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Item Number: 297

Addendum StartPage: 0

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APPLICATION OF CENTERPOINT §  
ENERGY HOUSTON ELECTRIC, LLC §  
FOR AUTHORITY TO CHANGE §  
RATES §

PUBLIC UTILITY COMMISSION  
BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

**City of Houston's Twenty-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,

297

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: \_\_\_\_\_



Chelsea J. Lu

**Counsel for City of Houston**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st 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 Twenty-First Request for Information**

- 21-1. Please refer to COH03-23 Attachment 1. Please provide a reconciliation of the total payroll for 2018 to the total payroll on WP II D-3 Adj 2, in the amount of \$303,531,720 in cell E3763 and explain all differences.
- 21-2. Please refer to COH03-23 Attachment 1. Please explain whether non-productive pay is included on the schedule, and if so, what pay category it is included in.
- 21-3. Please refer to COH03-23 Attachment 1. Please provide this schedule with all payroll categories included for 2018 and with the non-union biweekly payroll shown separately from the semimonthly payroll, and with the non-productive pay included with base pay.
- 21-4. Please refer to COH03-23 Attachment 3. Please provide a reconciliation of the total payroll for 2018 to the total payroll on WP II D-1 Adj 4, in the amount of \$135,441,772 in cell E185 and explain all differences.
- 21-5. Please refer to COH03-23 Attachment 3. Please explain whether non-productive pay is included on the schedule, and if so, what pay category it is included in.
- 21-6. Please refer to COH03-23 Attachment 3. Please provide this schedule with all payroll categories included for 2018 and with the non-union biweekly payroll shown separately from the semimonthly payroll, and with the non-productive pay included with base pay.
- 21-7. Please refer to COH03-24 Attachment 1. Please provide this schedule with all payroll categories included for 2019 and with the non-union biweekly payroll shown separately from the semimonthly payroll, and with the non-productive pay included with base pay.
- 21-8. Please refer to COH03-24 Attachment 3. Please provide this schedule with all payroll categories included for 2019 and with the non-union biweekly payroll shown separately from the semimonthly payroll, and with the non-productive pay included with base pay.