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

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BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS
FILING CLERK

**City of Houston's Fifteenth 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,

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City Attorney

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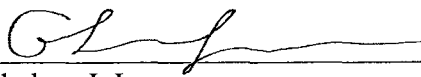
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Counsel for City of Houston

CERTIFICATE OF SERVICE

I hereby certify that on this 13th 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 Fifteenth Request for Information

- 15-1. Reference CEHE's response to COH01-22, confirm that the information provided represents the cost/benefit analyses and other information supporting the prudence of each CEHE distribution capital project having a total cost of more than \$5 million that was placed in service since 2009. If not, provide any additional information supporting the prudence of each project.
- 15-2. Reference CEHE's response to COH01-22, for each capital project identified, identify the specific portions of CEHE's testimony, exhibits and workpapers supporting the prudence of costs incurred for each such project.
- 15-3. Reference CEHE's response to COH01-22, for each capital project identified, identify the specific portions of CEHE's testimony, exhibits and workpapers demonstrating that the project was reasonable and why the project was necessary.
- 15-4. Reference CEHE's response to COH01-22, for each capital project identified, provide costs of such project that were referred to as "maintenance" or "repair costs" in the Company's testimony or exhibits supporting past DCRF filings.
- 15-5. Reference CEHE's response to COH01-22, for each capital project identified, provide the project in-service date and costs by FERC Account.
- 15-6. Reference CEHE's response to COH01-22, for each capital project identified, provide the corporate costs that were allocated to each project, along with the basis for such allocations, and the portion of such costs included in each CEHE DCRF filing.
- 15-7. Provided the projected kWh sales for each rate class for each month as used for each of the Company's approved DCRF rates, along with the actual kWh sales for each rate class for each month the DCRF was in effect.
- 15-8. Provide CEHE's DCRF rates, kWh sales and associated DCRF revenues for each rate class for each month up through the most recent month for which information is available.
- 15-9. Reference CEHE's response to COH01-22, provide the definition of the "Reliability Benefit" used for project valuation, provide the formula and assumptions for calculating this criterion, and explain whether the score for this criterion reflects estimated monetary benefit to customers or some other value.
- 15-10. Reference CEHE's response to COH01-22, provide the definition of the "Supplemental Benefits" criterion use for project valuation, provide the formula and assumptions for calculating this criterion, and explain whether the score for

this criterion reflects estimated monetary benefit to customers or some other value.

- 15-11. Reference CEHE's response to COH01-22, for each capital project identified, identify the project capital amount that was requested and allowed in CEHE's DCRF cases and the PUC Docket Number in which the project amount was approved.
- 15-12. Reference CEHE's response to COH01-22, for each capital project identified, provide the associated revenues collected through the Company's DCRFs for each such project for each month through the most recent month for which information is available.
- 15-13. Reference CEHE's response to COH01-22, for each capital project identified that involved joint transmission and distribution substation projects, provide the amount assigned to distribution along with workpapers supporting the basis for such assignment.
- 15-14. Reference CEHE's response to COH01-22, for each capital project identified that involved joint transmission and distribution substation projects, provide the amount assigned to distribution and the related revenues collected through the Company's DCRFs for each for such assigned costs for each month through the most recent month for which information is available.
- 15-15. Provide the exhibits included with CEHE's direct testimony that describe and provide amounts of distribution capital projects requested for recovery in each past DCRF case filed by the Company to date.
- 15-16. Provide CEHE's budgeted and actual O&M expenses for each of the last three calendar years along with budget variance reports that explain reasons for differences between budgeted and actual expenses.
- 15-17. Provide CEHE's budgeted and actual capital expenditures for each of the last three calendar years along with budget variance reports that explain reasons for differences between budgeted and actual expenses.