



Filing Receipt

Filing Date - 2025-03-26 01:58:33 PM

Control Number - 57648

Item Number - 374

**SOAH DOCKET NO. 473-25-12927
PUC DOCKET NO. 57648**

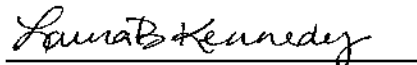
| | | |
|--|--------------------------------------|---|
| APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SETEX AREA RELIABILITY PROJECT IN JASPER, MONTGOMERY, NEWTON, POLK, SAN JACINTO, TRINITY, TYLER, AND WALKER COUNTIES | § § § § § § § § | BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS |
|--|--------------------------------------|---|

**RESPONSE OF ENTERGY TEXAS, INC.
TO CALDWELL'S FIRST REQUEST FOR INFORMATION:
CALDWELL 1:27 ADDENDUM 2**

Entergy Texas, Inc. ("ETI" or the "Company") files this Addendum to its Response to Caldwell'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.

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,

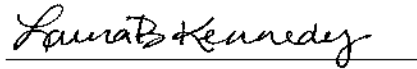


Laura B. Kennedy
ENERGY SERVICES, LLC
919 Congress Avenue, Suite 701
Austin, Texas 78701
P: (512) 487-3961
E: lkenn95@entergy.com

Attachments: **CALDWELL 1:27 ADDENDUM 2**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Caldwell's First Request for Information has been sent by email to the party that initiated this request in this docket on this the 26th day of March 2025.



Laura B. Kennedy

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 57648

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

Prepared By: Paul Williams, Gary L.
McClanahan
Sponsoring Witness: Gary L. McClanahan

Question No.: CLD 1-27

Part No.:

Addendum: 2

Question:

For all preparers and others with input on the preparation of the EA: Provide all communications, including emails, notes, memos, and other documents including telephone conversation notes and meeting notes, that discuss, refer to, are about, or were created during the planning, development, and preparation of the EA. This Request includes communications between or among the preparers, any Entergy employees or consultants who performed any substantive work or provided any substantive assistance or information regarding the routing of the proposed project, and any other person not employed by Entergy or POWER.

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. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Pursuant to agreement with Counsel for Caldwell Companies, this request does not seek privileged work product, trial strategy, or attorney mental impressions. Privileged correspondence that is responsive to this request has been withheld from production consistent with this agreement.

Please see the highly sensitive attachments via the following link:
<https://core.opentext.com/views/folder/public/viewFolder.html?shortLink=ab4326b1bb1a3dd2631fce4aec6bc4dbc400a52caf8bc784>.

Additional responsive documents will be produced as they are identified.

Addendum 1:

Upon further review, Entergy Texas, Inc. (“ETT”) does not consider the attachment (TP-57648-00CLD001-X027-001) through (TP-57648-00CLD001-X027-006) and (TP-57648-00CLD001-X027-009) through (TP-57648-00CLD001-X027-037) to be highly sensitive.

Accordingly, ETI has declassified the attachments and can be viewed via the following link: <https://core.opentext.com/views/folder/public/viewFolder.html?shortLink=35858ac580d5ad0914f229dc4f909f7cef369b4e525f1958>

Addendum 2:

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. Highly sensitive materials will be provided pursuant to the terms of the Protective Order in this docket.

Please see the following attachments (TP-57648-00CLD001-X027-001_ADD2) through (TP-57648-00CLD001-X027-172_ADD2) and (TP-57648-00CLD001-X027-174_ADD2) through (TP-57648-00CLD001-X027-193_ADD2) via the following link: <https://core.opentext.com/views/folder/public/viewFolder.html?shortLink=35858ac580d5ad0914f229dc4f909f7cef369b4e525f1958>. Please see the highly sensitive attachment (TP-57648-00CLD001-X027-173_HSPM_ADD2).

**DESIGNATION OF PROTECTED MATERIALS PURSUANT TO
PARAGRAPH 4 OF DOCKET NO. 57648 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.

Laura Kennedy
Entergy Texas, Inc.