

Control Number: 49421



Item Number: 106

Addendum StartPage: 0

RECEIVED

SOAH DOCKET NO. 473-19-3864
PUC DOCKET NO. 49421

2019 MAY -7 AM 10:46

PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF CENTERPOINT
ENERGY HOUSTON ELECTRIC, LLC
FOR AUTHORITY TO CHANGE
RATES

§
§
§
§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**City of Houston's Tenth Request for Information to
CenterPoint Energy Houston Electric, LLC**

In connection with the Application filed by CenterPoint Energy Houston Electric, LLC ("CEHE"), by and through its attorney of record, provides the following information within seven (7) 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 a request calls for 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, 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.

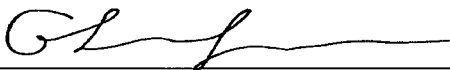
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification 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" and/or "CEHE" includes CenterPoint Energy Houston Electric, LLC and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

Respectfully submitted,

Ronald C. Lewis
City Attorney

YuShan Chang
State Bar No. 24040670
Senior Assistant City Attorney
900 Bagby, 4th Floor
Houston, Texas 77002
(832) 393-6442
(832) 393-6259 Facsimile
yushan.chang@houstontx.gov

Alton J. Hall, Jr.
State Bar No.: 08743740
Chelsea J. Lu
State Bar No. 24095439
ADAMS AND REESE LLP
LyondellBasell Tower
1221 McKinney St., Suite 4400
Houston, Texas 77010
(713) 651-5151
(713) 652-5152 (Fax)
alton.hall@arlaw.com
chelsea.lu@arlaw.com

By: 
Chelsea J. Lu

Counsel for City of Houston

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May, 2019, a true and correct copy of the foregoing document was served upon on all parties of record by email and to the Public Utilities Commission by Federal Express.


Chelsea J. Lu

City of Houston's Tenth Request for Information

- 10-1. Provide CEHE's requested distribution O&M expenses by FERC account and explain the reasons for increase in any account of more than 10% when compared to the levels incurred in 2017.
- 10-2. Explain the basis for the proposed adjustment to test year expenses in FERC account 565.
- 10-3. Provide CEHE's total capital investment for overhead distribution lines, total overhead distribution line miles, and total customers served from overhead distribution lines at years' end for each year since 2009.
- 10-4. Provide CEHE's total capital investment for underground distribution lines, total underground distribution line miles, and total customers served from underground distribution lines at years' end for each year since 2009.
- 10-5. Provide the average cost per line mile for new underground distribution lines added on CEHE's system since 2009.
- 10-6. Provide the average cost per line mile for new overhead distribution lines added on CEHE's system since 2009.
- 10-7. Provide CEHE's policy outlining criteria for deciding whether to add underground or overhead distribution lines for new service.
- 10-8. Provide CEHE's total capital investment for underground distribution lines that replaced existing overhead lines for each year since 2009.
- 10-9. Provide a listing of customers served from dedicated distribution lines placed in service since January of 2010, along with the in-service date, capital cost and any customer contribution in aid of construction for each such line.
- 10-10. Provide the total customer contribution in aid of construction for transmission lines and facilities for each year since 2009.
- 10-11. Provide the total customer contribution in aid of construction for distribution lines and facilities for each year since 2009.
- 10-12. Reference witness Pryor's WP RMP-2 and provide allocated labor costs included in the total cost of each capital project along with descriptions of the basis for such allocations.

- 10-13. Reference witness Pryor's WP RMP-2 and, for each project described as having a purpose of reliability improvement, provide the estimated reliability improvement and associated customer benefits expected from each project.
- 10-14. Provide the annual savings in meter reading O&M expenses resulting from deployment of AMS for each year since 2009.
- 10-15. Provide insurance proceeds for equipment failure, storm damage or other matters by FERC account for each year since 2009 and indicate the portion of total proceeds that have been reflected in the Company's adjusted test year request.
- 10-16. Provide the Company's total DCRF revenues by rate class for each year since the DCRF was implemented.
- 10-17. Reference witness Pryor's WP RMP-2 and provide cost/benefit analysis and other justification supporting the Intelligent Grid (IG) project.
- 10-18. Reference witness Pryor's WP RMP-2 and provide cost/benefit analysis and other justification supporting the "Post AMS" project for each year including the test year.
- 10-19. Reference witness Pryor's WP RMP-2 and provide specific criteria applied to determine projects that were conducted for "proactive" capital replacements for each listed capital project and projects during the test year having a total cost of more than \$5 million.
- 10-20. Reference witness Pryor's WP RMP-2 and provide the number of vehicles purchased each year including the test year under the "FLEET" project and list the type and cost of each vehicle that cost more than \$30,000 in each year.
- 10-21. Reference witness Pryor's WP RMP-2 and explain why the annual cost of vehicles purchased each year under the "FLEET" project was significantly higher in 2012, 2015 and 2016 and provide the Company's policy governing vehicle purchases.
- 10-22. Reference page 19, Figure 5 of witness Pryor's direct testimony and provide the capital investment for each category of listed reliability improvements by year.
- 10-23. Reference page 19, Figure 5 of witness Pryor's direct testimony and provide the estimated improvement to CEHE's SAIDI performance (minutes per year) associated with each listed category of reliability improvements.

- 10-24. Reference page 19, Figure 5 of witness Pryor's direct testimony and explain how replacement of capacitors and streetlighting improve distribution service reliability as measured by SAIDI.
- 10-25. Reference page 21, Figure 6 of witness Pryor's direct testimony and provide the capital investment for each category of listed service restoration investments by year.
- 10-26. Reference page 34 of witness Pryor's direct testimony and provide the annual SAIDI contribution of pole failure outages for each year since 2010.
- 10-27. Reference page 35 of witness Pryor's direct testimony and provide the annual SAIDI contribution of URD cable failure outages for each year since 2010.