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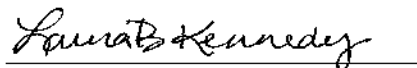
APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SETEX AREA RELIABILITY PROJECT IN JASPER, MONTGOMERY, NEWTON, POLK, SAN JACINTO, TRINITY, TYLER, AND WALKER COUNTIES	§ § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**RESPONSE OF ENTERGY TEXAS, INC.
TO DUNWOODY FAMILY'S THIRD REQUEST FOR INFORMATION:
DUNWOODY FAMILY'S 3:1 THROUGH 4**

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to Dunwoody Family's Third 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,

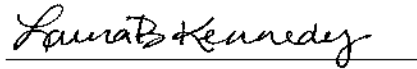


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Attachments: **DUNWOODY FAMILY'S 3:1 THROUGH 4**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Dunwoody Family's Third Request for Information has been sent by email to the party that initiated this request in this docket on this the 31st 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 Third Set of Data Requests
of Requesting Party: The Dunwoody Family

Prepared By: Paul Williams
Sponsoring Witness: Erik M. Guillot

Question No.: DNW 3-1

Part No.:

Addendum:

Question:

Please reference the Direct Testimony of Erik M. Guillot on page 23 of 29, lines 9–12, discussing the basis of the cost estimates, where Mr. Guillot indicates that a construction partner’s “unit pricing for a reference project” within the study area was utilized to develop the transmission cost estimate. Please describe the reference project and provide all documents regarding that construction partner’s unit pricing for that reference project, including cost inputs, assumptions, locations, and parcels.

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.

The “reference project” was developed by the Project engineering team for the purposes of developing unit prices (such as the cost of an insulator) to be universally utilized in each of the route estimates. This approach improves the usefulness of the unit costs and therefore the reasonableness of the route cost estimates developed for the Application.

It should be noted the route used in the reference project was developed without input or review by POWER’s environmental team that prepared the Environmental Assessment and Alternative Route Analysis provided as Attachment 1 to the Application to ensure no route or segment received preferential treatment in the development of this application. The route from the reference project is not one of the 34 routes filed with the Application.

Please refer to Entergy Texas, Inc.’s response to GFC 1-24 at attachment TP-57648-00GFC001-X024 for the center line of the transmission reference project.

Please also see the highly sensitive attachments (TP-57648-00DNW003-X001-001_HSPM) through (TP-57648-00DNW003-X001-006_HSPM).

**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.

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

Response of: Entergy Texas, Inc.
to the Third Set of Data Requests
of Requesting Party: The Dunwoody Family

Prepared By: Paul Williams, Monica
Tillman
Sponsoring Witness: Erik M. Guillot

Question No.: DNW 3-2

Part No.:

Addendum:

Question:

Please reference the Direct Testimony of Erik M. Guillot on page 23 of 29, lines 15–16, discussing the basis of the cost estimates, where Mr. Guillot states that “ROW estimates were calculated for each route by utilizing the average easement costs within the Project study area.” Please provide all inputs for the calculations of ROW estimates for each route.

Response:

Please refer to Entergy Texas, Inc.’s response to GFC 1-9.

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

Response of: Entergy Texas, Inc.
to the Third Set of Data Requests
of Requesting Party: The Dunwoody Family

Prepared By: Paul Williams, Monica
Tillman
Sponsoring Witness: Erik M. Guillot

Question No.: DNW 3-3

Part No.:

Addendum:

Question:

Please reference the Direct Testimony of Erik M. Guillot on page 23 of 29, lines 16–18 discussing the basis of the cost estimates, where Mr. Guillot states that “the average easement cost per acre was developed by reviewing the land values on over 500 parcels located across the study area.” Please provide the description, location, selection criteria, and individual valuation of each of those 500 parcels.

Response:

Please refer to Entergy Texas, Inc.’s response to DNW 3-1 and GFC 1-9.

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

Response of: Entergy Texas, Inc.
to the Third Set of Data Requests
of Requesting Party: The Dunwoody Family

Prepared By: Paul Williams
Sponsoring Witness: Erik M. Guillot

Question No.: DNW 3-4

Part No.:

Addendum:

Question:

Please reference the Direct Testimony of Erik M. Guillot on page 23 of 29, lines 18–19, discussing the basis of the cost estimates, where Mr. Guillot states that “POWER performed an independent estimate of the Project which was used to validate the ETI cost estimate.” Please provide that independent estimate, including what inputs, valuations, and assumptions were used to develop it.

Response:

Please refer to Entergy Texas, Inc.’s responses to DNW 3-1, CLD 1-11, and the Direct Testimony of Erik M. Guillot at Q34.