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DOCKET NO. 57172

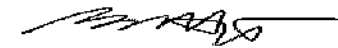
COMMISSION STAFF'S PETITION TO	§	PUBLIC UTILITY COMMISSION
ESTABLISH A SECONDARY CAP ON	§	
PERFORMANCE BONUSES UNDER 16	§	
TAC § 25.182(E) FOR THE 2024	§	
PROGRAM YEAR	§	OF TEXAS

**RESPONSE OF ENTERGY TEXAS, INC.
TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION:
STAFF 1:1 THROUGH 2**

Entergy Texas, Inc. ("ETT" or the "Company") files its Response to Commission Staff's First Request for Information. The response to such request is attached and is numbered as in the request. An additional copy is available for inspection at the Company's office in Austin, Texas.

ETT believes the foregoing response is correct and complete as of the time of the response, but the Company will supplement, correct, or complete the response if it becomes aware that the response is no longer true and complete, and the circumstance is such that failure to amend the answer is in substance misleading. The parties may treat this response as if it were filed under oath.

Respectfully submitted,

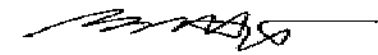


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Attachments: **STAFF 1:1 THROUGH 2**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Commission Staff's First Request for Information has been sent by email to the party that initiated this request in this docket on this the 6th day of January 2025.



George G. Hoyt

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 57172

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

Prepared By: Scott Barrios
Sponsoring Witness: N/A

Question No.: STAFF 1-1

Part No.:

Addendum:

Question:

For each year between 2014 and 2024, please provide all calculations of the avoided cost of capacity in your possession, custody, or control other than those provided by Commission Staff as described by 16 TAC § 25.5(d)(2)(A).

Response:

Entergy Texas, Inc. ("ETI") interprets this question as referring to 16 TAC § 25.181(d)(2)(A).

ETI does not have calculations responsive to this request. See the Rebuttal Testimony of Andrew Dornier at Exhibit ALD-R1, Interchange Item No. 43 in Docket No. 52067, *Application of Entergy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor and Request to Establish Revised Cost Caps* for the Midcontinent Independent System Operator Inc.'s ("MISO") cost of new entry ("CONE") for each MISO planning year from 2014 to 2020 for Local Resource Zone ("LRZ") 9. MISO's calculation of CONE for LRZ9 for more recent planning years is publicly available online.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 57172

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

Prepared By: Scott Barrios
Sponsoring Witness: N/A

Question No.: STAFF 1-2

Part No.:

Addendum:

Question:

For each year between 2014 and 2024, please provide all calculations of the avoided cost of energy in your possession, custody or control, other than those provided by ERCOT as described by 16 TAC § 25.5(d)(3)(A).

Response:

Entergy Texas, Inc. ("ETI") interprets this question as referring to 16 TAC § 25.181(d)(3)(A).

Please refer to the Rebuttal Testimony of Andrew Dornier and Exhibits ALD-R2 and ALD-R3, Interchange Item No. 43 in Docket No. 52067, *Application of Entergy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor and Request to Establish Revised Cost Caps* for a calculation of the avoided cost of energy for certain portions of the Midcontinent Independent System Operator, Inc. ("MISO") Local Resource Zone ("LRZ") 9 for 2014 to 2020. Please also refer to ETI's publicly available annual filings in Project No. 18692, *Avoided Cost Availability of Electric Utility System Cost Data Pursuant to Subst. R. 25.242(e)(2)*.