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

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

May 20, 2019

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**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**ALLIANCE FOR RETAIL MARKET
REQUEST NO.: ARM04-01**

QUESTION:

Refer to the Direct Testimony of Matthew A. Troxle, Exhibit MAT-7, Non-Rate Tariff Change Summary (Bates Pages 3071-3073). With the exception of Section 6.1.1.6 Lighting Services, the following proposed revision appears in each of the transmission and distribution (T&D) system service rate schedules in Section 6.1.1.1 of the Tariff: "Changed the Customer Charge and the Metering Charge from a per Retail Customer basis to a per Meter basis". Please explain the purpose of and rationale for this proposed revision, including an explanation of the difference (if any) between a "per Retail Customer" assessment and a "per Meter" assessment of Customer and Meter Charges for the affected rate classes.

ANSWER:

The purpose of and rationale for this proposed revision; The purpose for changing the Customer Charge and Metering Charge in the T&D rate schedules from a "per Retail Customer" to a "per meter" basis is to recover the costs associated with the acquisition, operation and maintenance of additional meters serving the same retail customer premises. The rationale is that customer that requires multiple meters should pay the costs for the meters used to serve them.

An explanation of the difference between a "per Retail Customer" assessment and a "per Meter" assessment; There would be no difference in assessment for retail customer premises served by a single meter. There would be a difference in assessment only for retail customer premises served by multiple meters under a single ESI ID. Currently, only one Customer Charge and one Metering Charge are assessed on those customers, because as currently stated in the Company's tariff, those charges are assessed on a "per Retail Customer" basis. The Company's proposal would allow it to assess those same charges on a "per meter" basis.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**ALLIANCE FOR RETAIL MARKET
REQUEST NO.: ARM04-02**

QUESTION:

Would a "per ESI ID" assessment of Customer and Meter Charges equally serve the purpose of this proposed revision? If not, explain why.

ANSWER:

No. As stated in response to ARM 4-1, the purpose for the change is to apply the Metering and Customer charges to retail customer premises served by multiple meters under a single ESI ID. A "per ESI ID" assessment would be the same as the current "per Retail Customer" assessment. However, a "per ESI ID" assessment could equally serve the purpose of this proposed revision if every additional meter serving a customer's premises was required to have an ESI ID.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**ALLIANCE FOR RETAIL MARKET
REQUEST NO.: ARM04-03**

QUESTION:

Can the proposed "per Meter" assessment increase the level of monthly Customer and Meter Charges assessed to a Retail Customer compared to the level of monthly Customer and Meter Charges assessed to the same Retail Customer pursuant to a "per Retail Customer" basis? If so, please explain the circumstances under which such an increase in T&D charges would occur and provide the justification for the increase.

ANSWER:

The Company is not changing the amount of the Customer and Metering Charges to be assessed based on whether the customer is served by a single meter or multiple meters. There is still a single Metering Charge and a single Customer Charge, but the Company is proposing to apply them on a per meter basis instead of a per customer basis. For customers with multiple meters, the number of Customer and Metering Charge assessments will increase to match the number of meters serving their premises. As stated in response to ARM 4-1, the justification for this increase is that customers who require multiple meters should pay the costs for the meters used to serve them. Therefore, Customers who currently have multiple meters but are not billed for one or more meters would be billed for each meter that is used in providing them service.

The change would also make it clear that a customer building a new structure or adding on to an existing structure that requires a second meter would be required to pay the Customer and Meter charge for the new meter as well as the existing meter.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**ALLIANCE FOR RETAIL MARKET
REQUEST NO.: ARM04-04**

QUESTION:

If your response to ARM RFI 4-3 is "Yes", please explain why the proposed revision is characterized as a "Non-Rate Tariff Change".

ANSWER:

The intent of this change is to limit socialization of meter cost that have been stranded by customers who consolidate multiple meters under one customer and meter charge. The Company is not proposing to assess a different Customer or Metering Charge on customers with multiple meters versus customers with a single meter, and this revision does not affect the amount of the Company's requested revenue requirement in this case.

However, regardless of whether these charges are considered "rate" or "non-rate" tariff changes, the Company identified these charges in its public notice provided to customers to ensure that all customers are aware of how the Company proposes to assess these charges as a result of this proceeding.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

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**ALLIANCE FOR RETAIL MARKET
REQUEST NO.: ARM04-05**

QUESTION:

If your response to ARM RFI 4-3 is "Yes", for each affected rate class please provide the number of Retail Customers that will experience an increase in the level of monthly Customer and Meter Charges as a result of the proposed revision.

ANSWER:

71 Transmission customers, 59 Primary Customers, 452 Secondary > 10 KVA and 6 Secondary < 10KVA.

In addition, see the Company's response to ARM04-03 and ARM04-04.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

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**ALLIANCE FOR RETAIL MARKET
REQUEST NO.: ARM04-06**

QUESTION:

Please explain how CenterPoint will operationalize the proposed revision on the monthly 810_02 invoices of T&D charges that CenterPoint remits to a retail electric provider (REP). Will the Customer Charge and Meter Charge entries on the 810_02 invoice include a numerical value greater than one if multiple Customer Charges and Meter Charges are being assessed to the same Retail Customer?

ANSWER:

The Customer Charge and Metering Charge entries on the 810_02 invoice will include a numerical value corresponding to the number of meters that are represented on the invoice.

SPONSOR (PREPARER):
John Hudson (John Hudson)

RESPONSIVE DOCUMENTS:
None

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**ALLIANCE FOR RETAIL MARKET
REQUEST NO.: ARM04-07**

QUESTION:

Will CenterPoint communicate the change in the billing of Customer and Meter Charges to the REP serving an affected Retail Customer prior to sending the first 810_02 invoice billed consistent with the proposed revision? If the answer is "Yes", how will this communication occur? If the answer is "No", please explain the justification for not communicating the change to the REP prior to the billing of the Customer and Meter Charges.

ANSWER:

CenterPoint Houston will communicate with the affected REPs prior to sending the first 810_02 invoices billed consistent with the proposed revision. The communication will come through the REP's Competitive Retailer Relations Account Manager.

SPONSOR (PREPARER):
John Hudson (John Hudson)

RESPONSIVE DOCUMENTS:
None

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**ALLIANCE FOR RETAIL MARKET
REQUEST NO.: ARM04-08**

QUESTION:

Confirm or deny: CenterPoint remits a monthly 810_02 invoice to a REP for each ESI ID served by the REP. If your response is "Deny", please explain why.

ANSWER:

Confirm.

SPONSOR (PREPARER):

John Hudson (John Hudson)

RESPONSIVE DOCUMENTS:

None

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**ALLIANCE FOR RETAIL MARKET
REQUEST NO.: ARM04-09**

QUESTION:

Confirm or deny: CenterPoint does not remit a monthly 810_02 invoice to a REP for each meter on the premise of each ESI ID served by the REP. If your response is "Deny", please explain why.

ANSWER:

Confirm. As detailed in the response to RFI ARM04-05, there are a number of customers who have more than one meter represented by an ESI-ID. CenterPoint Houston does not remit a separate 810_02 invoice for each of these meters.

SPONSOR (PREPARER):

John Hudson (John Hudson)

RESPONSIVE DOCUMENTS:

None

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.


