ELECTRIC SERVICE AND SHOULD THEREFORE BE EVALUATED WITH "HEIGHTENED SCRUTINY."[15] HOW DO YOU RESPOND?

A. Mr. Abbott takes an exceedingly narrow view of ETI's provision of electric service. His perspective – that utility proposals that are "unnecessary" deserve "heightened scrutiny" – reflects a bias toward the status quo that is both contrary to PURA Chapter 42 and the need for electric utilities to adapt to customers' changing needs

[13] Supp. Direct Testimony of William B. Abbott at 8-9.

[14] *See* Rebuttal Testimony of Samantha F. Hill at 28-33.

[15] Supp. Direct Testimony of William B. Abbott at 8.

and expectations. ETI seeks to serve its customer needs as technology changes, and as a result, those needs and the criticality of electric service evolve. The TECI and TECDA Riders will help ETI fulfill its "important role" in "supporting the installation and use of infrastructure for electric vehicle charging" in Texas.[16] While I am not a lawyer, I see nothing in the statute or elsewhere that suggests ETI's proposals here should have to meet some ill-defined "heightened scrutiny" standard. ETI's proposals should instead be welcomed for helping usher in the "rapid installation and widespread use of public electric vehicle charging stations" that the Texas Legislature envisioned through the enactment of PURA Chapter 42.[17]

Q9. IS ETI'S ADDITIONAL FACILITIES CHARGE ("AFC") RIDER AN APPROPRIATE SUBSTITUTE FOR THE TECI RIDER, AS MR. ABBOTT ARGUES?

A. No. The AFC Rider was originally designed to recover the capital infrastructure costs of installed transmission and distribution equipment with standard operation and maintenance ("O&M") costs over an expected 30-year asset life. By contrast, the TECI Rider is specifically designed to recover the non-standard capital infrastructure and O&M costs of TE equipment over an expected 10-year asset life. Crucially, unlike the TECI Rider, the AFC Rider does not have a tailored O&M

[16] Tex. Util. Code § 42.0101(c).

[17] Tex. Util. Code § 42.0101(b).

recovery mechanism. Substitution of the AFC Rider for the TECI Rider could therefore lead to the under-recovery of O&M costs within the asset life of the capital infrastructure or would not permit customers to elect differing levels of software and maintenance according to their specific needs.

As shown in Table 1, an illustrative customer with a total installed cost (less applicable revenue adjustment) of $42,000, with a $26,000 vendor O&M (and software) package, who elects a 5-year Recovery Term using the AFC Rider would pay monthly in perpetuity 0.19%[18] of the installed cost of all Additional Facilities to recover for the cost of O&M. This AFC Rider Recovery Term and Post Recovery term would provide recovery of the cost of the O&M package in 27 years, 17 years past the 10-year asset life of an EV charger. However, in the same illustrative example, the TECI Rider would recover the O&M package within the chosen 5-year Recovery Term.

[18] *Application of Entergy Texas, Inc. for Authority to Change Rates, Reconcile Fuel Costs, and Obtained Deferred Accounting Treatment*, Docket No. 39896, Interchange Item No. 802, Revised Schedules for Entergy Texas Reflecting Changes Based on Number-Running, "Comm Number Run 39896 ETI COS 8.28.12 SENT – Redacted" (Native Files), Tab "Att COM-6 AFC Calculation" at Cell J45.

Table 1

Illustrative example of O&M recovery for one 62 kW smart charger with 1-year recovery term		
	TECI	**AFC**
Total installed cost less applicable adjustment	$ 42,000	$ 42,000
Vendor O&M and Software package	$ 26,000	$ 26,000
Monthly AFC Rider O&M % Recovery for 5-year Recovery	n/a	0.19%[19]
Monthly O&M payment over 5-year Recovery Term	$ 433[20]	$ 80
Total O&M recovery payments over 5-year Recovery Term	$ 26,000	$ 4,788
Left to recover in AFC Rider Post Recovery Period	$ -	$ 21,212
Year O&M fully recovered	5	27
Years O&M recovery AFTER end of 10-year asset life	-	17

Q10. INSTEAD OF ETI'S PROPOSED TECI RIDER AND ASSOCIATED CONTRACT, WHICH IS EXPRESSLY PERMITTED BY PURA § 42.0103(o), MR. ABBOTT SUGGESTS ETI SHOULD HAVE PROPOSED AN EV RATE CLASS WITH STANDARDIZED RATES, SIMILAR TO ETI'S LIGHTING CLASS AND RATES. WOULD THAT BE AN APPROPRIATE SUBSTITUTE FOR THE TECI RIDER?

A. Not at all. As an initial matter, Mr. Abbott's recommendation that the TECI Rider be rejected in favor of some marginally defined rate class and set of rates not before the Commission is inconsistent with the way in which this remand proceeding should be considered. The Commission recognized that ETI is now "subject to the requirements" of Chapter 42 and that the "Commission is responsible for its

[19] *Id.*

[20] The TECI Rider monthly O&M payment over 5-year Recovery Term is calculated by dividing the total O&M cost by 5 years and again by 12 months (*i.e.*, $26,000/5 years/12 months = $433 a month).

implementation."[21] This proceeding was severed and remanded so that the Commission could consider "Entergy Texas's proposed riders under the new legislation . . . ."[22] Thus, what is up for consideration is whether the TECI Rider complies with PURA Chapter 42, not whether some other approach could also work.

Regardless, a general EV tariff with standard rates similar to the lighting class would be a poor substitute for the TECI Rider. To start, the Area Lighting Service ("ALS") tariff includes 7 different light choices and also includes the "unmetered lighting service from dusk to dawn every night, approximately 4,000 hours per year."[23] Conversely, the TECI Rider will provide a mechanism for ETI's customers to choose from a wide variety of TE infrastructure and service offerings that are available from competitive providers. The flexibility provided by the TECI Rider enables this variety as well as the ability to add new choices and stay current with changing technologies; the substitution of standard pricing would severely restrict the available types of infrastructure and maintenance options. For example, as shown in Table 2, each charger vendor could create as many as 30 decision points, with each decision point impacting the equipment cost as well as the O&M cost. There are already many EV charger equipment vendors on ETI's preapproved list, with more being added as the industry evolves and grows. As the example

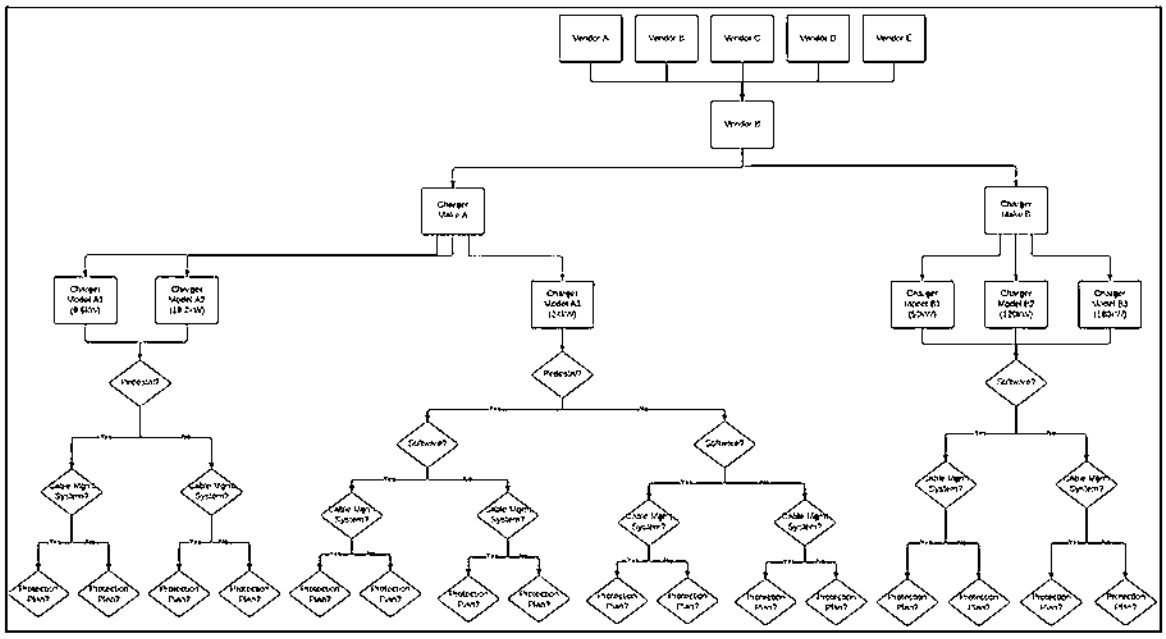
[21] Order Severing Issues at 3.

[22] *Id.*

[23] *Application of Entergy Texas, Inc. for Authority to Change Rates*, Docket No. 53719, Interchange Item No. 540, ETI's Clean Record Copy of Tariffs at Pages 29.1-2 (eff. Dec. 3, 2022).

shows, the number of potential offerings under the TECI Rider dwarfs the options available under the ALS tariff. Further, Table 2 only shows an example of the choice for one illustrative vendor. Those 30 decision points are effectively multiplied for every approved vendor, and as such, those decision points cannot simply be funneled into standardized price offerings in an EV tariff.

Table 2



Next, there is no standard electricity usage rate that could be applied to all TECI Rider participating customers, like the ALS Rider "4,000 hours per year."[24] The TECI Rider could be used by a school district with electric school buses, a library, a community college with electric shuttle buses, an apartment complex, a dock for shore power, among others. All of these examples and more will use

[24] *Id.* at Page 29.1.

different amounts of power (kW) and energy (kWh) adding to the complexities of potential customers' options.

Notably, PURA § 42.0103(o) expressly contemplates that utilities and customers will be "entering into agreements" (as ETI is proposing with the TECI Customer Agreement), which is inconsistent with the view that it is only reasonable to provide this highly customizable solution through a small set of standardized rates. The imposition of standard pricing would be inconsistent with the Legislature's desire that utility contracts and tariffs help foster the development of the competitive EV charging market.[25]

Mr. Abbott's testimony that the TECI Rider is not cost-based and will result in cost-shifting is particularly ironic given his proposed solution. Apart from failing to explain how a customized payment tailored to the level of infrastructure and service selected by a customer is not cost-based, Mr. Abbott's alternative proposal for standardized rates is virtually *certain* not to be cost-based. The TECI Rider and associated contract present a tailor-made approach that will ensure the recovery of the specific costs attributable to the participating customer. A tariff reflecting standardized EV rates would fail to match the specific costs associated with any particular customer's participation and would therefore result in the under- or over-recovery of TE infrastructure and maintenance costs.

Because an EV tariff with standardized rates would not be suited to a particular customer's needs, it would likely be undersubscribed for use cases that

[25] *See* Tex. Util. Code §§ 42.0101(a), 42.0103(o).

fall below the standard recovery reflected in the tariffed rates, and oversubscribed for use cases that exceed the costs that can be recovered under the tariff. In this way, Mr. Abbott's proposal would almost certainly result in the very cost-shifting he argues is a reason to reject the TECI Rider.

Q11. MR. ABBOTT CLAIMS THAT UNLIKE ETI'S AFC RIDER, THE TE INFRASTRUCTURE AND SERVICES OFFERED UNDER THE TECI RIDER CAN BE STANDARDIZED AND INCLUDED IN A STANDARD TARIFF. HOW DO YOU RESPOND?

A. Mr. Abbott's claim that "additional non-standard facilities are presumably fairly rare for mass market customers" and that "EV chargers may become very common over time" fails to appreciate the variety of TE infrastructure offerings and service opportunities.[26] As I described in my Direct Testimony and above, TECI Rider can cover a broad range of TE equipment and infrastructure installation options for ETI non-residential customers, such as residential property developers, fleet managers, tax-exempt organizations including governmental agencies and schools, shore power ports, and business owners. Mr. Abbott's statements regarding standardization seem to be reflective of residential charging, which is not eligible for participation under the TECI Rider.

The TECI Rider is in fact similar to the Company's Commission-approved AFC Rider where the Company installs facilities with standard O&M costs, that

[26] Supp. Direct Testimony of William B. Abbott at 13.

are paid for directly by the customer that utilizes and benefits from those facilities. The TECI Rider will be used where the Company installs TE facilities with project specific O&M costs that are paid for directly by the customer that utilizes and benefits from those TE facilities. As stated in my Direct Testimony, the project-specific O&M expenses will be addressed separately for each installation in the TECI Rider. For each installation, an agreed-upon fixed amount to cover ongoing O&M expenses will be added to the net monthly charge based on the customer's desired level of service. Unlike the facilities installed with the AFC Rider, under the TECI Rider, there are several reasons for allowing the customer to choose the level of O&M service, and thus expenses, associated with the investment. As I stated in my Direct Testimony:

> First, it allows each customer to tailor the level of service desired to match their specific needs. Second, there is a wide range of third-party provided warranty, insurance, remote monitoring, access, and network services costs among electric vehicle supply equipment ("EVSE"), or shore power connection providers. For example, a customer choosing to have ETI install networked TE chargers, that can connect to the cloud and that can be managed remotely, would incur more O&M costs than a customer that installs non-networked chargers and desires a basic model essentially in the form of a box with a plug capable of charging an EV.[27]

Finally, both are available to all non-residential customers. For example, a hospital may use the AFC Rider to have a back-up redundant distribution service line installed while simultaneously using the TECI Rider to have EV chargers for patient parking installed.

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[27] Direct Testimony of Samantha F. Hill at 18.

Q12. IS THERE ANYTHING ELSE TROUBLING ABOUT MR. ABBOTT'S COMPARISON OF ETI'S SCHEDULE AFC AND THE PROPOSED TECI RIDER?

A. Yes. Mr. Abbott seems to recognize the use and benefit of a tariff, such as Schedule AFC, that provides a mechanism for a utility to provide and collect the cost of infrastructure that goes beyond providing standard service. Indeed, even in the EV charging context, he acknowledges, "If a customer wishing to install an EV charger needs non-standard service for some reason, rider AFC would suffice for any non-standard EV charger costs."[28] Thus, Mr. Abbott seems to agree that a tariff such as Schedule AFC is better suited than standardized rates to ensure appropriate recovery of the cost of non-standard facilities. The TECI Rider is conceptually the same as Schedule AFC, just better tailored to the EV-related infrastructure and O&M at issue. Given the myriad of possible EV infrastructure, service, and vendor arrangements, Mr. Abbott's recognition of the place and purpose of Schedule AFC actually supports *approval* of the proposed TECI Rider rather than its rejection.

Q13. DOES MR. ABBOTT PROVIDE ANY BASIS FOR HIS ARGUMENT THAT THE TECI RIDER WILL RESULT IN UNREASONABLE COST-SHIFTING?

A. No. Mr. Abbott simply makes the unfounded assertion that the TECI Rider will result in unreasonable cost shifting and the under-recovery of costs. However, as my prior testimony demonstrates, the TECI Rider will ensure that all costs will in

[28] Supp. Direct Testimony of William B. Abbott at 14.

fact be recovered from participating customers. The closest Mr. Abbott comes to specificity is to point to the ability of customers to contract for an "agreed-upon amount of O&M,"[29] as if that means customers could simply opt to pay less than ETI's full O&M costs. That is clearly not the case. The amount of O&M to be paid by the customer will be the full O&M cost based on the "agreed" particular type of service the customer contracts for in an O&M package. In other words, ETI and the customer "agree" on the O&M cost only in the sense that the customer chooses the level of O&M ETI will provide and pays 100% of that cost. As I pointed out in my Direct Testimony, this flexibility will permit customers to choose from a wide range of potential applications, from relatively low-cost and low-maintenance options to more robust options and "turn-key" solutions, the costs of which they will directly pay utilizing the TECI Rider.[30]

Q14. WILL THE TECI RIDER RESULT IN UNREASONABLE COST-SHIFTING, AS MR. ABBOTT CLAIMS?

A. Not at all. As I have previously testified, the costs for a TECI Rider project will only be charged to that customer who voluntary elects to enroll in the TECI Rider, and no such costs will be imposed on ETI's other customers. Mr. Abbott points to general overhead and other costs as those that may not be adequately recovered from a TECI host customer and, thus, shifted to others. However, those costs would

[29] *Id.* at 13.

[30] Direct Testimony of Samantha F. Hill at 8-9.

be required for ETI to provide electric service either with or without the TECI Rider. That is, there are no *incremental* general overhead or other cost types not charged to the host customer through the TECI Rider. PURA Chapter 42 requires the recovery of *incremental* costs, which is precisely what the TECI Rider will recover. Consistent with PURA § 42.0103(p)(2), the provisions of the TECI Rider and related agreement ensure that ETI will "recover the costs of owning, constructing, financing, operating, and maintaining the public electric vehicle charging station from the [host customer] and not [ETI's] other customers." Exhibit SFH-SR-1 provides an illustrative example of three different use cases where the TECI Rider could be used. These examples show the recovery of all of the installed capital and O&M costs through TECI Rider customer payments as well as through the incremental revenue from the use of the TE equipment. Contrary to Mr. Abbott's assertion, as demonstrated in Exhibit SFH-SR-1, ETI's proposed TECI Rider is expected to over-recover the incremental costs driven by the TECI customer over time and, thus, benefit non-TECI customers by helping to offset ETI's general revenue requirement.

Q15. MR. ABBOTT REPEATS HIS ARGUMENT THAT FULLY EVALUATING ETI'S COSTS AND REVENUES ASSOCIATED WITH THE TECI RIDER WOULD BE INCREDIBLY DIFFICULT, DUE TO THE CUSTOMER-

SPECIFIC NATURE OF EACH AND EVERY TE INFRASTRUCTURE INSTALLATION.[31] HOW DO YOU RESPOND?

A. As stated previously, the TECI Rider was developed based on and is conceptually identical to the Commission-approved AFC Rider. As with the AFC Rider, there is no basis to conclude it will be difficult to evaluate the cost and revenues associated with TECI Rider. I would also note that Mr. Abbott's recognition that the TECI Rider permits a wide variety of offerings and cost structures is wholly inconsistent with his recommendation that ETI's proposal should be rejected in favor of a small set of standardized EV rates. Mr. Abbott appears to cast the range of TE solutions covered by TECI as either "standardizable" or "customer-specific" as needed to suit the argument he is making.[32]

Q16. MR ABBOTT EXPRESSES A CONCERN THAT THE LACK OF PUBLISHED NUMERICAL RATES UNDER THE TECI RIDER MAY IMPEDE THE DEPLOYMENT OF EV CHARGING STATIONS.[33] HOW DO YOU RESPOND?

A. I disagree with his concerns. Mr. Abbott acknowledges elsewhere in his testimony that EV charging is already available from competitive providers.[34] The introduction of an additional option for ETI's customers could not somehow

[31] Supp. Direct Testimony of William B. Abbott at 10.

[32] *Id.* at 10.

[33] *Id.* at 11.

[34] *Id.* at 8-9.

impede EV charging infrastructure development. Moreover, Mr. Abbott's claim that the lack of published, specific pricing will deter customer interest is not reflective of the sophistication of potential TECI Rider participants, whether they be a school district, the owner of an industrial complex, or a fleet of fueling stations. The lack of standardized pricing has not negatively affected ETI's AFC Rider participation rates, and nothing suggests that participation under the TECI Rider will be any different.

Q17. IS THE TECI RIDER INCONSISTENT WITH PURA § 42.0101(D)(2), AS MR. ABBOTT CLAIMS?

A. While I am not a lawyer, I believe the TECI Rider is fully consistent with the legislative finding that it is necessary to "develop and implement competitively neutral electricity tariffs that are optimized for public electric vehicle charging stations and based on cost causation principles while ensuring transparency in pricing and recognizing changing market needs."[35] First, Mr. Abbott selectively quotes that particular legislative finding while failing to read it in concert with (or even acknowledge) another legislative finding that "***electric utilities***, transmission and distribution utilities, competitive entities, and the commission have important roles to fill in supporting the installation and use of infrastructure for electric vehicle charging."[36] Mr. Abbott asserts that the TECI Rider is essentially a

[35] Tex. Util. Code § 42.0101(d)(2).

[36] Tex. Util. Code § 42.0101(c).

financing mechanism, and as such could potentially stifle the provision of such charging stations by competitive providers. However, the Legislature specifically recognized the role electric utilities have to play in supporting private sector investment in EV infrastructure through the provisions of PURA § 42.0103(o). Through this offering, ETI will partner with competitive providers to facilitate customer adoption and choice. Expanding access to such infrastructure facilitates the adoption of EVs by all individuals, businesses, and government entities, including in rural or underserved communities that may not attract private investment from third-party charging providers. In other words, Mr. Abbott has it backwards. To the extent ETI helps eliminate a customer barrier to EV charger installation (*e.g.*, upfront costs), it is *helping* competitive providers that offer those installations, not crowding them out. Because ETI is doing exactly what the legislation contemplates, it cannot be the case that ETI's proposal is contrary to the statute.

Q18. HOW DO YOU RESPOND TO MR. ABBOTT'S ASSERTION THAT THE TECI RIDER WOULD VIOLATE PURA § 42.0103(c) BECAUSE IT WOULD OPEN THE DOOR FOR ETI TO PROVIDE POTENTIALLY HIGHLY PREFERENTIAL SERVICE UNDER TECI RIDER TO ONE OF ITS AFFILIATES?[37]

A. Mr. Abbott has no basis to suggest ETI would illegally discriminate in favor of an

[37] Supp. Direct Testimony of William B. Abbott at 13.

affiliate and appears to be grasping at straws in an effort to undermine the Rider. First, there are very few instances in which an ETI affiliate is also a retail customer of the Company. Second, even if an affiliate were to take service under TECI, that service would be provided pursuant to the same TECI tariff and detailed form customer agreement attached thereto. If Staff is truly concerned ETI might use TECI to discriminate in favor of an affiliate, it will have every opportunity to propound discovery to explore that issue in a future rate proceeding. However, speculative concerns of this sort could be alleged in any number of contexts and serve as no basis to thwart the provision of service to ETI's customers.

III. CONCLUSION

Q19. DOES THIS CONCLUDE YOUR SUPPLEMENTAL REBUTTAL TESTIMONY?

A. Yes.

AFFIDAVIT OF SAMANTHA F. HILL

THE STATE OF LOUISIANA)
)
PARISH OF ORLEANS)

This day, Samantha Hill the affiant, appeared in person before me, a notary public, who knows the affiant to be the person whose signature appears below. The affiant stated under oath:

My name is Samantha F. Hill. I am of legal age and a resident of the State of Louisiana. The foregoing testimony and exhibit offered by me are true and correct, and the opinions stated therein are, to the best of my knowledge and belief, accurate, true and correct.

Samantha F. Hill

SUBSCRIBED AND SWORN TO BEFORE ME, notary public, on this the ____ day of March 2024.

Notary Public, State of Louisiana

Skylar Rosenbloom
Notary Public
State of Louisiana
Louisiana Bar Roll # 31389
My Commission is issued for Life

My Commission expires:

Death

For illustrative purposes

Customer Example	10-Year Incremental Net ETI (Cost)/Revenue	
1. School District	$ 64,104.00	
2. Community College	45,151.74	
3. Apartment Complex	11,082.24	
Total illustrative example 10-year benefit to customers	**$ 120,337.98**	{a}

{a} Note this is just three example customers over the 10-year contract period. Any additional customers over the 10-years shown here would create a greater benefit to all customers.

For illustrative purposes
Example: School district with four electric buses installing four 24 kW chargers on a new account (new service) on Rate Schedule GS.

EV charging electricity usage assumptions:				
Highest demand (kW)		96		
Annual energy usage (kWh)		90,000		
Annual customer bill	$	26,800		
Annual non-fuel revenue	$	15,000		
4-years non-fuel revenue	$	60,000		
EV charging infrastructure cost assumptions:				
Chargers equipment and installed cost	$	132,000		*Cost estimates for purposes of an illustrative example, include: equipment, shipping, vendor material/labor cost, and utility installation costs.*
Vendor O&M package	$	12,000	A	*O&M cost for purposes of an illustrative example*
Return, tax and insurance on capital costs	$	56,971		
Total ETI costs	**$**	**200,971**	**B**	
Installed cost less 4-year revenue credit	$	72,000		
Total TECI Rider participating infrastructure customer costs (less 4-year revenue credit)	**$**	**103,075**	**C**	
TECI 5-year recovery period in years (consistent 10-year contract):		5		
Monthly % Selected Recovery Term		2.386%	[1]	
Net Monthly Bill (infrastructure)	$	1,718		
Net Annual Bill (infrastructure)	$	20,615		
Net Monthly Bill (O&M)	$	200		
Net Annual Bill (O&M)	$	2,400		

	Total ETI Costs		TECI Bill (Infrastructure)		TECI Bill (O&M)		Usage Bill		Total Bill		Net ETI (Cost)/Revenue	
Year 0 - ETI EV charger installation costs	$ (200,971)										$ (200,971)	
Year 1 - Customer bill impact from EV charging			$ 20,615		$ 2,400		$ 15,000		**$ 38,015**		(162,956)	
Year 2 - Customer bill impact from EV charging			20,615		2,400		15,000		**38,015**		(124,941)	
Year 3 - Customer bill impact from EV charging			20,615		2,400		15,000		**38,015**		(86,926)	
Year 4 - Customer bill impact from EV charging			20,615		2,400		15,000		**38,015**		(48,911)	
Year 5 - Customer bill impact from EV charging			20,615		2,400		15,000		**38,015**		(10,896)	
Year 6 - Customer bill impact from EV charging							15,000		**15,000**		4,104	
Year 7 - Customer bill impact from EV charging							15,000		**15,000**		19,104	
Year 8 - Customer bill impact from EV charging							15,000		**15,000**		34,104	
Year 9 - Customer bill impact from EV charging							15,000		**15,000**		49,104	
Year 10 - Customer bill impact from EV charging							15,000		**15,000**		64,104	*10 year total net incremental revenue*
End of 10-year Customer Agreement	**$ (200,971)**	**B**	**$ 103,075**	**C**	**$ 12,000**	**A**	**$ 150,000**		**$ 265,075**			
Year 11 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			
Year 12 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			
Year 13 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			
Year 14 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			
Year 15 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			
Year 16 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			
Year 17 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			
Year 18 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			
Year 19 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			
Year 20 - Customer bill impact from EV charging							$ 15,000		**$ 15,000**			

1 Direct Testimony of Samantha F. Hill at Exhibit SFH-S-1

For illustrative purposes
ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED 24-Feb

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	96	96	96	96	96	96	96	96	96	96	96	96	1152
KWH	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500	90000
CUSTOMER CHARGE	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	631.08
BILLING LOAD CHARGES	912	912	912	912	912	912	912	912	912	912	912	912	10944
ENERGY CHARGES:													
ALL KWH	213	213	213	213	213	213	213	213	213	213	213	213	2556
VOLTAGE ADJ.	0	0	0	0	0	0	0	0	0	0	0	0	0
SUBTOTAL	1177.59	1177.59	1177.59	1177.59	1177.59	1177.59	1177.59	1177.59	1177.59	1177.59	1177.59	1177.59	14131.08
RIDER TCJA	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER FITC	0	0	0	0	0	0	0	0	0	0	0	0	0
AMS Surcharge	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER RCE-4	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER RCE-5	0.69	0.69	0	0	0	0	0	0	0	0	0.69	0.69	2.76
RIDER TTC	0	0	0	0	0	0	0	0	0	0	0	0	0
IHE DISCOUNT	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER EECRF	5.83	5.83	7.25	7.25	7.25	7.25	7.25	7.25	7.25	7.25	7.25	7.25	84.16
RIDER HRC	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER SRC	0	0	0	0	0	-42.08	0	0	0	0	0	0	-42.08
RIDER SRC-2	13.28	13.28	17.4	13.28	13.28	13.28	13.28	13.28	13.28	13.28	13.28	13.28	163.48
RIDER SCO	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER SCO-2	-0.28	-0.28	-0.2	-0.28	-0.28	-0.28	-0.28	-0.28	-0.28	-0.28	-0.28	-0.28	-3.28
RIDER DCRF	0	0	80.64	80.64	80.64	0	0	0	0	0	0	0	241.92
RIDER TCRF	0	0	118.56	118.56	118.56	0	0	0	0	0	0	0	355.68
RIDER RPCEA	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER PCF	0.03	0.03	0.08	0.08	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.46
RIDER GCRR	0	0	141.98	141.98	141.98	0	0	0	0	0	0	0	425.94
RIDER GCRR-RB-MCPS	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER GCRR-RB-HCPF	0	0	0	0	34.17	34.17	34.17	0	0	0	0	0	102.51
RIDER MTM	-4.38	-4.38	-4.62	-4.62	-4.62	-4.62	-4.62	-4.62	-4.62	-4.62	-4.62	-4.62	-54.96
RIDER 2024 BR-RBSR	4386	4386	0	0	0	0	0	0	0	0	0	0	8772
FACILITIES CHARGES	0	0	0	0	0	0	0	0	0	0	0	0	0
FUEL SURCHARGE	0	0	0	0	0	0	0	0	0	0	0	0	0
FUEL ADJ.	237.7313	237.7313	213.666	213.666	213.666	213.666	213.666	213.666	213.666	213.666	237.7313	237.7313	2660.253
TOTAL EXCL. TAXES	5816.491	5816.491	1752.346	1748.146	1782.266	1399.006	1441.086	1406.916	1406.916	1406.916	1431.671	1431.671	26839.92
MINIMUM	964.59	964.59	964.59	964.59	964.59	964.59	964.59	964.59	964.59	964.59	964.59	964.59	11575.08
BILL EXCL. TAXES	5816.491	5816.491	1752.346	1748.146	1782.266	1399.006	1441.086	1406.916	1406.916	1406.916	1431.671	1431.671	26839.92
BILLING KW DETERMINATION:													
METERED KW	96	96	96	96	96	96	96	96	96	96	96	96	
P.F. ADJD. KW	86	86	86	86	86	86	86	86	86	86	86	86	
MAX KW W/LOSSES	96	96	96	96	96	96	96	96	96	96	96	96	
CONTRACT POWER	96	96	96	96	96	96	96	96	96	96	96	96	
50% 1ST 500, 75% EXCESS	48	48	48	48	48	48	48	48	48	48	48	48	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	1172.93	1172.93	1513.95	1513.87	1513.87	1172.69	1172.69	1172.69	1172.69	1172.69	1172.69	1172.69	15096.38

For illustrative purposes
Example: Community College installs one 62 kW smart charger (two connectors) for students and faculty on a new account (new service) on Rate Schedule G5.

EV charging electricity usage assumptions:				
Highest demand (kW)		62		
Annual energy usage (kWh)		18,000		
Annual customer bill	$	11,000		
Annual non-fuel revenue	$	8,800		
4-years non-fuel revenue	$	35,200		
EV charging infrastructure cost assumptions:				
Chargers equipment and installed cost	$	70,000		*Cost estimates for purposes of an illustrative example, include: equipment, shipping, vendor material/labor cost, and utility installation costs.*
Vendor O&M and Software package	$	26,000	**A**	*O&M cost for purposes of an illustrative example*
Return, tax and insurance on capital costs	$	15,210		
Total ETI costs	**$**	**111,210**	**B**	
Installed cost less 4-year revenue credit	$	34,800		
Total TECI Rider participating infrastructure customer costs (less 4-year revenue credit)	**$**	**42,361**	**C**	
TECI 1-year recovery period in years (consistent 10-year contract):		1		
Monthly % Selected Recovery Term		10.144%	[1]	
Net Monthly Bill (infrastructure)	$	3,530		
Net Annual Bill (infrastructure)	$	42,361		
Net Monthly Bill (O&M)	$	2,167		
Net Annual Bill (O&M)	$	26,000		

	Total ETI Costs		TECI Bill (Infrastructure)		TECI Bill (O&M)		Usage Bill	Total Bill	Net ETI (Cost)/Revenue	
Year 0 - ETI EV charger installation costs	$ (111,210)								$ (111,210)	
Year 1 - Customer bill impact from EV charging			$ 42,361		$ 26,000		$ 8,800	**$ 77,161**	(34,048)	
Year 2 - Customer bill impact from EV charging							8,800	**8,800**	(25,248)	
Year 3 - Customer bill impact from EV charging							8,800	**8,800**	(16,448)	
Year 4 - Customer bill impact from EV charging							8,800	**8,800**	(7,648)	
Year 5 - Customer bill impact from EV charging							8,800	**8,800**	1,152	
Year 6 - Customer bill impact from EV charging							8,800	**8,800**	9,952	
Year 7 - Customer bill impact from EV charging							8,800	**8,800**	18,752	
Year 8 - Customer bill impact from EV charging							8,800	**8,800**	27,552	
Year 9 - Customer bill impact from EV charging							8,800	**8,800**	36,352	
Year 10 - Customer bill impact from EV charging							8,800	**8,800**	45,152	*10 year total net incremental revenue*
End of 10-year Customer Agreement	**$ (111,210)**	**B**	**$ 42,361**	**C**	**$ 26,000**	**B**	**$ 88,000**	**$ 156,361**		
Year 11 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		
Year 12 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		
Year 13 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		
Year 14 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		
Year 15 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		
Year 16 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		
Year 17 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		
Year 18 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		
Year 19 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		
Year 20 - Customer bill impact from EV charging							$ 8,800	**$ 8,800**		

1 Direct Testimony of Samantha F. Hill at Exhibit SFH-S-1

For illustrative purposes
ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED 24-Feb

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	62	62	62	62	62	62	62	62	62	62	62	62	744
KWH	1500	1500	1500	1500	1500	1500	1500	1500	1500	1500	1500	1500	18000
CUSTOMER CHARGE	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	631.08
BILLING LOAD CHARGES	589	589	589	589	589	589	589	589	589	589	589	589	7068
ENERGY CHARGES:													
ALL KWH	42.6	42.6	42.6	42.6	42.6	42.6	42.6	42.6	42.6	42.6	42.6	42.6	511.2
VOLTAGE ADJ.	0	0	0	0	0	0	0	0	0	0	0	0	0
SUBTOTAL	684.19	684.19	684.19	684.19	684.19	684.19	684.19	684.19	684.19	684.19	684.19	684.19	8210.28
RIDER TCJA	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER FITC	0	0	0	0	0	0	0	0	0	0	0	0	0
AMS Surcharge	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER RCE-4	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER RCE-5	0.14	0.14	0	0	0	0	0	0	0	0	0.14	0.14	0.56
RIDER TTC	0	0	0	0	0	0	0	0	0	0	0	0	0
IHE DISCOUNT	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER EECRF	1.17	1.17	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45	16.84
RIDER HRC	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER SRC	0	0	0	0	0	-8.42	0	0	0	0	0	0	-8.42
RIDER SRC-2	2.66	2.66	3.48	2.66	2.66	2.66	2.66	2.66	2.66	2.66	2.66	2.66	32.74
RIDER SCO	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER SCO-2	-0.06	-0.06	-0.04	-0.06	-0.06	-0.06	-0.06	-0.06	-0.06	-0.06	-0.06	-0.06	-0.7
RIDER DCRF	0	0	52.08	52.08	52.08	0	0	0	0	0	0	0	156.24
RIDER TCRF	0	0	76.57	76.57	76.57	0	0	0	0	0	0	0	229.71
RIDER RPCEA	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER PCF	0.01	0.01	0.02	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.14
RIDER GCRR	0	0	91.7	91.7	91.7	0	0	0	0	0	0	0	275.1
RIDER GCRR-RB-MCPS	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER GCRR-RB-HCPF	0	0	0	0	22.07	22.07	22.07	0	0	0	0	0	66.21
RIDER MTM	-2.83	-2.83	-2.98	-2.98	-2.98	-2.98	-2.98	-2.98	-2.98	-2.98	-2.98	-2.98	-35.46
RIDER 2024 BR-RBSR	877.2	877.2	0	0	0	0	0	0	0	0	0	0	1754.4
FACILITIES CHARGES	0	0	0	0	0	0	0	0	0	0	0	0	0
FUEL SURCHARGE	0	0	0	0	0	0	0	0	0	0	0	0	0
FUEL ADJ.	47.54625	47.54625	42.7332	42.7332	42.7332	42.7332	42.7332	42.7332	42.7332	42.7332	47.54625	47.54625	532.0506
TOTAL EXCL. TAXES	1610.026	1610.026	949.2032	948.3632	970.4232	741.6532	750.0732	728.0032	728.0032	728.0032	732.9563	732.9563	11229.69
MINIMUM	641.59	641.59	641.59	641.59	641.59	641.59	641.59	641.59	641.59	641.59	641.59	641.59	7699.08
BILL EXCL. TAXES	1610.026	1610.026	949.2032	948.3632	970.4232	741.6532	750.0732	728.0032	728.0032	728.0032	732.9563	732.9563	11229.69
BILLING KW DETERMINATION:													
METERED KW	62	62	62	62	62	62	62	62	62	62	62	62	
P.F. ADJD. KW	55	55	55	55	55	55	55	55	55	55	55	55	
MAX KW W/LOSSES	62	62	62	62	62	62	62	62	62	62	62	62	
CONTRACT POWER	62	62	62	62	62	62	62	62	62	62	62	62	
50% 1ST 500, 75% EXCESS	31	31	31	31	31	31	31	31	31	31	31	31	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	681.3	681.3	901.52	901.5	901.5	681.15	681.15	681.15	681.15	681.15	681.15	681.15	8835.17

For illustrative purposes
Example: An apartment complex installs two 11.5 kW chargers on a new account (new service) on Rate Schedule GS

EV charging electricity usage assumptions:			
Highest demand (kW)		23	
Annual energy usage (kWh)		6,000	
Annual customer bill	$	4,400	
Annual non-fuel revenue	$	3,600	
4-years non-fuel revenue	$	14,400	
EV charging infrastructure cost assumptions:			
Chargers equipment and installed cost	$	14,400	*Cost estimates for purposes of an illustrative example, include: equipment, shipping, vendor material/labor cost, and utility installation costs.*
Vendor O&M package	$	4,500	**A** *O&M cost for purposes of an illustrative example*
Return, tax and insurance on capital costs	$	10,518	
Total ETI costs	**$**	**29,418**	**B**
Installed cost less 4-year revenue credit	$	-	
Total TECI Rider participating infrastructure customer costs (less 4-year revenue credit)	**$**	**-**	**C** NOTE: This example's project costs equal the 4-years non-fuel revenue and as such will not have a TECI Rider infrastructure payment
TECI 10-year recovery period in years (consistent 10-year contract):		10	
Monthly % Selected Recovery Term		1.442%	[1]
Net Monthly Bill (infrastructure)	$	-	
Net Annual Bill (infrastructure)	$	-	
Net Monthly Bill (O&M)	$	38	
Net Annual Bill (O&M)	$	450	

	Total ETI Costs		TECI Bill (Infrastructure)		TECI Bill (O&M)		Usage Bill		Total Bill		Net ETI (Cost)/Revenue	
Year 0 - ETI EV charger installation costs	$ (29,418)										$ (29,418)	
Year 1 - Customer bill impact from EV charging			$ -		$ 450		$ 3,600		**$ 4,050**		(25,368)	
Year 2 - Customer bill impact from EV charging			-		450		3,600		**4,050**		(21,318)	
Year 3 - Customer bill impact from EV charging			-		450		3,600		**4,050**		(17,268)	
Year 4 - Customer bill impact from EV charging			-		450		3,600		**4,050**		(13,218)	
Year 5 - Customer bill impact from EV charging			-		450		3,600		**4,050**		(9,168)	
Year 6 - Customer bill impact from EV charging			-		450		3,600		**4,050**		(5,118)	
Year 7 - Customer bill impact from EV charging			-		450		3,600		**4,050**		(1,068)	
Year 8 - Customer bill impact from EV charging			-		450		3,600		**4,050**		2,982	
Year 9 - Customer bill impact from EV charging			-		450		3,600		**4,050**		7,032	
Year 10 - Customer bill impact from EV charging			-		450		3,600		**4,050**		11,082	*10 year total net incremental revenue*
End of 10-year Customer Agreement	**$ (29,418)**	**B**	**$ -**	**C**	**$ 4,500**	**D**	**$ 36,000**		**$ 40,500**			
Year 11 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			
Year 12 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			
Year 13 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			
Year 14 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			
Year 15 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			
Year 16 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			
Year 17 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			
Year 18 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			
Year 19 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			
Year 20 - Customer bill impact from EV charging							$ 3,600		**$ 3,600**			

1 Direct Testimony of Samantha F. Hill at Exhibit SFH-S-1

For illustrative purposes
ENTERGY TEXAS, INC.

RATE: GS
CUSTOMER: ZZZZ
ACCOUNT# YYYYY
12 MONTHS ENDED 24-Feb

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
BILLED KW	23	23	23	23	23	23	23	23	23	23	23	23	276
KWH	500	500	500	500	500	500	500	500	500	500	500	500	6000
CUSTOMER CHARGE	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	52.59	631.08
BILLING LOAD CHARGES	218.5	218.5	218.5	218.5	218.5	218.5	218.5	218.5	218.5	218.5	218.5	218.5	2622
ENERGY CHARGES:													
ALL KWH	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	170.4
VOLTAGE ADJ.	0	0	0	0	0	0	0	0	0	0	0	0	0
SUBTOTAL	285.29	285.29	285.29	285.29	285.29	285.29	285.29	285.29	285.29	285.29	285.29	285.29	3423.48
RIDER TCJA	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER FITC	0	0	0	0	0	0	0	0	0	0	0	0	0
AMS Surcharge	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER RCE-4	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER RCE-5	0.05	0.05	0	0	0	0	0	0	0	0	0.05	0.05	0.2
RIDER TTC	0	0	0	0	0	0	0	0	0	0	0	0	0
IHE DISCOUNT	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER EECRF	0.39	0.39	0.48	0.48	0.48	0.48	0.48	0.48	0.48	0.48	0.48	0.48	5.58
RIDER HRC	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER SRC	0	0	0	0	0	-2.81	0	0	0	0	0	0	-2.81
RIDER SRC-2	0.89	0.89	1.16	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	10.95
RIDER SCO	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER SCO-2	-0.02	-0.02	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.23
RIDER DCRF	0	0	19.32	19.32	19.32	0	0	0	0	0	0	0	57.96
RIDER TCRF	0	0	28.41	28.41	28.41	0	0	0	0	0	0	0	85.23
RIDER RPCEA	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER PCF	0	0	0.01	0.01	0	0	0	0	0	0	0	0	0.02
RIDER GCRR	0	0	34.02	34.02	34.02	0	0	0	0	0	0	0	102.06
RIDER GCRR-RB-MCPS	0	0	0	0	0	0	0	0	0	0	0	0	0
RIDER GCRR-RB-HCPF	0	0	0	0	8.19	8.19	8.19	0	0	0	0	0	24.57
RIDER MTM	-1.05	-1.05	-1.11	-1.11	-1.11	-1.11	-1.11	-1.11	-1.11	-1.11	-1.11	-1.11	-13.2
RIDER 2024 BR-RBSR	292.4	292.4	0	0	0	0	0	0	0	0	0	0	584.8
FACILITIES CHARGES	0	0	0	0	0	0	0	0	0	0	0	0	0
FUEL SURCHARGE	0	0	0	0	0	0	0	0	0	0	0	0	0
FUEL ADJ.	15.84875	15.84875	14.2444	14.2444	14.2444	14.2444	14.2444	14.2444	14.2444	14.2444	15.84875	15.84875	177.3502
TOTAL EXCL. TAXES	593.7988	593.7988	381.8144	381.5344	389.7144	305.1544	307.9644	299.7744	299.7744	299.7744	301.4288	301.4288	4455.96
MINIMUM	271.09	271.09	271.09	271.09	271.09	271.09	271.09	271.09	271.09	271.09	271.09	271.09	3253.08
BILL EXCL. TAXES	593.7988	593.7988	381.8144	381.5344	389.7144	305.1544	307.9644	299.7744	299.7744	299.7744	301.4288	301.4288	4455.96
BILLING KW DETERMINATION:													
METERED KW	23	23	23	23	23	23	23	23	23	23	23	23	
P.F. ADJD. KW	21	21	21	21	21	21	21	21	21	21	21	21	
MAX KW W/LOSSES	23	23	23	23	23	23	23	23	23	23	23	23	
CONTRACT POWER	23	23	23	23	23	23	23	23	23	23	23	23	
50% 1ST 500, 75% EXCESS	12	12	12	12	12	12	12	12	12	12	12	12	
GS MINIMUM KW	5	5	5	5	5	5	5	5	5	5	5	5	
NonFuel Revenue (AGM)	284.22	284.22	365.92	365.91	365.91	284.16	284.16	284.16	284.16	284.16	284.16	284.16	3655.3