



Control Number: 49421



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

**APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE 11 2:44
ENERGY HOUSTON ELECTRIC, LLC § OF
FOR AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**MOTION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
TO SEVER CERTAIN RATE CASE EXPENSES**

CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston” or the “Company”) files this Motion to Sever Rate Certain Case Expenses (“Motion”) and respectfully shows as follows:

I. MOTION

The Company’s direct testimony in this case supports the reasonableness of rate case expenses incurred in connection with this proceeding, Docket No. 49421, and rate case expenses incurred by CenterPoint Houston in the following dockets (including applicable appeals):

- *Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates*, Docket No. 38339, Order on Rehearing (June 23, 2011) (for expenses incurred after November 30, 2010);
- *Application of CenterPoint Energy Houston Electric LLC to Amend its Distribution Cost Recovery Factor and to Reconcile Docket No. 44572 Revenues*, Docket No. 45747, Order (July 20, 2016);
- *Application of CenterPoint Energy Houston Electric, LLC for Approval to Amend its Distribution Cost Recovery Factor*, Docket No. 47032, Order (July 28, 2017);
- *Application of CenterPoint Energy Houston Electric, LLC for the Final Reconciliation of Advanced Metering Costs*, Docket No. 47364, Order (Dec. 14, 2017); and
- *Application of CenterPoint Energy Houston to Amend its Distribution Cost Recovery Factor*, Docket No. 48226, Order (Aug. 30, 2018).

In an effort to reduce the number of issues currently in controversy, CenterPoint Houston requests that rate case expenses related to the preparation, presentation, and prosecution of this rate proceeding, Docket No. 49421, be severed and considered in a separate docket.

Consistent with Commission Procedural Rule 22.34, severing Docket No. 49421 rate case expense issues would serve the interest of efficiency.¹ Severing rate case expense issues related to the currently pending case will avoid the need for parties to provide estimates and updates on rate case expenses before the expenses are finalized and before a substantial portion of rate case expenses will be incurred. The severance of Docket No. 49421 rate case expense issues in the pending case also serves to eliminate procedural uncertainty by establishing a separate docket within which rate case expense issues will be considered after the pending rate case is resolved.

Final rate case expense amounts associated with Docket Nos. 38339, 45747, 47032, 47364, and 48226, for which rate case expenses are known, have been actually incurred and have not been recovered, should not be severed and should remain part of this proceeding.

As part of severing the current proceeding's rate case expense issues from Docket No. 49421, CenterPoint Houston proposes that all deadlines associated with filing testimony or other evidence addressing Docket No. 49421 rate case expenses be determined in the separate rate case expense docket. In addition, all discovery related to Docket No. 49421 rate case expenses would be conducted in the separate docket and not in this rate case, and parties would be required to intervene separately in the rate case expense docket.

II. REQUEST FOR RELIEF

CenterPoint Houston requests that the Commission: (1) grant this Motion and sever Docket No. 49421 rate case expense issues into a separate docket; (2) issue an order consistent with the general procedures addressed in the Motion; and (3) grant CenterPoint Houston such other relief to which it has shown itself entitled.

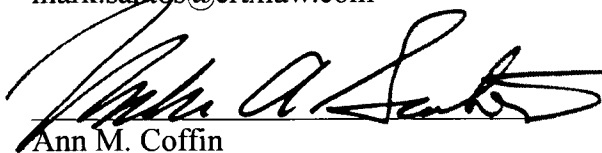
¹ P.U.C. PROC. R. 22.34(b) provides that issues may be severed if the presiding officer finds that severance would serve the interest of efficiency or prevent unwarranted expense or delay.

Respectfully submitted,

Patrick H. Peters III
Associate General Counsel and
Director of Regulatory Affairs
CenterPoint Energy, Inc.
1005 Congress Avenue, Suite 650
Austin, Texas 78701
512.397.3032
512.397.3050 (fax)
patrick.peters@centerpointenergy.com

Mickey Moon
Assistant General Counsel
CenterPoint Energy, Inc.
1111 Louisiana, 19th Floor
Houston, Texas 77002
713.207.7231
713.454.7197 (fax)
mickey.moon@centerpointenergy.com

Coffin Renner LLP
1011 West 31st Street
Austin, Texas 78705
512.879.0900
512.879.0912 (fax)
ann.coffin@crtxlaw.com
mark.santos@crtxlaw.com

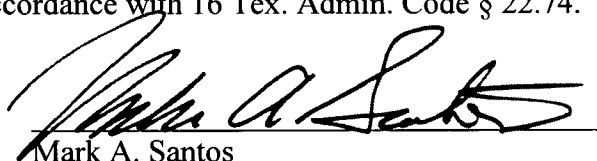


Ann M. Coffin
State Bar No. 00787941
Mark A. Santos
State Bar No. 24037433

**COUNSEL FOR CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May 2019, a true and correct copy of the foregoing document was served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74.


Mark A. Santos

