



Entergy

RECEIVED
DEC 05 2005
AIR QUALITY
PLANNING

Entergy Services, Inc.
10055 Grogans Mill Road
Parkwood Two, Suite 41
The Woodlands, TX 77380
Tel. 281-297-3304
Fax 281-297-3251

Fred Manhart
Manager
Environmental Support

December 1, 2005

Ms. Karen Hill
Texas Commission on Environmental Quality
P. O. Box 13087 (MC - 206)
Austin, Texas 78711

Re: Preliminary comments of Entergy Texas relating to the much more stringent nitrogen oxides emissions limits TCEQ is considering imposing on electric generating units in East Texas

Dear Ms. Hill:

This letter is in response to the EGU stakeholder meeting held by TCEQ in Austin, November 18, 2005 on the captioned matter. Entergy appreciates TCEQ opening a dialog with the public on the matter of nitrogen oxides emission limits it is considering imposing on EGUs in East Texas, and specifically this opportunity to comment on the November 18 meeting.

Entergy Texas ("Entergy"), a subsidiary of Entergy Corporation, is a vertically integrated investor owned electric utility company operating in Southeast Texas. Entergy provides electric energy to approximately 394,000 customers in 24 Texas counties. Our operations include electric power generation, transmission, and distribution, as well as customer service. Entergy owns and operates two electric generating plants in Texas, consisting of a total of 7 electric generating units ("EGUs"). All of Entergy's EGUs in Texas fall within the East Texas Region as described by TCEQ staff during the November 18 meeting.

Entergy is also a member of the Association of Electric Companies of Texas ("AECT"), which will be filing separate, detailed comments in this matter. Entergy participated in the development of AECT's comments. Entergy supports the comments being filed by AECT, and encourages TCEQ to give them careful consideration.

Entergy is particularly troubled by the belief underlying the proposal that a ton of NOx reduced anywhere in the East Texas Region is equally effective in reducing ozone formation in the Dallas/Fort Worth non-attainment area ("DFW"). We are further troubled by the corollary belief that a ton of NOx reduced anywhere in the East Texas Region is as cost-effective as a ton reduced anywhere else in the Region. If one is to accept the science of

Ms. Karen Hill
December 1, 2005
Page 2

pollutant transport, one must also accept that there are spatial and temporal relationships between sources and receptors. I.e. the old saw that “a ton is a ton, is a ton” is simply not true.

Again, we appreciate this opportunity to participate in the stakeholder process. If you have any questions regarding our comments or our support of the AECT comments, please feel free to contact me by phone at (281) 297-3304 or by email at fmanhar@entergy.com.

Sincerely,



Fred Manhart