



Control Number: 49421



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

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2019 MAY 23 AM 9:14
PUBLIC UTILITY COMMISSION
FILING CLERK

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

COMMISSION STAFF'S THIRTEENTH REQUEST FOR INFORMATION TO
OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC (CEHE)
QUESTION NOS. STAFF 13-1 THROUGH STAFF 13-7

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.

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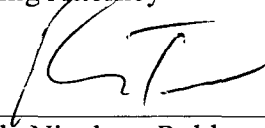
Dated: May 23, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Stephen Mack
Managing Attorney

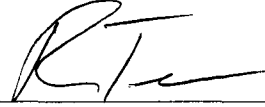


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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on May 23, 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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QUESTION NOS. STAFF 13-1 THROUGH STAFF 13-7**

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 13-1** What policies apply to CenterPoint Energy Houston Electric's (CEHE) dividend payments to CenterPoint Energy, Inc. (CenterPoint)? Please provide a comprehensive and detailed explanation of the factors determining the amount, timing, and basis of CEHE dividend payments to CenterPoint. If such dividend policies are formalized in a written document, please provide that document.
- Staff 13-2** Does CEHE make contributions to a CenterPoint money pool from which other CenterPoint affiliates may borrow? If so, please provide a comprehensive and detailed description of the operations of the money pool, the terms of its use, and the degree, if any, to which a given affiliate's borrowings are intermingled with other affiliates' borrowings.
- Staff 13-3** Does CEHE share any type of credit facility with any unregulated CenterPoint affiliate? If so, please explain thoroughly and provide relevant details, including the degree to which a given affiliate is financially responsible for any borrowings by other affiliates.
- Staff 13-4** Is any of CEHE's debt secured by non-CEHE assets? If so, please explain thoroughly and provide relevant details.
- Staff 13-5** Is any of the debt of CenterPoint or its non-CEHE affiliates secured by CEHE's assets? If so, please explain thoroughly and provide relevant details.
- Staff 13-6** Does CEHE have any assets that are pledged for any entity other than CEHE? If so, please explain thoroughly and provide relevant details.
- Staff 13-7** Please refer to the Company's incomplete responses to Staff 6-03 and 6-04. To cure the Company's incomplete response to 6-03, please provide the Test Year maximum scheduled instantaneous import flow on the Welsh DC tie (e.g., measured in kW, MW, kVAR, MVAR, etc., when the direction of the flow was into ERCOT). To cure the Company's incomplete response to 6-04, please provide the Test Year maximum scheduled instantaneous export flow on the Welsh DC tie (e.g., measured in kW, MW, kVAR, MVAR, etc., when the direction of the flow was out from ERCOT). If the Company does not measure instantaneous flow, please provide the requested information during a short time interval (e.g., a 15-minute or a 60-minute interval).