



Filing Receipt

Filing Date - 2024-11-26 02:36:28 PM

Control Number - 56865

Item Number - 110

**SOAH DOCKET NO. 473-25-00481
PUC DOCKET NO. 56865**

APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO CONSTRUCT A PORTFOLIO OF RENEWABLE GENERATION RESOURCES	§ § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
--	----------------------------	---

**OFFICE OF PUBLIC UTILITY COUNSEL’S
THIRD REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC.**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Third Request for Information to Entergy Texas, Inc. (“ETI”). OPUC requests that ETI provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding or under 16 TAC § 22.144(c)(1), whichever is shorter. OPUC further requests that ETI provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

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

records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

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

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

please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

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

Claim of Privilege

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

SOAH Docket No. 473-25-00481
PUC Docket No. 56865
OPUC's Third Request for Information to
Entergy Texas, Inc.

- 3-1.** Please refer to ETI's response to requests for information ("RFIs") OPUC 1-5 and TIEC 1-1. Please provide a detailed explanation, supporting calculations, and other documents that support the projected accredited summer and winter capacity ratings by year for the proposed Segno Solar Facility ("Segno") and the Votaw Solar Facility ("Votaw") as reflected in the highly sensitive attachment (TP-56865-00TIE001-X001_HSPM) provided in response to TIEC 1-1.

- 3-2.** Please refer to ETI's response to RFI OPUC 1-8. Please identify the percentage of ETI's industrial customers as of June 30, 2024 and the percentage of ETI's megawatt-hour ("MWh") sales to industrial customers for the 12 months ended June 30, 2024 that are comprised by the ETI electric service accounts for the industrial customers listed in ETI's response to RFI OPUC 1-8.

- 3-3.** Please refer to ETI's response to RFI OPUC 1-8. Please identify the percentage of ETI's current industrial customers and the percentage of ETI's MWh sales to current industrial customers that have sustainability goals consistent with those industrial customers listed in ETI's response to RFI OPUC 1-8.

- 3-4.** Please refer to ETI's response to RFI OPUC 1-8. Have the industrial customers listed in ETI's response to RFI OPUC 1-8 informed ETI as to the amount of increased electric service costs they would be willing to accept to achieve their sustainability goals? If so, please provide any documents that indicate their level of willingness to accept additional electric service costs in order to achieve their sustainability goals.

- 3-5.** Please refer to the Direct Testimony of William C. John at 10:2 – 12:15. Please provide, in a fully functioning Excel format, Midcontinent Independent System Operator's projected hourly loads for 2025 through 2029. If unable to provide projected hourly loads for all hours of any year, please provide projected hourly load profiles by day type (weekday and weekend day) and month.

- 3-6.** Please refer to ETI's response to RFIs OPUC 1-18 through 1-21. Please provide Entergy Corporation's current capitalization ratio (i.e., debt-to-equity ratio) and the capitalization ratios at the end of each calendar year of 2019 through 2023.

SOAH Docket No. 473-25-00481
PUC Docket No. 56865
OPUC's Third Request for Information to
Entergy Texas, Inc.

- 3-7.** Please refer to the Direct Testimony of Abigail B. Weaver at 25:12 – 15. Please provide a detailed description of the analysis ETI conducted to determine that the proposals ETI received in response to the 2021 Request for Proposals for Solar Photovoltaic Resources for Entergy Texas, Inc. (“2021 Solar RFP”) and proposals received in response the 2022 Request for Proposals for Renewable Resources for Entergy Texas, Inc. (“2022 ETI Renewables RFP”) accurately reflects the range of proposals that ETI would have received to an RFP issued in 2023.
- 3-8.** Please refer to the Direct Testimony of Abigail B. Weaver at 25:12 – 15. Please provide a detailed description of the analysis ETI conducted to determine that the ETI would not have received a more competitive third-party proposal than those ETI received in response to the 2021 Solar RFP and the 2022 ETI Renewables RFP, if ETI had issued an RFP in 2023.

Date: November 26, 2024

Respectfully submitted,

Chris Ekoh
Deputy Public Counsel
State Bar No. 06507015



Kourtnee Jinks
Assistant Public Counsel
State Bar No. 24097146

Renee Wiersema
Assistant Public Counsel
State Bar No. 24094361

Justin Swearingen
Senior Assistant Public Counsel
State Bar No. 24096794

Chris Ekoh
Deputy Public Counsel
State Bar No. 06507015
1701 N. Congress Avenue, Suite 9-180
P.O. Box 12397

Austin, Texas 78711-2397
512-936-7500 (Telephone)
512-936-7525 (Facsimile)

kourtnee.jinks@opuc.texas.gov (Service)
renee.wiersma@opuc.texas.gov (Service)
justin.swearingen@opuc.texas.gov (Service)
chris.ekoh@opuc.texas.gov (Service)
opuc_eservice@opuc.texas.gov (Service)

**ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL**

CERTIFICATE OF SERVICE

SOAH DOCKET NO. 473-25-00481
PUC DOCKET NO. 56865

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 26th day of November 2024 by facsimile, electronic mail, and/or first class, U.S. Mail.

