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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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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

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PUBLIC UTILITY COMMISSION
FILING CLERK

**City of Houston's First 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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By: 

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Counsel for City of Houston

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April, 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 First Request for Information

- 1-1. Provide CEHE's distribution O&M expenses by FERC account for each year since 2009.
 - 1-2. Provide CEHE's distribution capital additions by FERC account for each year since 2009.
 - 1-3. Provide CEHE's transmission O&M expenses by FERC account for each year since 2009.
 - 1-4. Provide CEHE's transmission capital additions by FERC account for each year since 2009.
 - 1-5. Provide CEHE's budgeted and actual distribution O&M expenses for each year since 2016.
 - 1-6. Provide CEHE's budgeted distribution O&M expenses for 2019 and 2020.
 - 1-7. Provide CEHE's budgeted and actual transmission O&M expenses for each year since 2016.
 - 1-8. Provide CEHE's budgeted transmission O&M expenses for 2019 and 2020.
 - 1-9. Provide CEHE's budgeted and actual distribution capital additions for each year since 2016.
 - 1-10. Provide CEHE's budgeted distribution capital additions for 2019 and 2020.
 - 1-11. Provide CEHE's budgeted and actual transmission capital additions for each year since 2016.
 - 1-12. Provide CEHE's budgeted transmission capital additions for 2019 and 2020.
 - 1-13. Provide CEHE's SAIDI, excluding major storm events, for each year since 2009
 - a. For distribution system outages only;
 - b. For transmission system outages only;
 - c. For distribution plus transmission outages.
 - 1-14. Provide CEHE's SAIDI, including major storm events, for each year since 2009
 - a. For distribution system outages only;
 - b. For transmission system outages only;
 - c. For distribution plus transmission outages.
 - 1-15. Provide CEHE's SAIFI, excluding major storm events, for each year since 2009
 - a. For distribution system outages only;
 - b. For transmission system outages only;
 - c. For distribution plus transmission outages.
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- 1-16. Provide CEHE's SAIFI, including major storm events, for each year since 2009
 - a. For distribution system outages only;
 - b. For transmission system outages only;
 - c. For distribution plus transmission outages.
 - 1-17. Provide CEHE's corporate goals for SAIDI and SAIFI performance for each of the last five years and for the next three years.
 - 1-18. Describe CEHE's current initiatives for improving distribution system reliability and the investments and expenditures related to each such initiative for each of the last five calendar years.
 - 1-19. Provide any utility industry surveys or benchmarking analyses prepared within the last five calendar years comparing CEHE's SAIDI or SAIFI performance to the performance of other utilities.
 - 1-20. Explain any factors unique to CEHE's system that contribute to higher SAIDI or SAIFI performance when compared to SAIDI or SAIFI performance of other utilities.
 - 1-21. Identify CEHE testimony addressing system SAIDI or SAIFI performance filed within the last five calendar years.
 - 1-22. Provide 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.
 - 1-23. Provide the total number of CEHE's customer complaints by class and type of complaint (including service reliability) over each of the last five years.
 - 1-24. Provide the total number of CEHE's customers that have requested higher levels of electric service reliability over each of the last five years.
 - 1-25. Provide the most recent rankings of the CEHE's customer service, customer satisfaction and system reliability performance when compared to other utilities in the electric utility industry.
 - 1-26. Provide a description of and the associated capital investment in distribution system improvements for grid hardening or to otherwise improve distribution reliability for each of the last five calendar years.
 - 1-27. Provide the amount expended on CEHE's existing tree-trimming programs for each of the last five years and as forecasted for the next three years.
 - 1-28. Provide CEHE's year-end gross plant in service and net book value for distribution plant assets for each year since 2009.
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- 1-29. Provide CEHE's forecasted year-end plant in service balance and net book value for distribution plant assets for each of the next five calendar years.
 - 1-30. Does CEHE currently offer any tariffs or other means for customers to obtain enhanced distribution system reliability service? If so, provide the tariffs, describe the services provided, and indicate the number of customers that have elected to purchase such services. If not, explain why not.
 - 1-31. Provide the total number of CEHEs customers by class at year end for each of the last five calendar years.
 - 1-32. Provide any customer survey information collected by CEHE in the last five calendar years to assess the level of satisfaction of customers with the CEHE's distribution service reliability or customer service.
 - 1-33. Provide CEHE's total overhead distribution line miles and underground distribution line miles at year end for each year since 2009.