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Item Number - 636

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

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

**GRANT DARNELL ON BEHALF OF HIMSELF AND HIS WIFE
SECOND SET OF REQUESTS FOR INFORMATION TO ENTERGY TEXAS, INC.**

Grant Darnell requests that Entergy Texas, Inc. ("Staff") fully respond to the attached set of requests for information ("RFIs") within three calendar days.

Responses to these RFIs shall conform in all respects to the Public Utility Commission of Texas's rules, including the requirement in 16 Tex. Admin. Code § 22.144(c)(2)(F) that they be made under oath. Responses shall identify the preparer or person under whose direct supervision each response was prepared, and the sponsoring witness, if any. Each request shall be answered separately; responses shall be preceded by the request to which the answer pertains.

Any information responsive to and any questions regarding these requests should be directed to the undersigned.

SOAH DOCKET No. 473-25-12927

PUC DOCKET NO. 57648

Date: April 24, 2025

Respectfully Submitted,

Grant Darnell
13962 Rose Rd
Willis, Texas 77378
(713) 301-0021
Gsd2@comcast.net

By: /s/ Grant Darnell
Grant Darnell

GRANT DARNELL'S SECOND REQUEST FOR INFORMATION TO ENTERGY TEXAS, INC.

General Instructions

1. In responding to each request, please provide information available from all corporate and individual files, as well as from all past and present contractors, staff, employees, officers, and board members and all predecessors and affiliates, as defined below.
2. These requests are continuing in nature and require supplemental responses in accordance with 16 Tex. Admin. Code § 22.144(i).
3. If any information is not available in the exact form requested, provide whatever information or documents that best respond to the request.
4. If any request appears unclear or ambiguous, please contact Grant Darnell as soon as possible to obtain clarification.
5. Each document of one page or more should include
 - a. full name and address of the author(s) who wrote and or prepared
 - b. date of the document
 - c. title and subject of the document
 - d. name and address of every recipient of the document
 - e. be bound, and the individual pages numbered consecutively
6. When the recipient of the RFI is requested to provide an estimation, study, schedule, or analysis, it should also provide the workpapers, underlying facts, inferences, suppositions, estimates, and conclusions necessary to support each study, schedule, or analysis.
7. If the actual data is unavailable, but estimates or approximations are available, provide the estimates or approximations that are the best available information and explain the procedure for developing the information supplied.
8. If the document has been lost, shredded, or destroyed (whether intentionally or unintentionally), an explanation of the reasons for and causes of such loss, shredding or destruction.

9. If any requested information or document cannot be provided in its entirety, it shall be provided to the greatest extent possible, with an indication of the portion of the information or document that cannot be provided and the reason it cannot be provided.
10. If any of the information requested is claimed to be privileged or proprietary, then the response should identify such information, identify all persons who participated in the preparation of the information or who received a copy, read, or examined the information or knows of its substance, state the present location of the information and all copies of it, and identify each person having custody or control of the information or any of the copies
11. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, ETI specifically requests that any electronic or magnetic information (which is included in the definition of “document”) that is responsive to a request herein be produced in a format that is compatible with Adobe Acrobat, Microsoft, and/or Macintosh and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable PDF copy of the entire email string. Attachments to emails should be provided with the email in searchable PDF form, unless it is stored in a different format, in which case the attachment should be produced in its native format.

GRANT DARNELL'S SECOND REQUEST FOR INFORMATION TO ENTERGY TEXAS, INC.

DEFINITIONS

"ETI" refers to Entergy Texas, Inc.

"Staff" refers to, for purposes of these RFIs, the Staff of the ETI and its contractors, employees, members, officers, directors, agents, attorneys, consultants, and all persons acting under contractual arrangements with, or purporting to act on its behalf.

"Date" shall detail the exact day, month, and year of creation and / or edited and / or changed.

The terms **"document"** or **"documents"** are used in their broadest sense to include, all written or graphic matter of every kind and description, whether printed, produced, or reproduced by any process, whether visually, magnetically, mechanically, electronically, or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control.

"Document" or **"documents"** shall also include every copy of a document where the copy contains any commentary, footnote or notation of any kind that does not appear on the original or any other copy. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, emails, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche, and any other data compilations from which information can be obtained and translated, by you, if necessary, into reasonably usable form.

GRANT DARNELL'S SECOND REQUEST FOR INFORMATION TO ENTERGY TEXAS, INC.

DARNELL REQUEST 2-01

Please consider an alteration to Segment 35 within in Routes 25, 34, and Intervenor proposed Routes 35, 37, 38, 40, 41, 42 and 43, by turning approximately 45 degrees at a point approximately 900 feet from the second (2nd) turn on Segment 35. See result of the proposed turn outlined in Blue on Attachment 1 and the kml file accompanying this RFI filing.

- The proposed turn eliminates one (1) tower, located at the corner of ETI's proposed Segment 35 and 38, by cutting the corner.
- Please provide ETI's best available estimate of the alternative Segment 35 in the same format as Table 4-2 Environmental and Land Use Data for Primary Route Evaluation, which is contained in ETI's CCN, Item 2, Attachment 1 Table 4-2 on pages 155 to 189 of 600, for Segments ExA thru 293.
- Please confirm ETI's best available cost estimate for this alternative to Segment 35 if the turn (cutting the corner) eliminates one (1) tower.
- If Entergy is not willing to construct its proposed transmission line on this alternative segment, please explain in detail why not.

ATTACHEMENT 1



[Segment numbers]

ETI proposed segment 35



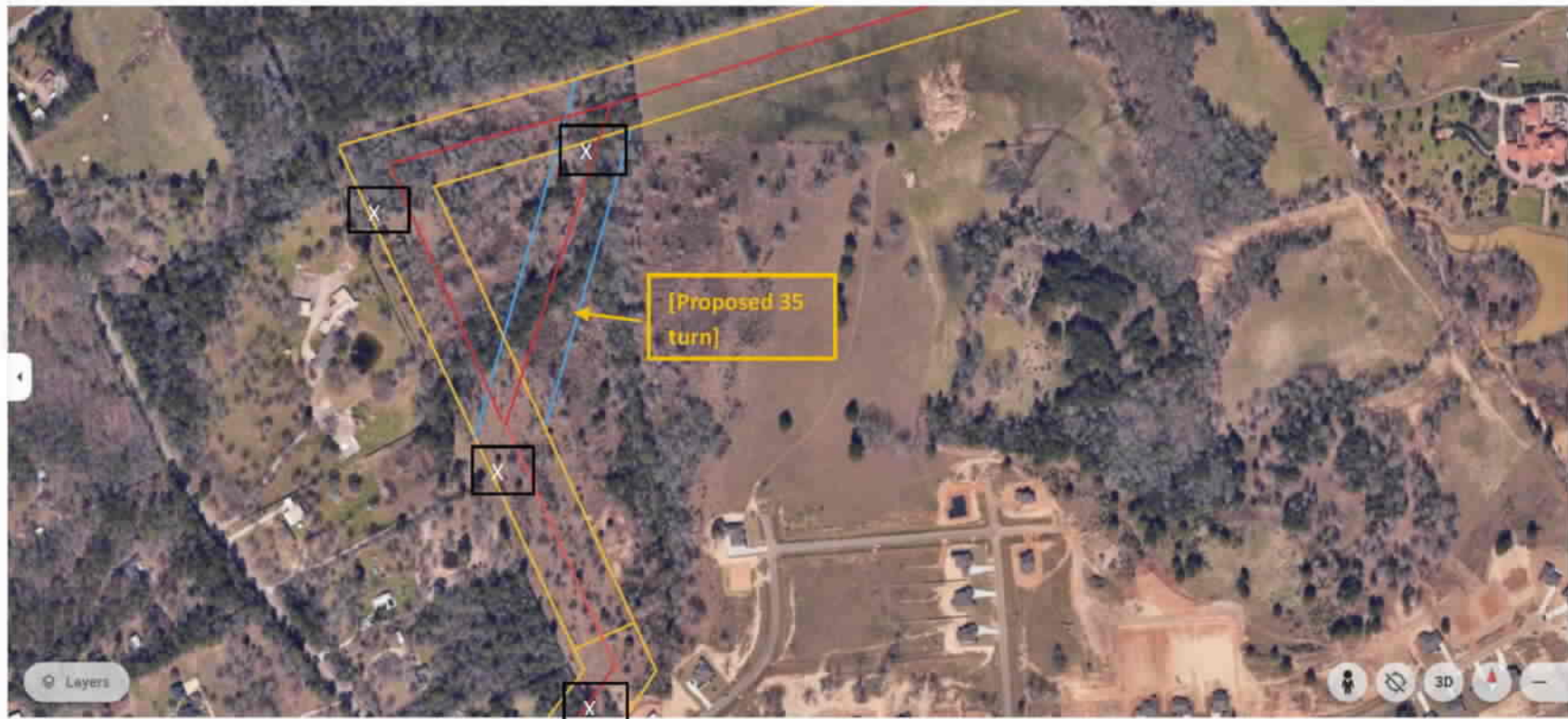
Proposed Modification to segment 35



Center Lines of Segment



ATTACHEMENT 1



Tower Positions



ETI proposed segment 35



Proposed Modification



Center Lines of Segment



The following files are not convertible:

(1) .kml

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.