

Control Number: 49421



Item Number: 298

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

RECEIVED

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

2019 MAY 22 AM 11:17  
BEFORE THE STATE OFFICE  
PUBLIC UTILITY COMMISSION  
ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S TWELFTH REQUEST FOR INFORMATION TO  
OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC (CEHE)  
QUESTION NOS. STAFF 12-1 THROUGH STAFF 12-4**

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.

2918

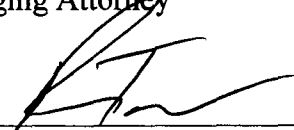
Dated: May 22, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Stephen Mack  
Managing Attorney

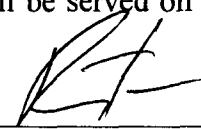


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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on May 22, 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 12-1** Please refer to the file “WP – Schedule H” tab “WP H-1.2”. For cells E9-E20, E31-E42, E75-E86, E97-E108, E119-E130, and E141-E152, please explain why a negative sign was added in this step to the weather adjustment results.
- Staff 12-2** For each rate class, please provide that rate class’s billable demand (including the application of the ratchet provision that was in effect during the Test Year), and what the rate class’s billable demand would have been if the ratchet provision had been eliminated (consistent with the Company’s proposal in this proceeding).
- Staff 12-3** Please refer to Schedule WP V-K-1.3, at Microsoft Excel rows 333 and 334. Please provide a full narrative description of the “Control system” referred to in these line items. What does this system do, and how did the Company determine the share of control system expenses to be included in FERC account 560 versus those to be included in FERC account 580? Please explain and provide the associated workpapers.
- Staff 12-4** Please refer to workpaper “TB Year to Date” in the file CEHE RFP workpapers. Please provide a more full description of the telecommunications and IT services that are associated with the following cost center descriptions: (a) Tele Del – Wireless, (b) Telecom Network, (c) TELECOM SUPPORT, (d) Telecomm Cell Relay, (e) ADDR & MTR ROUTE, (f) GIS BUSINESS SOL. For each cost center description, please explain how that cost center is involved in the provision of wholesale transmission service, if at all.