



Control Number: 44572



Item Number: 54

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2015 MAY -5 AM 10:19

BEFORE THE
PUBLIC UTILITY COMMISSION
FILING CLERK

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

PUBLIC UTILITY COMMISSION
OF TEXAS

**GULF COAST COALITION OF CITIES’
SECOND REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

The Gulf Coast Coalition of Cities (“GCCC”) files this second request for information (“RFI”) to CenterPoint Energy Houston Electric, LLC (“CenterPoint” or “Company”) in the above-styled docket. CenterPoint is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701, (512) 322-5800 within ten (10) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if CenterPoint receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

DEFINITIONS AND INSTRUCTIONS

A. ‘CenterPoint Energy Houston Electric’ or ‘CenterPoint’ refers to its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The term ‘document’ shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations,

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messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper documents is a separate document within the meaning of this term.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, GCCC specifically requests that any electronic or magnetic data (which is included in the definition of 'document') that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. GCCC further requests that CenterPoint produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms 'and' and 'or' shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. 'Each' shall be construed to include the word 'every' and 'every' shall be construed to include the word 'each.'

F. 'Any' shall be construed to include 'all' and 'all' shall be construed to include 'any.'

G. The term 'concerning,' or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term 'including,' or one of its inflections, means and refers to 'including but not limited to.'

I. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

L. Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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ATTORNEYS FOR THE GULF COAST
COALITION OF CITIES

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by e-mail, fax, hand-delivery and/or regular, first class mail on this 5th day of May, 2015 to the parties of record.


CHRISTOPHER L. BREWSTER

**SOAH DOCKET NO. 473-15-3257
PUC DOCKET NO. 44572**

**GCCC'S SECOND
RFI TO CENTERPOINT**

- KN 2-1 Refer to the Direct Testimony of Mary Kirk, page 19, lines 11-18. Please provide a description of the analysis conducted by CenterPoint to determine that it was necessary to implement its underground cable assessment program in 2013, and provide documentation supporting that decision.
- KN 2-2 Refer to the Direct Testimony of Mary Kirk, page 19, lines 18-22. Please provide the actual expenditures for the underground cable assessment program for each year through 2014, and budgeted amounts for each year beginning in 2015 through the last year budgeted. Please provide the actual or budgeted expenditures separately for the amount expensed and the amount capitalized, and indicate the FERC accounts to which the expensed or capitalized amounts were booked.
- KN 2-3 Refer to the Direct Testimony of Mary Kirk, page 19, lines 23-25. Does CenterPoint have a routine maintenance program for underground cable? If so, please provide the amount of underground cable routine maintenance expense incurred for each year 2009 through 2014 and budgeted amounts for each year beginning in 2015 through the last year budgeted, and indicate the FERC accounts to which the costs were booked.
- KN 2-4 Refer to the Direct Testimony of Mary Kirk, page 20, line 19 – page 21, line 9. Please provide a description and timeline of the process used by the accounting department to record plant to the final fixed asset FERC account after it is completed and in service.
- KN 2-5 Refer to the Direct Testimony of Mary Kirk, page 20, line 19 – page 21, line 9. Please provide the plant investment included in the filing in FERC account 106 by sub-classification.
- KN 2-6 Refer to the Direct Testimony of David Baker, page 4, line 16 – page 5, line 5. Please provide a description and explain the purpose of the components that make up the underground residential distribution (“URD”) equipment. Please explain if this is the equipment reflected in the 13,000 miles of underground residential conductors identified on line 10.
- KN 2-7 Refer to the Direct Testimony of David Baker, page 4, line 16 – page 5, line 5. Please provide the initial written scope and work plan for the underground cable assessment program, and each revision to the scope and work plan.
- KN 2-8 Refer to the Direct Testimony of David Baker, page 4, line 16 – page 5, line 5. If not explicitly described in the scope and work plan, please provide a description of how cables and other URD components are determined whether or not to meet specifications or have a high probability of failure.

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- KN 2-9 Refer to the Direct Testimony of David Baker, page 4, line 16 – page 5, line 5. Please provide the costs for the underground cable assessment program broken down by activity type and WBS element for each year through 2014.
- KN 2-10 Refer to the Direct Testimony of David Baker, Exhibits DEB-2 through DEB-6. Please identify each project that was initiated as a result of the underground cable assessment program and describe how the project significantly enhanced and increased the life of the cable system beyond its original useful life.