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PUBLIC UTILITY COMMISSION
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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
ADMINISTRATIVE HEARINGS

**City of Houston's Twenty-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,

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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,

Ronald C. Lewis
City Attorney

YuShan Chang
State Bar No. 24040670
Senior Assistant City Attorney
900 Bagby, 4th Floor
Houston, Texas 77002
(832) 393-6442
(832) 393-6259 Facsimile
yushan.chang@houstontx.gov

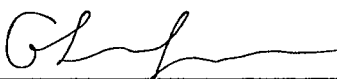
Alton J. Hall, Jr.
State Bar No.: 08743740
Chelsea J. Lu
State Bar No. 24095439
ADAMS AND REESE LLP
LyondellBasell Tower
1221 McKinney St., Suite 4400
Houston, Texas 77010
(713) 651-5151
(713) 652-5152 (Fax)
alton.hall@arlaw.com
chelsea.lu@arlaw.com

By: 
Chelsea J. Lu

Counsel for City of Houston

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd 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-Second Request for Information

- 15-1. Please refer to page 1 of 2 of CenterPoint's response to City of Houston 9th Request for Information Question No. COH09-06 and please explain in detail the reasons why CenterPoint assumes that there would be two replacement occurrences for LED lighting over the used and useful life of an existing LED installation in determining costs for LED street lighting services.
- 15-2. Please refer to page 1 of 2 of the Assumptions for Cost Calculations.xlsx workbook to CenterPoint's response to City of Houston 9th Request for Information Question No. COH09-12 and answer the following questions:
- a. How was the \$1,804.21 average installation cost for underground street light determined?
 - b. How were the 119,600 total installations/repair (events) for 2018 determined?
 - c. How were the 8,829 total pole installations for 2018 was determined? How was the "460 a day" determined?
 - d. How was the \$2.49 average fuel cost per hour determined?
 - e. How was the \$0.89 central dispatching per order determined?
- 15-3. Please refer to CenterPoint's response to City of Houston 14th Request for Information Question No. COH14-01 and provide the average yearly purchase cost of LED for each of the calendar years from 2014 through 2018.
- 15-4. Please refer to CenterPoint's response to City of Houston 14th Request for Information Question No. COH14-03 and please explain if the assets included in the Asset Class CE37301 (Street Lighting and Signal for FERC Account 106 (Construction Complete Not Classified) are used and useful. Please identify the assets that have been complete but have not been used.
- 15-5. Please refer to CenterPoint's response to City of Houston 14th Request for Information Question No. COH14-02 and answer the following questions:
- a. Please describe what the following cost centers do:
 - i. AMS Systems-PC (FINL)
 - ii. AMS Operations-PC (FINL)
 - iii. AMS Project Management Office
 - b. Please also identify the items of property and the corresponding amounts of the investment for these items that are associated with these cost centers.

Please provide all of the workpapers supporting your responses and 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.