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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

PUBLIC UTILITY COMMISSION
FILING CLERK

**City of Houston's Nineteenth 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.

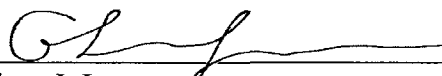
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification 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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Counsel for City of Houston

CERTIFICATE OF SERVICE

I hereby certify that on this 16th 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 Nineteenth Request for Information

- 19-1 Please identify each issue from the final order in Docket No. 38339 in which CEHE is taking a difference position in this rate case. Please include a brief description of the issue, and provide references to the paragraph number in the Final Order and to the testimony, exhibits and work papers in this rate case where the issue is addressed.
- 19-2 Please provide the O&M expenses by FERC account for each year 2016, 2017, and 2018.
- 19-3 Please refer to page 14, line 10 through page 15, line 9 of the Direct Testimony of Lynne Harkel-Rumford. Does the "Market Pricing" process to determine components of the CNP compensation program on an ongoing basis use the same survey data points as CNP used to build the 2018 cost basis? If not, what are the differences and why did the cost basis vary from the ongoing basis?
- 19-4 Please refer to page 17, line 20 through page 18, line 14 of the Direct Testimony of Lynne Harkel-Rumford. Three percent salary increases for most non-executive staff categories, including bargaining employees, were granted and included in 2018. Were there any "adjustments" for future salary increases, besides the 2019 CPA, included in the cost basis?
- 19-5 Please refer to page 19, lines 19 and 20 of the Direct Testimony of Lynne Harkel-Rumford. Ms. Harkel-Rumford states "Market data obtained from salary surveys is the major component in determining the market reference point." Are there other inferred components? If so, please identify those other components and explain how they are used by CEHE in the review of employee compensation.
- 19-6 Please refer to page 19, lines 16 through 21 of the Direct Testimony of Lynne Harkel-Rumford. Provide specific detail on how the "Market Reference Point" is calculated. Please explain how the "market reference point" is determined? Is the "market reference point" the same as "Market 50th Percentile Total Salaries," in column D of "WP LHR-3 Market Compensation Survey Data Compared to CNP.xls"?
- 19-7 Please refer to Figure 1 on page 24 of the Direct Testimony of Lynne Harkel-Rumford. This chart is used to show four positions below the market median. Please provide similar data for those positions above market median.
- 19-8 Please refer to page 40, lines 2 through 4 of the Direct Testimony of Lynne Harkel-Rumford. Please provide a copy of the Benefit Restoration Plan.
- 19-9 Please refer to page 40, line 2 through 4 of the Direct Testimony of Lynne Harkel-Rumford. Can the Benefit Restoration Plan be cancelled by the company at any time without recompense to effected staff? If yes, why is it being included in the revenue requirement to be recovered?
- 19-10 Please refer to page 71, lines 3 through 6 of the Direct Testimony of Kristie L. Colvin. Is the Benefit Restoration Plan liability on or off book? If it is on book, please provide the FERC USOA account for the liability.

- 19-11 Please refer to page 41, lines 5 through 8 of the Direct Testimony of Lynne Harkel-Rumford. Please provide a copy of the Savings Restoration Plan.
- 19-12 Please refer to page 41, lines 5 through 8 of the Direct Testimony of Lynne Harkel-Rumford. Can the Savings Restoration Plan be cancelled by the company at any time without recompense to effected staff? If yes, why is it being included in the revenue requirement to be recovered?
- 19-13 Please refer to page 41, lines 5 through 8 of the Direct Testimony of Lynne Harkel-Rumford. Has the Company included a liability for the unfunded Savings Restoration Plan similar to the Benefit Restoration Plan? If so, please provide the amount of the liability, references to testimony, exhibits and work papers related to the liability, explain whether the liability is on or off book, and provide the FERC USAO account if it is on book.
- 19-14 Please refer to page 42, lines 8 and 9 of the Direct Testimony of Lynne Harkel-Rumford. Please provide the cost associated with these accounts.
- 19-15 Please refer to page 41, lines 11 and 12 of the Direct Testimony of Lynne Harkel-Rumford. How many of the 87 utility and energy companies in the Towers Watson Benefits Data Source provide a savings restoration plan?
- 19-16 Please refer to page 41, line 5 through 8 of the Direct Testimony of Lynne Harkel-Rumford. Please provide the amount that CEHE included in the revenue requirement for the Savings Restoration Plan.
- 19-17 Please refer to page 43, line 24 through page 44, line 2 of the Direct Testimony of Lynne Harkel-Rumford. Please identify the inactive employees that are eligible to receive the postemployment benefits and explain if the benefit provided is required by law or by contract.
- 19-18 Please refer to page 44, lines 11 and 12 of the Direct Testimony of Lynne Harkel-Rumford. Has the Company included a liability for the unfunded deferred compensation plan similar to the Benefit Restoration Plan? If so, please provide the amount of the liability, references to testimony, exhibits and work papers related to the liability, explain whether the liability is on or off book, and provide the FERC USAO account if it is on book.