

# **Filing Receipt**

Filing Date - 2025-03-28 02:53:31 PM

Control Number - 57172

Item Number - 64

### SOAH DOCKET NO. 473-25-05322 DOCKET NO. 57172

COMMISSION STAFF'S PETITION TO	§	BEFORE THE STATE OFFICE
ESTABLISH A SECONDARY CAP ON	§	
PERFORMANCE BONUSES UNDER 16	§	OF
TAC § 25.182(E) FOR THE 2024	§	
PROGRAM YEAR	§	ADMINISTRATIVE HEARINGS

# RESPONSE OF ENTERGY TEXAS, INC. TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION: STAFF 2:1 THROUGH 3

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to Commission Staff's Second 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.

ETI 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,

**Everett Britt** 

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ATTORNEY FOR ENTERGY TEXAS, INC.

Attachments: STAFF 2:1 THROUGH 3

## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Commission Staff's Second Request for Information has been sent by email to the party that initiated this request in this docket on this the 28<sup>th</sup> day of March 2025.

**Everett Britt** 

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

Response of: Entergy Texas, Inc.

Prepared By: Andrew Dornier to the Second Set of Data Requests

Sponsoring Witness: N/A

of Requesting Party: Commission Staff

Question No.: STAFF 2-1 Part No.: Addendum:

### Question:

With reference to the chart on page 14 of the Direct Testimony of Jay Zarnikau, for ETI's load please provide the total load and load weighted average real time energy wholesale market (where Entergy participates) settlement prices for the Peak Periods between December 2013 and February 2024. See, e.g., Exhibit ALD-R2, Rebuttal Testimony of Andrew L. Dornier, Docket No. 52067, Application of Energy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor and Request to Establish Revised Cost Caps (Aug. 6, 2021).

#### Response:

Pursuant to the agreement with the counsel for the Commission staff, this question is limited to seeking information for 2023 and 2024.

The table below shows the Entergy Texas, Inc. Load Zone LMP and Load MWhs for both Day Ahead and Real Time and the calculated Weighted Average LMP for the peak hours for Winter and Summer in 2023 and 2024.

	Date	Hour	Day	Day	Real	Real	Weighted
			Ahead	Ahead	Time	Time	Average
			Schedule	LMP	Load	LMP	LMP
			Load				
Winter	01/31/2023	20	2,550	\$35.55	3,043	\$ 36.91	\$35.77
Summer	08/14/2023	17	4,120	\$89,90	4,150	\$ 38,37	\$89.52
Winter	01/15/2024	21	3,370	\$171.13	3,547	\$ 198.55	\$172.50
Summer	08/08/2024	17	4,060	\$55.00	4,052	\$ 26.42	\$54.94

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

Response of: Entergy Texas, Inc.

Prepared By: Charles John, Olivia Zietz to the Second Set of Data Requests

Sponsoring Witness: N/A

of Requesting Party: Commission Staff

Question No.: STAFF 2-2 Part No.: Addendum:

Question:

With reference to the charts on page 13 of the Direct Testimony of Jay Zarnikau, for load served by ETI, please provide summer peak demand forecast for years 2024 through 2032.

### Response:

Information included in the response contains highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Please see the highly sensitive attachment (TP-57172-00PUC002-X002\_HSPM).

<u>DESIGNATION OF PROTECTED MATERIALS PURSUANT TO PARAGRAPH 4 OF DOCKET NO. 57172 PROTECTIVE ORDER</u>

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.

**Everett Britt** 

Duggins Wren

Mann & Romero, LLP

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

Response of: Entergy Texas, Inc.

Prepared By: Charles John, Olivia Zietz to the Second Set of Data Requests

Sponsoring Witness: N/A

of Requesting Party: Commission Staff

Question No.: STAFF 2-3 Part No.: Addendum:

Question:

With reference to the charts on page 13 of the Direct Testimony of Jay Zarnikau, for load served by ETI, please provide annual energy forecast for years 2023 through 2029.

### Response:

Information included in the response contains highly sensitive protected ("highly sensitive") materials. Specifically, the responsive materials are protected pursuant to Texas Government Code Sections 552.101 and/or 552.110. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Please see the highly sensitive attachment (TP-57172-00PUC002-X003\_HSPM).

<u>DESIGNATION OF PROTECTED MATERIALS PURSUANT TO PARAGRAPH 4 OF DOCKET NO. 57172 PROTECTIVE ORDER</u>

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.

**Everett Britt** 

Duggins Wren

Mann & Romero, LLP