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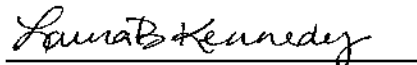
APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SETEX AREA RELIABILITY PROJECT IN JASPER, MONTGOMERY, NEWTON, POLK, SAN JACINTO, TRINITY, TYLER, AND WALKER COUNTIES	§ § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**RESPONSE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

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

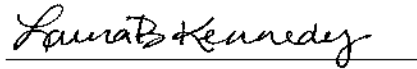


Laura B. Kennedy
ENERGY SERVICES, LLC
919 Congress Avenue, Suite 701
Austin, Texas 78701
P: (512) 487-3961
E: lkenn95@entergy.com

Attachments: **CALDWELL 4:1 THROUGH 3**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Caldwell's Fourth 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 Fourth Set of Data Requests
of Requesting Party: Caldwell Companies

Prepared By: Paul Williams, Taylor
Garvey
Sponsoring Witnesses: Gary L.
McClanahan, Chad Ladner

Question No.: CLD 4-1

Part No.:

Addendum:

Question:

- a. Please provide a detailed narrative explaining why the proposed additional 230/138 kV substation is necessary with Running Bear Substation Option D.
- b. Can the 500 kV part of Substation D connect into the existing 230/138 kV substation that is associated with Running Bear Substation Options A, B, and C.
- c. If your answer to subpart b is anything but an unequivocal "Yes" please explain what prevents the 500kV part of Substation D from connecting to the existing 230/138 kV substation associated with Running Bear Substation Options A, B, and C.
- d. If your response to subpart b is anything but an unequivocal "Yes" please identify and provide your analysis and any documents supporting your response to subpart b.

Response:

- a. To meet all North American Electric Reliability Corporation ("NERC") Standards and satisfy Entergy Local Planning Criteria and Guidelines, the Project must bring power to the area's load serving 230 kV and 138 kV networks. Therefore, the proposed additional 230/138 kV substation is necessary to be able to cut the proposed 500 kV transmission line into both the existing 230 kV and 138 kV systems. Without the additional 230/138 kV substation, the new extra high voltage source would drive an additional constraint on existing 230 kV facilities.
- b. No. There is no room in the existing transmission line corridor (nor is there available open space to expand the existing transmission line corridor) to be able to connect a 230 kV transmission line that meets the planning objectives from Substation Option D to the 230 kV yard associated with Running Bear Substation Options A, B, and C. Furthermore, from a transmission planning perspective, even

if the corridor could be rebuilt or expanded to accommodate the 230 kV connection, the length of that connection would be unreasonably long at over 5 miles, which would materially impact the ability of the Project to meet the planning objectives as further detailed in subpart (c). Please refer to Section IV of the Direct Testimony of Chad J. Ladner.

- c. From a transmission planning perspective, it is expected that the connecting 230 kV line(s) should be limited to a reasonable length to avoid reduced benefits of the Project due to increased impedance that would result in the line serving as a weaker import/export tie line for the region. Any feasible path would exceed 5 miles, resulting in an unreasonably long 230 kV connection that would materially impact the planning objectives.
- d. No such transmission planning powerflow analysis is available as the configuration described by Caldwell in CLD 4-1 subpart (b) was not studied in detail by Entergy's transmission planning team for reasons stated in subpart (c) above. This configuration was also not identified as an alternative by stakeholders during the Midcontinent Independent System Operator, Inc.'s MTEP process as part of their independent assessment.

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

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

Prepared By: Taylor Garvey
Sponsoring Witness: Chad J. Ladner

Question No.: CLD 4-2

Part No.:

Addendum:

Question:

Please provide all reliability analyses that support the need for the proposed project.

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.

Please see the highly sensitive attachments (TP-57648-00CLD004-X002-001_HSPM) through (TP-57648-00CLD004-X002-005_HSPM).

Please refer to Exhibit CJL-1 to the Direct Testimony of Chad J. Ladner.

**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 Fourth Set of Data Requests
of Requesting Party: Caldwell Companies

Prepared By: Paul Williams, Taylor
Garvey
Sponsoring Witnesses: Chad J. Ladner,
Erik M. Guillot

Question No.: CLD 4-3

Part No.:

Addendum:

Question:

Please provide all engineering, reliability, cost, financial, and voltage studies that were conducted to evaluate the four Running Bear Substation Options.

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.

Please refer to Entergy Texas, Inc.'s ("ETI") response to CLD 1-11, at attachment TP-57648-00CLD001-X011-001, for cost estimates for the Running Bear Substation Options. There are no further financial comparisons of the four options.

From a reliability and voltage perspective, the four Running Bear Substation options are electrically equivalent. Accordingly, no studies were conducted to compare the options on these topics.

From an engineering perspective, please refer to ETI's response to DNW 1-2 for one-line diagrams that show the difference among the options. Please see the highly sensitive attachments (TP-57648-00CLD004-X003-001_HSPM) and (TP-57648-00CLD004-X003-002_HSPM) for construction outage analysis conducted to ensure that Option D was feasible, like the other options.

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

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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.