

581LM	7/8/24 8:46	4699.81	34.5	Tree On Line Outside R.O.W.
583LM	7/8/24 6:33	8968.22	34.5	Tree On Line Outside R.O.W.
584LM	7/8/24 9:56	3374.05	34.5	Tree On Line Outside R.O.W.
585LM	7/8/24 9:14	2380.83	34.5	Overhanging Limb
590AP	7/8/24 14:44	3210.05	13.2	Tree On Line Outside R.O.W.
591AP	7/8/24 10:27	2790.34	13.2	Tree On Line Outside R.O.W.
592AP	7/8/24 9:09	3546.55	13.2	Tree On Line Outside R.O.W.
592WR	7/8/24 10:04	1904.71	34.5	Tree On Line Outside R.O.W.
593WD	7/8/24 9:35	2950.19	13.2	Tree On Line Outside R.O.W.
594WD	7/8/24 10:58	1583.04	13.2	Tree On Line Outside R.O.W.
598TA	7/8/24 6:39	9380.43	13.2	Tree On Line Outside R.O.W.
599TA	7/8/24 6:40	9064.90	13.2	Tree On Line Outside R.O.W.
600HU	7/8/24 8:43	3219.05	34.5	Tree On Line Outside R.O.W.
607HU	7/8/24 8:39	3429.49	13.2	Vine Growing into Line
608HU	7/8/24 10:57	3865.65	13.2	Tree On Line Outside R.O.W.
609HU	7/8/24 13:32	3035.32	13.2	Tree On Line Outside R.O.W.
610HU	7/8/24 9:46	1690.12	13.2	Tree On Line Outside R.O.W.
611HU	7/8/24 8:41	2994.60	34.5	Tree on Line from Inside R.O.W.
627TE	7/8/24 8:52	4052.85	13.2	Tree On Line Outside R.O.W.
628TE	7/8/24 9:07	4504.82	13.2	Tree On Line Outside R.O.W.
632WT	7/8/24 11:48	4379.89	13.2	Tree On Line Outside R.O.W.
633WT	7/8/24 11:00	3111.20	13.2	Tree On Line Outside R.O.W.
634WT	7/8/24 8:18	2161.51	13.2	Overhanging Limb
64CRK	7/8/24 11:19	542.12	13.2	Tree On Line Outside R.O.W.
650VT	7/8/24 9:53	6299.05	13.2	Tree On Line Outside R.O.W.
651VT	7/8/24 11:17	3264.26	13.2	Tree on Line from Inside R.O.W.
652VT	7/8/24 11:28	4060.95	13.2	Tree On Line Outside R.O.W.
653VT	7/8/24 9:37	1318.65	13.2	Tree On Line Outside R.O.W.
655VT	7/8/24 12:18	3386.13	13.2	Tree On Line Outside R.O.W.
657VT	7/8/24 9:52	4448.35	13.2	Tree On Line Outside R.O.W.
65MAN	7/8/24 8:54	433.67	13.2	Overhanging Limb
66MAN	7/8/24 6:45	1331.18	13.2	Overhanging Limb
670GE	7/8/24 7:54	4569.01	13.2	Tree On Line Outside R.O.W.
673MA	7/8/24 9:39	2862.97	13.2	Tree On Line Outside R.O.W.
674MA	7/8/24 5:51	1381.48	13.2	Tree On Line Outside R.O.W.
682GR	7/8/24 8:38	6198.81	13.2	Tree/Limb Growing Inside R.O.W.
682VI	7/8/24 6:57	1301.99	13.2	Overhanging Limb
68PTA	7/8/24 9:10	73.59	13.2	Tree On Line Inside R.O.W.
69PTA	7/8/24 11:25	2133.16	13.2	Tree/Limb Growing Inside R.O.W.
70ECH	7/8/24 9:07	1793.95	13.2	Tree/Limb Growing Inside R.O.W.

711MG	7/8/24 5:11	3534.49	13.2	Tree On Line Outside R.O.W.
723DY	7/8/24 7:00	4049.74	13.2	Tree On Line Outside R.O.W.
724DY	7/8/24 6:25	3342.26	13.2	Tree On Line Outside R.O.W.
726DY	7/8/24 6:17	2661.49	13.2	Tree On Line Outside R.O.W.
727DY	7/8/24 7:26	3503.77	13.2	Tree On Line Outside R.O.W.
72ECH	7/8/24 9:47	1211.62	13.2	Tree On Line Outside R.O.W.
736CY	7/8/24 7:12	4917.48	13.2	Vine Growing into Line
738CY	7/8/24 6:08	2961.32	13.2	Tree On Line Outside R.O.W.
73ECH	7/8/24 10:14	594.60	13.2	Tree On Line Outside R.O.W.
73RAY	7/8/24 6:40	4935.03	13.2	Tree On Line Outside R.O.W.
740OK	7/8/24 6:35	7661.61	13.2	Tree/Limb Growing Inside R.O.W.
741DA	7/8/24 13:55	4045.90	13.2	Tree On Line Outside R.O.W.
743DA	7/8/24 7:37	2435.22	13.2	Tree On Line Outside R.O.W.
743OK	7/8/24 6:11	8197.81	34.5	Tree On Line Outside R.O.W.
744DA	7/8/24 7:18	3267.14	13.2	Tree On Line Outside R.O.W.
745OK	7/8/24 6:57	5767.69	34.5	Tree On Line Outside R.O.W.
74RAY	7/8/24 7:18	2238.19	13.2	Tree On Line Outside R.O.W.
750FO	7/8/24 6:21	3452.31	34.5	Tree On Line Outside R.O.W.
751FO	7/8/24 7:32	2715.28	34.5	Overhanging Limb
752FO	7/8/24 6:40	2676.57	34.5	Tree On Line Outside R.O.W.
753FO	7/8/24 6:40	8426.54	34.5	Tree On Line Outside R.O.W.
754FO	7/8/24 8:08	3091.11	34.5	Tree On Line Outside R.O.W.
755FO	7/8/24 7:44	3210.13	34.5	Tree On Line Outside R.O.W.
757FO	7/8/24 9:05	3212.54	34.5	Tree On Line Outside R.O.W.
758FO	7/8/24 9:53	4155.79	34.5	Tree On Line Outside R.O.W.
759FO	7/8/24 8:13	9226.37	34.5	Tree On Line Outside R.O.W.
765AL	7/8/24 0:18	2868.95	34.5	Tree On Line Outside R.O.W.
770AL	7/8/24 6:58	3846.77	34.5	Tree On Line Outside R.O.W.
77JRU	7/8/24 10:47	1893.10	4.2	Vine Growing into Line
781EG	7/8/24 6:24	3455.47	13.2	Vine Growing into Line
782PW	7/8/24 6:48	4488.28	13.2	Vine Growing into Line
801FE	7/8/24 9:08	1991.13	13.2	Tree On Line Outside R.O.W.
806PD	7/8/24 9:58	1823.99	34.5	Tree On Line Outside R.O.W.
809PD	7/8/24 11:18	2704.15	34.5	Tree/Limb Growing Inside R.O.W.
80WED	7/8/24 9:35	3018.93	4.2	Tree On Line Outside R.O.W.
810PD	7/8/24 11:16	4204.00	34.5	Tree On Line Outside R.O.W.
819MD	7/8/24 10:30	4308.57	13.2	Tree On Line Outside R.O.W.
883GR	7/8/24 9:42	2968.79	34.5	Tree/Limb Growing Inside R.O.W.
904NA	7/8/24 8:30	1373.47	13.2	Tree On Line Inside R.O.W.
905NA	7/8/24 8:44	1457.90	34.5	Tree On Line Inside R.O.W.
91MPL	7/8/24 8:15	3144.89	4.2	Tree On Line Outside R.O.W.
920DO	7/8/24 7:48	1282.20	34.5	Tree On Line Outside R.O.W.
969NA	7/8/24 9:20	2031.03	34.5	Overhanging Limb
981GR	7/8/24 8:51	1890.29	34.5	Overhanging Limb
982GR	7/8/24 8:44	1669.90	34.5	Tree/Limb Growing Inside R.O.W.
GORD	7/8/24 10:25	7244.87	13.2	Tree On Line Outside R.O.W.

* note: Based on intended transmission design, unplanned outages on transmission lines do not necessarily result in interruptions.

Circuit	FIRST CALL DATE TIME	Duration Minutes*	Voltage (kV)	Cause Description
HELBIG - ELIZABETH 69.00 kV (585)	7/8/24 1:11 AM	less than 1 minute	69	Fell From Off R-O-W
TANGLEWOOD (L-463) TAP - TANGLEWOOD 69.00 kV (463)	7/8/24 1:11 AM	less than 1 minute	69	Fell From Off R-O-W
CHINA - COLONY 230.00 kV (822)	7/8/24 1:29 AM	2015	230	Fell From Off R-O-W
KOLBS - ATLANTIC BULK 69.00 kV (117)	7/8/24 6:36 AM	5764	69	Fell From Off R-O-W
JAYHAWKER CREEK CO-SHECO SECURITY (811.1)	7/8/24 7:05 AM	4360	138	Fell From Off R-O-W
SPLENDORA - PORTER 138.00 kV (571)	7/8/24 7:23 AM	3	138	Fell From Off R-O-W
JACINTO - SPLENDORA (871.1)	7/8/24 8:21 AM	1	138	Fell From Off R-O-W
SPLENDORA - PORTER 138.00 kV (571)	7/8/24 8:38 AM	7352	138	Fell From Off R-O-W
BATSON - DAISSETTA 69.00 kV (56)	7/8/24 9:04 AM	2	69	Fell From Off R-O-W
HULL (L-103) TAP - HULL 69 kV 103.0	7/8/24 9:04 AM	2	69	Fell From Off R-O-W
DAYTON BULK - PARKWAY 138.00 kV (86)	7/8/24 9:13 AM	less than 1 minute	138	Fell From Off R-O-W
EASTGATE - HUFFMAN 138.00 kV (802)	7/8/24 9:13 AM	less than 1 minute	138	Fell From Off R-O-W
L-533 (KLEMP-EXPOSAIC) TAP - KLEMP 138 kV 533.0	7/8/24 9:13 AM	less than 1 minute	138	Fell From Off R-O-W
HELBIG - SOUTH SILSBEE 69.00 kV (467)	7/8/24 9:26 AM	3	69	Fell From Off R-O-W
NORTH SILSBEE - SOUTH SILSBEE TAP 69.00 kV (470)	7/8/24 9:26 AM	3	69	Fell From Off R-O-W
ALDEN - LEWIS CREEK 138 SWYD 138.00 kV (569)	7/8/24 9:36 AM	1364	138	Fell From Off R-O-W
DAYTON BULK - PARKWAY 138.00 kV (86)	7/8/24 9:39 AM	2	138	Fell From Off R-O-W
EASTGATE - HUFFMAN 138.00 kV (802)	7/8/24 9:39 AM	2	138	Fell From Off R-O-W
L-533 (KLEMP-EXPOSAIC) TAP - KLEMP 138 kV 533.0	7/8/24 9:39 AM	2	138	Fell From Off R-O-W
DAYTON BULK - PARKWAY 138.00 kV (86)	7/8/24 9:44 AM	2976	138	Fell From Off R-O-W
EASTGATE - HUFFMAN 138.00 kV (802)	7/8/24 9:44 AM	2976	138	Fell From Off R-O-W
GOSLIN - ALDEN 138.00 kV (869)	7/8/24 9:44 AM	15	138	Fell From Off R-O-W
L-533 (KLEMP-EXPOSAIC) TAP - KLEMP 138 kV 533.0	7/8/24 9:44 AM	2976	138	Fell From Off R-O-W
PONDEROSA - NAVASOTA 138.00 kV (96)	7/8/24 9:48 AM	1	138	Fell From Off R-O-W
JACINTO - HIGHTOWER 138.00 kV (887)	7/8/24 10:06 AM	3905	138	Fell From Off R-O-W
METRO - OAK RIDGE (TX) (169.1)	7/8/24 10:09 AM	1510	138	Fell From Off R-O-W
BENTWATER - PONDEROSA 138.00 kV (112)	7/8/24 10:21 AM	1	138	Fell From Off R-O-W
CHINA - GARDEN 230.00 kV (496)	7/8/24 10:46 AM	2	230	Fell From Off R-O-W
CEDAR HILL - MALLARD 138 kV 813.0	7/8/24 10:57 AM	4048	138	Fell From Off R-O-W
CONROE BULK - TAMINA 138.00 kV (886)	7/8/24 10:57 AM	4048	138	Fell From Off R-O-W
JEFFCON (L-555) TAP - JEFFCON 138 kV 555.0	7/8/24 11:10 AM	2726	138	Fell From Off R-O-W
SHECO SECURITY - LEWIS CREEK 138 SWYD 138.00 kV (503)	7/8/24 11:10 AM	2726	138	Fell From Off R-O-W
JACINTO - SHECO BATISTE CREEK 230.00 kV (568)	7/8/24 11:17 AM	2444	230	Fell From Off R-O-W
RICH (SHECO) - SHECO SHEPHERD 138 kV 417.0	7/8/24 11:45 AM	less than 1 minute	138	Fell From Off R-O-W
FOREST [TX] - GOSLIN 138.00 kV (320)	7/8/24 12:05 PM	2540	138	Fell From Off R-O-W
JACINTO - PEACH CREEK 230.00 kV (524)	7/8/24 12:07 PM	2471	230	Fell From Off R-O-W
CLEVELAND [TX] - SOUTHLINE 138.00 kV (808)	7/8/24 12:16 PM	9652	138	Fell From Off R-O-W
SOUTH BEAUMONT - YANKEE DOODLE 69.00 kV (576)	7/8/24 12:27 PM	less than 1 minute	69	Fell From Off R-O-W
SHECO CALVIN - MOSCOW 138.00 kV (411)	7/8/24 12:43 PM	4014	138	Fell From Off R-O-W
RAYWOOD - SOUTH LIBERTY (440.1)	7/9/24 1:36 AM	4394	69	Fell From Off R-O-W
ETEC URLAND - WARREN 138.00 kV (589)	7/9/24 4:58 AM	4165	138	Fell From Off R-O-W
GOSLIN - METRO (803.1)	7/9/24 6:59 AM	259	138	Fell From Off R-O-W
RAYWOOD - DAYTON BULK 138.00 kV (542)	7/9/24 10:37 AM	483	138	Fell From Off R-O-W

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: Melanie Taylor,
Francis Shannon
Beginning Sequence No. CR14
Ending Sequence No. CR17

Question No.: STAFF 1-79

Part No.:

Addendum:

Vegetation Management

Question:

Please provide aerial maps of circuits and their easements that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl. Overlay the map with the circuits that received vegetation management treatment for the past 5 years, using a distinct color code for each year. Provide any additional information or details to show clarity.

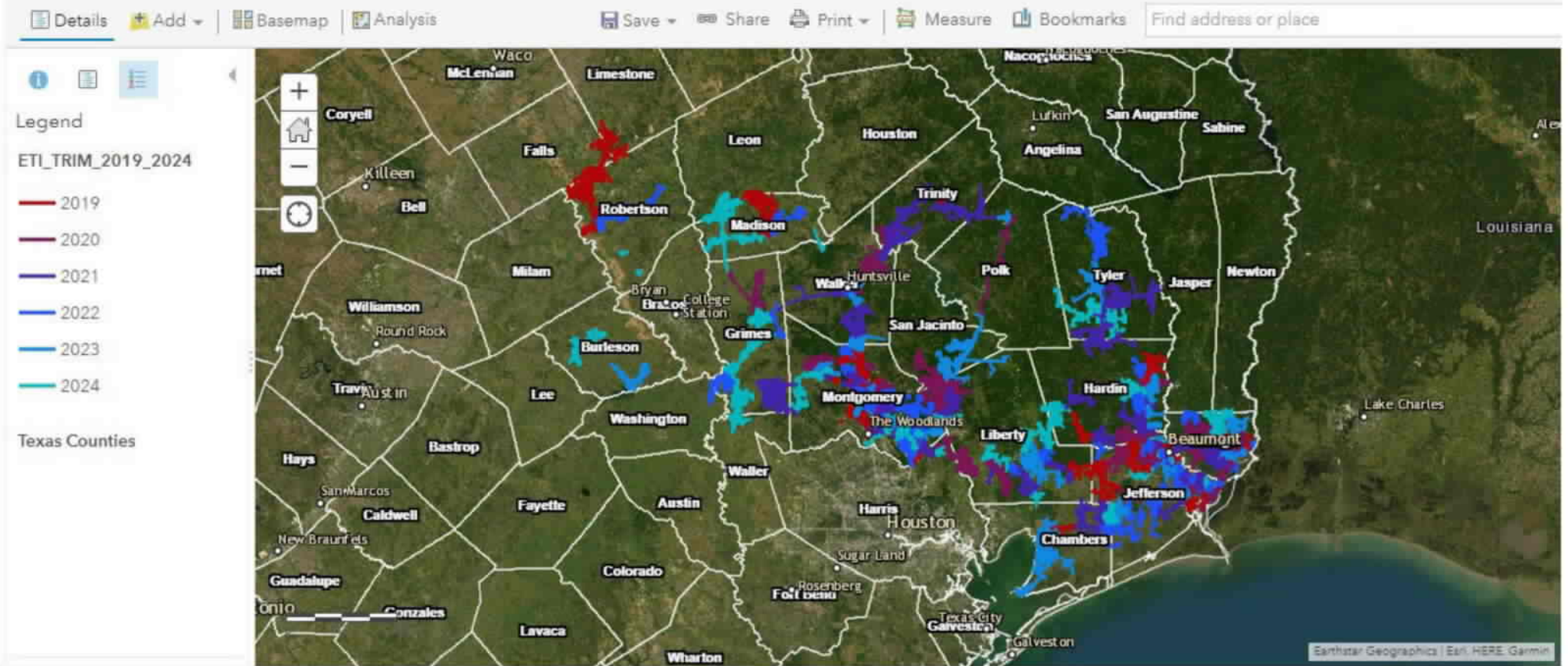
Response:

Please see attachment (TP-56822-00PUS001-X079) which shows the vegetation management trimming over the last 5 years as well as circuits that had vegetation-related outages during the May 16, 2024 severe thunderstorm event and Hurricane Beryl. Entergy Texas, Inc. ("ETI") does not have easement or right of way data incorporated into its mapping system.

Map overview showing ETI circuits trimmed between 2019-2024.

Home ▾ TX Veg Mgmt 2024 Storm Outage Viewer

New Map ▾



Map Overview showing vegetation related outages from May 16th 2024 thunderstorm event.

Home ▾ TX Veg Mgmt 2024 Storm Outage Viewer

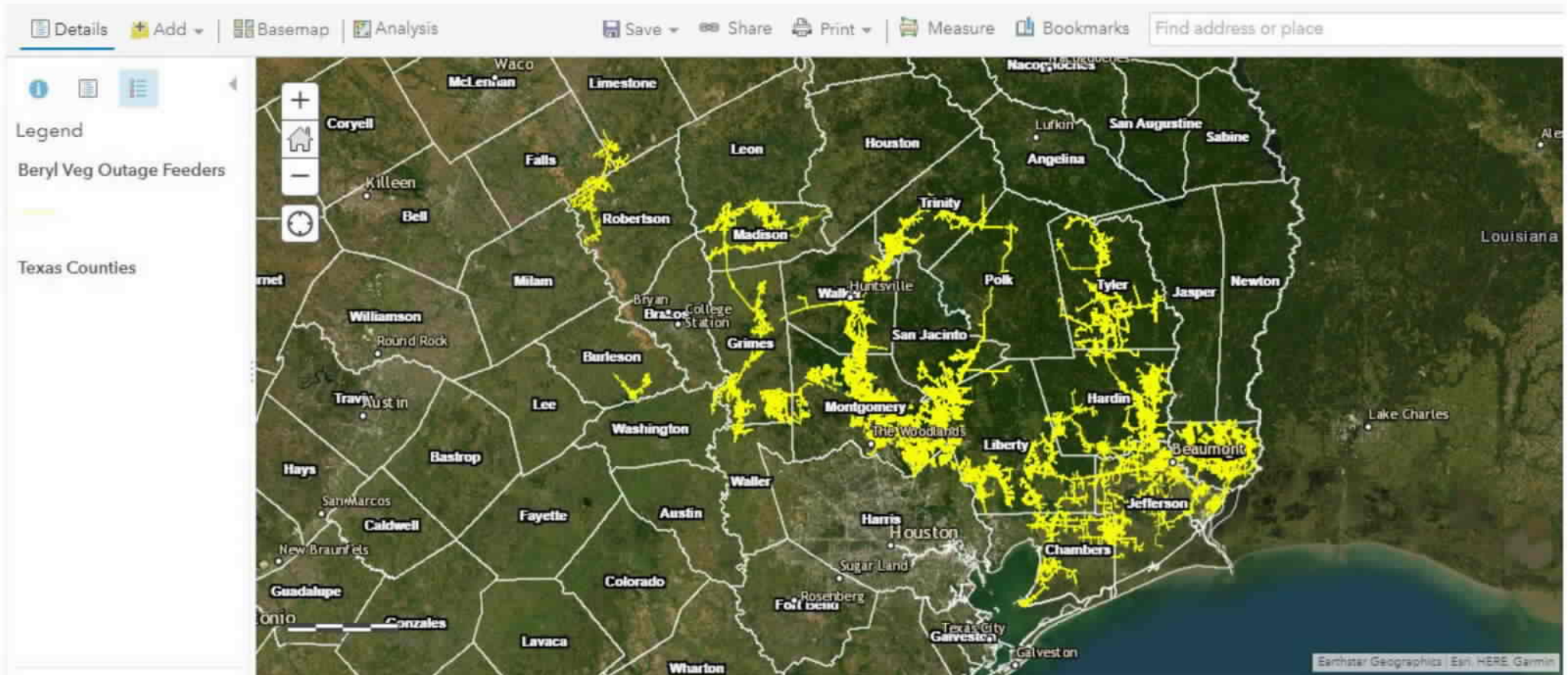
New Map ▾



Map Overview showing vegetation related outages from Hurricane Beryl.

Home ▾ TX Veg Mgmt 2024 Storm Outage Viewer

New Map ▾



ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

Response of: Entergy Texas, Inc.
to the First Set of Data Requests

of Requesting Party: Commission Staff

Prepared By:
Sponsoring Witnesses: Melanie Taylor,
Francis Shannon
Beginning Sequence No. EV59
Ending Sequence No. EV59

Question No.: STAFF 1-80

Part No.:

Addendum:

Vegetation Management

Question:

For the May 2024 Derecho and Hurricane Beryl, please provide the percentage of forced interruptions that were related to vegetation issues.

Response:

Entergy Texas, Inc.'s percentage of transmission and distribution forced interruptions associated with vegetation causes was 66% for the May 16, 2024 severe thunderstorm event and 60% for Hurricane Beryl. A percentage of the interruptions classified as attributable to lightning (~20%) could also be related to vegetation causes.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: Melanie Taylor,
Francis Shannon
Beginning Sequence No. CR18
Ending Sequence No. CR18

Question No.: STAFF 1-81

Part No.:

Addendum:

Vegetation Management

Question:

What steps are being taken to address vegetation management and infrastructure issues that contributed to outages or were identified during restoration after the May 2024 Derecho and Hurricane Beryl?

Response:

Entergy Texas, Inc.'s normal post-storm restoration process includes an assessment of the impacted areas to identify and address any outstanding storm--related vegetation issues (damaged, broken, leaning, uprooting trees, etc.). This assessment was completed after the May 16, 2024 severe thunderstorm event. The post storm vegetation work for Hurricane Beryl is currently in progress. In addition, the Company is continuing to complete its annual vegetation management work plan. During these two events, over 80% of the vegetation related outages were caused by uprooted green trees outside of the utility right of way.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: Melanie Taylor,
Francis Shannon
Beginning Sequence No. CR19
Ending Sequence No. CR19

Question No.: STAFF 1-82

Part No.:

Addendum:

Vegetation Management

Question:

When did you last substantively review, augment, or modify your vegetation management plan before July 8, 2024?

Response:

Entergy Texas, Inc. (“ETI”) develops an annual work plan, which it periodically reviews and modifies as necessary. For example, in 2023, the Company augmented its vegetation management plan due to the drought impacts and wildfire risk. Throughout 2023, ETI cut down approximately 11,400 hazard trees and cleared vegetation for wildfire mitigation at approximately 4,400 locations identified during patrols.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Francis Shannon
Beginning Sequence No. CR20
Ending Sequence No. CR21

Question No.: STAFF 1-83

Part No.:

Addendum:

Vegetation Management

Question:

What percentage of vegetation-related outages were caused by trees or branches outside of the easement or right of way? In responding to this question, please provide both an overall percentage and a breakdown for each county within your service territory that was affected by the May 2024 Derecho or within the Impacted Area for Hurricane Beryl.

Response:

Please see the below table for the percentage of vegetation-related outages by county for areas affected by the May 16, 2024 severe thunderstorm event.

County Name	Outside the ROW
MONTGOMERY	88.7%
LIBERTY	94.7%
GRIMES	22.1%
HARDIN	99.1%
TYLER	34.6%
WALKER	97.0%
JEFFERSON	80.6%
SAN JACINTO	100.0%
ORANGE	100.0%
TRINITY	67.9%
MADISON	0.0%
ROBERTSON	9.1%
NEWTON	100.0%
HARRIS	0.0%
FALLS	100.0%
BURLESON	0.0%
CHAMBERS	0.0%
WASHINGTON	0.0%

Question No.: STAFF 1-83

BRAZOS	0.0%
POLK	0.0%
JASPER	0.0%

ETI OROW/Total Veg	82.1%
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Please see the below table for the percentage of vegetation-related outages by county for areas affected by Hurricane Beryl.

County Name	Outside the ROW
MONTGOMERY	81.1%
LIBERTY	94.7%
JEFFERSON	40.8%
WALKER	97.2%
HARDIN	45.3%
ORANGE	63.4%
CHAMBERS	61.2%
GALVESTON	0.0%
TRINITY	99.0%
TYLER	98.5%
GRIMES	18.1%
MADISON	12.2%
HARRIS	100.0%
SAN JACINTO	100.0%
POLK	96.1%
LEON	0.0%
WASHINGTON	0.0%
NEWTON	89.3%
BURLESON	6.3%
FALLS	100.0%
ROBERTSON	100.0%
WALLER	0.0%

ETI OROW/Total Veg	80.6%
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ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: Melanie Taylor,
Francis Shannon
Beginning Sequence No. LC1
Ending Sequence No. LC1

Question No.: STAFF 1-84

Part No.:

Addendum:

Vegetation Management

Question:

Describe your programs or initiatives that are designed to work with property owners to address potentially hazardous vegetation management issues that are outside of the utility easement or right of way.

Response:

When trees outside the right of way ("ROW") are identified and pose an obvious hazard to Entergy Texas, Inc.'s ("ETT") facilities, the Company works with and coordinates with property owners to address the issue. The Company generally has success in mitigating these hazard trees. During storm events a significant portion of vegetation issues are caused by trees located outside the easement or ROW that were not or could not have been identified as a hazard. It would be very challenging to identify and convince property owners to let the utility cut down these trees that appear healthy and may pose no obvious hazard.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: Melanie Taylor,
Francis Shannon
Beginning Sequence No. EV38
Ending Sequence No. EV38

Question No.: STAFF 1-85

Part No.:

Addendum:

Vegetation Management

Question:

Identify the number of staff that participate in any program or initiative designed to address vegetation management hazards outside of the utility easement or right of way.

Response:

Please see the Company's responses to Staff 1-73 and 1-84. The entire Entergy Texas, Inc. vegetation management staff (internal staff and contractors) participate and contribute to identifying and addressing vegetation management hazards outside of the utility easement or right of way.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: James Wood
Beginning Sequence No. EV60
Ending Sequence No. EV86

Question No.: STAFF 1-86

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

Please state whether you participated in or were a member of any mutual assistance programs on or before July 8, 2024. If yes:

- a. Please identify all mutual assistance programs you participated in or were a member of on that date;
 - b. Please provide copies of any agreements entered as part of your membership or participation in those mutual assistance programs;
 - c. Please provide a list of members or participants for each mutual assistance program you are a member or participant in.
-

Response:

Information included in the response contains protected (“highly sensitive”) materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101 and/or 552.110. Confidential materials will be provided pursuant to the terms of the Commission’s Standard Protective Order.

- a. The Entergy Operating Companies, including Entergy Texas, Inc. (“ETI”), maintain memberships in the Southeastern Electric Exchange, Texas Regional Mutual Assistance Group, and Mid-West Mutual Assistance Group. Entergy’s home (primary) regional mutual assistance group is the Southeastern Electric Exchange.
- b. Please see the attached highly sensitive attachments (TP-56822-00PUS001-X086-001_HSPM through TP-56822-00PUS001-X086-005_HSPM).
- c. Membership lists for the Southeastern Electric Exchange and the Texas Regional Mutual Assistance Group are available on their websites at the following links. Midwest Mutual Assistance Group does not maintain a website. However, the members of the Midwest Mutual Assistance Group as of July 12, 2021 are listed on

pages 2-3 of highly sensitive attachment (TP-56822-00PUS001-X086_HSPM) provided in response to subpart b.

- Southeastern Electric Exchange: <https://theexchange.org/members.html>.
- Texas Regional Mutual Assistance Group:
<https://texasmutualassistancegroup.org>

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO
PARAGRAPH 4 OF DOCKET NO. 56822 PROTECTIVE ORDER**

The Response to this Request for Information includes Protected Materials within the meaning of the Protective Order in force in this Docket. Public Information Act exemptions applicable to this information include Tex. Gov't Code Sections 552.101 and/or 552.110. ETI asserts that this information is exempt from public disclosure under the Public Information Act and subject to treatment as Protected Materials because it concerns competitively sensitive commercial and/or financial information and/or information designated confidential by law.

Counsel for ETI has reviewed this information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials Designation.

George Hoyt
Entergy Texas, Inc.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: James Wood
Beginning Sequence No. LC2
Ending Sequence No. LC2

Question No.: STAFF 1-87

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

Please describe, prior to, during, or in the aftermath of Hurricane Beryl how you integrated mutual assistance crews into your existing emergency preparedness and response processes, any coordination challenges you faced in doing so, and how you addressed any such challenges prior to, during, or in the aftermath of Hurricane Beryl.

Response:

Please see the Company's response to Staff 1-95. Entergy Texas, Inc. ("ETI") groups restoration workers in two general categories: internal workers and external workers. Internal workers are ETI employees and baseload contractors which commonly work on Entergy Operating Company ("EOC") property. External workers may be mutual assistance workers from another utility or contractors which are not commonly on EOC property. When mutual assistance crews are brought on property, the crews are assigned a field supervisor (Storm Crew Leader) to direct their work assignments and to serve as a single point of contact to ETI. All crews assigned to a field supervisor receive a general orientation via a web-based computer training and an in-person orientation upon arrival in their assigned work area to ensure the workers understand ETI's expectations and processes.

All resources are managed and tracked in two computer-based applications: Storm Manager and Storm Assist. These applications allow the Company to manage work assignments to the crews, and assign and track locations and logistics services for the crews. These processes have been successfully utilized by the EOCs for many years and has allowed them to safely and effectively manage resources, including tens of thousands during Hurricane Laura and Hurricane Ida. Any challenges identified during a response are quickly resolved via the assigned field supervisor and the supporting resource management team. Please refer to the Company's response to Staff 1-13 for additional details on the management of emergency response assignments.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: James Wood
Beginning Sequence No. LC3
Ending Sequence No. LC3

Question No.: STAFF 1-88

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

Please describe the command structure and communication protocols used to manage and direct resources from mutual assistance program(s) you received assistance from prior to, during, and in the aftermath of Hurricane Beryl.

Response:

See the Company's response to Staff 1-95. Entergy Texas, Inc. ("ETI") utilizes the Incident Command System framework for restoration incidents. Please also refer to the Company's responses to Staff 1-52 and 1-53. Restoration crews are assigned to an appropriate group or division within the Operations Section. External crews are assigned to a field supervisor (Storm Crew Leader) to direct their work assignments and to serve as a single point of contact to ETI. Communications with external resources is initiated through the Entergy Services, LLC ("ESL") System Resource Section, which performs all acquisitions and mobilization of external resources.

Once the resources are mobilized, they are turned over to the ETI Resource Section to be assigned to the appropriate Operations Section team for work assignments. The resources will remain assigned under a field supervisor until they are ready to be released, at which time they are transferred back to the Resource Section for assignments elsewhere in the incident or to be demobilized.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: James Wood
Beginning Sequence No. LC4
Ending Sequence No. LC4

Question No.: STAFF 1-89

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

Please describe the process and timeline for requesting or activating assistance as part of your membership or participation in any mutual assistance program(s) prior to, during, or in the aftermath of Hurricane Beryl.

Response:

See the Company's response to Staff 1-95. Entergy Texas, Inc. ("ETI") may request resources via the mutual assistance process through the Texas Regional Mutual Assistance Group, Southeastern Electric Exchange, or the Midwestern Regional Mutual Assistance Group anytime an emergency condition exists or will exist, and may receive resources for as long as the condition persists. Requests for resources are typically processed within 12 hours unless the requesting company requests a delay in the process. To initiate the process, ETI contacts the designated point of contact for the respective mutual assistance group to make a request. Requests to the mutual assistance point of contact will include the type and number of resources requested (distribution line, vegetation, etc.), the location where resources are needed, the reason the resources are being requested (wildfire, storm, earthquake), and the requested arrival date of the resources. Depending on the needs of other impacted or potentially impacted utilities, a coordination call may be scheduled to allow utilities to offer resources to the requesting utilities and determine the appropriate priority of assignment. Available resources are assigned to requesting utilities as needed to fulfill the request. If a situation presents in which more resources are requested than those being offered, an equitable share process is utilized to divide the available resource amounts the requesting utilities. After resources are allocated, the offering utility provides contact information for the resources to the receiving utility to begin mobilization.

Whenever restoration operations begin wrapping up, by practice, resources received via the mutual assistance process are typically prioritized for release before other resources to allow a quick return back to the home utility.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: James Wood,
Francis Shannon
Beginning Sequence No. LC5
Ending Sequence No. LC5

Question No.: STAFF 1-90

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

Once you learned of the Hurricane Beryl's potential to affect your ability to provide service to your customers, what specific actions were taken to begin coordinating with and staging mutual assistance resources to respond to service issues resulting from the hurricane?

Response:

Please refer to the Company's response to Staff 1-14, which details the timeline of actions Entergy Texas, Inc. ("ETI") took to monitor and prepare for Beryl, including coordinating additional resources. Please also refer to the Company's responses to Staff 1-95, 1-96, and 1-97 regarding mutual assistance resources.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: James Wood,
Francis Shannon
Beginning Sequence No. LC6
Ending Sequence No. LC6

Question No.: STAFF 1-91

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

Provide the following information concerning mutual assistance received in response to either the May 2024 Derecho or Hurricane Beryl:

- a. Identify all mutual assistance programs from which you requested assistance;
 - b. Describe the specific assistance, including but not limited to the number of damage assessors, vegetation management crews, linesmen, generators, and materials, requested from the mutual assistance program(s); and
 - c. Provide all documentation of requests made to mutual assistance programs and their responses to your requests.
 - d. If it is not evident from the documentation provided in response to Staff 1-91(c), please provide the date the request was made, the date the specific assistance requested began arriving in the Impacted Area, and the date by when the specific assistance requested was fully received.
-

Response:

Entergy Texas, Inc. (“ETI”) did not receive mutual assistance during its response to the May 16, 2024 severe thunderstorm event. For ETI’s response to Hurricane Beryl, please refer to the Company’s response to Staff 1-95.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: James Wood
Beginning Sequence No. LC7
Ending Sequence No. LC7

Question No.: STAFF 1-92

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

When you receive responses to requests for assistance from other mutual assistance program participants that confirm their ability to provide the requested assistance, are you able to accept or decline resources being offered as needed, or must you accept all assistance provided in response to a request?

Response:

Generally, Entergy Texas, Inc. has the ability to accept or reject assistance that is offered. In some instances, the company providing resources may require certain stipulations to their offer such as additional safety or logistics personnel which are disclosed during the process.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: James Wood
Beginning Sequence No. LC8
Ending Sequence No. LC8

Question No.: STAFF 1-93

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

What considerations did you give to reimbursement of costs and expenses incurred by participants of mutual assistance programs when making requests for assistance during the events of Hurricane Beryl?

Response:

Mutual assistance reimbursements to a peer utility for employees and equipment are outlined in the applicable mutual assistance agreements, but generally provide for the full reimbursement of reasonable expenses incurred by the company providing resources. Entergy Texas, Inc. ("ETI") did not receive mutual assistance from another utility during Hurricane Beryl. ETI was able to utilize contractors and internal workers from other Entergy Operating Companies to support ETI's restoration needs. Had ETI needed additional resources and resources from a peer utility were available, ETI would consider the travel distance, estimated costs and capabilities of those resources compared to others available through mutual assistance or available in the market to determine the best value for ETI customers.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: James Wood,
Francis Shannon
Beginning Sequence No. LC9
Ending Sequence No. LC10

Question No.: STAFF 1-94

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

Please provide a list of any hurricane response staging area you established in the lead up to and in the aftermath of Hurricane Beryl. Please include the date the center(s) was established, the location of the center(s), the day-to-day staffing levels at the center, and types of equipment and personnel staged at the center(s).

Response:

Entergy Texas, Inc. (“ETI”) opened four staging sites during Hurricane Beryl. Three of these sites, the Lone Star Convention Center, Randall Reed Stadium, and Woodforest Bank Stadium, were used as both material laydown for supply chain operations and overnight parking for restoration worker vehicles. The fourth site, the Lamar Montagne Center, was used for overnight parking only. Fuel trucks provided fueling operations at each of these sites. ETI did not require the opening of staging sites during Hurricane Beryl to provide personnel basecamps/sleeping accommodations. All field restoration personnel utilized these staging sites (including damage assessors, distribution line workers, transmission line workers, vegetation workers, safety/oversight personnel, fleet personnel, and supply chain personnel), in addition to the full-time staff managing the staging sites listed in the below table.

Site Name	Date Opened	Location	Staffing Level Date - # Personnel	Types of Equipment
Lamar Montagne Center	7/10/2024	4401 S M L King Jr Pkwy, Beaumont, TX	7/10 – 7 7/11 – 7 7/12 – 7	Portable toilets, ice, water, roll off boxes
Lone Star Convention Center	7/10/2024	9055 Airport Rd, Conroe, TX	7/10 – 10 7/11 – 13 7/12 – 7 7/13 – 6 7/14 – 7 7/15 – 9 7/16 – 4 7/17 – 4	Frame tent, generator, lighting, fencing, forklifts, cones, pallet jack, portable toilets, handwash stations, tables,

Question No.: STAFF 1-94

			7/18 - 3	chairs, garbage cans, office trailer, ice, water/Gatorade, roll off boxes
Randall Reed Stadium	7/11/2024	21360 Valley Ranch Pkwy, New Cancy, TX	7/11 - 13 7/12 - 17 7/13 - 21 7/14 - 22 7/15 - 20 7/16 - 18 7/17 - 18 7/18 - 17 7/19 - 10	Frame tent, generator, lighting, fencing, forklifts, cones, pallet jack, portable toilets, handwash stations, tables, chairs, garbage cans, office trailer, ice, water/Gatorade, roll off boxes
Woodforest Bank Stadium	7/10/2024	19115 David Memorial Dr, Shenandoah, TX	7/10 - 14 7/11 - 14 7/12 - 13 7/13 - 11 7/14 - 13 7/15 - 13 7/16 - 11 7/17 - 4 7/18 - 3	Frame tent, generator, lighting, fencing, forklifts, cones, pallet jack, portable toilets, handwash stations, tables, chairs, garbage cans, office trailer, ice, water/Gatorade, roll off boxes

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: James Wood
Beginning Sequence No. PI54
Ending Sequence No. PI54

Question No.: STAFF 1-95

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

How did the rollout and deployment of mutual assistance during the events of Hurricane Beryl compare to previous hurricane events during which you requested assistance from mutual assistance programs? In your response, please specifically compare the types and quantities of resources requested, the percentage of request aid provided, the efficacy of coordination between your company and the mutual assistance provider, and the efficiency of staging, deployment, and release of those assistance resources.

Response:

Entergy Texas, Inc.'s ("ETI") coordination with mutual assistance groups began several days before Hurricane Beryl made landfall. ETI participated in the mutual assistance process with the Southeastern Electric Exchange and the Texas Regional Mutual Assistance Group throughout Hurricane Beryl, which allowed ETI to maintain a high level of awareness on the needs of fellow utilities and constraints in the resource market, and to offer support when able. This was consistent with past storms and mutual assistance activations. ETI did not directly request mutual assistance resources from other utilities for Hurricane Beryl, as the Company was able to acquire all necessary resources from its internal workforce (ETI employees and on-property contractors as well as from the Entergy Operating Companies) and external resources by utilizing a robust storm vendor contract strategy. The utilization of internal resources provided more efficient and safe restoration for this storm event given their familiarity with ETI's system, processes, and standards. ETI mobilized a field workforce of approximately 2,269, workers which included 1,256 internal baseload contractors, 538 internal Entergy Operating Company or ETI employees, and 475 external contractors. Coordination with mutual assistance partners occurred daily through various touchpoints. By participating in the mutual assistance process, ETI maintained visibility into resource demobilizations by peer utilities. This enabled ETI to acquire resources released from Oncor Electric Delivery Company and Mid-South Electric Cooperative, whose proximity allowed for expedient and cost-efficient mobilization of those resources to ETI's service territory.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: James Wood,
Francis Shannon
Beginning Sequence No. LC11
Ending Sequence No. LC11

Question No.: STAFF 1-96

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

Please describe what specific actions you took to begin staging internal staff and any responsive mutual assistance crews or resources.

Response:

In the days before Hurricane Beryl was forecasted to impact Entergy Texas, Inc.'s ("ETI") service area, preparations were made by Entergy Services LLC ("ESL") employees, ETI employees, and contractors to respond to ETI customer outages and/or respond to a neighboring Texas utility to support impacts if needed. Please refer to the Company's response to Staff 1-90.

Based on the forecasted timing of Hurricane Beryl to move inland, ETI internal resources (ETI employees and contractors) were placed on standby in their respective home networks and resources mobilized from Entergy Operating Companies as well as external resources were primarily directed to travel into ETI's East Region on the morning of July 8th where they could then be dispatched into the projected impact areas of ETI's West Region late on July 8th or early on July 9th depending on when it would be safe to travel. Other resources such as highwater vehicles, air boats, fuel trucks and the Entergy mobile command center were staged in ETI's East Region and Entergy Louisiana LLC's West Region. Material supply needs were readied for immediate deployment into the impacted areas from distribution centers and storm material yards.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: James Wood
Beginning Sequence No. PI55
Ending Sequence No. PI55

Question No.: STAFF 1-97

Part No.:

Addendum:

Staffing and Mutual Assistance

Question:

Did you have to train or on-board any personnel that was provided in response to your request(s) for mutual assistance during the events of Hurricane Beryl? If yes, please describe what kind of training or on-boarding you provided.

Response:

Entergy Texas, Inc. (“ETI”) primarily utilized internal resources and resources from other Entergy Operating Companies to perform restoration following Hurricane Beryl, and did not directly request mutual assistance resources from other utilities. The utilization of internal resources provided more efficient and safe restoration for this storm event given their familiarity with ETI’s system, processes, and standards. ETI utilized external resources for damage assessment and distribution line and transmission line restoration. ETI enrolled external users into our Damage Assessment Collection Tool application and performed training on accessing the tool via their mobile device in preparation of landfall for Beryl.

All external resources utilized complete a computer-based orientation module, typically before or during transit to the ETI service area. The orientation provides the external workers with ETI points of contact, safety rules including local hospital information, area hazards, an incident briefing/summary, grounding and clearance rules, logistics information, ETI asset standards, etc. The orientation also explains communications protocols. Orientations are available in English and Spanish. Once resources arrive on site, they participate in a brief safety orientation before starting work on ETI property.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. PI1
Ending Sequence No. PI2

Question No.: STAFF 1-98

Part No.:

Addendum:

Mobile Generation

Question:

Please provide details regarding the lease or procurement of each mobile generation facility in the TDU's control, including:

- a. Details regarding the competitive bidding process used or the justification for not using a competitive bidding process.
- b. The size of each mobile generation facility in megawatts (MW):
- c. The initial lease or procurement date of each facility:
- d. The lease term, in months, of each mobile generation facility:
- e. The expiration date of each facility's lease:
- f. The to-date costs associated with each mobile generation facility, including operating, leasing costs, or other capital expense:
- g. The expected costs associated with each lease, including operation and leasing costs:
- h. The expected return on investment associated with each lease or procurement.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas ("ERCOT") region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

Question No.: STAFF 1-98

a. Please see the Company’s response to Staff 1-102 for an explanation of ETI’s typical procurement strategy for mobile generation.

b.-g. Please refer to the below table for information regarding the 11 mobile generators procured by ETI for utilization during Hurricane Beryl restoration.

Generator Size (MW)	Lease Start Date	Lease Expiration Date	Lease Term	Costs* <small>*all leases have concluded, so costs to date and expected costs are the same</small>
1	7/10/24	7/15/24	0.25 months (1 week)	\$64,534
0.5	7/9/24	7/15/24	.25 months (1 week)	\$20,964
0.32	7/11/24	7/15/24	.25 months (1 week)	\$25,541
1	7/10/24	7/15/24	.25 months (1 week)	\$31,720
0.5	7/10/24	7/15/24	.25 months (1 week)	\$47,560
0.3	7/10/24	7/15/24	.25 months (1 week)	\$56,894
0.15	7/10/24	7/15/24	.25 months (1 week)	\$29,075
0.125	7/9/24	7/15/24	.25 months (1 week)	\$20,943
0.125	7/9/24	7/15/24	.25 months (1 week)	\$29,544
0.125	7/11/24	7/15/24	.25 months (1 week)	\$28,138
0.125	7/10/24	7/15/24	.25 months (1 week)	\$19,537

h. As a vertically integrated electric utility operating outside of the ERCOT region, ETI does not earn or recover a return on leased mobile generation.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. PI3
Ending Sequence No. PI3

Question No.: STAFF 1-99

Part No.:

Addendum:

Mobile Generation

Question:

Please provide details regarding mobile generation or temporary emergency electric energy facilities (TEEEF):

- a. The control number of the TDU's most recently approved mobile generation or TEEEF cost recovery;
 - b. Details regarding whether the mobile generation or TEEEF cost recovery was processed as part of a larger Distribution Cost Recovery Factor proceeding or in a separate contested case;
 - c. The revenue requirement associated with the TDU's mobile generation or TEEEF expenses, broken out by rate class; and
 - d. The in-force tariffs associated with the TDU's mobile generation or TEEEF rider, broken out by rate class.
-

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Accordingly, ETI is not in possession of information responsive to this request.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. PI4
Ending Sequence No. PI5

Question No.: STAFF 1-100

Part No.:

Addendum:

Mobile Generation

Question:

Provide the following information concerning your customer base:

- a. Total number of customers served by rate class;
 - b. Average demand by rate class;
 - c. Peak demand by rate class; and
 - d. Net peak demand by rate class.
-

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

Please see the attachment (TP-56822-00PUS001-X100).

- a. The information provided in the attached reflects the customer counts by rate class for the month of July 2024 and the average number of customers for the twelve months ending July 31, 2024.
- b. The average demand by rate class is determined by calculating the average hourly demand for the month of July 2024 and for the twelve months ending July 31, 2024.
- c. The peak demand by rate class is provided from the most recently developed analysis in ETI’s 2022 base rate case, Docket No. 53719.

- d. The Company interprets this request to seek data regarding peak demand less mobile generation. Based on this interpretation, the Company does not have information responsive to this request.

Staff's First Set of RFI to Entergy Texas, Inc.
Project No. 56822
Staff 1-100
Per Book Data: Number of Customers

Rate Class	July 2024	Average 12 Months Ended July 2024
Residential Service	457,458	451,840
Small General Service	39,867	39,533
General Service	20,489	20,430
Large General Service	400	395
Large Industrial Power Service	135	131
Lighting	1,825	1,920
	520,174	514,248

Note:

Customer counts are calculated using the unadjusted per books data.

Staff's First Set of RFIs to Entergy Texas, Inc.
 Project No. 56822
 Staff 1-100
 Per Book Data: Average Demand

Rate Class	July 2024 (KW)	Avg 12 Months Ended July 2024 (KW)
Residential Service	980,085	778,820
Small General Service	92,862	78,255
General Service	425,533	381,779
Large General Service	160,806	149,507
Large Industrial Power Service	1,040,759	979,943
Lighting	9,815	10,053
Total	2,709,861	2,378,356

Note:

Average hourly demands are calculated using the unadjusted per books data.

Staff's First Set of RFIs to Entergy Texas, Inc.
 Project No. 56822
 Staff 1-100
 2022 Rate Case Data

Rate Class	Rate Case Coincident Peak (1 CP) @ Plant
Residential Service	1,689,265
Small General Service	107,934
General Service	701,223
Large General Service	208,277
Large Industrial Power Service	952,075
Lighting	-
	3,658,774

Note:

1. Peak Demands from ETI's 2022 base rate case Docket No. 53719.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Francis Shannon
Beginning Sequence No. PI6
Ending Sequence No. PI11

Question No.: STAFF 1-101

Part No.:

Addendum:

Mobile Generation

Question:

Please provide information on the average customer density by circuit mile for the feeders in the Impacted Area.

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

Please see the below table for the customer density of impacted feeders during the May 16, 2024 severe thunderstorm event and Hurricane Beryl.

Feeder	Customer Density	Feeder	Customer Density
426CV	16.07	362HT	80.22
334NC	61.88	582LM	42.78
30BRC	92.38	770AL	58.4
513CN	45.63	563WD	65.74
755FO	73.35	751FO	89.32
457FL	46.41	574CN	70.63
425CV	20.61	333NC	64.38
570DC	10.13	132CE	107.59
365HT	36.92	581LM	90.39
453KT	36.1	338NC	58
657VT	44.36	566CR	23.34
545PL	33.14	610HU	119

Question No.: STAFF 1-101

551EP	44.48	360HT	49.79
592WR	9.6	308SP	41.79
162VD	43.53	505CN	78.47
607HU	114	726DY	25.94
345JT	23.34	653VT	41.55
762AL	126.43	590AP	70.61
539LA	47.57	576CN	49.35
406CV	33.29	343JT	33.08
364HT	53.43	572CN	81.94
552EP	49.84	632WT	51.4
920DO	12.92	525PA	76.74
154BE	33.08	592AP	55.24
432KT	14.25	567CR	33.47
308FR	44.63	506CN	129.89
682VI	38	63GRO	87.67
105SL	22.85	321AP	52.65
405CV	26.09	627TE	25.16
981GR	11.37	195CR	43.25
53BAT	12.94	570CR	26.22
506WR	9.24	309SP	35.28
761SA	10.98	583LM	54.03
59GRO	71.48	361HT	41.44
112MC	45.5	808PD	12.83
969NA	22.79	363BD	40.91
441LU	51.32	85WED	73.71
404CV	43.1	37KOL	56
436TI	0.59	160CH	18.72
904NA	67.57	550EP	42.14
670GE	11.35	62GRO	92.71
471NS	20.23	67PTA	53.82
232ST	10.95	120EL	104.77
546PL	58	351PW	34.83
239CR	32.27	764AL	63.2
213BA	11.27	332AD	37
738CY	44.12	479MD	23
435KT	6.69	759FO	40.64
594WD	20.52	512CN	92.93
4CAL	9.09	562WD	83.83
269RV	15.74	73RAY	13.44
781EG	11.67	100BL	53.71
40LNB	95.18	741OK	69.92
18LOB	31.78	752FO	77.79
611HU	25.88	381MC	24.44

Question No.: STAFF 1-101

982GR	8.29	41LNB	83.9
380MC	23.26	577CN	51.7
544JT	45.81	82WED	120.25
461SI	57.73	599TA	29.06
673MA	24.86	560WD	64
392WO	68.4	184PS	20.14
163VD	36.36	185PS	25.14
137TG	75.4	31200	17.85
156BE	26.56	241WS	23.5
403CV	51.59	782PW	23
549JT	94.29	111MC	64.4
711MG	15.2	754FO	82.7
324CO	57.11	86WED	81
917SW	36.33	724ME	65.81
152RS	93.25	535SH	54.85
48TCO	7.16	515CN	76.13
521BW	39.36	106HM	56.83
23HKS	106.92	540LA	27.97
326CO	57.57	87WED	12
674MA	27.25	33BRC	100.33
123EL	103.84	476MD	39.79
182AM	17.53	113WS	57
155BE	41.89	733SN	19
744DA	16.8	227HI	20.73
110MC	76.69	375MR	34.28
352ON	76.33	45PTN	84.18
654VT	27.99	490LI	14.5
724DY	49.23	64CRK	70.86
634WT	34.84	37TYR	43.67
240WS	21.74	340WN	25.43
32BRC	72.06	745OK	58.67
73ECH	44	131VI	38.66
310SP	39.85	362BD	43.25
477MD	25.03	341WN	28.23
151RS	71.78	88WED	66.46
740OK	37.47	122EL	57.69
750FO	60.83	22YAN	106.68
520BW	18.33	765AL	31.83
231ST	42.2	708GL	55.78
75RAY	4.85	43LNB	44.78
456FL	35.04	103CD	86.06
463SI	38.5	68PTA	27.94
166CH	18.67	105CD	76.47

Question No.: STAFF 1-101

72ECH	25.32	98SPU	49.53
511CN	116.57	21NOE	84.64
537LA	38.5	133CE	71.17
568DC	11.04	61CRK	33.33
883GR	11.13	134TG	95.04
743DA	13.14	270BC	5.18
771AL	65.3	165CH	8.86
90MPL	62.2	159CH	20.56
342WN	40.43	361BD	61.63
905NA	16.2	107HM	32.19
211BA	29.42	25HKS	78.25
346JT	28.26	50FTW	58.67
806PD	16.87	452KT	35.09
233ST	10.17	92STG	84.75
251KP	9.47	54FTW	34.67
70PAS	28.21	81LAV	68.21
320AP	32.38	725DY	20.66
628TE	8.77	93STG	104.9
608HU	168.95	731SN	3.71
93CHI	21	682GR	63.5
268RV	19.45	758FO	45.18
127SO	13.89	350ON	33.89
74RAY	21.44	46PTN	57.74
119RB	6.93	84DQN	85.67
257GV	11.38	567FT	4.86
345OI	22.18	193NE	58.95
600HU	22.31	L008F	11.93
727DY	31.24	250BY	8.41
102CD	104.47	27NOE	48
26HRN	7.37	29NOE	80
325CO	68.35	28NOE	39.75
768AL	37.71	65CRK	49.91
393WO	58.73	374MR	19.03
141LV	18.02	514CN	53.5
17LOB	45.7	591AP	49.43
462SI	30.88	101BL	28.84
593WD	47.27	78JRU	37
164VD	33.43	130VI	86.43
536SH	43.62	67MAN	45.36
723DY	33.43	35KOL	83.08
307SP	33.47	360BD	46.56
363HT	49.98	85DQN	40.5
736CY	19.68	42LNB	77.25

Question No.: STAFF 1-101

91STG	73.84	351ON	37.54
121EL	48.29	60CRK	67
317TA	30.65	131CE	84.71
507CN	93.6	112WS	73.6
6CAL	17.77	23YAN	92.17
92CHI	7.09	36KOL	88.27
104CD	104.82	702GL	45.89
113MC	88.43	681GR	9.71
135TG	39.41	90STG	85.92
238CR	11.88	91MPL	29.57
336NC	101.48	575CN	76.92
741DA	33.86	22HKS	85
742OK	59.25	633WT	71
31BRC	102	704GL	57.86
516CN	28.56	69PTA	27.73
519DO	20.77	153RS	51.8
226HI	3	478MD	45.21
382MC	19.14	77JRU	102.67
598TA	21.19	129VI	69.88
706GL	76.88	262TR	20.5
70ECH	22.43	111WS	52.83
104SL	20	130CE	66.91
138CI	10.84	51FTW	62
142LV	9.62	71ECH	42.33
158HA	22.82	17WWK	57
15WWK	91	194NE	3
161VD	57.4	132VI	72.13
180AM	40.38	26NOE	72.5
197NE	16	504CN	46.6
261TR	46.69	316TA	16.53
310FR	40.82	721ME	58.5
311SP	38.23	99SPU	59.73
327CO	56.35	34KOL	75.25
335NC	50.52	801FE	10.2
350PW	25.2	212BA	3.5
35HDN	17.02	703GL	53.26
569DC	8.21	769AL	37.06
681VI	49.22	126SO	25.62
753FO	52.19	280ML	45.13
809PD	9.53	39TYR	3
584LM	102.14	472NS	23.57
744OK	58.89	87DQN	51.67
304NC	47.82	136TG	68.67

Question No.: STAFF 1-101

538LA	38.43	16LCN	70.75
522BW	35.36	281ML	62.88
337NC	60.22	330AD	8.5
66MAN	104.6	430TI	49.35
580LM	71.74	528CM	5.33
743OK	70.2	63CRK	18.5
763AL	41.06	80LAV	85.63

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. PI12
Ending Sequence No. PI13

Question No.: STAFF 1-102

Part No.:

Addendum:

Mobile Generation

Question:

Please provide an explanation of any alternatives to mobile generation facilities considered by the TDU before entering a lease for or procuring mobile generation facilities.

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

ETI does not maintain paid lease agreements for mobile generation facilities outside of actual storm restoration incidents. Instead, ETI utilizes company-specific mobile generation support storm contracts that have been pre-negotiated outside of emergency restoration incidents. Pre-negotiation generally enables ETI to more quickly procure and deploy mobile generation when needed during emergency incidents while avoiding price increases that may occur during emergency incidents when demand for mobile generation may exceed supply. These contracts do not commit ETI to making payments for mobile generating facilities when they are not needed, and do not reserve specific mobile generators for a future event. Instead, they provide ETI the optionality to quickly procure generation when needed at pre-established pricing. During storm response, ETI leases mobile generation facilities when specific needs have been identified and only on a temporary basis, until the Company expects to restore power to the impacted customer(s).

ETI has an established restoration process that is followed to bring critical facilities back online as soon as possible (see the Company’s response to Staff 1-44). Mobile generation is typically considered in instances in which ETI anticipates having extended outages such that the procurement and installation of those generators will enable the Company to bring targeted facilities back online sooner. When restoring power to customers during major restoration incidents, there are three feasible options:

Question No.: STAFF 1-102

- 1) Returning the customer to service via normal (“pre-storm”) means;
- 2) Switching (rerouting power flow to adjacent circuits when possible to take advantage of facilities and equipment not damaged by the storm); or
- 3) Installing temporary mobile generation facilities to provide power until service can be restored.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. PI14
Ending Sequence No. PI14

Question No.: STAFF 1-103

Part No.:

Addendum:

Mobile Generation

Question:

Please describe the specific use cases contemplated by the TDU before executing a contract for the lease or procurement of mobile generation facilities.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

Please refer to the Company's response to Staff 1-102.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. PI15
Ending Sequence No. PI16

Question No.: STAFF 1-104

Part No.:

Addendum:

Mobile Generation

Question:

Please provide the following information concerning mobile generation facilities in your possession:

- a. The total capacity, in MWs, of mobile generation facilities leased or procured before July 8, 2024:
- b. The rationale for leasing or procuring that capacity.
- c. And how mobility and capacity were prioritized when leasing or procuring mobile generation facilities.

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

- a. Please refer to the Company’s response to Staff 1-102.
- b. Please refer to the Company’s response to subpart a.
- c. Please refer to the Company’s response to Staff 1-102. During Hurricane Beryl, ETI procured and prioritized mobile generators based on a multitude of factors. ETI Customer Service collaborated with local government officials and emergency operations teams to strategically identify designated cooling centers and vulnerable public water and sewage utility infrastructure in the hardest hit areas that would take longer to restore service in. Customer Service also procured mobile generators to provide power for hotels that accommodated restoration crews that were

Question No.: STAFF 1-104

strategically housed in the hardest hit areas to help expedite the restoration process. Please also refer to the Company's response to Staff 1-98 for the capacity of the mobile generators procured to meet these needs, all of which were one megawatt or less and can be mobilized via truck without permits and with little to no notice. Please also refer to the Company's response to Staff 1-112.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. PI17
Ending Sequence No. PI18

Question No.: STAFF 1-105

Part No.:

Addendum:

Mobile Generation

Question:

Provide the following information for mobile generation facilities already under lease or procured before July 8, 2024:

- a. The size, in MWs, of each deployed mobile generation facility;
- b. The length of time needed to move each deployed mobile generation facility from storage to its designated staging area;
- c. the length of time needed to move each mobile generation facility from staging to its deployment location;
- d. An explanation for how and where the mobile generation facility was used; and
- e. If a mobile generation facility was not used, an explanation as to why.

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

- a. ETI’s mobile generation facility strategy does not entail leasing or procuring mobile generation facilities prior to extreme weather events. Please see the Company’s response to Staff 1-102.

Question No.: STAFF 1-105

- b. Not applicable. Please refer to the Company's response to subpart a.
- c. Not applicable. Please refer to the Company's response to subpart a.
- d. See the Company's response to Staff 1-113 for the customers (by type) served with mobile generation facilities leased during the Hurricane Beryl restoration and the size of generator used.
- e. Please refer to the Company's response to subparts a and d.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. P19
Ending Sequence No. P19

Question No.: STAFF 1-106

Part No.:

Addendum:

Mobile Generation

Question:

Please describe all situations in which the TDU's leased or procured mobile generation facilities were deployed before Hurricane Beryl. If applicable, please describe how those previous deployment situations differed from the use cases initially contemplated by the TDU.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

ETI has performed two smaller mobile generation deployments before Hurricane Beryl. The first was in East Texas during Hurricane Laura, when ETI deployed four units to help support a lodging hotel for line-workers, a water treatment facility, a meal delivery service (Meals on Wheels), and a critical industrial customer. In addition, ETI deployed a single mobile generator earlier this year to support a warming center during the January 2024 freeze.

The use cases for these previous limited deployments were consistent with the use cases contemplated by ETI. Please also refer to the Company's response to Staff 1-102.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witnesses: Stuart Barrett,
Francis Shannon
Beginning Sequence No. PI56
Ending Sequence No. PI57

Question No.: STAFF 1-107

Part No.:

Addendum:

Mobile Generation

Question:

Please provide the following information on power restoration plans or procedures regarding critical infrastructure facilities.

- a. Did the TDU develop a list of critical infrastructure facilities within the TDU's service territory?
 - b. Did the TDU develop emergency preparedness plans in collaboration with critical infrastructure facilities in its service territory?
 - c. Did the TDU develop a list of routes for use in reaching critical infrastructure facilities during an emergency or significant power outage?
 - d. Did the TDU identify the specific steps it would take to energize critical infrastructure facilities in its service territory with mobile generation facilities?.
 - e. Did the TDU pre-position mobile generation facilities at critical infrastructure facilities in its service territory to respond to significant power outages in a timely manner?
-

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or

temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

- a. Yes. ETI maintains a list of critical care customers that includes critical infrastructure facilities. This list of customers is reviewed periodically throughout the year by ETI customer service team members and management in order to verify its accuracy.
- b. While ETI did not develop emergency preparedness plans in collaboration with critical infrastructure facilities, those facilities are contemplated in the restoration planning and prioritization processes. Please also refer to the Company’s response to Staff 1-44.
- c. ETI monitors access to affected areas as needed as part of the Company’s emergency response and notifies personnel when needed (and may engage law enforcement) if ETI anticipates or experiences access issues to critical facilities.
- d. Yes. ETI has a process in place to manage the energization of mobile generation facilities when used as part of storm restoration efforts. ETI regional customer service managers communicated with customers regarding the availability and process for utilizing temporary backup generation.
- e. ETI did not pre-position mobile generation before Hurricane Beryl at customer facilities.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. LC14
Ending Sequence No. LC15

Question No.: STAFF 1-108

Part No.:

Addendum:

Mobile Generation

Question:

Please provide the following information regarding drills, procedures, and plans to use mobile generation facilities.

- a. Did the TDU develop operating plans or procedures for the deployment of mobile generation? If so, please describe the TDUs strategy for deploying its mobile generation.
 - b. Did the TDU assign specific personnel to manage, either directly or indirectly, the operation and deployment of its mobile generation facilities?
 - c. Did the TDU conduct personnel trainings or preparedness drills for the operation of its mobile generation facilities?
 - d. Please describe any plans or procedures developed in coordination with other TDUs or mutual assistance groups for the operation or deployment of mobile generation.
-

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

- a. Yes. Please see the Company’s response to Staff 1-112. In addition, mobile generators would only be leased at the time and for the time period for which they were needed, depending on factors including the type of damage customers utilizing the generation may have received, their ability to take power once it is restored by ETI, and the overall restoration timeline in their area. ETI maintains

Question No.: STAFF 1-108

- lists of customers who may need backup generation on an ongoing basis in order to ensure an understanding of the type and size of mobile generation that may be needed.
- b. Yes. ETI has an established team in place that handles mobile generation as their assigned role during storm restoration and other applicable emergency incidents. That team works directly with designated customer service, transmission, and distribution personnel during emergency incidents, whose roles also include this activity during major restoration incidents.
 - c. Yes. The deployment of mobile generation facilities was included in the Entergy Services, LLC storm response exercise conducted in May 2024.
 - d. ETI does have the ability through mutual assistance agreements related to materials, equipment, and supplies to procure mobile generators from peer utilities if needed and available. See the Company's response to Staff 1-116.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. CR1
Ending Sequence No. CR2

Question No.: STAFF 1-109

Part No.:

Addendum:

Mobile Generation

Question:

Please provide the following information regarding each mobile generation facility borrowed during Hurricane Beryl as part of a mutual assistance program or agreement.

- a. How the original request for mobile generation facilities through mutual assistance was made;
 - b. The size, in MW, of each borrowed mobile generation facility;
 - c. The date the mutual assistance program or agreement was entered;
 - d. The date the borrowed mobile generation facility was deployed;
 - e. The duration, in hours, of the borrowing agreement. Describe whether this duration was for a fixed number of hours or a specific number of operating hours;
 - f. The identity of the original owner or lessor of the mobile generation facility subject to the mutual assistance program or agreement; and
 - g. Whether obtained mobile generation facilities were used during, or in power restoration efforts following, Hurricane Beryl.
 - i. If the mobile generation facility was not deployed, provide an explanation as to why the mobile generation facility was not deployed; and
 - ii. If the mobile generation facility was deployed, provide an explanation of how it was used.
-

Question No.: STAFF 1-109

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

- a.-g. ETI did not obtain mobile generation facilities through mutual assistance programs or agreements during Hurricane Beryl.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. CR3
Ending Sequence No. CR3

Question No.: STAFF 1-110

Part No.:

Addendum:

Mobile Generation

Question:

When mobile generation facilities are offered to other TDUs during significant power outages, what information does the loaning TDU require from the borrowing TDU related to the probable operation of the mobile generation?

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

ETI has not loaned or borrowed mobile generation from other utilities.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. CR4
Ending Sequence No. CR4

Question No.: STAFF 1-111

Part No.:

Addendum:

Mobile Generation

Question:

Please describe if any mobile generation facilities in the TDU's control were deployed in the service territories of municipally owned utilities or electric cooperatives during Hurricane Beryl.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

ETI did not deploy any mobile generation facilities outside of its service territory during Hurricane Beryl.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Commission Staff

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. CR5
Ending Sequence No. CR5

Question No.: STAFF 1-112

Part No.:

Addendum:

Mobile Generation

Question:

Please describe how the determination was made regarding when and where to deploy or redeploy each mobile generation facility during, or in response to, Hurricane Beryl.

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

Prior to landfall, the ETI critical customer list was reviewed by key personnel (including the ETI Vice President of Customer Service) to ensure it was accurate. Post-landfall, estimated restoration times were monitored for applicable customers, and outreach was conducted by local Customer Service personnel in the affected areas to help assess critical customers’ mobile generation need and identify any additional areas where there was a need (such as a church or community center serving as a cooling center or shelter for impacted residents). The ETI leadership team in partnership with restoration planning and prioritization personnel worked together to develop the plan for mobilization of generators, where needed.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. CR6
Ending Sequence No. CR6

Question No.: STAFF 1-113

Part No.:

Addendum:

Mobile Generation

Question:

Please describe the number of distribution customers that had power restored by each mobile generation facility leased or procured by the TDU during, or in response to, Hurricane Beryl.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

The following table reflects the type of customers served by mobile generation facilities during or in response to Hurricane Beryl, each of which provided power to facilities that benefited multiple individuals during the response to Hurricane Beryl.

Customer Category	Gen Size (kW)
Hotel/Lodging	1000
Cooling Center	125
Cooling Center	150
Retail Gas Station	125
Hotel/Lodging	300
Municipal Services	500
Municipal Services	125
Food Service	125
Hospital/Clinic/Pharmacy	300
Municipal Services	150

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. CR7
Ending Sequence No. CR7

Question No.: STAFF 1-114

Part No.:

Addendum:

Mobile Generation

Question:

Please describe the number of distribution customers that had power restored by each mobile generation facility obtained through mutual assistance during, or in response to, Hurricane Beryl.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

ETI did not obtain mobile generation facilities through mutual assistance programs or agreements during Hurricane Beryl.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. EV1
Ending Sequence No. EV1

Question No.: STAFF 1-115

Part No.:

Addendum:

Mobile Generation

Question:

Please describe the number of transmission customers that had power restored by a mobile generation facility leased or procured by the TDU during, or in response to, Hurricane Beryl.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

ETI did not utilize mobile generation facilities for any transmission customers during Hurricane Beryl.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. EV2
Ending Sequence No. EV2

Question No.: STAFF 1-116

Part No.:

Addendum:

Mobile Generation

Question:

Please describe the number of transmission customers that had power restored by a mobile generation facility obtained through mutual assistance during, or in response to, Hurricane Beryl.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

ETI did not obtain mobile generation facilities through mutual assistance programs or agreements during Hurricane Beryl.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. EV3
Ending Sequence No. EV3

Question No.: STAFF 1-117

Part No.:

Addendum:

Mobile Generation

Question:

If applicable, please note if any fueling problems arose with deployed mobile generation facilities during, or in response to, Hurricane Beryl. If so, please describe the fueling problems in detail and any action that the TDU took in response.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

No fueling issues arose during the use of mobile generation facilities for Hurricane Beryl.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. EV4
Ending Sequence No. EV4

Question No.: STAFF 1-118

Part No.:

Addendum:

Mobile Generation

Question:

Please describe all costs incurred by the TDU that were associated with the deployment of mobile generation facilities during, or in response to, Hurricane Beryl.

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

Please see the Company’s response to Staff 1-98 for the total cost incurred for each mobile generation facility used during, or in response to, Hurricane Beryl. Those costs were associated with the following:

- Weekly lease rate per generator;
- Weekly lease rate for cables needed for each generator;
- Freight costs;
- Labor for connection and disconnect;
- Labor for administrative and project management services;
- Rental costs for temporary fencing and bollards; and
- Fuel and fuel delivery costs.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. EV5
Ending Sequence No. EV5

Question No.: STAFF 1-119

Part No.:

Addendum:

Mobile Generation

Question:

Please describe any obstacles that limited the deployment of mobile generation facilities during, or in response to, Hurricane Beryl.

Response:

Entergy Texas, Inc. ("ETI") is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act ("PURA") § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities ("TEEEF"). Notwithstanding, please see the following response:

ETI's deployment of mobile generation facilities for Hurricane Beryl was limited only by the time required to source and deploy those facilities.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
PROJECT NO. 56822

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

Prepared By:
Sponsoring Witness: Stuart Barrett
Beginning Sequence No. EV6
Ending Sequence No. EV6

Question No.: STAFF 1-120

Part No.:

Addendum:

Mobile Generation

Question:

Please describe any procedural improvements that the TDU intends to make prior to the next deployment of mobile generation facilities. If available, please reference specific sections of any after action report or lessons learned document the TDU has created.

Response:

Entergy Texas, Inc. (“ETI”) is a vertically integrated electric utility operating outside of the Electric Reliability Council of Texas region. Pursuant to Public Utility Regulatory Act (“PURA”) § 39.452(d)(1), the provisions of PURA § 39.918 do not apply to ETI, including those pertaining to procuring, operating, and recovering the cost of mobile generation or temporary emergency electric energy facilities (“TEEEF”). Notwithstanding, please see the following response:

While ETI was able to procure and deploy mobile generation facilities during Hurricane Beryl, the Company will continue to look for opportunities to more cost-effectively procure and deploy mobile generation.

The following files are not convertible:

Thundestorm).xlsx	TP-56822-00PUS001-X056-001 (May Severe
	TP-56822-00PUS001-X056-002 (Beryl).xlsx
	TP-56822-00PUS001-X057.xlsx
	TP-56822-00PUS001-X078.xlsx
	TP-56822-00PUS001-X100.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.