



Control Number: 44572



Item Number: 53

Addendum StartPage: 0

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APPLICATION OF CENTERPOINT §  
ENERGY HOUSTON ELECTRIC, §  
LLC FOR APPROVAL OF §  
DISTRIBUTION COST RECOVERY §  
FACTOR PURSUANT TO P.U.C. §  
SUBST. R. 25.243.

PUBLIC UTILITY COMMISSION  
OF TEXAS

### CITY OF HOUSTON'S SECOND REQUEST FOR INFORMATION

In connection with the Application filed by CenterPoint Energy Houston Electric, LLC (“CenterPoint”), the City of Houston (“the City”) requests CenterPoint, by and through its attorney of record, provide the following information within ten (10) days of receipt of these requests. It is further requested that the answers to the requests for information be made under oath, and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as supplement to your original answer.

### DEFINITIONS AND EXPLANATORY NOTES

1. When the request calls for the identification of a “person or witness,” the identification shall include a full name, business address and business telephone number. The identification should also include a job title and name of employer.
2. The terms “document” and “documents” are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms “document” and “documents” shall include all agreements, contracts, communications,

53

correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms "non-privileged document" and non-privileged documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.

3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification of a "document," the identification should include the following:
  - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
  - b. the date of the document;
  - c. the title and/or "re" of the document;
  - d. the subject matter of the document;
  - e. the full name and address of the recipient and every person who received copies of the document;
  - f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and

- g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
- 5. The term “studies” includes any document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information with the subjects referred to in this proceeding.
- 6. The term “CenterPoint” or “CenterPoint Energy Houston Electric, LLC” includes CenterPoint Energy Resources and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

PUCT Docket No. 44572  
CEHE Application for Approval of a DCRF  
City of Houston's Second Set of RFIs

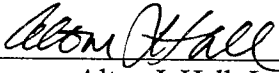
1. Identify each underlying component of the DCRF formula that was not separately identified and approved in CEHE's last comprehensive base-rate proceeding, provide workpapers that demonstrate how each such component of the DCRF was derived from information from that proceeding, including the source documents from that proceeding from which the information was derived.
2. Please identify all extraordinary and non-recurring expenses during calendar year 2014 and explain why CEHE did not make adjustments for each such expense or revenue in its earnings monitoring report.
3. Please provide detailed documentation of the weather adjustment procedure for adjustments to sales and revenues of each class as presented in Schedule X of CEHE's EMR for 2014, including a copy of the model used for such adjustments and supporting details for the coefficients applied to each range of temperature in calculating the proposed adjustments to 2014 data.
4. Please provide detailed narrative descriptions of each of the listed items included in Supplemental Schedule I-1, including the Commission Order and finding approving the listed amortization and the authorized start and end dates over which the amortization was to be made.

Respectfully submitted,

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By:   
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ATTORNEY FOR CITY OF HOUSTON

## CERTIFICATE OF SERVICE

I hereby certify that on this the 4th of May, 2015, a true and correct copy of the foregoing document was served upon on all parties of record by email, facsimile and/or First-Class Mail United States mail, postage paid.

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