



Control Number: 49421



Item Number: 252

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

**APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC § OF
FOR AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S ELEVENTH REQUEST FOR INFORMATION TO
OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC (CEHE)
QUESTION NOS. STAFF 11-1 THROUGH STAFF 11-2**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff of the Public Utility Commission of Texas (Commission) requests that CenterPoint Energy Houston Electric, LLC, (CEHE) by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 10 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

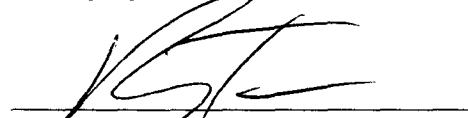
Dated: May 20, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on May 20, 2019, in accordance with 16 TAC § 22.74.


Rustin Tawater

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DEFINITIONS

- 1) "CEHE" or "you" refers to CenterPoint Energy Houston Electric, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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Staff 11-1 For the following projects which were reviewed and approved by ERCOT, please indicate the total cost that the company spent for the project and show a comparison to the estimated cost at the time of ERCOT approval. Please identify, by PUC docket number, any CCNs, which were approved by the Commission in association with the project. Additionally, identify all the Monthly Construction Progress Reports that were filed with the Commission that report the completion of the project (either the entire project or each of the total project's component projects) and the final costs associated with these projects. If the project has not yet been completed and the company is not seeking inclusion of any associated costs for the project, then please indicate so.

- a) CNP Mount Belvieu Area Upgrade Project
- b) CNP Freeport Area Upgrade Project
- c) CNP Fort Bend Area Upgrade Project
- d) CNP Katy Area Upgrades
- e) CenterPoint Energy Jones Creek Project
- f) CNP Houston Region Import Capacity Project
- g) CNP Dow-Velasco Project
- h) Houston Import RPG Project
- i) CenterPoint Energy Angleton to Petson to Monsan Ckt 04 Rebuild Project
- j) CenterPoint Energy Southwyck – Algoa Corner Rebuild Project
- k) CenterPoint Energy-Fort Bend to West Columbia 69 kV to 138Kv Circuit 45 Conversion Project
- l) CenterPoint Energy-Freeport Master Plan Project

Staff 11-2 For any projects responsive to Staff 11-1, or their sub-projects, for which the final costs were in excess of the estimated cost at the time of ERCOT approval, please explain, in detail, the reason for the difference in cost.