#### PUC DOCKET NO.

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

#### **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 Steven H. Neinast Scott Olson Director, Entergy Services, Inc. Duggins Wren Mann & **Regulatory Affairs** 919 Congress Ave. Romero, LLP 600 Congress, 19<sup>th</sup> Floor Entergy Texas, Inc. Suite 840 Austin, Texas 78701 919 Congress Ave., Suite 840 Austin, Texas 78701 Austin, Texas 78701 512-487-3957 (512) 744-9300 512-487-3975 (Fax) 512-487-3958 (512) 744-9399 (Fax) (Fax) 512-487-3998

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

Scott Olson Duggins Wren Mann & Romero, LLP 600 Congress, 19<sup>th</sup> Floor Austin, Texas 78701 (512) 744-9300 (512) 744-9399 (Fax)

#### II. Jurisdiction

ETI is an electric utility, as the Public Utility Regulatory Act<sup>1</sup> § 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.

#### 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

<sup>&</sup>lt;sup>1</sup> TEX. UTIL. CODE ANN. §§ 11.001 – 58.303 (VERNON 2007 and SUPP. 2013) ("PURA").

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 6 billing period (November 2014 – October 2015) 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 2014 and 2015 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 29, 2014, which is the date upon which the bills for the first cycle for the month of November 2014 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. Dedra D. Knighten, which is attached to this Petition.

As shown in the Direct Testimony and exhibits of Ms. Knighten, 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. Knighten. 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.<sup>2</sup> Consistent with the Financing Order and the procedural schedules that have been adopted in ETI's prior Hurricane Reconstruction Schedule ("Schedule HRC") Non-Standard True-Up proceedings, ETI proposes the following procedural schedule:<sup>3</sup>

Deadline for intervention	August 29, 2014
Deadline to request a hearing	September 5, 2014
If hearing is not requested, parties to submit Stipulation/Proposed	September 12, 2014
Findings of Fact and Conclusions of Law. If hearing is requested, parties	
to submit a proposed procedural schedule.	

#### VI. Notice

ETI is notifying the parties to Docket No. 37247 and Staff of this filing by providing them with a copy of this filing. In addition, similar to Docket Nos. 36846, 38105, 39297, 40276,

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 Docket No. 36846, Non-standard True-up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 33586, Order No. 2 (April 23, 2009); Docket No. 38105, Non-standard True-up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 33586, Order No. 2 (April 8, 2010); Docket No. 39297, Non-standard True-up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 33586, Order No. 2 (April 21, 2011); Docket No. 40276, Non-standard True-up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 41333, Non-standard True-up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 33586, Order No. 3 (April 19, 2013); and Docket No. 42341, Non-standard True-up Filing of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 33586, Order No. 2 (April 10, 2014).

41333, and 42341, ETI proposes that notice in the form set out in Appendix C be provided to (1) the governing bodies of Texas incorporated municipalities with original jurisdiction over ETI; and (2) all municipally-owned electric utilities and electric cooperatives with service areas in which ETI provides retail service to customers.

#### 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 the Commission to 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 2014, the tariff in this filing will supersede the tariff approved in Docket No. 41935.

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.

Dated: July 31, 2014. RESPECTFULLY SUBMITTED,

By:		
-	Scott Olson	

Scott Olson State Bar No. 24013266

Steven H. Neinast Entergy Services, Inc. 919 Congress Avenue, Suite 840 Austin, Texas 78701 512-487-3957 (Fax) 512-487-3958

Scott Olson Duggins Wren Mann & Romero, LLP 600 Congress, 19<sup>th</sup> Floor Austin, Texas 78701 (512) 744-9300 (512) 744-9399 (Fax)

ATTORNEYS FOR ENTERGY TEXAS, INC.

Page 38.12 ATTACHMENT A Effective: October 29, 2014

#### **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. NET MONTHLY RATE

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 Adjust	ed SRC Rates
Residential	\$0.00542	per kWh
Small General Service	\$0.00744	per kWh
General Service	\$0.00417	per kWh
Large General Service	\$0.00219	per kWh
Large Industrial Power Service	\$0.16756	per kW
Experimental Economic As-Available Power Service	\$0.01124	per kWh
Standby and Maintenance Service	\$0.02918	per kW
Street and Outdoor Lighting	\$0.02288	per kWh
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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 Act<sup>1</sup> (PURA): (1) to securitize the sum of system restoration costs as determined by the Commission in Docket No. 36931,<sup>2</sup> 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

<sup>&</sup>lt;sup>1</sup> TEX. UTIL. CODE ANN. §§ 11.001-66.016 (Vernon 2007 & Supp. 2008).

<sup>&</sup>lt;sup>2</sup> Application of Entergy Texas, Inc. for Determination of 2008 System Restoration Costs, Docket No. 36931 (Aug. 18, 2009).

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#### 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. 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

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- 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

## FORM OF LETTER NOTICE TO INCORPORATED MUNICIPALITIES, MOUS & COOPS

#### [ETI LETTERHEAD]

[DATE]

Dear:

This letter is to inform you that on July 31, 2014, Entergy Texas, Inc. ("ETI" or the "Company") filed with the Public Utility Commission of Texas (the "Commission") a proceeding styled Non-standard True-up of Entergy Texas, Inc. Pursuant to the Financing Order in Docket No. 37247 Concerning Schedule SRC. The filing seeks approval of System Restoration Costs ("SRC") rates to be calculated and applied beginning with the first billing cycle for the month of November 2014, pursuant to the Non-Standard True-Up Provisions of the order issued by the Commission on September 11, 2009, in Docket No. 37247, Application of Entergy Texas, Inc. for a Financing Order (the "Financing Order") and Sections 14.001, 32.001, 36.401-36.406, and 39.301-39.313 of the Texas Utilities Code. Customers potentially affected include those retail customers, whether or not receiving electric service from ETI, whose facilities, premises and loads located in ETI's certificated service area are being served or have been served by ETI at any time on or after the date of the Financing Order. The filing has been assigned Docket No. \_\_\_\_\_\_.

On November 6, 2009, Transition Bonds were issued under the Financing Order. The Financing Order establishes how the annual costs permitted to be recovered through SRC Charges are allocated among customer classes. The Non-Standard True-Up provisions of the Financing Order require adjustment of the SRC Charges for each customer class if the forecasted billing units for any one or more customer classes are projected to decrease by more than 10% from the billing units for the 12 months ending December 31, 2008 (known as threshold billing units). The forecasted billing units for the Experimental Economic As-Available Power Service rate class for the period November 2014 through October 2015 are forecasted to be less than the threshold billing units.

If the Non-Standard True-Up is approved, SRC rates applicable to all retail customer classes will be affected. The current and proposed rates for the SRC classes are as follows:

SRC Rate Class	<b>Current SRC Rates</b>	Proposed SRC Rates
Residential	\$0.00570 per kWh	\$0.00542 per kWh
Small General Service	\$0.00840 per kWh	\$0.00744 per kWh

General Service	\$0.00410 per kWh	\$0.00417 per kWh							
Large General Service	\$0.00196 per kWh	\$0.00219 per kWh							
Large Industrial Power	\$0.17831 per kW	\$0.16756 per kW							
Service									
Experimental	\$0.00468 per kWh	\$0.01124 per kWh							
Economic As-Available									
Power Service									
Standby and	\$0.01947 per kW	\$0.02918 per kW							
Maintenance Service									
Street and Outdoor	\$0.02211 per kWh	\$0.02288 per kWh							
Lighting									

The scope of the proceeding will be limited to determining whether the Non-Standard True-Up complies with the Financing Order. The Financing Order requires the Commission to rule upon the Company's request within 90 days or the requested rates will go into effect. Persons with questions or who want more information on this petition may contact Entergy Texas, Inc. at 350 Pine Street, Beaumont, Texas 77701, or call 1/800-368-3749 (select option 1, then press 0) during normal business hours. A complete copy of this Petition is available for inspection at the above address. Persons who wish to formally participate in this proceeding, or who wish to express their comments concerning this Petition should contact the Public Utility Commission of Texas, Office of Customer Protection, P.O. Box 13326, Austin, Texas 78711-3326, or call (512) 936-7120 or toll free at (888) 782-8477. Hearing and speech-impaired individuals with text telephones (TTY) may call (512) 936-7136 or use Relay Texas (toll free) (800) 735-2989.

The deadline for filing a motion to intervene in this proceeding is \_\_\_\_\_. Additionally, any person who intervenes and would like a hearing on this matter must file a request for a hearing with the Commission by \_\_\_\_\_\_. The request for a hearing must also include a specific list of issues the person believes should be addressed at the hearing.

Sincerely,

#### AFFIDAVIT OF DEDRA D. KNIGHTEN

The undersigned, Dedra D. Knighten, being first duly sworn on oath, states as follows:

- 1. My name is Dedra D. Knighten. I am a Senior Lead 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 DDK-1, which contains commercially sensitive financial forecast information relating to the calculation of ETI's system restoration cost charges.
  - WP/Exhibit DDK-1, Workpaper 4, 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.

Dedra D. Knighten

Didra D. Mughter

SUBSCRIBED AND SWORN TO BEFORE ME by the said Dedra D. Knighten on the 29th day of July, 2014.

Notary Public

State of Louisiana

My Commission Expires: <u>woon my death</u>.

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

#### DOCKET NO. \_\_\_\_\_

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

# 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 Dedra D. Knighten 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. Knighten 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 600 Congress, 19<sup>th</sup> Floor Austin, Texas 78701 (512) 744-9300 (512) 744-9399 (Fax)

ATTORNEY FOR ENTERGY TEXAS, INC.

DOCKET NO.	

NON-STANDARD TRUE-UP FILING
OF ENTERGY TEXAS, INC.

PURSUANT TO THE FINANCING
ORDER IN DOCKET NO. 37247

CONCERNING SCHEDULE SRC

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# BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

**DIRECT TESTIMONY** 

OF

DEDRA D. KNIGHTEN

ON BEHALF OF

ENTERGY TEXAS, INC.

**JULY 2014** 

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 DEDRA D. KNIGHTEN

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#### **EXHIBITS**

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

1 I. INTRODUCTION

- 2 Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.
- 3 A. My name is Dedra D. Knighten. I am a Senior Lead Regulatory Analyst in the
- 4 Fuel and Special Riders Department for Entergy Services, Inc. My business
- 5 address is 639 Loyola Avenue, New Orleans, Louisiana 70113.

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- 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
- the Entergy Operating Companies. This work includes the preparation of
- 11 Non-Standard True-Up calculations for Entergy Texas, Inc.'s ("ETI") System
- 12 Restoration Costs Schedule ("Schedule SRC").

13

- 14 Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL
- 15 EXPERIENCE.
- 16 A. I earned a Bachelor of Science in Management from Louisiana State
- 17 University in August 1999 with a major in management information systems. I
- worked as a Programmer analyst for Worldspan, LP in Miramar, Florida from
- 19 September 1999 to July 2002. My responsibilities included requirements
- 20 gathering with clients, writing computer programs, and creating detailed
- 21 documentation. In July 2002, I resigned my position at Worldspan, LP to

The Entergy Operating Companies include Entergy Texas, Inc. ("ETI"), Entergy Louisiana, LLC. ("ELL"); Entergy Gulf States Louisiana, L.L.C. ("EGSL"); Entergy Arkansas, Inc. ("EAI"); Entergy Mississippi, Inc. ("EMI"); and Entergy New Orleans, Inc. ("ENO").

enter the full time MBA program at the Freeman School of Business of Tulane University in New Orleans, Louisiana. I graduated in May 2004 and was hired by Entergy Services, Inc. as a Lead Financial Analyst in the Corporate Planning and Performance department. From 2004 to 2011, I continued to work as a Lead Financial Analyst in various departments, including Utility planning, Supply Chain, and Financial Business partners. In 2011, I was promoted to the position of Senior Lead Regulatory Analyst in the Fuel and Special Riders department.

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#### II. PURPOSE OF TESTIMONY

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

17

- 18 Q. WHAT RELIEF IS THE COMPANY REQUESTING IN THIS FILING?
- 19 A. The Company is requesting approval of its revised Schedule SRC —
- 20 Attachment A effective on and after the first billing cycle for November 2014,
- which begins October 29, 2014.

Α.

#### III. <u>BACKGROUND</u>

2 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 2014 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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- Q. WHY IS THE NON-STANDARD TRUE-UP ADJUSTMENT NEEDED AT THIS
- TIME?
- 14 A. The billing units for the Period 6 SRC period (November 2014 through
  15 October 2015) 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 2014 billing cycle are adjusted pursuant to the

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;
  - 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 DDK-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.
- The final PBR for Period 6 is \$55,521,490. This amount corresponds to the 3 Α. 4 actual interest rates and other factors known at issuance on November 6, 5 2009 and includes class-specific over/under collections with a net over-6 collection of \$1,230,268. Consistent with prior treatment, the Excess Funds Subaccount balance is netted against the cumulative over-collection.<sup>2</sup> The 7 8 resulting balance is applied in calculating the initial PBR shown in column (1) of Exhibit DDK-1 (\$56.579.244).<sup>3</sup> The cumulative over-collection is then 9 10 applied on a class-specific basis in column (2) of Exhibit DDK-1, resulting in 11 the Adjusted PBR shown in column (3) on Exhibit DDK-1 (\$55,348,976). This 12 has the effect of lowering the initial PBR by the amount of the cumulative 13 over-collection. The Adjusted PBR is then adjusted for uncollectibles, 14 resulting in the final Period 6 PBR shown in column (5) of Exhibit DDK-1 15 (\$55,521,490).

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- 17 Q. EXPLAIN THE PROJECTED BILLING UNITS USED IN THE CURRENT18 FILING.
- 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

<sup>&</sup>lt;sup>2</sup> WP3/Exhibit DDK-1.

WP2/Exhibit DDK-1.

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

Α.

#### Q. HOW DO THE SRC RATES CHANGE FROM THE PREVIOUS YEAR?

SRC Rates are higher in this filing as compared to last year except for the Residential, Small General Service ("SGS"), and Large Industrial Power Service ("LIPS") rates. The rate increases in the General Service, Large General Service, and Standy and Maintenance Service classes were primarily driven by a decrease in the Forecasted Billing units relative to Period 5. The increase in the Street and Outdoor Lighting class was primarily driven by an in increase in the PBR for Period 6. The increase in the EAPS class was driven by a Period 5 under-collection and a decrease in Forecasted Billing Units. The rate decreases for both the Residential and SGS rate classes were primarily driven by an increase in the Forecasted Billing units relative to Period 5. The decrease in the LIPS rate class was primarily caused by an increase in the Forecasted Billing units relative to Period 5 but offset somewhat by an increase in the Period 6 PBR. Please see Exhibit DDK-2 for the Period 5 and Period 6 rate comparison.

1		V. PROPOSED TARIFF
2	Q.	HAVE YOU PROVIDED A REVISED TARIFF REFLECTING THE
3		NON-STANDARD TRUE-UP CALCULATION OF SRC CHARGES?
4	A.	Yes. Exhibit DDK-3 contains the proposed Schedule SRC – Attachment A,
5		which has been marked showing the changes from the current Schedule SRC
6		— Attachment A.
7		
8	Q.	WHAT CHANGES ARE PROPOSED FOR SCHEDULE SRC -
9		ATTACHMENT A?
10	A.	The rates are changed as indicated with margin notations on Exhibit DDK-3.
11		An effective date of October 29, 2014 has been added to the header on
12		the page.
13		
14		VI. <u>CONCLUSION</u>
15	Q.	WHAT RELIEF IS THE COMPANY REQUESTING IN THIS PROCEEDING?
16	A.	The Company is requesting that Schedule SRC – Attachment A contained in
17		Exhibit DDK-3 be approved effective with the first billing cycle of November
18		2014 (October 29, 2014).
19		
20	Q.	HAVE THE REQUESTED SRC RATES BY SRC RATE CLASS BEEN
21		CALCULATED IN A MANNER CONSISTENT WITH THE FINANCING
22		ORDER REQUIREMENTS?
23	A.	Yes, they have.

- 1 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
- 2 A. Yes, it does.

## This page replaces Highly Sensitive Exhibit DDK-1 Filed Separately Under Seal

ENTERGY TEXAS, INC.
Functionalization and Allocation of Payments - February and August 2015
Billing Period 6 - Texas Retail by Class

Line

2						Tayas Ratail	<u>.</u>			
2	ı	Tx Retail (1)	(2)	(3)	<b>S</b> (4)	(5)	(6)	(7)	<u>SMS</u> (8)	(6)
	Production									
~	Texas Retail Allocation Factors *	100.000%	43.5249%	2.1765%	21.9201%	7.5549%	21.6431%	1.9501%	0.8743%	0.3561%
7	Related Storm Costs	2,440,116								
က	Total Storm Costs	496,356,566								
4	Ratio of Related Storm Costs	0.4916%								
2	Annual Levelized Payment **	56,579,244								
9	Payment Allocated to Prod	278,146	121,063	6,054	60,970	21,014	60,199	5,424	2,432	066
	Transmission									
7	Texas Retail Allocation Factors *	100.000%	45.7242%	2.2720%	22.5398%	7.4625%	18.8947%	1.9855%	0.7864%	0.3349%
∞	Related Storm Costs	70,981,989								
တ	Total Storm Costs	496,356,566								
9	Ratio of Related Storm Costs	14.3006%								
Ξ	Annual Levelized Payment **	56,579,244								
12	Payment Allocated to Trans	8,091,174	3,699,626	183,831	1,823,734	603,804	1,528,803	160,650	63,629	27,097
	Distribution									
13	Texas Retail Allocation Factors *	100.0000%	59.5467%	4.4127%	24.6479%	5.5437%	1.4705%	0.0000%	0.1477%	4.2308%
4	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 **	56,579,244								
18	Payment Allocated to Distrib	48,004,370	28,585,019	2,118,289	11,832,069	2,661,218	705,904	0	70,902	2,030,969
	Net General Plant									
19	Texas Retail Allocation Factors *	100.000%	52.3305%	3.6199%	20.1101%	5.8632%	14.1243%	1.1314%	0.7442%	2.0764%
50	Related Storm Costs	1,803,271								
7	Total Storm Costs	496,356,566								
22	Ratio of Related Storm Costs	0.3633%								
23	Annual Levelized Payment **	56,579,244								
24	Payment Allocated to Other	205,554	107,567	7,441	41,337	12,052	29,033	2,326	1,530	4,268
	:									
52	Total Payments**	56,579,244 32,513,275	32,513,275	2,315,615	13,758,110	3,298,088	2,323,939	168,400	138,493	2,063,324

\* 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

		Annual	Payment	Amounts				\$ 56,702,217		\$ 56,702,217		\$ 56,702,217		\$ 56,702,217		\$ 56,702,217		\$ 56,702,217		\$ 56,702,217		\$ 56,702,217		\$ 56,702,217		\$ 56,702,217		\$ 56,702,217		\$ 56,702,217
		Total	Payment	Due		\$ 27,039,149	\$30,722,505	\$ 25,979,712	\$ 30,906,789	\$ 25,795,428	\$30,795,068	\$ 25,907,149	\$30,929,340	\$ 25,772,877	\$ 30,753,301	\$ 25,948,916	\$30,796,359	\$ 25,905,858	\$30,749,348	\$ 25,952,869	\$30,733,483	\$ 25,968,734	\$ 30,707,836	\$ 25,994,381	\$30,687,025	\$ 26,015,192	\$ 30,685,042	\$ 26,017,175	\$ 30,659,627	\$ 26,042,590
			Ongoing	Costs		\$ 518,958	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500	\$ 407,500	\$ 297,500
			Ŧ	Payment Due	· \$	\$ 26,520,190	\$ 30,315,005	\$ 25,682,212	\$ 30,499,289	\$ 25,497,928	\$ 30,387,568	\$ 25,609,649	\$ 30,521,840	\$ 25,475,377	\$ 30,345,801	\$ 25,651,416	\$ 30,388,859	\$ 25,608,358	\$ 30,341,848	\$ 25,655,369	\$ 30,325,983	\$ 25,671,234	\$ 30,300,336	\$ 25,696,881	\$ 30,279,525	\$ 25,717,692	\$ 30,277,542	\$ 25,719,675	\$ 30,252,127	\$ 25,745,090
			<del>-</del>	Tranche3	· \$	\$ 7,048,028	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 19,773,943	\$ 30,300,336	\$ 25,696,881	\$ 30,279,525	\$ 25,717,692	\$ 30,277,542	\$ 25,719,675	\$ 30,252,127	\$ 25,745,090
			<u>+</u>	Tranche2	· \$	\$ 3,890,494	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 11,595,596	\$ 20,864,076	\$ 25,601,519	\$ 20,821,018	\$ 25,554,508	\$ 20,868,029	\$ 25,538,643	\$ 5,897,291	- &	· \$		- &	- &	· &	· \$	· \$
			<u>+</u>	Tranche1	· \$	\$ 15,581,668	\$ 22,885,065	\$ 18,252,272	\$ 23,069,349	\$ 18,067,988	\$ 22,957,628	\$ 18,179,709	\$ 23,091,900	\$ 18,045,437	\$ 13,962,864	· \$	· \$	· \$	₩											
				Tranche3		· \$	\$ 14,986,603	\$ 25,841,203	\$ 21,803,670	\$ 26,863,814	\$ 22,890,299	\$ 27,951,446	\$ 24,005,716	\$ 29,063,893	\$ 25,193,355															
			Principal	Tranche2		•	· \$	•	· &	•	•	•	· \$	•	\$ 8,952,996	\$ 18,384,869	\$ 23,457,835	\$ 19,105,439	\$ 24,187,603	\$ 19,942,549	\$ 24,977,114	\$ 5,791,594	· &	· \$	· &	· &	· &	· \$	· \$	· \$
				Tranche1		\$12,733,654	\$21,085,542	\$ 16,676,256	\$ 21,670,101	\$ 16,898,443	\$ 21,967,206	\$17,422,140	\$22,519,005	\$ 17,711,244	\$ 13,816,410	· \$	· \$	- \$	· \$	· \$	· \$	- \$	- \$	· \$	· \$	- \$	· \$	· \$	· \$	· &
				Tranche3		\$7,048,028	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,787,340	\$ 4,459,133	\$ 3,893,211	\$ 3,415,711	\$ 2,827,393	\$ 2,326,096	\$ 1,713,959	\$ 1,188,234	\$ 551,734
4.380%	4.382%	6, 50.	Interest	Tranche2		\$ 3,890,494	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,642,600	\$ 2,479,208	\$ 2,143,684	\$1,715,578	\$1,366,904	\$ 925,480	\$ 561,529	\$ 105,697	· &	· &	· &	· &	· &	· &	· \$	· \$
3,650%	3,555%	0.000		Tranche1		\$ 2,848,014	\$ 1,799,523	\$ 1,576,017	\$ 1,399,248	\$ 1,169,545	\$ 990,422	\$ 757,569	\$ 572,895	\$ 334,193	\$ 146,454	· &	· •	· &	· •	· •										
2 120%	2 121%	6/171/9		Tranche3	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 218,600,000	\$ 203,613,397	\$ 177,772,194	\$ 155,968,524	\$ 129,104,710	\$ 106,214,411	\$ 78,262,965	\$ 54,257,249	\$ 25,193,355
- uouno	Vield	5	Balance	Tranche2	\$ 144,800,000	\$ 144,800,000	\$ 144,800,000	\$ 144,800,000	\$ 144,800,000	\$ 144,800,000	\$ 144,800,000	\$ 144,800,000	\$ 144,800,000	\$ 144,800,000	\$ 144,800,000	\$ 135,847,004	\$ 117,462,135	\$ 94,004,300	\$ 74,898,861	\$ 50,711,257	\$ 30,768,708	\$ 5,791,594	- &			- &	- &	· \$	•	' ₩
				Tranche1	\$ 182,500,000	\$ 182,500,000	\$ 169,766,346	\$ 148,680,805	\$ 132,004,549	\$ 110,334,448	\$ 93,436,006	\$ 71,468,800	\$ 54,046,659	\$ 31,527,654	\$ 13,816,410		٠	-	٠	- 4		-	-	- 4	٠	-	-			·
			<u></u>	Date	11/6/2009 \$	8/1/2010 \$	2/1/2011	8/1/2011	2/1/2012 \$	8/1/2012 \$	2/1/2013 \$	8/1/2013 \$	2/1/2014 \$	8/1/2014 \$	2/1/2015 \$	8/1/2015 \$	2/1/2016 \$	8/1/2016 \$	2/1/2017 \$	8/1/2017	2/1/2018	8/1/2018	2/1/2019 \$	8/1/2019 \$	2/1/2020 \$	8/1/2020 \$	2/1/2021	8/1/2021	2/1/2022 \$	8/1/2022 \$

\$ 30,345,801 Transition Bond Payment - February 2015 \$ 25,651,416 Transition Bond Payment - August 2015 \$ 104,027 Net Excess Funds Subaccount Adjustment \$ 478,000 Ongoing Costs \$ 56,579,244 Total

# ENTERGY TEXAS, INC. SUMMARY OF SYSTEM RECONSTRUCTION COST RIDER APPLICATION OVER OR (UNDER) ANALYSIS FOR JULY 2013 - JUNE 2014 BILLING PERIOD 6 RATE DEVELOPMENT

	Total	Billed 34,001,157	2,579,251	13,914,335	2 282 980		109,226	1,956,562	57,836,740														
		June 2014 2,721,069.23 \$	217,585.43 \$	7,230,012.28			9,177.61 \$	157,518.46 \$	4,778,639.82 \$														
		May 2014 2,055,216.90 \$	183,048.97 \$	1,082,061.69 \$	176 414 67 \$	· 69	9,128.94 \$	157,099.21 \$	3,897,404.37 \$														
	ugust 2014 Payment	April 2014 1,858,876.53 \$	173,713.20 \$	994,626.71 \$	204 806 63 \$	· 69	9,128.94 \$	156,696.52 \$	3,622,526.73 \$														
	Actual Billings Available for August 2014 Paymen	March 2,424,431.65 \$	208,997.11 \$	720,062,42	168 529 93 \$	· <del>()</del>	8,976.18 \$	156,372.86 \$	4,251,961.23 \$														
	Actual E	February 3,010,997.98 \$	235,485.19 \$	1,099,760.00	171 654 82 \$		8,976.18 \$	156,210.56 \$	4,898,572.92 \$														
ervicer's Certificates		January 2014 3,273,719.49 \$	242,350.11 \$	1,139,063.21	168 823 29 \$		8,884.42 \$	156,349.87 \$	5,227,417.27 \$														
Billed SRC \$ From Monthly Servicer's Certificates		€9	205,606.55 \$	1,082,160.89	167 415 20 \$		8,884.42 \$	155,728.49 \$	4,461,134.61 \$														
Billed		November 2,057,421.38 \$	180,133.23 \$	1,084,459.32 \$	179 117 24 \$		8,884.42 \$	154,773.67 \$	3,909,332.31 \$														
	bruary 2014 Payment	October 2,981,473.80 \$	206,746.50 \$	\$ 08.178,808,1	213 682 02 \$	· <del>69</del>	9,269.30 \$	176,909.68 \$	5,174,746.59 \$														
	Actual Billings Available for February 2014 Payment	September 3,665,851.68 \$	243,448.28 \$	1,433,986.78 \$	172 970 13 \$	9	9,268.16 \$	176,575.15 \$	5,988,673.06 \$	¥	Over or (Under)	Kecovery	1,235,248	44,634	95,052	(108,954)	175,126	(328,883)	(26,229)	144,273	1,230,268	1,126,241	(1,230,268) (104,027)
	Actual E	August 3,686,575.62 \$	241,396.48 \$	1,174,967.78 \$	262 270 52 \$	· <del>69</del>	12,784.73 \$	176,449.77 \$	5,834,314.93 \$			l otal Billed	34,001,157 \$	2,579,251 \$	13,914,335 \$	2,993,228 \$	2,282,980 \$	·	109,226 \$	1,956,562 \$	57,836,740 \$	ance @ 7/25/2014 \$	ss Funds balance \$ count Adjustment \$
		July 2013 3,657,268.89 \$	240,740.04 \$	1,228,773.33 \$	203 411 94 \$	φ.	5,862.84 \$	175,877.36 \$	5,792,015.84 \$	PBR for Period 5	Adjusted for	Uncollectibles	32,765,909 \$	2,534,617 \$	13,819,283 \$	3,102,182 \$	2,107,854 \$	328,883 \$	135,455 \$	1,812,289 \$	56,606,472 \$	Excess Funds Subaccount balance @ 7/25/2014 \$	Remove Class-specific True-up from Excess Funds balance \$ Net Excess Funds Subaccount Adjustment \$ ===
Rate Class		Residential Service \$	Small General Service	General Service	Large General Service	Exper. Econ. As-Avail. Pwr. Svc. \$	Standby and Maintenance Service \$	Street and Outdoor Lighting \$	Totals \$		Č.	Kate Class	Residential Service \$	Small General Service \$	General Service \$	Large General Service \$	Large Industrial Power Service \$	Exper. Econ. As-Avail. Pwr. Svc. \$	Standby and Maintenance Service \$	Street and Outdoor Lighting \$	Totals \$	Excess	Remove Class-sper Ne

## This page replaces Highly Sensitive WP4/Exhibit DDK-1 Filed Separately Under Seal

ENTERGY TEXAS, INC.
Comparison of Period 5 and Period 6 SRC Rates

	Period 5		Change in SR	C Rates
Rate Classes	SRC Rates	SRC Rates	\$ per Unit	% Change
	(1)		(3) (4)	(4)
Residential Service	\$0.00570	\$0.00542	-\$0.00028	-5.0%
Small General Service	\$0.00840	\$0.00744	-\$0.00096	-11.5%
General Service	\$0.00410	\$0.00417	\$0.00007	1.7%
Large General Service	\$0.00196	\$0.00219	\$0.00023	11.5%
Large Industrial Power Service	\$0.17831	\$0.16756	-\$0.01075	%0'9-
Economic As-Available Service	\$0.00468	\$0.01124	\$0.00656	140.0%
Standby and Maintenance Service	\$0.01947	\$0.02918	\$0.00971	49.9%
Street and Outdoor Lighting	\$0.02211	\$0.02288	\$0.00077	3.5%

Page 38.12 ATTACHMENT A Effective: October 29, 2014

#### **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. NET MONTHLY RATE

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	\$0.00542	per kWh				
Small General Service	\$0.00744	per kWh				
General Service	\$0.00417	per kWh				
Large General Service	\$0.00219	per kWh				
Large Industrial Power Service	\$0.16756	per kW				
Experimental Economic As-Available Power Service	\$0.01124	per kWh				
Standby and Maintenance Service	\$0.02918	per kW				
Street and Outdoor Lighting	\$0.02288	per kWh				
Experimental Economic As-Available Power Service Standby and Maintenance Service	\$0.01124 \$0.02918	per kWh per kW				

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.