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PUC DOCKET NO 485 47

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:

Barry Howell	Courtney R. Nicholson	Scott Olson
Director,	Entergy Services, Inc.	Duggins Wren Mann &
Regulatory Affairs	919 Congress Ave.	Romero, LLP
Entergy Texas, Inc.	Suite 701	600 Congress, 19th Floor
919 Congress Ave., Suite 840	Austin, Texas 78701	Austin, Texas 78701
Austin, Texas 78701	512-487-3944	solson@dwmrlaw.com
512-487-3975	(Fax) 512-487-3958	(512) 744-9300
(Fax) 512-487-3998		(512) 744-9399 (Fax)

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

Scott Olson Duggins Wren Mann & Romero, LLP 600 Congress, 19th Floor Austin, Texas 78701 solson@dwmrlaw.com (512) 744-9300 (512) 744-9399 (Fax)

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. 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.

TEX. UTIL. CODE ANN. §§ 11.001 – 58.302 (West 2016 & Supp. 2017), §§ 59.001-66.016 (West 2007 & Supp. 2017) ("PURA").

III. 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 10 billing period (November 2018 – October 2019) for the Experimental Economic As-Available Power Service ("EAPS") rate class are forecasted to decrease by more than 10% compared to the billing units established for the annual period ending December 31, 2008. Therefore, ETI proposes that the SRC rates to be applied during 2018 and 2019 be adjusted pursuant to the Non-Standard True-Up provision of the Financing Order.

IV. Required Showing

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 30, 2018, which is the date upon which the bills for the first cycle for the month of November 2018 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. Meghan DeRoche, which is attached to this Petition.

As shown in the Direct Testimony and exhibits of Ms. DeRoche, the justification for applying the Non-Standard True-Up is that the billing units for the EAPS rate class 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. DeRoche. For convenience, Appendix B contains the referenced Findings of Facts and Ordering Paragraphs from the Financing Order.

V. Scope of Proceeding, Procedural Schedule

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, 2018
Deadline to request a hearing	September 7, 2018
If a hearing is not requested, parties to submit Stipulation/Proposed	September 14, 2018
Findings of Fact and Conclusions of Law. If hearing is requested, parties	
to submit a proposed procedural schedule.	

VI. Notice

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.

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.

See, e.g., Docket No. 47451, Non-standard True-up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 37247, Order No. 2 (Aug. 18, 2017).

VII. Protective Order

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

VIII. Requested Relief

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 2018, the tariff in this filing will supersede the tariff approved in Docket No. 47451.⁴

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.

Non-Standard True-Up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 37247 Concerning Schedule SRC, Docket No. 47451 (Oct. 17, 2017).

Dated: July 26, 2018. RESPECTFULLY SUBMITTED,

Scott Olson

State Bar No. 24013266

Courtney R. Nicholson Entergy Services, Inc. 919 Congress Ave. Suite 701 Austin, Texas 78701 512-487-3944 (Fax) 512-487-3958

Scott Olson Duggins Wren Mann & Romero, LLP 600 Congress, 19th Floor Austin, Texas 78701 solson@dwmrlaw.com (512) 744-9300 (512) 744-9399 (Fax)

ATTORNEYS 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 26th day of July, 2018.

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 is made to revise the Initial or Adjusted 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 Adjusted SRC Rates		
Residential	\$0.00519 per kWh		
Small General Service	\$0.00534	per kWh	
General Service	\$0.00408	per kWh	
Large General Service	\$0.00223 per kWh		
Large Industrial Power Service	\$0.16149	per kW	
Experimental Economic As-Available Power Service	\$0.00000	per kWh	
Standby and Maintenance Service	\$0.02319 per kW		
Street and Outdoor Lighting	\$0.02053 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

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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).

Docket No. 37247 Financing Order

12. Interim True-Up

- 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. Non-Standard True-Up

- 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

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- 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 non-standard 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 non-standard true-up.

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(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

Docket No. 37247 Financing Order

- 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

STATE OF LOUISIANA §

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PARISH OF ORLEANS §

AFFIDAVIT OF MEGHAN DeROCHE

The undersigned, Meghan DeRoche, being duly sworn on oath, states as follows:

- 1. My name is Meghan DeRoche. I am a Senior Regulatory Analyst in the Fuel and Special Riders department for Entergy Services, Inc. My business address is 639 Loyola Avenue, New Orleans, Louisiana 70113. I am over the age of twenty-one years, am of sound mind, am competent to make this Affidavit, and have personal knowledge of the statements 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.
- 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 MPD-1, 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 forecast financial information. This forecast financial information should be maintained as highly sensitive information in this case because it is commercially sensitive financial information and public disclosure of the information could lead to an unreasonable risk of competitive harm to ETI.

Further Affiant sayeth not.

Meghan DeRoche

SUBSCRIBED AND SWORN TO BEFORE ME by the said Meghan DeRoche on the 20th day of July, 2018.

Notary Public

State of Louisiana

JENNIFER B. FAVALORA Notary Public (ID# 57639) Orleans Parish, Louisiana Commission Issued For Life

My Commission Expires: upon my death

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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 Meghan DeRoche 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. DeRoche 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).

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.

Scott Olson

Duggins Wren Mann & Romero, LLP

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(512) 744-9300

(512) 744-9399 (Fax)

ATTORNEYS FOR ENTERGY TEXAS, INC.

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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

MEGHAN DeROCHE

ON BEHALF OF

ENTERGY TEXAS, INC.

JULY 2018

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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

DIRECT TESTIMONY OF MEGHAN DEROCHE

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EXHIBITS

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

2	Q.	PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.
3	A.	My name is Meghan DeRoche. I am a Senior Lead Regulatory Analyst in the
4		Fuel and Special Riders Department for Entergy Services, Inc. ("ESI"). My
5		business address is 639 Loyola 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
9		other regulatory issues including storm cost securitization true-up filings for
10		the Entergy Operating Companies. 1 This work includes the preparation of
11		Non-Standard True-Up calculations for ETI's System Restoration Costs
12		Schedule ("Schedule SRC").
13		
14	Q.	PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL
15		EXPERIENCE.
16	A.	In 2007, I graduated from the Louisiana State University with a Bachelor of
17		Science Degree in Accounting. In 2007, I was hired by Deloitte & Touche
18		LLP to work in the Enterprise Risk Services (ERS) department where I
19		assisted companies in becoming compliant with Sarbanes Oxley and OMB
20		Circular A-123. In 2010, I was hired by ESI to work in the accounting
	("	he Entergy Operating Companies include Entergy Texas, Inc. ("ETI"), Entergy Louisiana, LLC ELL"); Entergy Arkansas, Inc. ("EAI"); Entergy Mississippi, Inc. ("EMI"); and Entergy New Irleans, LLC ("ENO").
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I. INTRODUCTION

department and later went to work in the finance department. During my time in accounting I worked in the revenue and fuel accounting groups. My main role in these groups was to complete general accounting functions and provide analysis. In the Finance Business Partners department, my main role was to develop and manage the Capital and O&M five year plan for Transmission. In 2017, I accepted a position in the Fuel and Special Riders Department.

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II. PURPOSE OF TESTIMONY

- 10 Q. PLEASE EXPLAIN THE PURPOSE OF YOUR TESTIMONY IN THIS FILING.
- 11 A. The purpose of my testimony in this filing is to: (1) support the calculation of
- 12 Schedule SRC Rates by SRC Rate Class pursuant to the Non-Standard True-
- Up provisions as approved in the Financing Order in Docket No. 37247,
- 14 Findings of Fact ("FoF") 86 through 88, and (2) support the Schedule SRC —
- 15 Attachment A accompanying this filing.

16

- 17 Q. WHAT RELIEF IS THE COMPANY REQUESTING IN THIS FILING?
- 18 A. The Company is requesting approval of its revised Schedule SRC —
- Attachment A effective on and after the first billing cycle for November 2018,
- which begins October 30, 2018.

Α.

III. <u>BACKGROUND</u>

Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF SCHEDULE SRC.

On July 16, 2009, ETI filed its application for a financing order under Subchapter I of Chapter 36 and Subchapter G of Chapter 39 of the Public Utility Regulatory Act ("PURA") to permit securitization of system restoration costs and other qualified costs as described in its application. That proceeding was assigned Docket No. 37247. On September 11, 2009, the Commission issued a final order ("Financing Order") that authorized the issuance of Transition Bonds and the recovery of costs associated with such bonds through SRC Charges. Subsequently, ETI caused the Transition Bonds to be issued and began billing SRC Charges on November 30, 2009, pursuant to the Financing Order in Docket No. 37247.

The current filing is being made to comply with the procedures in the Financing Order for making a Non-Standard True-Up that require such filings to be made at least 90 days in advance of the proposed effective date of the revised Schedule SRC reflecting the revenues contained in the Non-Standard True-Up. The current filing is being made more than 90 days prior to the first billing cycle for November 2018 so that the SRC rates applied to each SRC rate class will reflect the allocation contemplated by the Non-Standard True-Up provisions of the Financing Order.

IV. NON-STANDARD TRUE-UP

2 Q. WHAT IS THE NON-STANDARD TRUE-UP ADJUSTMENT?

3 Α. FoF 86 of the Financing Order states that a Non-Standard True-Up 4 adjustment will be applied if the forecasted billing units for one or more of the 5 SRC rate classes for an upcoming SRC period decrease by more than 10% 6 compared to the billing units for the 12 months ending December 31, 2008 7 (known as the threshold billing units). FoFs 87 and 88 set forth a Non-8 Standard True-Up adjustment procedure for adjusting the SRC rates for each 9 SRC rate class and the process to be followed in making a Non-Standard 10 True-Up filing.

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

13 TIME?

14 A. The billing units for the Period 10 SRC period (November 2018 through
15 October 2019) for the Experimental Economic As-Available Power Service
16 ("EAPS") rate class are forecasted to be less than the threshold billing
17 determinants, as shown in Appendix D to the Financing Order. Therefore, in
18 accordance with FoF 86 of the Financing Order, the SRC rates proposed to
19 be effective with the November 2018 billing cycle are adjusted pursuant to the
20 Non-Standard True-Up provisions of the Financing Order.

- 1 Q. HOW IS THE NON-STANDARD TRUE-UP ADJUSTMENT CALCULATED?
- 2 A. As prescribed in FoF 87 and Schedule SRC, the Non-Standard True-Up is to
- 3 be calculated in the following manner:

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- a. allocate the upcoming period's Periodic Billing Requirement ("PBR") based on the PBR Allocation Factors ("PBRAF") approved in Docket No. 36931;
 - 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;
- 12 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 PBR 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.
- The calculation of the proposed SRC rates, detailed in Highly Sensitive
- 29 Exhibit MPD-1 to this testimony complies with the provisions of the Financing
- 30 Order and Schedule SRC detailed above.

- Q. PLEASE EXPLAIN THE CALCULATION OF THE PBR USED IN THE
 CURRENT FILING.
- 3 The PBR for Period 10 is \$55,015,604. This amount corresponds to the Α. 4 actual interest rates and other factors known at issuance on November 6, 2009 and includes a class-specific over collection of \$1,631,465. Consistent 5 with prior treatment, the Excess Funds Subaccount balance is netted against 6 the cumulative over-collection.² 7 The resulting balance is applied in 8 calculating the initial PBR shown in column (1) of Exhibit MPD-1 9 (\$56,470,962).3 The cumulative over-collection is then applied on a class-10 specific basis in column (2) of Exhibit MPD-1, resulting in the Adjusted PBR shown in column (3) on Exhibit MPD-1 (\$54,839,497). This has the effect of 11 12 decreasing the initial PBR by the amount of the cumulative over-collection. The Adjusted PBR is then adjusted for uncollectibles, resulting in the final 13

14

16 Q. EXPLAIN THE PROJECTED BILLING UNITS USED IN THE CURRENT17 FILING.

Period 10 PBR shown in column (5) of Exhibit MPD-1 (\$55,015,604).

A. Entergy Services, Inc.'s Forecasting Section forecasts monthly kWh sales by revenue class in support of ETI's business planning process. The forecasted revenue class kWh sales are allocated to the SRC rate classes based on

WP3/Exhibit MPD-1.

³ WP2/Exhibit MPD-1.

1	historic revenue class and rate class relationships. For SRC rate classes that
2	require forecasted kW rather than kWh, the historic relationship of kW
3	and kWh for those classes was utilized to calculate the required kW.

7

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Α.

5 Q. HOW DO THE SRC RATES CHANGE FROM THE PREVIOUS RATE
6 FILING?

SRC Rates are lower in this filing across all classes as compared to current SRC Rates with the exception of the Standby and Maintenance Service (SMS) and General Service (GS) classes. The increase in the SMS class is primarily driven by an under-collection in Period 9. The increase in the GS class is primarily driven by the decrease in the Forecasted Billing units relative to Period 9 as well as the under-collection in Period 9. The decreases in the other classes were generally driven by an over-collection and an increase in the Forecasted Billing units relative to Period 9. Please see Exhibit MPD-2 for the Period 9 and Period 10 rate comparison.

16

15

17 V. PROPOSED TARIFF

— Attachment A.

- 18 Q. HAVE YOU PROVIDED A REVISED TARIFF REFLECTING THE
 19 NON-STANDARD TRUE-UP CALCULATION OF SRC CHARGES?
- 20 A. Yes. Exhibit MPD-3 contains the proposed Schedule SRC Attachment A,
 21 which has been marked showing the changes from the current Schedule SRC

22

Entergy Texas, Inc. Direct Testimony of Meghan DeRoche 2018 Schedule SRC Non-Standard True-Up Filing

1	Q.	WHAT CHANGES ARE PROPOSED FOR SCHEDULE SRC -
2		ATTACHMENT A?
3	A.	The rates are changed as indicated with margin notations on Exhibit MPD-3.
4		An effective date of October 30, 2018 has been added to the header on
5		the page.
6		
7		VI. CONCLUSION
8	Q.	WHAT RELIEF IS THE COMPANY REQUESTING IN THIS PROCEEDING?
9	A.	The Company is requesting that Schedule SRC – Attachment A contained in
10		Exhibit MPD-3 be approved effective with the first billing cycle of November
11		2018 (October 30, 2018).
12		
13	Q.	HAVE THE REQUESTED SRC RATES BY SRC RATE CLASS BEEN
14		CALCULATED IN A MANNER CONSISTENT WITH THE FINANCING
15		ORDER REQUIREMENTS?
16	A.	Yes.
17		
18	Q.	DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
19	A.	Yes.

This page replaces

HIGHLY SENSITIVE

Exhibit MPD-1

Page 1 of 1

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ENTERGY TEXAS, INC. Functionalization and Allocation of Payments - February and August 2019 Billing Period 10 - Texas Retail by Class

No	_					Texas Re	tail			
		Tx Retail	RES	<u>sgs</u>	<u>GS</u>	LGS	<u>LIPS</u>	<u>EAPS</u>	<u>SMS</u>	<u>LTG</u>
		(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 **	56,470,964								
6	Payment Allocated to Prod	277,614	120,831	6,042	60,853	20,973	60,084	5,414	2,427	989
	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 **	56,470,964								
12	Payment Allocated to Trans	8,075,689	3,692,544	183,480	1,820,244	602,648	1,525,877	160,343	63,507	27,045
	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 **	56,470,964								
18	Payment Allocated to Distrib	47,912,502	28,530,314	2,114,235	11,809,426	2,656,125	704,553	0	70,767	2,027,082
	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 **	56,470,964								
24	Payment Allocated to Other	205,160	107,361	7,427	41,258	12,029	28,977	2,321	1,527	4,260
25	Total Payments**	EG 470 DGE	32,451,049	2.311.184	13,731,781	3,291,775	2,319,491	168,078	138,228	2,059,376

^{*} 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% 3 653% 4 387% Yield

																				Total	Annual
		Balance				Interest					Principal			7	P+I	P+I	P+I	P+1	Ongoing	Payment	Payment
Date	Tranche1	Tranche2	Tranche3	Tranche1	Tra	nche2	Tran	che3	Tranche1		Tranche2	Ti	ranche3	_	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	\$	3,890,494	\$	7,048,028	\$ 12,733,654	4 \$	S -	\$	-	- 1	\$ 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	\$	2,642,600	\$	4,787,340	\$ 21,085,542	2 \$	\$-	\$	-		\$ 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	\$	2,642,600	\$	4,787,340	\$ 16,676,256	5 \$	\$-	\$	-		\$ 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	\$	2,642,600	\$	4,787,340	\$ 21,670,10	1 5	\$ -	\$	-		\$ 23,069,349	\$ 2,642,600	\$ 4,787,340	\$ 30,499,289	\$ 407,500	\$ 30,906,789	
8/1/2012	\$ 110,334,448	\$ 144,800,000	\$ 218,600,000	\$ 1,169,545	\$	2,642,600	\$	4,787,340	\$ 16,898,443	3 \$	\$-	\$	-		\$ 18,067,988	\$ 2,642,600	\$ 4,787,340	\$ 25,497,928	\$ 297,500	\$ 25,795,428	\$ 56,702,217
2/1/2013	\$ 93,436,006	\$ 144,800,000	\$ 218,600,000	\$ 990,422	\$	2,642,600	\$	4,787,340	\$ 21,967,200	3 \$	\$-	• \$	-	\$	\$ 22,957,628	\$ 2,642,600	\$ 4,787,340	\$ 30,387,568	\$ 407,500	\$ 30,795,068	
8/1/2013	\$ 71,468,800	\$ 144,800,000	\$ 218,600,000	\$ 757,569	\$	2,642,600	\$	4,787,340	\$ 17,422,140	3	\$-	\$	-	- \$	\$ 18,179,709	\$ 2,642,600	\$ 4,787,340	\$ 25,609,649	\$ 297,500	\$ 25,907,149	\$ 56,702,217
2/1/2014	\$ 54,046,659	\$ 144,800,000	\$ 218,600,000	\$ 572,895	\$	2,642,600	\$	4,787,340	\$ 22,519,00	5 \$	s -	\$	-	- 1	\$ 23,091,900	\$ 2,642,600	\$ 4,787,340	\$ 30,521,840	\$ 407,500	\$ 30,929,340	
8/1/2014	\$ 31,527,654	\$ 144,800,000	\$ 218,600,000	\$ 334,193	\$	2,642,600	\$	4,787,340	\$ 17,711,24	4 5	S -	\$	-		\$ 18,045,437	\$ 2,642,600	\$ 4,787,340	\$ 25,475,377	\$ 297,500	\$ 25,772,877	\$ 56,702,217
2/1/2015	\$ 13,816,410	\$ 144,800,000	\$ 218,600,000	\$ 146,454	\$	2,642,600	\$	4,787,340	\$ 13,816,416	3	\$ 8,952,996	\$	-		\$ 13,962,864	\$ 11,595,596	\$ 4,787,340	\$ 30,345,801	\$ 407,500	\$ 30,753,301	
8/1/2015	\$ -	\$ 135,847,004	\$ 218,600,000	\$ -	\$	2,479,208	\$	4,787,340	\$	- \$	\$ 18,384,869	\$	-		\$ -	\$ 20,864,076	\$ 4,787,340	\$ 25,651,416	\$ 297,500	\$ 25,948,916	\$ 56,702,217
2/1/2016	\$ -	\$ 117,462,135	\$ 218,600,000	\$ -	\$	2,143,684	\$	4,787,340	\$	- 5	\$ 23,457,835	\$	-		S -	\$ 25,601,519	\$ 4,787,340	\$ 30,388,859	\$ 407,500	\$ 30,796,359	
8/1/2016	\$ -	\$ 94,004,300	\$ 218,600,000	\$ -	\$	1,715,578	\$	4,787,340	\$	- \$	\$ 19,105,439	\$	-	•	\$ -	\$ 20,821,018	\$ 4,787,340	\$ 25,608,358	\$ 297,500	\$ 25,905,858	\$ 56,702,217
2/1/2017	\$ -	\$ 74,898,861	\$ 218,600,000	\$ -	\$	1,366,904	\$	4,787,340	\$	- \$	\$ 24,187,603	\$	-		5 -	\$ 25,554,508	\$ 4,787,340	\$ 30,341,848	\$ 407,500	\$ 30,749,348	
8/1/2017	\$ -	\$ 50,711,257	\$ 218,600,000	\$ -	\$	925,480	\$	4,787,340	\$	- 5	\$ 19,942,549	\$	-		5 -	\$ 20,868,029	\$ 4,787,340	\$ 25,655,369	\$ 297,500	\$ 25,952,869	\$ 56,702,217
2/1/2018	\$ -	\$ 30,768,708	\$ 218,600,000	\$ -	\$	561,529	\$	4,787,340	\$	- 5	\$ 24,977,114	. \$	-	5	\$-	\$ 25,538,643	\$ 4,787,340	\$ 30,325,983	\$ 407,500	\$ 30,733,483	
8/1/2018	\$ -	\$ 5,791,594	\$ 218,600,000	\$ -	\$	105,697	\$	4,787,340	\$	- \$	\$ 5,791,594	\$	14,986,603		\$ -	\$ 5,897,291	\$ 19,773,943	\$ 25,671,234	\$ 297,500	\$ 25,968,734	\$ 56,702,217
2/1/2019	\$ -	\$ -	\$ 203,613,397	\$ -	\$	-	\$	4,459,133	\$	- \$	S -	\$	25,841,203		\$ -	\$ -	\$ 30,300,336	\$ 30,300,336	\$ 407,500	\$ 30,707,836	
8/1/2019	\$ -	\$ -	\$ 177,772,194	\$ -	\$	-	\$	3,893,211	\$	- \$	\$ -	\$	21,803,670		\$ -	\$ -	\$ 25,696,881	\$ 25,696,881	\$ 297,500	\$ 25,994,381	\$ 56,702,217
2/1/2020	\$ -	\$ -	\$ 155,968,524	\$ -	\$	-	\$	3,415,711	\$	- \$	\$-	\$	26,863,814	. 1	S -	\$ -	\$ 30,279,525	\$ 30,279,525	\$ 407,500	\$ 30,687,025	
8/1/2020	\$ -	\$ -	\$ 129,104,710	\$ -	\$	-	\$	2,827,393	\$	- \$	S -	\$	22,890,299		\$ -	\$ _	\$ 25,717,692	\$ 25,717,692	\$ 297,500	\$ 26,015,192	\$ 56,702,217
2/1/2021	\$ -	\$ -	\$ 106,214,411	\$ -	\$	-	\$	2,326,096	\$	- \$	\$ -	\$	27,951,446		\$ -	\$ -	\$ 30,277,542	\$ 30,277,542	\$ 407,500	\$ 30,685,042	
8/1/2021	\$ -	\$ -	\$ 78,262,965	\$ -	\$	-	\$	1,713,959	\$	- \$	\$ -	\$	24,005,716		\$ -	\$ -	\$ 25,719,675	\$ 25,719,675	\$ 297,500	\$ 26,017,175	\$ 56,702,217
2/1/2022	\$ -	\$ -	\$ 54,257,249	\$ -	\$	-	\$	1,188,234	\$	- 1	\$ -	\$	29,063,893		\$-	\$ _	\$ 30,252,127	\$ 30,252,127	\$ 407,500	\$ 30,659,627	
8/1/2022	\$ -	\$ -	\$ 25,193,355	\$ -	\$	_	\$	551,734	\$	- \$	\$-	\$	25,193,355		\$ -	\$ -	\$ 25,745,090	\$ 25,745,090	\$ 297,500	\$ 26,042,590	\$ 56,702,217

Penod 10 PBR \$30,300,336 Transition Bond Payment - February 2019 \$25,696,881 Transition Bond Payment - August 2019 \$ (36,253) Net Excess Funds Subaccount Adjustment \$ 510,000 Ongoing Costs

\$ 56,470,964 Total

ENTERGY TEXAS, INC.
SUMMARY OF SYSTEM RECONSTRUCTION COST RIDER APPLICATION
OVER OR (UNDER) AMALYSIS FOR AULY 2017 - JUNE 2018
BILLING PERIOD 10 RATE DEVELOPMENT

Rate Class						Billed	Billed SRC \$ From Monthly Servicer's Certificates	Servicer's Certificates						
	Ц		Actual	Actual Billings Available for February 2018 Payn	bruary 2018 Payment				Actual	Actual Billings Avadable for August 2018 Payment	Jourt 2018 Payment			Total
		July 2017	August	September	October	November	December	January 2018	February	March	April 2018	May 2018	June 2018	Billed
Residential Service	•	3,776,015 37 \$	3,924,513 79 \$	3,208,312 07 \$	3,408,863 72 \$	2,285,341 82 \$	2,253,962 65 \$	3,409,779.88 \$	2,770,501 04 \$	2,025,348 12 \$	1,881,248 70 \$	2,066,885.95 \$	3,354,552.35 \$	34,365,325
Small General Service	•	229,467 34 \$	242,582 83 \$	206,553 09 \$	225,625 52 \$	199,097 36 \$	191,157 22 \$	265,526 18 \$	236,090.87 \$	204,970 29 \$	187,376.35 \$	197,182 54 \$	262,073,49 \$	2,647,703
General Service	s	1,297,290 89 \$	1,330,616 52 \$	1,158,123,58 \$	1,287,607 22 \$	1,099,995 23 \$	1,027,587 73 \$	1,122,603 58 \$	964,183.58 \$	1,054,869 05 \$	985,433.07 \$	1,006,214 73 \$	1,274,284 35 \$	13,608,810
Large General Service	•	325,607 32 \$	324,460 92 \$	300,318 13 \$	307,773 16 \$	267,748.63 \$	252,217 35 \$	259,249 10 \$	243,599 30 \$	267,977 23 \$	259,893 69 \$	258,322 41 \$	295,129,39 \$	3,362,297
Large Industrial Power Service	•	204,770.46 \$	206.949 42 \$	202,145,51 \$	186,511.83 \$	\$ 25 999 99	326,342 41 \$	195,552 71 \$	186,116,00 \$	193,013 14 \$	197,760 55 \$	195,601 03 \$	201,019 44 \$	2,362,649
Exper Econ As-Avail Pwr Svc	•										•		•	
Standby and Maintenance Service	•	11,317 79 \$	11,317.22 \$	10,880 93 \$	10,412.63 \$	(1,572.75) \$	22,922 05 \$	9,115.91 \$	11,350 63 \$	10,17937 \$	10,438 09 \$	10,323 82 \$	9,683.34 \$	126,369
Street and Outdoor Lighting	<u>ب</u>	185,058 78 \$	185,262.78 \$	185,002 64 \$	185,367.24 \$	166,226 65 \$	164,096 51 \$	165,786.62 \$	158,471 02 \$	171,822 32 \$	166,264 34 \$	166,748 11 \$	166,735 22 \$	2,066,842
Totals	•	6,029,527 95 \$	6,225,703 48 \$	5,271,335 95 \$	5,612,161 32 \$	4,083,703.51 \$	4,238,285 92 \$	5,427,613.98 \$	4,570,312 44 \$	3,928,179 52 \$	3,688,414 79 \$	3,901,278.59 \$	5,563,477 58 \$	58,539,995
	•	PBR for Period 9	·	₹										
Rate Class	^ DI	Adjusted for Uncollectibles	Total Billed	Over or (Under) Recovery										
Residential Service	9	32,847,477 \$	34,365,325 \$	1,517,848										
Small General Service	•	2,251,372 \$	2,647,703 \$	396,331										
General Service	s	13,784,510 \$	13,608,810 \$	(175,700)										
Large General Service	•	3,335,715 \$	3,362,297 \$	26,582										
Large Industrial Power Service	•	2,620,879 \$	2,362,649 \$	(258,230)										
Exper Econ As-Avail Pwr Svc	•	504 \$	•	(204)										
Standby and Maintenance Service	•	129,559 \$	126,369 \$	(3,190)										
Street and Outdoor Lighting	s	1,938,514 \$	2,066,842 \$	128,328										
Totals	. ,	\$ 08,530 \$	\$ 566,623,85	1,631,465										
LLI	Excess F	Excess Funds Subaccount balance @ 8/1/2018 \$	ance @ 8/1/2018 \$	1,667,718										
Remove Class	s-specif	Remove Class-specific True-up from Excess Funds balance \$	is Funds balance \$	(1,631,465)										
	N	Net Excess Funds Subaccount Adaptment	Count Adwistment S	36 253										

WP4/Exhibit MPD-1 Page 1 of 2 through 2 of 2 Public Version

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WP4/Exhibit MPD-1

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ENTERGY TEXAS, INC.
Comparison of Period 9 and Period 10 SRC Rates

	Period 9	Period 10	Change in SRC Rates			
Rate Classes	SRC Rates	SRC Rates	\$ per Unit	% Change		
	(1)	(2)	(3)	(4)		
Residential Service	\$0.00559	0.00519	-\$0.00040	-7.2%		
Small General Service	\$0.00671	0.00534	-\$0.00137	-20 4%		
General Service	\$0.00399	0.00408	\$0.00009	2.3%		
Large General Service	\$0 00227	0.00223	-\$0.00004	-1.8%		
Large Industrial Power Service	\$0.17400	0.16149	-\$0.01251	-7.2%		
Economic As-Available Service	\$0.00000	\$0.00000	\$0.00000	0.0%		
Standby and Maintenance Service	\$0 02156	0.02319	\$0.00163	7.6%		
Street and Outdoor Lighting	\$0.02077	0.02053	-\$0.00024	-1.2%		

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 is made to revise the Initial or Adjusted 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 Adjusted SRC Rates				
Residential	\$0.00519	per kWh			
Small General Service	\$0.00534	per kWh			
General Service	\$0.00408	per kWh			
Large General Service	\$0.00223	per kWh			
Large Industrial Power Service	\$0.16149	per kW			
Experimental Economic As-Available Power Service	\$0.00000	per kWh			
Standby and Maintenance Service	\$0.02319	per kW			
Street and Outdoor Lighting	\$0.02053	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.

R