Control Number: 50714

Item Number: 18

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APPLICATION OF ENTERGY TEXAS,	§	**BEFORE THE STATE OFFICE**
INC. TO AMEND ITS DISTRIBUTION	§	**OF**
COST RECOVERY FACTOR	§	**ADMINISTRATIVE HEARINGS**

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND REQUEST FOR ADMISSION TO ENTERGY TEXAS, INC. QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8 AND STAFF RFA 1-1

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Energy Texas, Inc. by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 10 working days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: May 5, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Heath D. Armstrong
Managing Attorney

/s/ Taylor P. Denison
Taylor P. Denison
State Bar No. 24116344
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7203
(512) 936-7268 (facsimile)
taylor.denison@puc.texas.gov

**SOAH DOCKET NO. 473-20-3301
PUC DOCKET NO. 50714**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on May 5, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Taylor P. Denison
Taylor P. Denison

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND
REQUEST FOR ADMISSION TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8
AND STAFF RFA 1-1**

DEFINITIONS

1) "Entergy Texas, Inc." or "you" refers to ETI and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND
REQUEST FOR ADMISSION TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8
AND STAFF RFA 1-1**

INSTRUCTIONS

1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.

2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.

4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND
REQUEST FOR ADMISSION TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8
AND STAFF RFA 1-1**

Staff 1-1 Regarding the adjustment to class billing determinants to reflect the number of customers for the 12-month period ending December 31, 2019, please provide workpapers with all formulae intact showing the calculation of the proposed adjustments for each class.

Staff 1-2 Please provide workpapers with all formulae intact showing the calculation of an adjustment to the Lighting class billing determinants to reflect the number of customers for the 12-month period ending December 31, 2019, consistent with the DCRF rule's requirement that rate class billing determinants be "(weather-normalized and adjusted to reflect the number of customers at the end of the period) for the 12 months ending on the date used for purposes of determining the Current Net Distribution Invested Capital."

Staff 1-3 Regarding the Company's proposal to not apply an end-of-period customer adjustment to the billing determinants for the Lighting class, please provide a comprehensive justification for the proposed departure from the DCRF rule's requirement that rate class billing determinants be "(weather-normalized and adjusted to reflect the number of customers at the end of the period) for the 12 months ending on the date used for purposes of determining the Current Net Distribution Invested Capital." Include citations to all DCRF proceedings wherein such an end-of-period customer adjustment issue was contested and where Commission precedent supports the Company's proposal, and to any other Commission decisions that explicitly support the Company's proposal.

Staff 1-4 Refer to Exhibit KS-1 and Schedule X.3. Please explain in detail why:

  a. The actual HDD from Exhibit KS-1 do not match the actual HDD in Schedule X.3 for the Commercial class.
  b. The normal HDD from Exhibit KS-1 do not match the normal HDD in Schedule X.3 for the Commercial class.
  c. The actual CDD from Exhibit KS-1 do not match the actual CDD in Schedule X.3 for the Commercial class.
  d. The normal CDD from Exhibit KS-1 do not match the normal CDD in Schedule X.3 for the Commercial class.
  e. The actual CDD from Exhibit KS-1 do not match the actual CDD in Schedule X.3 for the Governmental class.

f. The normal CDD from Exhibit KS-1 do not match the normal CDD in Schedule X.3 for the Governmental class.

Staff 1-5   Refer to Exhibit KS-1. Please provide the calculations used to compute column [10] for the Residential, Commercial, and Governmental classes.

Staff 1-6   Please describe what distribution system function each of the following items serves? Please provide a complete and detailed explanation and rationale.

a. General Plant:

DCRF Project Number	Project Description
C6PP279ETI	ETX-Network Switch Rem. 2019
C6PP312EPL	EPL-800MHz Radio System Ref. 2019
C6PP278ETX	ETX-Eliminate Leased TDM Service
C6PP282WDO	WDO-2019 PBX Replacements Program
C6PP286EPL	2019 Telecom Cap Equip Replace EPL
C6PP277ETI	ETX-PC Refresh - Enterprise 2019
C1PPTDAH1J	DA Release 1 - Hardware Jackson
C6PP243EPL	BRO-TOWER INSP. 2018
C1PPDR215H	CDR Digital Assets Hardware
C6PPHBT894	Laclede Telecom Project
C6PP256TX0	SBA--Network Switch Refresh 18
C6PPDWPC8T	2018 Computers Utility ETI
C6PP076TDR	ETX-DIS-CIP-003 Version 7
C6PP076TTR	ETX-TRA-CIP-003 Version 7
C1PPTDAH1L	DA Release 1 - Hardware Little Rock
C6PP299TOL	TOL-MW REPLACEMENT 2019

C6PP314ETI	2019 U.P. Supply TX000
C6PP299BEO	WEEKS-MW REPLACEMENT 2019
C1PPDR115H	Cust Digital IVR Hardware
C6PPWS1353	MCPS Laptops and Monitors Purchase
C6PP299DYT	SAM-MW REPLACMENT 2019
C6PPHBT886	CNO Telecom Furniture
C6PP258WDO	WDO Eliminate Leased TDM Services
C6PP301EPL	EPL-Remote Site Infr.Blkt. 2019
C6PP292TEX	ETI - 2019 SIP TRUNKING
C6PP305EPL	EPL Fiber Repl. Mid Level Eq 2019
C6PP259WDO	ETI-PBX Replacements Prog. 2018
C1PPAMHLR1	EAM - R1 Infrastructure LDC
C6PP083SAB	SAB-GTT-FOS-OSI PI Annual Product R
C1PPLHRHDW	BCG Reliability Hardware Costs
C6PP297EPL	ETX-800MHz Radio Coverage 2019
C6PP249TX0	TX Corporate Wireless Refresh & Exp
C1PPAMHJR1	EAM - R1 Infrastructure JDC
C6PP309EPL	EPL-Telecom Monitoring Ref. 2019.
C6PPHBT932	Conroe Conference Room Chairs
C6PPHBT219	NVS-Navasota SC Chairs
C6PPW10TX0	ETI-W10-New PC's 2018
C6PP203WDO	WDO Security Device Remediation

C6PP208EPL	EPL-NW Switch Remediation 2018
C6PP203NVO	NVO Security Device Remediation
C6PP203SBC	SBC Security Device Remediation
C6PP203TOP	TOP Security Device Remediation
C6PPWGP935	SBC Laptop Purchase
C6PP020TXF	TXF-Server Ref. Remediation
C6PP019TXF	TXF--SERVER REF & EXP 2018
C6PP237ETI	Texas - Infu. Cable Mgmt. Remedi
C6PPCRK003	Purchase New Computer for TX SS
C6PPTNX812	Chevyland Relay Laptops
C6PPWGP924	SBC Laptop Purchase
C6PP019TXO	TXO--SERVER REF & EXP
C6PP020TXO	TXO-Server Ref. Remediation
C1PP6DCJ17	CIPv6 Jackson Data Center
C1PP6LRL17	CIPv6 Little Rock Data Center
C6PP254WDO	WDO-Security Device Refresh 2018
C6PPHBT839	Edison Plaza 2018 Restack

b. Intangibles:

C1PPDW0885	Enterprise Analytics
C1PPGMDL01	SW-Grid Modernization Data Lake
C1PPINT059	Application Containerization
C1PP081INT	CBLE-Substation Design Automation
C1PPSNOINT	Service Now Expansion-2018
C1PP274INT	SW - Mainframe Replatforming
C1PPAMDVSW	EAM - Asset Collection / Validation
C6PPAMCETI	EAM Conflation - TX
C1PP285ESI	2019 - UNIX-Linux Ser. and OS Ref.
C1PPDYNTRC	2019 Dynatrace License Purchase
C1PPX053IN	EndPoint Protection - Software
C1PP20INT1	Learning Management
C1PPEAMGIS	EAM/WFMS - EPOCH GIS Software and L
C1PP283INT	2019 Peoplesoft PUM INT WO
C1PP519INT	Spatial Load Forecasting Platform
C1PP308S00	SW-Remote Content Filtering for Clo
C1PP082INT	Software - TSAT-VSAT
C1PP144INN	Rate Admin and Customer Load 2018
C1PP294S00	2019 SQL and Oracle Database Refre.
C1PPLHRSFW	BCG Reliability Software Costs
C1PPBTA191	RPA: Automation Anywhere
C1PP235INT	HANA 2.0 UPGRADE
C6PP062ETI	TX-15260-FP-Regulatory Rate Develop
C1PPAMCOS1	EAM- Conflation Software- ESI

C1PP091INT	SW-P2R Database Replatform
C1PPU12INT	EDE-myEbusiness Enhancements
C1PPBTU191	RPA: Utility Operations
C1PP0INT32	Masking Software
C1PP310INT	SW-P2R Server Upgrade and Refresh
C1PPINT057	Entergy_com Replatform with ZMS
C1PP088IN3	Project CIRCE 2019
C1PP088IN2	CIRCE Rel 2.1 2018
C1PP266INT	Multi-factor Authentication for Rem
C1PP021SW1	SW1- Windows 10 Upgrade
C1PP119INT	Middleware - Consolidation & API Mg
C1PPAMESRI	EAM/WFMS - ESRI GIS Software an
C1PP021SW2	SW2-Windows 10 Upgrade
C1PP032INT	Encryption Software
C1PPBTF191	RPA: Finance
C1PP291RL3	SPO-PCI Biannual Prod Rel 3 2019
C1PPTDASWZ	DA - Software Install and Labor
C1PP0INT89	SW-BI Tools Upgrade & Exp. 18 PH 2
C1PPINT034	Informatica-2018
C1PPICX066	15780-ITRON-FCS Upgrade
C1PPBTS191	RPA: Supply Chain
C1PP028INT	Corp Privileged Access Mgmt Upg
C1PP026INT	LCMSM Upgrade_Cleanup
C1PPBTE191	RPA: ESS
C1PPCF082Z	Record to Report
C6PP292ETI	SW-ETI 2019 SIP TRUNKING
C1PPLRL331	LRL-Little Rock Data Center

C1PPBTI191	RPA: IT
C1PPLRL328	15802-EPOWR_Ent Planned Outage Res
C1PP143INT	SW-Validation Process btw BW and P2
C1PP334INT	Microsoft License 2019 True Up
C1PPS31INT	Certificate Manage Solution 2018
C1PPBTD191	RPA: Incident Resp
C1PP291RL1	SPO-PCI Biannual Prod Rel 1 2019
C1PPICS022	SW 15784-FP-Lease Accounting and GU
C1PP234INT	SW--Forward Proxy Replacement
C1PP335ESI	15760-Enterprise Mobile Manageme
C1PPMA02SW	MA - Upgrade IPS Logility-2018
C1PP267INT	SW-Secure DNS-DHCP-2018
C1PP090INN	SW-Peoplesoft PUM Upgrade Program
C1PP067ATS	ATOS Workplace Svcs Intelligent Doc
C1PPMA8IN3	MA-Project CIRCE 2019
C1PPBTP191	RPA: Power Gen
C1PPINT060	SW-Cisco UC Upgrade & Exp 2019
C1PP291RL2	SPO-PCI Biannual Prod Rel 2 2019
C1PPBTO182	RPA: SPO
C1PPUO038A	Bill Print Vendor Replacement
C1PPDCJ331	DCJ-Jackson Data Center
C1PPMAODLI	Oracle Database Lifecycle Mgmt
C6PPT57INT	TX - SIP Trunking
C1PPLFN331	LFN-Lake Front North
C1PPBTD182	RPA: Incident Response Jun-Dec 201

C1PP044INT	SW--IT Project Mgmt System Upgrade
C1PPBTS182	RPA SUPPLY CHAIN JUNE - DEC 2018
C1PP336ESI	15759-Digital Rights Management
C1PPBTH191	RPA: HR
C1PPBTU182	RPA:Utility Ops June-Dec. 20
C1PPFIN182	Finance Robotic Automation 2Q18
C1PP24INT5	3 & 4 Qtr SQL & Oracle DB Ref. 18
C1PP072INT	SW-Trans Asset Renewal
C1PP219INT	SW-App. Performance Monitoring
C1PP089INT	SWBI Tools Upgrade & Exp 18 PH1
C1PPINT054	SW-View Outage Replacement
C1PPMA267I	MA-SW-Secure DNS-DHCP-2018
C1PPF082FN	Finance Reporting
C1PPU13INT	EDE-COLLECT Upgrade
C1PP019INT	Software Server Ref Exp Prog 2018
C1PPMAF082	Record to Report
C1PP259INT	SW-2018 PBX REPLACEMENT
C1PPBTE182	RPA: ESS June - Dec. 2018
C1PPU51INT	Stakeholder Engagement Mgmt.
C1PPBTI182	RPA:IT June - Dec. 2018
C1PP023INT	Cisco UC Upgrade and Capacity Exp.
C1PPBTP182	RPA: Power Gen Jun-Dec 2018
C1PP204INT	Software - Alert Enterprise
C1PP034INT	ENT-INFORMATICA 10 UPGRADE
C1PPMAP082	MA-Core HR (PR/ESS/MSS/Benefits)

C1PPCF082O	Order to Cash - PeopleSoft Systems Replacement
C1PPC05INT	EDE-Litigation Hold Automation
C1PP284INT	SW-Ser. Ref. and Exp 2019
C1PPINT023	SW - 2019 Server Refresh Rem.
C1PPF74INT	GTT-FOS-OSI PI Annual Product Relea
C1PP10INT2	ME-WH Mgnt Sys Upgrade Phase II
C1PPBTY182	RPA: Safety
C1PPBRT182	RPA: NERC/CIP
C1PP073INT	Enterprise Bi-annual Upgrades
C1PPBTJ182	RPA: Capital Projects
C1PPBTT191	RPA
C1PPINT037	FP-Scalable Asset Vision Cld Serv I
C1PPBTL191	RPA: Legal
C1PP264INT	SW-UNIX-Linux Serv & OS Ref.18
C1PPBTT182	RPA: Jun-Dec 2018
C1PP11INT2	SW - Office 365 - Collaboration-2
C1PP011INT	SW - Office 365 - Collaboration
C1PP152INT	SW - Documentum Upgrade
C1PP245INT	1 & 2 Qtr SQL & Oracle DB ref. 18
C1PPBTH182	RPA: HR June - Dec. 2018
C1PPD14216	SQL and Oracle Database Refresh
C1PPID157A	Network Asset and Conf. Mngmt.
C1PPMMA119	Minor Add Middleware ESB EAI Conv
C1PPC23INT	Outsource Copy Centers
C1PPU02INT	GDT Performance Upgrade
C1PP094INT	CBLE - PowerPlan Lessee

	Accounting
C1PP49INT1	SW1-EDE-Bill Syst Contr Repo Integ
C1PPF082RE	HR Reporting
C1PP090INT	Infra Disaster Recov Automation
C1PPIXC05A	Automation Anywhere
C6PPT59INT	ETX-2018 Reg. Rate Development
C1PPCF082P	Core HR (Payroll/ESS/MSS/Benefits)
C1PP020INT	Upgrade IPS Logility-2018
C1PPCF082T	Source to Pay
C1PPODLINT	Oracle Database Lifecycle Mgmt
C1PPTAMSWZ	EAM - Meters - Software

Staff 1-7   For the intangible and general plant categories listed above, please provide the FERC accounts in which the amounts are booked.

Staff 1-8   Please provide a complete and detailed explanation regarding why ETI has included the following spare transformers in this DCRF application.

DCRF Project Number	Project Description
C6PPDB0091	ETI: Purch (1)138x69-34.5kV | 50MVA
C6PPDB0161	ETI: Spare 138x69-34.5 | 25MVA
C6PPDB0124	ETI: Purch 138-13.8 | 10.5MVA LTC

Staff RFA 1-1 Confirm or deny that the Commission order approving the unopposed stipulation and settlement agreement in Docket No. 48371 includes an ordering paragraph stating "Entry of this Order does not indicate the Commission's endorsement or approval of any principle or methodology that may underlie the settlement agreement and must not be regarded as precedential as to the appropriateness of any principle or methodology underlying the settlement agreement."