



Control Number: 49421



Item Number: 29

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

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

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BEFORE THE STATE OFFICE
OF PUBLIC UTILITIES
ADMINISTRATIVE HEARINGS

**City of Houston's Second 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,

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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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April, 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.


Alton J. Hall, Jr.

City of Houston's Second Request for Information

- 2-1. On page 2 of Mr. Troxle's direct testimony, please provide the amounts of DCRF and TCRF adjusted in the determination of the present revenues in Column (a), in total and by class.
- 2-2. Please provide the DCRF revenues CenterPoint collected from retail customers for each of the following periods:
 - a. 9/1/15 thru 8/31/16
 - b. 9/1/16 thru 8/31/17
 - c. 9/1/17 thru 8/31/18
 - d. 9/1/18 thru 12/31/18
- 2-3. Please refer to page 2 Mr. Troxle's direct testimony. Please provide a summary of revenues for the combination of distribution, meter, and customer revenues only, using the same format for the summary of revenues table as shown on this page. The summary should reflect the total on distribution revenues (including distribution, meter, and customers) revenues that were collected from CenterPoint's retail customers for the test year and the total distribution revenues that CenterPoint proposes to collect from its retail customers for the rate year.
- 2-4. Please refer to page 2 Mr. Troxle's direct testimony. Please provide a summary of revenues for transmission revenues only, using the same format for the summary of revenues table as shown on this page. The summary should reflect the transmission revenues that were collected from CenterPoint's retail customers for the test year and the transmission revenues that CenterPoint proposes to collect from its retail customers for the rate year.
- 2-5. Please refer to page 37 of Mr. Troxle's testimony and provide the following information:
 - a. Total number of street lights.
 - b. Total number of LED street lights by type of initial lumen and watt.
 - c. Total number of non-LED street lights by type of initial lumen and watt.
 - d. Total number of LED street lights by type of initial lumen and watt for City of Houston.
 - e. Total number of non-LED street lights by type of initial lumen and watt for City of Houston.
- 2-6. Please refer to page 37 of Mr. Troxle's testimony and provide the following information:
 - a. Total number of street lights in each of the calendar years 2014, 2015, 2016, and 2017.
 - b. Total number of LED street lights by type of initial lumen and watt in each of the calendar years 2014, 2015, 2016, and 2017.

- c. Total number of non-LED street lights by type of initial lumen and watt in each of the calendar years 2014, 2015, 2016, and 2017.
 - d. Total number of LED street lights by type of initial lumen and watt for City of Houston in each of the calendar years 2014, 2015, 2016, and 2017.
 - e. Total number of non-LED street lights by type of initial lumen and watt for City of Houston in each of the calendar years 2014, 2015, 2016, and 2017.
- 2-7. Please refer to page 37 of Mr. Troxle's testimony and provide the following information:
 - a. Total number of street lights in each of the calendar years 2014, 2015, 2016, and 2017.
 - b. Total number of LED street lights by type of initial lumen and watt that CenterPoint installed to replace the non-LED street lights in each of the calendar years 2014, 2015, 2016, 2017, and 2018.
 - c. Total number of LED street lights by type of initial lumen and watt that CenterPoint installed to replace the non-LED street lights for City of Houston in each of the calendar years 2014, 2015, 2016, 2017, and 2018.
- 2-8. Please provide the actual costs of replacing non-LED lighting luminaries with LED technology, that were incurred in 2015, 2016, 2017, and 2018. Please provide a detailed breakdown of these actual costs.
- 2-9. Please provide the actual costs of replacing non-LED lighting luminaries with LED technology, for City of Houston, that were incurred in 2015, 2016, 2017, and 2018. Please provide a detailed breakdown of these actual costs.
- 2-10. Please provide the costs of purchasing the LED light bulbs to replace non-LED lights that were incurred in 2015, 2016, 2017, and 2018. Please provide copies of invoices showing the purchase prices for the LED Light bulbs.
- 2-11. Please provide the installation costs for providing CEHE's LED Lighting services, that were incurred in 2015, 2016, 2017, and 2018.
- 2-12. Please provide the operation and maintenance costs for providing CEHE's LED Lighting services, that were incurred in 2015, 2016, 2017, and 2018.
- 2-13. When did CEHE start offering LED Lighting options to customers?
- 2-14. Please provide the numbers of customers taking LED Lighting options by each LED Lighting option from 2010 to 2018. Does CEHE offer LED Lighting options to a limited

number of customers or particular groups of customers? If so, please explain the reasons for the limited offers.

- 2-15. Please provide the number of street lights whose non LED Lighting services have been replaced by LED Lighting from 2010 to 2018.
- 2-16. Please provide the number of City of Houston street lights whose non LED Lighting services have been replaced by LED Lighting from 2010 to 2018.
- 2-17. Do CEHE's current and past DCRFs reflect any capital investments related to LED Lightings? If so, please identify in detail the amounts of capital investments related to LED Lightings that is included in each of CEHE's current and past DCRFs.

Note: If any of the Responses to Request for Information above contain data or information shown in spreadsheet format, please provide electronic versions of the spreadsheets.