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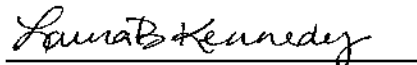
APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SETEX AREA RELIABILITY PROJECT IN JASPER, MONTGOMERY, NEWTON, POLK, SAN JACINTO, TRINITY, TYLER, AND WALKER COUNTIES	§ § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**RESPONSE OF ENTERGY TEXAS, INC.
TO THE ROCK CREEK ALLIANCE'S FIRST REQUEST FOR INFORMATION:
ROCK CREEK 1:1 THROUGH 13**

Entergy Texas, Inc. ("ETI" or the "Company") files its Response to the Rock Creek Alliance'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,

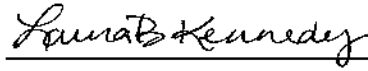


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Attachments: **ROCK CREEK 1:1 THROUGH 13**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to the Rock Creek Alliance's First Request for Information has been sent by email to the party that initiated this request in this docket on this the 30th 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: Rock Creek Alliance

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

Question No.: RCA 1-1

Part No.:

Addendum:

Question:

Please identify and provide copies of all hydrological studies, floodplain analyses, and stormwater impact assessments conducted by or on behalf of Entergy regarding the noticed area related to Segment 51, including but not limited to:

- a. Any evaluation of flood risks or changes to water flow patterns resulting from the construction of transmission line structures within the noticed area related to Segment 51.
- b. Any modeling or analysis of stormwater runoff, erosion, or sediment displacement that could impact Rock Creek Alliance Properties or the adjacent properties.
- c. All communications with federal, state, or local agencies (e.g., Texas Commission on Environmental Quality (TCEQ), U.S. Army Corps of Engineers, or local floodplain administrators) regarding hydrological concerns within the noticed area related to Segment 51.

If no such studies or assessments have been conducted, please explain why and describe any measures Entergy intends to take to evaluate or mitigate hydrological risks in the noticed area related to Segment 51.

Response:

Please refer to Entergy Texas, Inc.'s response to CF 1-1. ETT's responses to CF 1-1, including responses to subparts a, b, and c apply to all segments within the noticed area including Segment 51. No concerns were received from agencies regarding the noticed area related to Segment 51.

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: Rock Creek Alliance

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

Question No.: RCA 1-2

Part No.:

Addendum:

Question:

Identify and please provide all studies, assessments, or reports conducted by or on behalf of Entergy regarding potential health and safety issues including, but not limited to, research suggesting higher rates of childhood cancer, concerning humans related to the installation of an electrical transmission line including, but not limited to, a 500-kV transmission line, within 500 feet of a residential structure within the noticed area related to Segment 51.

Response:

Entergy Texas, Inc. ("ETI") does not conduct or directly sponsor studies related to the referenced potential health and safety issues. ETI follows all applicable guidelines and codes developed by independent government and health organizations.

Please refer to ETI's response to YFT 1-5, which includes an attachment that was available at the public meetings, and that references independent electric and magnetic field ("EMF") research and studies.

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PUBLIC UTILITY COMMISSION OF TEXAS
DOCKET NO. 57648

Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Rock Creek Alliance

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

Question No.: RCA 1-3

Part No.:

Addendum:

Question:

Identify and please provide all studies, assessments, or reports conducted by or on behalf of Entergy regarding potential health and safety issues concerning livestock related to the installation of an electrical transmission line including, but not limited to, a 500-kV transmission line, within 500 feet of a structure and/or grazing area within the noticed area related to Segment 51.

Response:

Please refer to Entergy Texas, Inc.'s response to RCA 1-2.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Rock Creek Alliance

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

Question No.: RCA 1-4

Part No.:

Addendum:

Question:

Please provide all communications with any federal, state, or local agencies (e.g., Texas Parks and Wildlife Department (TPWD), U.S. Army Corps of Engineers, U.S. Fish & Wildlife Service) regarding wetland determinations, environmental permitting, or habitat assessments in the within [sic] the noticed area related to Segment 51.

Response:

Please refer to Entergy Texas, Inc.'s response to CF 1-3.

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: Rock Creek Alliance

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

Question No.: RCA 1-5

Part No.:

Addendum:

Question:

Please provide all documentation regarding any mitigation measures Entergy plans to implement to address potential environmental impacts associated with Segment 51.

Response:

No specific mitigation measures have been developed pertaining to any proposed segments included in the Application, including Segment 51, at this time.

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

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DOCKET NO. 57648

Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Rock Creek Alliance

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

Question No.: RCA 1-6

Part No.:

Addendum:

Question:

State whether Entergy has conducted or intends to conduct a formal study and/or assessment regarding potential health and safety issues concerning humans related to the installation of an electrical transmission line including, but not limited to, a 500-kV transmission line, within 500 feet of a structure and/or grazing area within the noticed area related to Segment 51.

- a. If so, please provide copies of any such studies.
 - b. If not, please explain why not.
-

Response:

- a. Entergy Texas, Inc. ("ETI") has not conducted, and does not have plans to conduct, a formal study and/or assessment regarding potential health and safety issues concerning humans related to the installation of an electrical transmission line including, but not limited to, a 500-kV transmission line, within 500 feet of a structure and/or grazing area within the noticed area.
- b. Please refer to ETI's response to RCA 1-2.

ENTERGY TEXAS, INC.
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Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Rock Creek Alliance

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

Question No.: RCA 1-7

Part No.:

Addendum:

Question:

State whether Entergy has conducted or intends to conduct a formal study and/or assessment regarding potential health and safety issues concerning livestock related to the installation of an electrical transmission line including, but not limited to, a 500-kV transmission line, within 500 feet of a structure and/or grazing area within the noticed area related to Segment 51.

- a. If so, please provide copies of any such studies.
 - b. If not, please explain why not.
-

Response:

- a. Entergy Texas, Inc. ("ETI") has not conducted, and does not have plans to conduct, a formal study and/or assessment regarding potential health and safety issues concerning livestock related to the installation of an electrical transmission line including, but not limited to, a 500-kV transmission line, within 500 feet of a structure and/or grazing area within the noticed area.
- b. Please refer to ETI's responses to RCA 1-2 and 1-3.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Rock Creek Alliance

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

Question No.: RCA 1-8

Part No.:

Addendum:

Question:

Identify any rare, threatened, or endangered species that have been identified or may potentially be impacted by Segment 51, including supporting documentation.

Response:

Please refer to Entergy Texas, Inc.'s responses to CF 1-6 and CF 1-3.

ENTERGY TEXAS, INC.
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Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Rock Creek Alliance

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

Question No.: RCA 1-9

Part No.:

Addendum:

Question:

Please provide all documentation regarding Entergy's policies and procedures for identifying and mitigating risks to private residences within 500 feet of a proposed transmission line related to the noticed area related to Segment 51.

Response:

Please refer to Entergy Texas, Inc.'s response to CLD 1-24.

ENTERGY TEXAS, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
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Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Rock Creek Alliance

Prepared By: Paul Williams
Sponsoring Witnesses: Gary L.
McClanahan, Erik M. Guillot

Question No.: RCA 1-10

Part No.:

Addendum:

Question:

Please provide all geotechnical, topographical, or soil studies that Entergy has conducted or obtained for Segment 51, including any assessments of construction feasibility, slope stability, or soil conditions.

Response:

Entergy Texas, Inc. ("ETI") has not conducted any geotechnical, topographical or soil studies for Segment 51.

Please also refer to ETI's responses to CF 1-8, 1-9, and 1-11. The responses specific to Segment 128 are applicable to Segment 51, except CF 1-11 subpart (b) as the question for that subpart pertains specifically to Carter Lake.

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: Rock Creek Alliance

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

Question No.: RCA 1-11

Part No.:

Addendum:

Question:

Please provide any hydrological or geotechnical studies that Entergy has conducted related to subsurface conditions, water movement, or soil stability within the noticed area related to Segment 51.

Response:

Please refer to Entergy Texas, Inc.'s ("ETI's") response to CF 1-9. ETI's response to CF 1-9 applies to all segments within the noticed area including the noticed area related to Segment 51.

Please also refer to ETI's responses to CF 1-1, CF 1-5, CF 1-8, and RCA 1-10.

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: Rock Creek Alliance

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

Question No.: RCA 1-12

Part No.:

Addendum:

Question:

Please provide all communications between Entergy and any governmental agency regarding the potential impact of the proposed transmission line within the noticed area related to Segment 51.

Response:

Please refer to Entergy Texas, Inc.'s response to CF 1-10. Responses received from agencies did not specify any concerns within the noticed area related to Segment 51.

ENTERGY TEXAS, INC.
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DOCKET NO. 57648

Response of: Entergy Texas, Inc.
to the First Set of Data Requests
of Requesting Party: Rock Creek Alliance

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

Question No.: RCA 1-13

Part No.:

Addendum:

Question:

Please identify and describe the specific construction methods, equipment, and techniques that Entergy intends to use for transmission line installation within the noticed area related to Segment 51, including but not limited to:

- a. Whether Entergy anticipates using heavy machinery, pile-driving, deep excavation, or blasting techniques.
- b. Any analysis conducted regarding potential vibration-related risks any subsurface features, hydrological structures or, terrain modifications in the vicinity of Rock Creek Alliance Properties or surrounding properties.
- c. Any construction staging areas or access routes that may involve grading, excavation, or soil compaction.
- d. The estimated weight and load-bearing impact of construction equipment expected to be used within the noticed area related to Segment 51.

If Entergy has not yet determined the precise construction methods to be used, please provide all internal studies, contractor discussions, or preliminary assessments related to construction feasibility within the noticed area related to Segment 51.

Response:

Please refer to Entergy Texas, Inc.'s response to CF 1-11. The responses specific to Segment 128 are applicable to Segment 51, with the exception of the specific references to Carter Lake in CF 1-11 subpart (b).