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**SOAH DOCKET NO. 473-24-07154
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| PROCEEDING TO RESOLVE | § | |
| ISSUES IN DOCKET NO. 53719 | § | BEFORE THE STATE OFFICE |
| RELATED TO TRANSPORTATION | § | OF |
| ELECTRIFICATION AND | § | ADMINISTRATIVE HEARINGS |
| CHARGING INFRASTRUCTURE | § | |

TEXAS INDUSTRIAL ENERGY CONSUMERS' REPLY BRIEF

Entergy Texas, Inc. (ETI) asserts that its proposed Transportation Electrification and Charging Infrastructure Rider (Proposed Rider) will not shift operation and maintenance (O&M) costs from customers participating under the Proposed Rider to non-participating customers.¹ Texas Industrial Energy Consumers (TIEC) continues to assert that the Proposed Rider, without modification, could allow ETI to undercharge customers taking metered service under the Proposed Rider for O&M expenses, which could result in shifting O&M costs to other customers. If the Commission approves the Proposed Rider, it should ensure that cost shifting does not occur by adding language clarifying that customers taking service under the Proposed Rider must be charged for the O&M costs that they incur, as set out in TIEC's initial brief. In the alternative, the Commission should include an ordering paragraph in its order in this case stating that ETI may not shift any O&M costs incurred under the Proposed Rider to any other customer.

¹ See, e.g. ETI ln. Br. at 10.

Respectfully submitted,

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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, Christian Rice, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 25th day of April, 2024 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Christian E. Rice

Christian E. Rice