



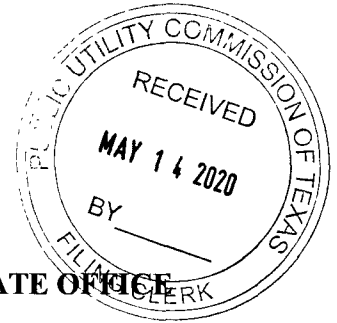
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**SOAH DOCKET NO. 473-20-3631
PUC DOCKET NO. 50803**



**APPLICATION OF ENTERGY
TEXAS, INC. TO ADJUST ITS
ENERGY EFFICIENCY COST
RECOVERY FACTOR**

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**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

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 Entergy 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 20 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 an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: May 14, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
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/s/Courtney Dean
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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 14, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/Courtney Dean
Courtney N. Dean

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

DEFINITIONS

- 1) "Entergy," the "company," or "you" refers to Entergy Texas, Inc. 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.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

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.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO ENTERGY TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

Staff 1-1 Is Entergy Texas, Inc. ("ETI" or "the Company") requesting the EECRF net of energy efficiency costs included in base rates?

Staff 1-2 If the response to Staff RFI No. 1-1 is yes, please provide:

- a) The EECRF amounts (individual component costs) included in base rates;
- b) The FERC accounts and amounts included in base rates for the years being reconciled; and
- c) The FERC accounts and amounts included in base rates for the current energy efficiency program year; and
- d) The FERC accounts and amounts included in base rates for the 2021 energy efficiency program year.

Staff 1-3 If your response to Staff RFI No. 1-1 is no, please provide a detailed explanation.

Rate-Case Expenses

Staff 1-4 Please provide roll-up schedules for the rate-case expenses that the Company is requesting in this proceeding. Please provide amounts for services by month and for expenses by expense category (courier services, postage, travel, room and board, etc.) by month.

Incentive Compensation

Staff 1-5 Please identify all incentive compensation costs included in the Company's EECRF request by incentive compensation plan type for the 2019 2020, and 2021 energy efficiency program years.

Staff 1-6 For each type of incentive compensation identified in Staff 1-5 above, please separate the payments for operational performance measure and for financial performance measures. For the purposes of this request, consider any incentive compensation to be financially based if its payment or amount is based on, derived from, or calculated using inputs from a balance sheet, income statement, or other financial report. Provide the information for incentive compensation expenses directly incurred by ETI and for expenses allocated to ETI by an affiliate.

Affiliates

- Staff 1-7** Please identify all affiliate expenses for which the Company is seeking recovery in this docket. (Are there any affiliate expenses besides the \$20,439.37 identified in the direct testimony of Jessica C. Landry?) Please provide FERC accounts for any affiliate expenses not included on Exhibit JCL-5. Please provide project codes and work order numbers for all affiliate expenses requested in this docket.
- Staff 1-8** What amount of affiliate expense is included in ETI's annual revenue requirement? What procedures did ETI follow to ensure that affiliate expenses requested in this proceeding are not already being recovered in annual base rates?
- Staff 1-9** Does the Company's requested EECRF affiliate expenses include amounts for carrying charges on shared assets? If so, please provide the amount of carrying charges by category, such as depreciation, equity, and debt.

Interest

- Staff 1-10** Please refer to Exhibit JCL-3 and Cell I26 that is hardcoded. Please provide a worksheet showing the calculation or derivation of the amount of (\$28,423) for interest on the over-recovery of the prior EECRF.