



Control Number: 49421



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Addendum StartPage: 0

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

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

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2019 MAY 10 PM 2:46  
BEFORE THE STATE OFFICE  
PUBLIC UTILITY COMMISSION  
FILING CLERK  
OF  
ADMINISTRATIVE HEARINGS

**ALLIANCE FOR RETAIL MARKETS' FOURTH REQUEST FOR INFORMATION  
TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Alliance for Retail Markets (ARM) requests CenterPoint Energy Houston Electric, LLC (CenterPoint), as defined in this Fourth Request for Information (RFI), to respond to the questions and sub-questions in this RFI under oath. Please answer the questions and sub-questions in the order in which they are submitted, and include sufficient detail to provide a complete and accurate response. Also, please state the name of the witness who will sponsor the response to each question and sub-question and who can vouch for the truth of the response.

**Definitions**

As used in this RFI:

- (1) "CenterPoint", "Company", and "Applicant" refer to CenterPoint Energy Houston Electric, LLC and its affiliates, and any person acting or purporting to act on their behalf.
- (2) "CenterPoint Energy Inc." is the parent company of CenterPoint Energy Houston Electric, LLC (as defined above).
- (2) "You", "yours" and "your" refer to CenterPoint Energy Houston Electric, LLC (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
- (3) "Document", "documents", and "documentation" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (email), memoranda, notes, analyses, minutes, presentations, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements,

notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

- (4) “Test Year” refers to the 12-month period ending December 31, 2018.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege set forth in this RFI apply to these questions.
2. In answering these questions, furnish all information available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and identify the present location and custodian of any copy or summary of the document.
6. If any question appears confusing or the scope of the question is unclear, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and copy, at the top of the page, the question and any sub-questions being answered followed by the answer(s) to each.
8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical

assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.
12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If the information requested is included in previously furnished exhibits, workpapers, or 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.
14. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.
15. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

**Claim of Privilege**

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Respectfully submitted,



Stephen J. Davis  
State Bar No. 05547750

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**ATTORNEY FOR  
ALLIANCE FOR RETAIL MARKETS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon all parties on May 10, 2019 by first class mail.



Stephen J. Davis

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

**ALLIANCE FOR RETAIL MARKETS'  
FOURTH REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

- ARM 4-1:** Refer to the Direct Testimony of Matthew A. Troxle, Exhibit MAT-7, Non-Rate Tariff Change Summary (Bates Pages 3071-3073). With the exception of Section 6.1.1.1.6 Lighting Services, the following proposed revision appears in each of the transmission and distribution (T&D) system service rate schedules in Section 6.1.1.1 of the Tariff: “Changed the Customer Charge and the Metering Charge from a per Retail Customer basis to a per Meter basis”. Please explain the purpose of and rationale for this proposed revision, including an explanation of the difference (if any) between a “per Retail Customer” assessment and a “per Meter” assessment of Customer and Meter Charges for the affected rate classes.
- ARM 4-2:** Would a “per ESI ID” assessment of Customer and Meter Charges equally serve the purpose of this proposed revision? If not, explain why.
- ARM 4-3:** Can the proposed “per Meter” assessment increase the level of monthly Customer and Meter Charges assessed to a Retail Customer compared to the level of monthly Customer and Meter Charges assessed to the same Retail Customer pursuant to a “per Retail Customer” basis? If so, please explain the circumstances under which such an increase in T&D charges would occur and provide the justification for the increase.
- ARM 4-4:** If your response to ARM RFI 4-3 is “Yes”, please explain why the proposed revision is characterized as a “Non-Rate Tariff Change”.
- ARM 4-5:** If your response to ARM RFI 4-3 is “Yes”, for each affected rate class please provide the number of Retail Customers that will experience an increase in the level of monthly Customer and Meter Charges as a result of the proposed revision.
- ARM 4-6:** Please explain how CenterPoint will operationalize the proposed revision on the monthly 810\_02 invoices of T&D charges that CenterPoint remits to a retail electric provider (REP). Will the Customer Charge and Meter Charge entries on the 810\_02 invoice include a numerical value greater than one if multiple Customer Charges and Meter Charges are being assessed to the same Retail Customer?
- ARM 4-7:** Will CenterPoint communicate the change in the billing of Customer and Meter Charges to the REP serving an affected Retail Customer prior to sending the first 810\_02 invoice billed consistent with the proposed revision? If the answer is “Yes”, how will this communication occur? If the answer is “No”, please explain the justification for not communicating the change to the REP prior to the billing of the Customer and Meter Charges.

**ARM 4-8:** Confirm or deny: CenterPoint remits a monthly 810\_02 invoice to a REP for each ESI ID served by the REP. If your response is “Deny”, please explain why.

**ARM 4-9:** Confirm or deny: CenterPoint does not remit a monthly 810\_02 invoice to a REP for each meter on the premise of each ESI ID served by the REP. If your response is “Deny”, please explain why.