PUC DOCKET NO.

NON-STANDARD TRUE-UP FILING OF ENTERGY TEXAS, INC. PURSUANT TO THE FINANCING ORDER IN DOCKET NO. 37247 CONCERNING SCHEDULE SRC

PUBLIC UTILITY COMMISSION OF TEXAS

PETITION

\$\$ \$\$ \$\$ \$\$ \$\$

Entergy Texas, Inc. ("ETI" or the "Company") is filing this Non-Standard True-Up as the servicer of Transition Bonds issued pursuant to the Financing Order issued by the Public Utility Commission of Texas ("PUCT" or "Commission") in Docket No. 37247, *Application of Entergy Texas, Inc. for a Financing Order* (September 11, 2009). ETI makes this filing on its own behalf and on behalf of any successor servicers, which may include any successors and assigns that on a future date provide transmission and distribution service directly to customers taking service at facilities, premises or loads located within ETI's service area.

I. Business Address and Authorized Representatives

The business address of the Company is:

Entergy Texas, Inc. 350 Pine Street Beaumont, Texas 77701.

The business mailing address of the Company is:

Entergy Texas, Inc. P.O. Box 2951 Beaumont, Texas 77704.

The business telephone number of the Company is (409) 838-6631.

The authorized representatives of the Company in this proceeding are:

Rich Lain	George Hoyt
Manager, Regulatory Affairs	Assistant General Counsel
Entergy Texas, Inc.	Entergy Services, LLC
919 Congress Ave., Suite 740	919 Congress Ave., Suite 701
Austin, Texas 78701	Austin, Texas 78701
512-487-3975	512-487-3945
(Fax) 512-487-3998	(Fax) 512-487-3958
	ghoyt90@entergy.com

Inquiries and pleadings concerning this Petition should be directed to the following representative:

George Hoyt Assistant General Counsel Entergy Services, LLC 919 Congress Ave. Suite 701 Austin, Texas 78701 512-487-3945 (Fax) 512-487-3958 ghoyt90@entergy.com

II. Jurisdiction

ETI is an electric utility, as the Public Utility Regulatory Act¹ § 31.002(6) defines that term, and ETI or any successor wires company is the servicer of the Transition Bonds issued pursuant to the Financing Order in Docket No. 37247 (the "Financing Order"). Further, the Commission has jurisdiction over the Company's Non-Standard True-Up filing pursuant to Sections 14.001, 32.001, 36.401-36.406 and 39.301-39.313 of PURA. This filing is made in compliance with Findings of Fact 86-88 and Ordering Paragraph 14 of the Financing Order.

III. <u>Affected Customers</u>

The Non-Standard True-Up will affect amounts billed for energy consumption and demand of retail customers taking service from the Company and any successor wires company and to the facilities, premises and loads of such retail customers.

1

Public Utility Regulatory Act, TEX. UTIL. CODE ANN. §§ 11.001 - 66.016 ("PURA").

IV. Background

On September 11, 2009, the Commission approved the Financing Order, which authorized the issuance of Transition Bonds and the recovery of costs associated with such bonds. ETI issued Transition Bonds pursuant to the Financing Order on November 6, 2009 and began billing System Restoration Costs ("SRC") Charges on November 30, 2009.

The Financing Order provides that retail electric customers must pay the principal, interest, and related costs of the Transition Bonds through SRC Charges, pursuant to the form of tariff approved in the Financing Order. The Financing Order establishes how the annual costs permitted to be recovered through SRC rates are allocated among SRC rate classes. In Findings of Fact 86-88, the Financing Order also sets out a procedure for adjusting the SRC rates to each SRC rate class if the forecasted billing units for any one of the classes for an upcoming period decrease by more than 10% compared to the billing units established for the annual period ending December 31, 2008. This procedure is called the Non-Standard True-Up. The billing units for the Period 13 billing period (November 2021 – October 2022) for the Standby and Maintenance Service ("SMS") and Experimental Economic As-Available Power Service ("EAPS") rate classes are forecasted to decrease by more than 10% compared to the billing units of the billing units established for the annual period during December 31, 2008. Therefore, ETI proposes that the SRC rates to be applied during 2021 and 2022 be adjusted pursuant to the Non-Standard True-Up provision of the Financing Order.

V. <u>Required Showing</u>

Finding of Fact No. 88 in the Financing Order requires ETI to make the Non-Standard True-Up filing at least 90 days before the proposed true-up adjustment is to take effect. ETI proposes that the adjustment be effective for bills rendered beginning on October 29, 2021, which is the date upon which the bills for the first cycle for the month of November 2021 will be rendered, so that the SRC rates applied to the various retail customer classes will reflect the allocation contemplated by the Non-Standard True-Up provisions of the Financing Order.

The proposed SRC rates are set out in proposed revised Schedule SRC — Attachment A, Initial or Adjusted System Restoration Costs Rates, which is attached hereto as Appendix A, and application of those rates is also governed by Schedule SRC, System Restoration Costs, which is unchanged. Calculation of the SRC rates is addressed in the Direct Testimony of Ms. Erin Schorr, which is attached to this Petition.

As shown in the Direct Testimony and exhibits of Ms. Schorr, the justification for applying the Non-Standard True-Up is that the billing units for the SMS and EAPS rate classes are projected to be more than 10% below the billing units for that class for the 12 months ended December 31, 2008 (i.e., the non-standard true-up threshold). Pursuant to Finding of Fact 86 of the Financing Order, such a decrease in forecasted billing units by one or more customer classes requires application of a non-standard true-up.

Additional support for the filing is contained in the testimony and exhibits of Ms. Schorr. For convenience, Appendix B contains the referenced Findings of Facts and Ordering Paragraphs from the Financing Order.

VI. <u>Scope of Proceeding, Procedural Schedule</u>

Finding of Fact No. 88 of the Financing Order states that the scope of the proceeding is limited to determining whether the proposed adjustment complies with the Financing Order. That finding also directs the Commission to conduct a contested case proceeding pursuant to PURA § 39.003. Finding of Fact No. 88 further contemplates that this proceeding will be concluded within 90 days.² Consistent with the Financing Order and the procedural schedules that have been adopted in ETI's prior SRC Non-Standard True-Up proceedings, ETI proposes the following procedural schedule:³

Deadline for intervention	August 31, 2021
Deadline to request a hearing	September 7, 2021
If a hearing is not requested, parties to submit Stipulation/Proposed	September 14, 2021
Findings of Fact and Conclusions of Law. If hearing is requested, parties	
to submit a proposed procedural schedule.	

² FoF 88 provides that "[t]he Commission will issue a final order by the proposed true-up adjustment date stated in the non-standard true-up filing," which filing must be made at least 90 days before the date of the proposed true-up adjustment.

³ See, e.g., Docket No. 51136, Non-Standard True-up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 37247, Order No. 2 (Sep. 4, 2020).

VII. <u>Notice</u>

Pursuant to Ordering Paragraph 14 and FoF 88(b), ETI is notifying the parties to Docket No. 37247 and Staff of this filing by providing them with a copy of this filing. Proof of service is evidenced by the attached Certificate of Service.

VIII. <u>Protective Order</u>

ETI requests that the Commission's Standard Protective Order be issued in this proceeding.

IX. <u>Requested Relief</u>

With the exception of the rates, the tariff set out in Appendix A has been approved by the Commission. ETI requests that the Commission approve the SRC rates set out in Schedule SRC — Attachment A, Initial or Adjusted System Restoration Costs Rates. ETI anticipates that, effective with the first billing cycle for November 2021, the tariff in this filing will supersede the tariff approved in Docket No. 51136.⁴

ETI also requests that (1) a procedural schedule be established leading to Commission approval of the requested rates within 90 days, (2) the notice proposed by the Company be approved as to form, content and proposed distribution, (3) the requested Protective Order be issued, (4) the tariff attached as Appendix A be approved, and (5) ETI be granted such other relief to which the Commission deems ETI to be entitled.

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Docket No. 51136, Order (Jan. 29, 2021).

Dated: July 30, 2021

By:

George Hoyt State Bar No. 24049270

George Hoyt Assistant General Counsel Entergy Services, LLC 919 Congress Ave. Suite 701 Austin, Texas 78701 512-487-3945 (Fax) 512-487-3958 ghoyt90@entergy.com

ATTORNEY FOR ENTERGY TEXAS, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Non-Standard Schedule SRC Trueup Compliance Filing has been sent by facsimile or e-mail, regular mail or hand-delivered to the parties of record in Docket 37247 on this 30th day of July 2021.

George Hoyt

Page 39.12 ATTACHMENT A Effective: October 29, 2021

ENTERGY TEXAS, INC.

SCHEDULE SRC - ATTACHMENT A

INITIAL OR ADJUSTED SYSTEM RESTORATION COSTS RATES

I. RATE CLASSES

For purposes of determining and billing Initial or Adjusted System Restoration Costs Rates, each end-use customer will be designated as a customer belonging to one of eight classes as identified and defined in § V of Rate Schedule SRC.

II. <u>NET MONTHLY RATE</u>

The Initial or Adjusted SRC Rates shall be determined in accordance with and are subject to the provisions set forth in Rate Schedule SRC. Not less than 15 days prior to the first billing cycle for the Company's November 2010 billing month and no less frequently than annually thereafter, the Company or successor Servicer will file a revision to Schedule SRC, Attachment A setting forth the Adjusted SRC Rates to be effective for the upcoming period. If made as a result of the standard true-up adjustment in Rate Schedule SRC, the Adjusted SRC Rates will become effective on the first billing cycle of the Company's November billing month. If an interim true-up adjustment is made pursuant to Rate Schedule SRC, the Adjusted SRC Rates will be become effective on the first billing cycle of the Company's billing month that is not less than 15 days following the making of the interim true-up adjustment filing. If a non-standard true-up filing pursuant to Rate Schedule SRC Rates, the filing will be made at least 90 days prior to the first billing cycle for the Company's November billing month. Amounts billed pursuant to this schedule are not subject to Rider IHE or State and local sales tax.

SRC Rate Class	Initial or Adjus	ted SRC Rates
Residential	\$0.00504	per kWh
Small General Service	\$0.00497	per kWh
General Service	\$0.00465	per kWh
Large General Service	\$0.00256	per kWh
Large Industrial Power Service	\$0.13652	per kW
Experimental Economic As-Available Power Service	\$0.00000	per kWh
Standby and Maintenance Service	\$0.03797	per kW
Street and Outdoor Lighting	\$0.02278	per kWh

The Initial or Adjusted SRC Rates are multiplied by the kWh or kW as applicable, read, estimated or determined during the billing month and will be applied to bills rendered on and after the effective date.

DOCKET NO. 37247

APPLICATION OF ENTERGY TEXAS, § INC. FOR A FINANCING ORDER § §

PUBLIC UTILITY COMMISSION OF TEXAS

FINANCING ORDER

This Financing Order addresses the application of Entergy Texas, Inc. (ETI or the Company) under Subchapter I of Chapter 36 and Subchapter G of Chapter 39 of the Public Utility Regulatory Act¹ (PURA): (1) to securitize the sum of system restoration costs as determined by the Commission in Docket No. 36931,² carrying costs as applicable on the system restoration costs through the issuance of the transition bonds, and other qualified costs; (2) for approval of the proposed securitization financing structure and issuance of transition bonds; (3) for approval of transition charges sufficient to recover qualified costs; and (4) for approval of a tariff to implement the transition charges.

On August 21, 2009, ETI filed a unanimous settlement agreement (Agreement) resolving all issues in this proceeding. As discussed in this Financing Order, the Commission finds that the Agreement and ETI's application for approval of the securitization transaction, as modified by the Agreement and this Financing Order, should be approved. The Commission also finds that the securitization approved in this Financing Order meets all applicable requirements of PURA. Accordingly, in accordance with the terms of this Financing Order, the Commission: (1) approves the securitization requested by ETI; (2) authorizes the issuance of transition bonds in one or more series in an aggregate principal amount of (a) \$539,881,826 of system restoration costs pursuant to the Commission's Order in Docket No. 36931 (36931 Order) (which amount includes carrying costs in the amount of \$43,525,261 through the projected issuance date of the transition bonds of October 26, 2009, calculated at a rate of 10.86% per annum pursuant to the 36931 Order), plus (b) up-front qualified costs of issuing the transition bonds and of retiring some existing debt at ETI, which are capped, and are not to exceed \$5 million plus (i) the cost of original issue discount, credit enhancements and other arrangements to enhance marketability

¹ TEX. UTIL. CODE ANN. §§ 11.001-66.016 (Vernon 2007 & Supp. 2008).

² Application of Entergy Texas, Inc. for Determination of 2008 System Restoration Costs, Docket No. 36931 (Aug. 18, 2009).

12. <u>Interim True-Up</u>

- 84. The servicer is also required to make mandatory interim true-up adjustments semi-annually (or quarterly during the period between the expected final maturity and the legal final maturity of the last bond tranche or class) using the methodology identified in Findings of Fact Nos. 77 to 83 applicable to the annual true-up, (i) if the servicer forecasts that transition charge collections will be insufficient to make all scheduled payments of principal, interest and other amounts in respect of the transition bonds during the current or next succeeding payment period and/or (ii) to replenish any draws upon the capital subaccount.
- 85. In the event an interim true-up is necessary, the interim true-up adjustment should be filed not less than 15 days prior to the first billing cycle of the month in which the revised transition charges will be in effect. In no event would such interim true-up adjustments occur more frequently than every three months if quarterly transition bond payments are required or every six months if semi-annual transition bond payments are required; provided, however, that interim true-up adjustments for any transition bonds remaining outstanding after the expected final maturity date of the last bond tranche or class shall occur quarterly.

13. <u>Non-Standard True-Up</u>

- 86. A non-standard true-up procedure will be applied if the forecasted billing units for one or more of the transition charge customer classes for an upcoming period decreases by more than 10% compared to the billing units (known as the threshold billing units), shown in Appendix D to this Financing Order.
- 87. In conducting the non-standard true-up the servicer will:
 - (a) allocate the upcoming period's PBR based on the PBRAFs approved in Docket No. 36931;
 - (b) calculate undercollections or overcollections, including without limitation any caused by REP defaults, if applicable, from the preceding period in each class by

subtracting the previous period's transition charge revenues collected from each class from the PBR determined for that class for the same period;

- (c) sum the amounts allocated to each customer class in steps (a) and (b) to determine an adjusted PBR for each transition charge customer class;
- (d) divide the PBR for each customer class by the maximum of the forecasted billing units or the threshold billing units for that class, to determine the "threshold rate";
- (e) multiply the threshold rate by the forecasted billing units for each class to determine the expected collections under the threshold rate;
- (f) allocate the difference in the adjusted PBR and the expected collections calculated in step (e) among the transition charge customer classes by using the PBRAFs approved in Docket No. 36931;
- (g) add the amount allocated to each class in step (f) above to the expected collection amount by class calculated in step (e) above to determine the final Periodic Billing Requirement for each class; and
- (h) divide the final PBR for each class by the forecasted billing units to determine the transition charge rate by class for the upcoming period.
- 88. A proceeding for the purpose of approving a non-standard true-up should be conducted in the following manner:
 - (a) The servicer will make a "non-standard true-up filing" with the Commission at least 90 days before the date of the proposed true-up adjustment. The filing will contain the proposed changes to the transition charge rates, justification for such changes as necessary to specifically address the cause(s) of the proposed nonstandard true-up, and a statement of the proposed effective date.
 - (b) Concurrently with the filing of the non-standard true-up with the Commission, the servicer will notify all parties in this docket of the filing of the proposal for a nonstandard true-up.

Financing Order

(c) The servicer will issue appropriate notice and the Commission will conduct a contested case proceeding on the non-standard true-up proposal pursuant to PURA § 39.003.

The scope of the proceeding will be limited to determining whether the proposed adjustment complies with this Financing Order. The Commission will issue a final order by the proposed true-up adjustment date stated in the non-standard true-up filing. In the event that the Commission cannot issue an order by that date, the servicer will be permitted to implement its proposed changes. Any modifications subsequently ordered by the Commission will be made by the servicer in the next true-up filing.

14. Additional True-Up Provisions

- 89. The true-up adjustment filing will set forth the servicer's calculation of the true-up adjustment to the transition charges. Except for the non-standard true-up in Findings of Fact Nos. 86 through 88, the Commission will have 15 days after the date of a true-up adjustment filing in which to confirm the mathematical accuracy of the servicer's adjustment. Except for the non-standard true-up adjustment described above, any true-up adjustment filed with the Commission should be effective on its proposed effective date, which shall be not less than 15 days after filing. Any necessary corrections to the true-up adjustment, because of mathematical errors in the calculation of such adjustment or otherwise, will be made in future true-up adjustment filings. Any interim true-up may take into account the PPR for the next succeeding 12 months if required by the servicing agreement.
- 90. The true-up procedures contained in Schedule SRC found in Appendix B to this Financing Order are reasonable and will reduce risks related to the transition bonds, resulting in lower transition bond charges and greater benefits to ratepayers and should be approved.
- 91. The broad-based true-up mechanism and the State pledge described above, along with the special purpose entity's bankruptcy remoteness from ETI and the collection account, will serve to minimize if not effectively eliminate, for all practical purposes and circumstances, any credit risk to the payment of the transition bonds (i.e., that sufficient

- 14. **True-Ups.** True-ups of the transition charges, including standard, interim and non-standard true-ups, should be undertaken and conducted as described in Schedule SRC. The servicer shall file the true-up adjustments in a compliance docket and shall give notice of the filing to all parties in this docket.
- 15. **Ownership Notification.** Any entity that bills transition charges to retail consumers shall, at least annually, provide written notification to each retail consumer for which the entity bills transition charges that the transition charges are the property of BondCo and not of the entity issuing such bill.

C. Transition Bonds

- 16. Issuance. BondCo is authorized to issue transition bonds as specified in this Financing Order. The ongoing qualified costs described in Appendix C may be recovered directly through the transition charges.
- 17. ETI may securitize up-front qualified costs in accordance with this Financing Order, subject to the cap on ETI's securitizable up-front qualified costs as shown in this Financing Order. In the issuance advice letter, ETI will update the SEC registration fee, rating agency fees, and underwriters' fees. The cap on up-front qualified costs does not apply to costs associated with: (1) credit enhancements and arrangements to enhance marketability, including original issue discount, provided that the Commission's designated representative and ETI agree in advance that such enhancements and arrangements provide benefits greater than their tangible and intangible costs; (2) the costs of the Commission's financial advisor, if the Commission hires a financial advisor to assist it with issuance of the bonds; and (3) any costs incurred by ETI to defend this Financing Order, if this Financing Order is appealed.
- 18. ETI may recover its actual ongoing qualified costs (including amounts required to provide a return on the portion, if any, of capital contributions in excess of 0.5% of the original principal amount of each series of bonds, as described in Finding of Fact 62) through its transition charges. The amount of ongoing qualified costs is subject to updating in the issuance advice letter to reflect a change in the size of the transition bond issuance and other information available at the time of submission of the issuance advice

AFFIDAVIT OF ERIN SCHORR

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STATE OF LOUISIANA

PARISH OF NEW ORLEANS

BEFORE ME, the undersigned authority, on this day personally appeared Erin Schorr, who, having been placed under oath by me states as follows:

- 1. "My name is Erin Schorr, Regulatory Analyst in the Fuel and Special Riders Department of Entergy Services, LLC. My business address is 639 Loyola Avenue, New Orleans, Louisiana 70113. I am over the age of twenty-one, of legal age and a resident of the State of Louisiana, I am of sound mind, capable of making this affidavit, and personally acquainted with the facts stated herein. The statements herein are true and correct and I am authorized to make them to the Public Utility Commission of Texas in Connection with the Non-Standard True-up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 37247 Concerning Schedule SRC.
- 2. I am responsible for the following exhibits and workpapers to the filing package accompanying Entergy Texas, Inc.'s ("ETI") Petition in the above-styled proceeding.
 - Exhibit EDS-1 (including workpapers), which contains commercially sensitive financial forecast information relating to the calculation of ETI's system restoration cost charges.
- 3. This type of forecast information is maintained confidentially by ETI, is not made available for public disclosure, and, even within ETI, is only made available for review by those employees whose job duties required knowledge of financial forecast information. This financial forecast information should be maintained as highly sensitive information and public disclosure of the information could lead to an unreasonable risk of competitive harm to ETI.
- Further, Affiant sayeth not.

an Schenne

Erin Schorr

SUBSCRIBED AND SWORN TO BEFORE ME by the said Erin Schorr on the $\frac{29}{100}$ day of July, 2021.

01546 Notary Public

State of Louisiana

foald My Commission Expires:

DOCKET NO.

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NON-STANDARD TRUE-UP FILING OF ENTERGY TEXAS, INC. PURSUANT TO THE FINANCING ORDER IN DOCKET NO. 37247 CONCERNING SCHEDULE SRC

BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

STATEMENT UNDER SECTION 4 OF STANDARD PROTECTIVE ORDER

The undersigned attorney for Entergy Texas, Inc. ("ETI") submits this statement under Section 4 of the Standard Protective Order adopted in this case.

As set forth in the affidavit of Erin Schorr that is included as part of the filing package in this case, certain exhibits and workpapers included in ETI's petition contain information that is commercially sensitive. As Ms. Schorr explains in her affidavit, the public disclosure of this information would cause harm to ETI. As such, these materials are protected under TEX. GOV'T CODE §§ 552.101, 552.104, and 552.110 and TEX. UTIL. CODE §§ 39.001(b)(4) and 32.101(c).

I have reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Highly Sensitive Protected Materials (Highly Confidential) designation it is given in ETI's filing.

George Hoyt

Assistant General Counsel Entergy Services, LLC 919 Congress Ave., Suite 701 Austin, Texas 78701 512-487-3945

ATTORNEY FOR ENTERGY TEXAS, INC.

DOCKET NO. _____

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NON-STANDARD TRUE-UP FILING	
OF ENTERGY TEXAS, INC.	
PURSUANT TO THE FINANCING	
ORDER IN DOCKET NO. 37247	
CONCERNING SCHEDULE SRC	

BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

DIRECT TESTIMONY

OF

ERIN SCHORR

ON BEHALF OF

ENTERGY TEXAS, INC.

JULY 2021

DOCKET NO.

NON-STANDARD TRUE-UP FILING OF ENTERGY TEXAS, INC. PURSUANT TO THE FINANCING ORDER IN DOCKET NO. 37247 CONCERNING SCHEDULE SRC

DIRECT TESTIMONY OF ERIN SCHORR

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EXHIBITS

Exhibit EDS-1	Calculation of the Proposed SRC Charges
Exhibit EDS-2	Rate Comparison
Exhibit EDS-3	Proposed SRC Rates (Schedule SRC — Attachment A)

1		I. <u>INTRODUCTION</u>
2	Q.	PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.
3	A.	My name is Erin Schorr. I am a Regulatory Analyst in the Fuel and Special Riders
4		Department for Entergy Services, LLC ("ESL"). My business address is 639 Loyola
5		Avenue, New Orleans, Louisiana 70113.
6		
7	Q.	WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?
8	A.	My current responsibilities include supporting ongoing regulatory filings and other
9		regulatory issues including storm cost securitization true-up filings for the Entergy
10		Operating Companies. ¹ This work includes the preparation of Non-Standard True-Up
11		calculations for ETI's System Restoration Costs Schedule ("Schedule SRC").
12		
13	Q.	PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL
14		EXPERIENCE.
15	A.	In 2013, I graduated from the University of New Orleans. In 2013, I was hired by
16		KPMG LLP as an Audit Associate. In 2016, I was hired by ESL to work in the Fuel
17		and Special Riders Department.

¹ The Entergy Operating Companies include Entergy Texas, Inc. ("ETI"), Entergy Louisiana, LLC ("ELL"); Entergy Arkansas, LLC ("EAL"); Entergy Mississippi, LLC ("EML"); and Entergy New Orleans, LLC ("ENO").

1		II. <u>PURPOSE OF TESTIMONY</u>
2	Q.	PLEASE EXPLAIN THE PURPOSE OF YOUR TESTIMONY IN THIS FILING.
3	A.	The purpose of my testimony in this filing is to: (1) support the calculation of
4		Schedule SRC Rates by SRC Rate Class pursuant to the Non-Standard True-Up
5		provisions as approved in the Financing Order in Docket No. 37247, Findings of Fact
6		("FoF") 86 through 88, and (2) support the Schedule SRC — Attachment A
7		accompanying this filing.
8		
9	Q.	WHAT RELIEF IS THE COMPANY REQUESTING IN THIS FILING?
10	A.	The Company is requesting approval of its revised Schedule SRC — Attachment A
11		effective on and after the first billing cycle for November 2021, which begins
12		October 29, 2021.
13		
14		III. <u>BACKGROUND</u>
15	Q.	PLEASE PROVIDE A BRIEF DESCRIPTION OF SCHEDULE SRC.
16	A.	On July 16, 2009, ETI filed its application for a financing order under Subchapter I of
17		Chapter 36 and Subchapter G of Chapter 39 of the Public Utility Regulatory Act
18		("PURA") to permit securitization of system restoration costs and other qualified costs
19		as described in its application. That proceeding was assigned Docket No. 37247. On
20		September 11, 2009, the Commission issued a final order ("Financing Order") that
21		authorized the issuance of Transition Bonds and the recovery of costs associated with
22		such bonds through SRC Charges. Subsequently, ETI caused the Transition Bonds to

1		be issued and began billing SRC Charges on November 30, 2009, pursuant to the
2		Financing Order in Docket No. 37247.
3		The current filing is being made to comply with the procedures in the Financing
4		Order for making a Non-Standard True-Up that require such filings to be made at least
5		90 days in advance of the proposed effective date of the revised Schedule SRC
6		reflecting the revenues contained in the Non-Standard True-Up. The current filing is
7		being made more than 90 days prior to the first billing cycle for November 2021 so that
8		the SRC rates applied to each SRC rate class will reflect the allocation contemplated
9		by the Non-Standard True-Up provisions of the Financing Order.
10		
11		IV. <u>NON-STANDARD TRUE-UP</u>
12	Q.	WILLT IS THE NON STANDARD TRUE UP A DILIGTMENT?
	×۰	WHAT IS THE NON-STANDARD TRUE-UP ADJUSTMENT?
13	Q۰ A.	FoF 86 of the Financing Order states that a Non-Standard True-Up adjustment will be
13 14	-	
	-	FoF 86 of the Financing Order states that a Non-Standard True-Up adjustment will be
14	-	FoF 86 of the Financing Order states that a Non-Standard True-Up adjustment will be applied if the forecasted billing units for one or more of the SRC rate classes for an
14 15	-	FoF 86 of the Financing Order states that a Non-Standard True-Up adjustment will be applied if the forecasted billing units for one or more of the SRC rate classes for an upcoming SRC period decrease by more than 10% compared to the billing units for the
14 15 16	-	FoF 86 of the Financing Order states that a Non-Standard True-Up adjustment will be applied if the forecasted billing units for one or more of the SRC rate classes for an upcoming SRC period decrease by more than 10% compared to the billing units for the 12 months ending December 31, 2008 (known as the threshold billing units). FoFs 87

Q. WHY IS THE NON-STANDARD TRUE-UP ADJUSTMENT NEEDED AT THIS TIME?

3	A.	The billing units for the Period 13 SRC period (November 2021 through October 2022)
4		for the Standby and Maintenance Service ("SMS") and Experimental Economic As-
5		Available Power Service ("EAPS") rate classes are forecasted to be less than the
6		threshold billing determinants, as shown in Appendix D to the Financing Order.
7		Therefore, in accordance with FoF 86 of the Financing Order, the SRC rates proposed
8		to be effective with the November 2021 billing cycle are adjusted pursuant to the Non-
9		Standard True-Up provisions of the Financing Order.
10		
11	Q.	HOW IS THE NON-STANDARD TRUE-UP ADJUSTMENT CALCULATED?
12	A.	As prescribed in FoF 87 and Schedule SRC, the Non-Standard True-Up is to be
13		calculated in the following manner:
14 15		a. allocate the upcoming period's Periodic Billing Requirement ("PBR") based on the PBR Allocation Factors ("PBRAF") approved in Docket No. 36931;
16 17 18 19 20		b. calculate under-collections or over-collections, including without limitation any caused by Retail Electric Provider defaults, if applicable, from the preceding period in each class by subtracting the previous period's transition charge revenues collected from each class from the PBR determined for that class for the same period;
21 22		c. sum the amounts allocated to each customer class in steps (a) and (b) to determine an adjusted PBR for each transition charge customer class;
23 24 25		d. divide the PBR for each customer class by the maximum of the forecasted billing units or the threshold billing units for that class, to determine the "threshold rate";
26 27		e. multiply the threshold rate by the forecasted billing units for each class to determine the expected collections under the threshold rate;
28		f allocate the difference in the adjusted PBR and the expected collections

28f.allocate the difference in the adjusted PBR and the expected collections29calculated in step (e) among the transition charge customer classes by using the30PBRAFs approved in Docket No. 36931;

1 2 3		g. add the amount allocated to each class in step (f) above to the expected collection amount by class calculated in step (e) above to determine the final PBR for each class; and
4 5		h. divide the final PBR for each class by the forecasted billing units to determine the transition charge rate by class for the upcoming period.
6		The calculation of the proposed SRC rates, detailed in Highly Sensitive
7		Exhibit EDS-1 to this testimony, complies with the provisions of the Financing Order
8		and Schedule SRC detailed above.
9		
10	Q.	PLEASE EXPLAIN THE CALCULATION OF THE PBR USED IN THE CURRENT
11		FILING.
12	А.	The PBR for Period 13 is \$56,488,807. This amount corresponds to the actual interest
13		rates and other factors known at issuance on November 6, 2009 and includes a
14		class-specific over-collection of \$146,631. Consistent with prior treatment, the Excess
15		Funds Subaccount balance is netted against the cumulative over-collection. ² The
16		resulting balance is applied in calculating the initial PBR shown in column (1) of
17		Exhibit EDS-1 \$56,360,581. ³ The cumulative over-collection is then applied on a
18		class-specific basis in column (2) of Exhibit EDS-1, resulting in the Adjusted PBR
19		shown in column (3) on Exhibit EDS-1 \$56,328,919. This has the effect of decreasing
20		the initial PBR by the amount of the cumulative over-collection. The Adjusted PBR is
21		then adjusted for uncollectibles, resulting in the final Period 13 PBR shown in column
22		(5) of Exhibit EDS-1 \$56,488,807.

² WP3/Exhibit EDS-1.

³ WP2/Exhibit EDS-1.

1	Q.	EXPLAIN THE PROJECTED BILLING UNITS USED IN THE CURRENT FILING.
2	A.	Entergy Services, Inc.'s Forecasting Section forecasts monthly kWh sales by revenue
3		class in support of ETI's business planning process. The forecasted revenue class kWh
4		sales are allocated to the SRC rate classes based on historic revenue class and rate class
5		relationships. For SRC rate classes that require forecasted kW rather than kWh, the
6		historic relationship of kW and kWh for those classes was utilized to calculate the
7		required kW.
8		
9	Q.	HOW DO THE SRC RATES CHANGE FROM THE PREVIOUS RATE FILING?
10	A.	SRC Rates remain relatively unchanged across all classes as compared to current SRC
11		Rates, except for the SMS rate class. The increase in the Standby and Maintenance
12		Service class is primarily driven by the decrease in the Forecasted Billing units relative
13		to Period 12. Please see Exhibit EDS-2 for the Period 12 and Period 13 rate
14		comparison.
15		
16		V. <u>PROPOSED TARIFF</u>
17	Q.	HAVE YOU PROVIDED A REVISED TARIFF REFLECTING THE
18		NON-STANDARD TRUE-UP CALCULATION OF SRC CHARGES?
19	A.	Yes. Exhibit EDS-3 contains the proposed Schedule SRC – Attachment A, which has
20		been marked showing the changes from the current Schedule SRC — Attachment A.

1	Q.	WHAT CHANGES ARE PROPOSED FOR SCHEDULE SRC – ATTACHMENT A?
2	A.	The rates are changed as indicated with margin notations on Exhibit EDS-3. An
3		effective date of October 29, 2021 has been added to the header on the page.
4		
5		VI. <u>CONCLUSION</u>
6	Q.	WHAT RELIEF IS THE COMPANY REQUESTING IN THIS PROCEEDING?
7	A.	The Company is requesting that Schedule SRC – Attachment A contained in
8		Exhibit EDS-3 be approved effective with the first billing cycle of November 2021
9		(October 29, 2021).
10		
11	Q.	HAVE THE REQUESTED SRC RATES BY SRC RATE CLASS BEEN
12		CALCULATED IN A MANNER CONSISTENT WITH THE FINANCING ORDER
13		REQUIREMENTS?
14	A.	Yes.
15		
16	Q.	DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
17	A.	Yes.

This exhibit contains information that is Highly Sensitive and will be provided under the terms of the Protective Order (Confidentiality Disclosure Agreement) entered in this case.

ENTERGY TEXAS, INC. Comparison of Period 12 and Period 13 SRC Rates

	Period 12	Period 13	Change in SRC Rates			
Rate Classes	SRC Rates	SRC Rates	\$ per Unit	% Change		
	(1)	(2)	(3)	(4)		
Residential Service	0.00544	0.00504	-\$0.00040	-7.4%		
Small General Service	0.00569	0.00497	-\$0.00072	-12.7%		
General Service	0.00419	0.00465	\$0.00046	11.0%		
Large General Service	0.00241	0.00256	\$0.00015	6.2%		
Large Industrial Power Service	0.13798	0.13652	-\$0.00146	-1.1%		
Economic As-Available Service	\$0.00000	\$0.00000	\$0.00000	0.0%		
Standby and Maintenance Service	0.01982	0.03797	\$0.01815	91.6%		
Street and Outdoor Lighting	0.02365	0.02278	-\$0.00087	-3.7%		

ENTERGY TEXAS, INC.

SCHEDULE SRC - ATTACHMENT A

INITIAL OR ADJUSTED SYSTEM RESTORATION COSTS RATES

I. RATE CLASSES

For purposes of determining and billing Initial or Adjusted System Restoration Costs Rates, each end-use customer will be designated as a customer belonging to one of eight classes as identified and defined in § V of Rate Schedule SRC.

II. <u>NET MONTHLY RATE</u>

The Initial or Adjusted SRC Rates shall be determined in accordance with and are subject to the provisions set forth in Rate Schedule SRC. Not less than 15 days prior to the first billing cycle for the Company's November 2010 billing month and no less frequently than annually thereafter, the Company or successor Servicer will file a revision to Schedule SRC, Attachment A setting forth the Adjusted SRC Rates to be effective for the upcoming period. If made as a result of the standard true-up adjustment in Rate Schedule SRC, the Adjusted SRC Rates will become effective on the first billing cycle of the Company's November billing month. If an interim true-up adjustment is made pursuant to Rate Schedule SRC, the Adjusted SRC Rates will be become effective on the first billing cycle of the Company's billing month that is not less than 15 days following the making of the interim true-up adjustment filing. If a non-standard true-up filing pursuant to Rate Schedule SRC Rates, the filing will be made at least 90 days prior to the first billing cycle for the Company's November billing month. Amounts billed pursuant to this schedule are not subject to Rider IHE or State and local sales tax.

SRC Rate Class	Initial or Adjus	ted SRC Rates
Residential	\$0.00504	per kWh
Small General Service	\$0.00497	per kWh
General Service	\$0.00465	per kWh
Large General Service	\$0.00256	per kWh
Large Industrial Power Service	\$0.13652	per kW
Experimental Economic As-Available Power Service	\$0.00000	per kWh
Standby and Maintenance Service	\$0.03797	per kW
Street and Outdoor Lighting	\$0.02278	per kWh

The Initial or Adjusted SRC Rates are multiplied by the kWh or kW as applicable, read, estimated or determined during the billing month and will be applied to bills rendered on and after the effective date.

ENTERGY TEXAS, INC. Functionalization and Allocation of Payments - February and August 2022 Billing Period 13 - Texas Retail by Class

_ine No.						Texas Re	tail			
	-	Tx Retail	<u>RES</u>	<u>SGS</u>	<u>GS</u>	LGS	LIPS	EAPS	<u>SMS</u>	LTG
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
	Production									
1	Texas Retail Allocation Factors *	100.0000%	43.5249%	2.1765%	21.9201%	7.5549%	21.6431%	1.9501%	0.8743%	0.3561%
2	Related Storm Costs	2,440,116								
3	Total Storm Costs	496,356,566								
4	Ratio of Related Storm Costs	0.4916%								
5	Annual Levelized Payment **	56,360,586								
6	Payment Allocated to Prod	277,071	120,594	6,030	60,734	20,932	59,967	5,403	2,422	987
	Transmission									
7	Texas Retail Allocation Factors *	100.0000%	45.7242%	2.2720%	22.5398%	7.4625%	18.8947%	1.9855%	0.7864%	0.3349%
8	Related Storm Costs	70,981,989								
9	Total Storm Costs	496,356,566								
10	Ratio of Related Storm Costs	14.3006%								
11	Annual Levelized Payment **	56,360,586								
12	Payment Allocated to Trans	8,059,904	3,685,327	183,121	1,816,686	601,470	1,522,895	160,029	63,383	26,993
	Distribution									
13	Texas Retail Allocation Factors *	100.0000%	59.5467%	4.4127%	24.6479%	5.5437%	1.4705%	0.0000%	0.1477%	4.2308%
14	Related Storm Costs	421,131,190								
15	Total Storm Costs	496,356,566								
16	Ratio of Related Storm Costs	84.8445%								
17	Annual Levelized Payment **	56,360,586								
18	Payment Allocated to Distrib	47,818,851	28,474,547	2,110,102	11,786,343	2,650,934	703,176	0	70,628	2,023,120
	Net General Plant									
19	Texas Retail Allocation Factors *	100.0000%	52.3305%	3.6199%	20.1101%	5.8632%	14.1243%	1.1314%	0.7442%	2.0764%
20	Related Storm Costs	1,803,271								
21	Total Storm Costs	496,356,566								
22	Ratio of Related Storm Costs	0.3633%								
23	Annual Levelized Payment **	56,360,586								
24	Payment Allocated to Other	204,759	107,150	7,412	41,177	12,005	28,921	2,317	1,524	4,252
25	Total Payments**	56 360 585	32,387,618	2.306.665	13,704,940	3,285,341	2,314,959	167.749	137,957	2,055,352

* Source of Texas Retail Allocation Factors - Docket No. 36931 Phillip B. Gillam Direct Testimony Exhibit PBG-3.

** Payment shown on Attached Payment Schedule

ENTERGY TEXAS, INC. SYSTEM RESTORATION COSTS BOND PAYMENT SCHEDULE

Coupon	2.120%	3.650%	4.380%
Yield	2.121%	3.653%	4.387%

		riela	2.121%	3.653%	4.387	%											Total	Annual
ſ		Balance			Interes				Principal			P+I	P+I	P+I	P+I	Ongoing	Payment	Payment
Date	Tranche1	Tranche2	Tranche3	Tranche1	Tranche2	Tra	nche3	Tranche1	Tranche2	Tranche3		Tranche1	Tranche2	Tranche3	Payment Due	Costs	Due	Amounts
11/6/2009	\$ 182,500,000	\$ 144,800,000	\$ 218,600,000									\$-	\$-	\$-	\$-			
8/1/2010	\$ 182,500,000	\$ 144,800,000	\$ 218,600,000	\$ 2,848,014	\$ 3,890,49	4 \$	7,048,028	\$ 12,733,654	\$	- \$	-	\$ 15,581,668	\$ 3,890,494	\$ 7,048,028	\$ 26,520,190	\$ 518,958	\$ 27,039,149	
2/1/2011	\$ 169,766,346	\$ 144,800,000	\$ 218,600,000	\$ 1,799,523	\$ 2,642,60	0\$	4,787,340	\$ 21,085,542	\$	- \$	-	\$ 22,885,065	\$ 2,642,600	\$ 4,787,340	\$ 30,315,005	\$ 407,500	\$ 30,722,505	
8/1/2011	\$ 148,680,805	\$ 144,800,000	\$ 218,600,000	\$ 1,576,017	\$ 2,642,60	0\$	4,787,340	\$ 16,676,256	\$	- \$	-	\$ 18,252,272	\$ 2,642,600	\$ 4,787,340	\$ 25,682,212	\$ 297,500	\$ 25,979,712	\$ 56,702,217
2/1/2012	\$ 132,004,549	\$ 144,800,000	\$ 218,600,000	\$ 1,399,248	\$ 2,642,60	0\$	4,787,340	\$ 21,670,101	\$	- \$	-	\$ 23,069,349	\$ 2,642,600	\$ 4,787,340	\$ 30,499,289	\$ 407,500	\$ 30,906,789	
		, ,,		1 1 - 1 - 1	1 ,- ,	0\$.,	\$ 16,898,443		- \$	-	\$ 18,067,988	\$ 2,642,600	\$ 4,787,340	, . ,		, , .	\$ 56,702,217
2/1/2013	\$ 93,436,006	\$ 144,800,000	\$ 218,600,000	\$ 990,422	1 ,- ,	0\$	4,787,340	\$ 21,967,206	\$	- \$	-	\$ 22,957,628		\$ 4,787,340	\$ 30,387,568	\$ 407,500	\$ 30,795,068	
8/1/2013		1 77		\$ 757,569			.,,	\$ 17,422,140		- \$		\$ 18,179,709	\$ 2,642,600	\$ 4,787,340		1 - 1		\$ 56,702,217
2/1/2014		\$ 144,800,000		\$ 572,895	1 ,- ,	0\$	4,787,340	1 7 7		- \$		\$ 23,091,900	\$ 2,642,600	\$ 4,787,340	\$ 30,521,840		\$ 30,929,340	
8/1/2014		\$ 144,800,000		\$ 334,193	1 ,- ,		4,787,340	• • •		- \$		\$ 18,045,437	\$ 2,642,600	+ .,,			, ,.	\$ 56,702,217
			\$ 218,600,000		1 ,- ,		4,787,340		\$ 8,952,99			1 - 1 1	\$ 11,595,596	, , . ,	1 1 1 1		\$ 30,753,301	
8/1/2015			\$ 218,600,000		+ _,,		4,787,340		\$ 18,384,86			\$-	\$ 20,864,076	+ .,,	,,		\$ 25,948,916	\$ 56,702,217
2/1/2016		\$ 117,462,135			+ _,,		4,787,340		\$ 23,457,83				\$ 25,601,519	, , . ,	, ,		\$ 30,796,359	
8/1/2016			\$ 218,600,000		+ .,,		4,787,340		\$ 19,105,43				\$ 20,821,018	, , . ,				\$ 56,702,217
2/1/2017			\$ 218,600,000		, ,,.		4,787,340		\$ 24,187,60				\$ 25,554,508		1 - 1 - 1 - 1	1	\$ 30,749,348	
8/1/2017			\$ 218,600,000		+,		4,787,340		\$ 19,942,54			\$-	\$ 20,868,029	\$ 4,787,340			1 - 1 - 1	\$ 56,702,217
2/1/2018		,,	\$ 218,600,000		\$ 561,52		4,787,340		\$ 24,977,11		-	+	¢ 20,000,010		, ,		\$ 30,733,483	
8/1/2018		, . ,	\$ 218,600,000		\$ 105,69		4,787,340		\$ 5,791,59	1 1 1 -			\$ 5,897,291	\$ 19,773,943			\$ 25,968,734	\$ 56,702,217
2/1/2019			\$ 203,613,397		\$	- \$	4,459,133			- \$25,841,2			\$ -	\$ 30,300,336			\$ 30,707,836	
8/1/2019			\$ 177,772,194		\$	- \$	3,893,211			- \$21,803,6			Ŷ	\$ 25,696,881	\$ 25,696,881		1 - / /	\$ 56,702,217
2/1/2020			\$ 155,968,524		+	- \$	3,415,711			- \$26,863,8				\$ 30,279,525	1 1 - 1		\$ 30,687,025	
8/1/2020			\$ 129,104,710		+	- \$	2,827,393			- \$22,890,29		+		\$ 25,717,692	, ,		\$ 26,015,192	\$ 56,702,217
2/1/2021			\$ 106,214,411		\$	- \$	2,326,096			- \$27,951,4				, , .	1 7 7 -		\$ 30,685,042	
8/1/2021		+	\$ 78,262,965		\$	- \$	1,713,959			- \$24,005,7		\$ -		\$ 25,719,675		1 - 1	1 - 1 - 1 -	\$ 56,702,217
2/1/2022		+	\$ 54,257,249			- \$	1,188,234			- \$29,063,8		\$-		\$ 30,252,127	, . ,		\$ 30,659,627	
8/1/2022	\$-	\$-	\$ 25,193,355	\$-	\$	- \$	551,734	\$-	\$	- \$25,193,3	55	\$-	\$-	\$ 25,745,090	\$ 25,745,090	\$ 297,500	\$ 26,042,590	\$ 56,702,217

Period 13 PBR

\$ 30,252,127 Transition Bond Payment - February 2022

\$ 25,745,090 Transition Bond Payment - August 2022
\$ (146,631) Excess Funds Subaccount Adjustment per Semi- Annual Servicer's Certificate dated August 1, 2021

\$ 510,000 Ongoing Costs

\$ 56,360,586 Total

ENTERGY TEXAS, INC. SUMMARY OF SYSTEM RESTORATION COST RIDER APPLICATION OVER OR (UNDER) ANALYSIS FOR JULY 2020 - JUNE 2021 BILLING PERIOD 13 RATE DEVELOPMENT

Rate Class	Billed SRC \$ From Monthly Servicer's Certificates													
			<u>Actu</u>	al Billings Available for Fe	bruary 2021 Payment				Actual	Billings Available for A	ugust 2021 Payment			Total
		July 2020	August	September	October	November	December	January 2021	February	March	April 2021	May 2021	June 2021	Billed
Residential Service	\$	3,129,940.72 \$	3,771,392.62	\$ 3,842,316.72 \$	3,798,272.11 \$	2,811,120.98 \$	2,245,965.26	\$ 2,378,209.21 \$	3,004,480.49 \$	2,455,670.53 \$	2,885,811.80 \$	1,868,999.89 \$	2,235,036.57 \$	34,427,217
Small General Service	\$	158,524.46 \$	195,927.17	\$ 176,251.13 \$	195,916.88 \$	186,647.18 \$	186,248.31	\$ 191,880.35 \$	201,558.95 \$	192,947.20 \$	233,479.29 \$	182,513.01 \$	199,481.45 \$	2,301,375
General Service	\$	1,406,966.86 \$	1,390,742.93	\$ 1,346,054.64 \$	1,288,995.92 \$	1,207,416.11 \$	1,022,370.80	\$ 968,447.00 \$	1,031,148.88 \$	891,181.80 \$	1,042,702.90 \$	963,495.03 \$	1,044,847.30 \$	13,604,370
Large General Service	\$	275,988.56 \$	286,102.85	\$ 290,978.49 \$	290,349.01 \$	270,165.75 \$	247,148.05	\$ 245,421.45 \$	244,452.89 \$	219,573.31 \$	245,309.45 \$	250,857.05 \$	252,474.58 \$	3,118,821
Large Industrial Power Service	\$	205,089.47 \$	195,898.56	\$ 215,883.64 \$	189,933.36 \$	219,779.31 \$	194,417.80	\$ 172,713.54 \$	183,672.45 \$	169,803.33 \$	162,192.26 \$	176,864.36 \$	176,612.51 \$	2,262,861
Exper. Econ. As-Avail. Pwr. Svc.	\$	- \$	-	\$-\$	- \$	- \$	- 3	\$-\$	- \$	- \$	- \$	- \$	- \$	-
Standby and Maintenance Service	\$	7,629.57 \$	9,937.53	\$ 8,826.73 \$	7,825.43 \$	7,378.03 \$	2,188.91	\$ 7,080.18 \$	7,064.88 \$	6,618.69 \$	5,413.70 \$	5,730.57 \$	5,243.61 \$	80,938
Street and Outdoor Lighting	\$	204,463.51 \$	182,125.28	\$ 181,080.73 \$	168,115.87 \$	191,938.38 \$	180,663.73	\$ 182,508.40 \$	181,148.72 \$	169,576.84 \$	186,943.00 \$	177,362.10 \$	185,409.23 \$	2,191,336
Totals	\$	5,388,603.15 \$	6,032,126.94	\$ 6,061,392.08 \$	5,939,408.58 \$	4,894,445.74 \$	4,079,002.86	\$ 4,146,260.13 \$	4,853,527.26 \$	4,105,371.70 \$	4,761,852.40 \$	3,625,822.01 \$	4,099,105.25 \$	57,986,918

Rate Class	PBR for Period 12 Adjusted for Uncollectibles	Total Billed	[A] Over or (Under) Recovery		
Residential Service	\$ 32,768,672	\$ 34,427,217	\$	1,658,545	
Small General Service	\$ 2,201,271	\$ 2,301,375	\$	100,104	
General Service	\$ 14,730,629	\$ 13,604,370	\$	(1,126,259)	
Large General Service	\$ 3,448,428	\$ 3,118,821	\$	(329,607)	
Large Industrial Power Service	\$ 2,469,887	\$ 2,262,861	\$	(207,026)	
Exper. Econ. As-Avail. Pwr. Svc.	\$ -	\$ -	\$	-	
Standby and Maintenance Service	\$ 148,708	\$ 80,938	\$	(67,770)	
Street and Outdoor Lighting	\$ 2,187,661	\$ 2,191,336	\$	3,675	
Totals	\$ 57,955,256	\$ 57,986,918	\$	31,662	

Excess Funds Subaccount balance @ 8/1/2021	\$ 178,293
Remove Class-specific True-up from Excess Funds balance	\$ (31,662)
Net Excess Funds Subaccount Adjustment	\$ 146,631

WP/Exhibit EDS-1 Workpaper 4 Page 1 of 2 to 2 of 2 (Public Version)

This workpaper contains information that is Highly Sensitive and will be provided under the terms of the Protective Order (Confidentiality Disclosure Agreement) entered in this case.