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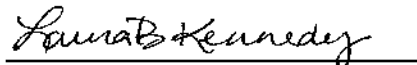
APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SETEX AREA RELIABILITY PROJECT IN JASPER, MONTGOMERY, NEWTON, POLK, SAN JACINTO, TRINITY, TYLER, AND WALKER COUNTIES	§ § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**RESPONSE OF ENTERGY TEXAS, INC.
TO GEORGE WEBSTER'S FIRST REQUEST FOR INFORMATION:
WEBSTER 1:1 THROUGH 5**

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to George Webster'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,

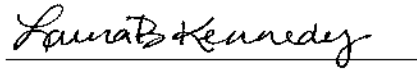


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Attachments: **WEBSTER 1:1 THROUGH 5**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to George Webster's First Request for Information has been sent by email to the party that initiated this request in this docket on this the 18th day of April 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: George Webster

Prepared By: Gary L. McClanahan
Sponsoring Witness: Gary L. McClanahan

Question No.: GWB 1-1

Part No.:

Addendum:

The following requests for information are regarding Segment 34.

Question:

How were the distances from the habitable structures to the centerline defined? I would assume it is from the closest edge of the structure to the centerline. Please clarify.

Response:

Geographic Information System software calculates the distance between the closest point of the digitized outline of the habitable structure to the closest point of the proposed centerline.

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

Prepared By: Gary L. McClanahan
Sponsoring Witness: Gary L. McClanahan

Question No.: GWB 1-2

Part No.:

Addendum:

The following requests for information are regarding Segment 34.

Question:

When and how were the distances in Figure 1 obtained in regard to Segment 34.
Were satellite images without foliage used? What were the dates of the images used?

Response:

Distances from alternative route centerlines to habitable structures were measured during preparation of the Environmental Assessment and Alternative Route Analysis ("EA") provided as Attachment 1 to the Application dating from September 2024 to January 2025.

Habitable structures were identified using Google Earth aerial and satellite imagery of various dates up through 2024 with and without foliage. Habitable structures were also identified during reconnaissance surveys from public viewpoints. See also Section 2.1.4 (Field Reconnaissance) and Section 3.2.1 (Land Use) of the EA.

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

Prepared By: Gary L. McClanahan
Sponsoring Witness: Gary L. McClanahan

Question No.: GWB 1-3

Part No.:

Addendum:

The following requests for information are regarding Segment 34.

Question:

How were habitable structures defined and identified. Is a garage where no one sleeps considered a habitable structure?

Response:

Habitable structures are defined in 16 Texas Administrative Code §25.101 (a)(3), provided as Exhibit GLM-3 to the Direct Testimony of Gary L. McClanahan, Jr. and are identified in accordance with Question 21 of the Application. Please see also Sections 3.2.1 and 4.2.1 of the Environmental Assessment and Alternative Route Analysis provided as Attachment 1 to the Application.

Garages that are detached from a house are not typically considered a habitable structure. However, garages that are attached to a house are included as part of the house.

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

Prepared By: Gary L. McClanahan
Sponsoring Witness: Gary L. McClanahan

Question No.: GWB 1-4

Part No.:

Addendum:

The following requests for information are regarding Segment 34.

Question:

According to Figure 2, Route 21 has 151 Habitable Structures within 300/500 ft. Were the distance data for Segment 34 in Figure 1 used to create the Habitable Structures Value of 151 for Route 21 in Figure 2?

Response:

The values in Figure 2 originated from Table 4-1 of the Environmental Assessment and Alternative Route Analysis ("EA") provided as Attachment 1 to the Application. Figure 1 appears to be the first page of Table 7-22 of the EA.

The data from Table 4-1 of the EA and Table 7-22 of the EA are results from two different Geographic Information System ("GIS") calculation models. However, the measurement process that is used within the GIS software to calculate the results is the same. Table 4-1 of the EA is reporting total number of habitable structures within 300/500 feet (where applicable), whereas Table 7-22 is reporting distances of each habitable structure counted in Table 4-1 to the nearest alternative segment utilized by Route 21. The sum of habitable structures in Table 7-22 of the EA for Route 21 equates to the number of habitable structures reported in Table 4-1 of the EA for Route 21, which is 151 habitable structures.

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

Prepared By: Gary L. McClanahan
Sponsoring Witness: Gary L. McClanahan

Question No.: GWB 1-5

Part No.:

Addendum:

The following requests for information are regarding Segment 34.

Question:

7 of the 13 Habitable Structures for Segment 34 in Figure 1 are less than 300 ft from the centerline. Were these 7 Habitable Structures included in the Route 21 300 ft to 500 ft tabulation in Figure 2?

Response:

Please refer to Entergy Texas, Inc.'s response to GWB 1-4.

Yes, all habitable structures listed in Table 7-22 of the Environmental Assessment and Alternative Route Analysis ("EA") provided as Attachment 1 to the Application are counted in the total number of habitable structures inventoried for Route 21.

The tabulations of habitable structures in Table 4-1 of the EA and Table 4-22 of the EA are not tabulations of habitable structures within the range of 300 feet to 500 feet. The tabulation is all habitable structures within 300 feet of alternative segments that would be constructed at 230 kV or less (i.e., ExD1 and ExD2) and habitable structures within 500 feet of the segments of the Project that would be constructed at 500 kV (i.e., Segment 34).

Please also refer to the Direct Testimony of Gary L. McClanahan, Jr. at Q31 and Q40.