

DOCKET NO. 53153

ENERGY TEXAS, INC.’S	§	
STATEMENT OF INTENT AND	§	PUBLIC UTILITY COMMISSION OF
APPLICATION FOR APPROVAL OF	§	
TWO VOLUNTARY RENEWABLE	§	TEXAS
OPTION TARIFFS, RIDER SVRO AND	§	
RIDER LVRO	§	

ENERGY TEXAS, INC.’S STATEMENT OF INTENT AND APPLICATION

Entergy Texas, Inc. (“ETI” or the “Company”) files this Statement of Intent and Application for approval of two voluntary rate tariffs, Rider Small Volume Renewable Option (“Rider SVRO”) and Rider Large Volume Renewable Option (“Rider LVRO”). In support, ETI respectfully shows as follows:

I. JURISDICTION

ETI is an electric utility, a public utility, and a utility as those terms are defined in PURA¹ §§ 11.004(1) and 31.002(6). Pursuant to PURA §§ 14.001, 32.001(a), and 36.001, the Public Utility Commission of Texas (“Commission”) has exclusive original jurisdiction over this Statement of Intent and Application for service to ETI customers in areas outside of municipalities and areas inside municipalities that have surrendered their jurisdiction to the Commission under PURA § 33.002. ETI is also filing this Statement of Intent and Application with all of the municipalities that retain exclusive original jurisdiction over ETI’s rates within their corporate limits pursuant to PURA § 33.001. ETI anticipates that it will appeal the actions of its original jurisdiction cities to the Commission and that it will seek consolidation of those appeals with this docket pursuant to the Commission’s appellate authority under PURA § 32.001(b).

¹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016 (“PURA”).

II. DESCRIPTION OF APPLICANT AND AUTHORIZED REPRESENTATIVES

ETI provides fully bundled electric delivery service to approximately 483,000 customers across 27 counties in Southeast Texas. The only ETI customers that will be affected by this Statement of Intent and Application are those customers who elect to participate in one of the voluntary tariffs proposed.

ETI's business address is 350 Pine Street, Beaumont, Texas 77701. ETI's mailing address is P.O. Box 2951, Beaumont, Texas 77704-2951. ETI's telephone number is (409) 838-6631. ETI's authorized representatives in this proceeding are:

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ETI requests that all information and documents related to this proceeding be served on Ms. Garcia's office, as listed in the previous paragraph.

III. REQUEST FOR APPROVAL OF VOLUNTARY GREEN PRICING OPTIONS

ETI requests approval to implement two voluntary green pricing options, Riders SVRO and LVRO. Both Riders are voluntary offerings that give customers the ability to match some or all of their monthly electricity usage with renewable energy credits ("RECs") that are purchased by ETI and retired on the customer's behalf. The Company has developed these green pricing options in response to interest received from ETI customers, including larger customers seeking more renewable options from the Company to help meet their corporate sustainability goals. These voluntary green pricing options are also consistent with ETI's commitment to a cleaner, sustainable energy future while maintaining reliability and affordability. Through participation

in these proposed Riders, ETI customers will be able to match up to 100% of their annual energy usage with energy produced by renewable resources, which, in turn, would allow a customer to state that they are supporting the use and deployment of renewable resources and reducing Scope 2 emissions accordingly.² Participation in either Rider SVRO or Rider LVRO and the charges assessed under the respective Rider would be in addition to the charges paid by customers under their otherwise applicable rate schedules and riders. Through these Riders, ETI has sought to design green pricing options that will garner robust participation from interested customers, while not affecting customers who do not wish to participate.

ETI will administer these green pricing options by purchasing and then retiring the RECs associated with Riders SVRO and LVRO, and providing assistance with customer enrollment, customer education, and Green-e[®] certification. As described in the Direct Testimony of Anastasia R. Meyer filed in support of this Statement of Intent and Application, RECs purchased or generated for customers participating in Riders SVRO and LVRO will be Green-e[®] certified, which allows the renewable energy sourced by ETI to be validated as being: (a) sourced from facilities that meet quality criteria that have been endorsed by a diverse stakeholder group; (b) marketed transparently and honestly; and (c) delivered exclusively to the purchaser of the REC (*i.e.*, that the renewable attribute of the generation is not double-counted). Through Green-e[®] certification, ETI will be able to further define the resources used and create an offering that meets its customers' needs. ETI expects to initially source RECs for Riders SVRO and LVRO by purchasing RECs through the market.

Under Rider SVRO, ETI will offer qualifying small volume customers (*i.e.* Residential,

² The U.S. Environmental Protection Agency (“EPA”) defines Scope 2 emissions as indirect emissions that occur through the use of purchased electricity, steam, heat, or cooling. *See* <https://www.epa.gov/sites/default/files/2020-12/documents/electricityemissions.pdf>.

Small General Service, General Service, and Large General Service customers) three levels (tiers) of participation that correspond to the percentage of monthly electricity usage a customer elects to match to green electricity through RECs (referred to as their “SVRO Election”). A customer can make an SVRO Election that enables them to match 25% (Tier One), 50% (Tier Two), or 100% (Tier Three) of their electricity usage each month with RECs, up to 499,999 kilowatt-hours (“kWh”) per month. There is no minimum term for participation for customers enrolled in Rider SVRO, and service under this option will be month-to-month until terminated by ETI or the customer. As further detailed in Ms. Meyer’s Direct Testimony, the monthly charge for Rider SVRO will be equal to the monthly amount of kWh corresponding to the participating customer’s SVRO Election times the applicable \$/kWh Tier Rate (which includes the cost of REC procurement, and program costs for customer education and Green-e® certification). As an example, for a residential customer using approximately 1,000 kWh per month, their monthly Rider SVRO charge would be approximately \$3.83 if subscribed at the Tier One level, \$6.35 if subscribed at the Tier Two level, and \$10.10 if subscribed at the Tier Three level.

Under Rider LRVO, ETI will offer qualifying large volume non-residential customers (*i.e.* General Service, Large General Service, and Large Industrial Power Service customers) the opportunity to purchase a fixed, large volume of RECs each month. Participating LVRO customers will designate an amount of monthly electricity usage to match to green electricity through RECs (referred to as their “LVRO Energy”), which must be at least 500,000 kWh, but cannot exceed the customer’s average monthly usage for the previous year. In order to allow the Company adequate time to plan for the larger volume of RECs needed for participating LVRO customers, there is a minimum term of participation of one year for service under this option. Large volume customers electing to participate in Rider LVRO will enter into the Agreement for

Large Volume Renewable Option Rider (“LVRO Agreement”). The LVRO Agreement memorializes the terms under which the participating customer will contract with ETI for the Company to procure the necessary quantity of RECs to match the customer’s designated LVRO Energy. As further detailed in Ms. Meyer’s Direct Testimony, the monthly charge for Rider LVRO will be equal to the monthly amount of kWh corresponding to the participating customer’s LVRO Energy times the applicable \$/kWh Monthly Rate (which includes the cost of REC procurement, and program costs for Green-e[®] certification).

ETI also proposes an annual true-up process for each of the proposed Riders, through which the Company will compare the actual cost of RECs purchased by ETI and retired on behalf of participating customers to the revenues actually collected based on the fixed REC price used to develop the rates charged under Riders SVRO and LVRO for the most recent preceding 12 months. The resulting over- or under-collection of REC costs will be incorporated into the subsequent updated pricing for the next 12 months for both green pricing options. This true-up will be limited only to the REC procurement cost portion of the rates. That is, ETI does not propose to true up any over- or under-collection of the program costs associated with either Rider.

In support of this Statement of Intent and Application, ETI is filing the Direct Testimony, Exhibits, and Workpaper of Ms. Meyer. The proposed Rider SVRO tariff is included as Exhibit ARM-1 to Ms. Meyer’s testimony, and the proposed Rider LVRO tariff (and associated LVRO Agreement) is included as Exhibit ARM-2. ETI requests an effective date of March 28, 2022 for Riders SVRO and LVRO (as well as the form LVRO Agreement).

IV. NOTICE AND INTERVENTION DEADLINE

ETI proposes to provide notice of this filing consistent with 16 TAC § 22.55, “Notice in Other Proceedings.” Because the proposed tariffs are voluntary and offer a subscription-based

service, no existing customers will be affected by this offering. Therefore, ETI proposes to provide notice of this filing by a one-time publication in newspapers of general circulation in the Company's service area.³ ETI's proposed form of notice is attached as Attachment A.

ETI proposes an intervention deadline of March 17, 2022, which is 45 days following the filing of this Statement of Intent and Application.⁴

V. PROTECTIVE ORDER

As part of its application in this proceeding, ETI has provided certain confidential information. Accordingly, ETI requests that the Commission's standard protective order be issued in this proceeding.

VI. CONCLUSION AND REQUESTED RELIEF

ETI respectfully requests that the Commission grant the relief requested in this Statement of Intent and Application, including:

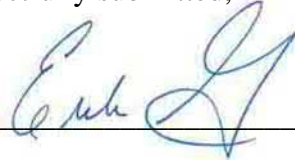
- a) approval of Riders SVRO and LVRO (including the form LVRO Agreement included as Attachment A to Rider LVRO);
- b) approval of ETI's proposed method and form of notice;
- c) entry of the Commission's standard protective order; and
- d) such other relief to which ETI may be entitled.

³ ETI's proposed method of notice is consistent with the notice provided in other applications for a new, voluntary rate tariff. See *Application of Entergy Texas, Inc. to Amend Its Certificate of Convenience and Necessity to Deploy Natural Gas-Fired Distributed Generation and Statement of Intent for Rate Schedule UODG*, Docket No. 51575; *Application of El Paso Electric Company to Implement a Voluntary Community Solar Pilot Program in Texas*, Docket No. 44800; see also *Application of Southwestern Public Service Company for Authority to: (1) Revise Its Interruptible Credit Option Tariff; and (2) Implement a New Saver's Switch Tariff; and Related Relief*, Docket No. 35668.

⁴ See 16 TAC § 22.104(b).

Dated: January 31, 2022

Respectfully submitted,



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ATTORNEY FOR ENTERGY TEXAS, INC.

NOTICE OF NEW RATE REQUEST

On January 31, 2022, Entergy Texas, Inc. (“ETI” or the “Company”) filed a statement of intent and application (“Application”) with the Public Utility Commission of Texas (“Commission”) for approval of two voluntary rate tariffs, Rider Small Volume Renewable Option (“Rider SVRO”) and Rider Large Volume Renewable Option (“Rider LVRO”), as well as an associated form Agreement for service under Rider LVRO. ETI’s Application was assigned Docket No. 53153, and is styled *Entergy Texas, Inc.’s Statement of Intent and Application for Approval of Two Voluntary Renewable Option Tariffs, Rider SVRO and Rider LVRO*. ETI also filed the Application simultaneously with each of the municipalities that has retained original jurisdiction over ETI’s rates. Riders SVRO and LVRO are new voluntary rate tariffs that will be charged only to eligible customers who elect to participate and match some or all of their monthly electricity usage with renewable energy credits that are purchased and/or generated by ETI and retired on the customer’s behalf. The only ETI customers that will be affected by this Application are those customers who elect to participate in one of the voluntary tariffs proposed. ETI is requesting that Riders SVRO and LVRO be effective beginning March 28, 2022.

Persons with questions or who want more information on this petition may contact ETI at Attn: Customer Service, 350 Pine Street, Beaumont, Texas 77701, or call (866) 981-2602 during normal business hours. Persons may also email tcrc@entergy.com with questions or to request more information or a copy of the Application.

Commission rules provide that the deadline to intervene in a proceeding before the Commission is 45 days from filing, or March 17, 2022, unless changed by an Order. 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) 1-800-735-2989.

Due to the COVID-19 pandemic, the preferred method for you to file your request for intervention is electronically, and you will be required to serve the request on other parties by email. Therefore, please include your own email address on the intervention request. Instructions for electronic filing via the “PUC Filer” on the Commission’s website can be found here: <https://interchange.puc.texas.gov/filer>. Instructions for using the PUC Filer are available at: http://www.puc.texas.gov/industry/filings/New_PUC_Web_Filer_Presentation.pdf. Once you obtain a tracking sheet associated with your filing from the PUC Filer, you may email the tracking sheet and the document you wish to file to: centralrecords@puc.texas.gov. For assistance with your electronic filing, please contact the Commission’s Help Desk at (512) 936-7100 or helpdesk@puc.texas.gov. You can review materials filed in this docket on the PUC Interchange at: <http://interchange.puc.texas.gov/>.