



Control Number: 49421



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SOAH DOCKET NO. 473-19-3864

PUC DOCKET NO. 49421

2019 MAY 28 PM 4: 24

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

§ BEFORE THE STATE OFFICE  
§ PUBLIC UTILITY COMMISSION  
§ FILING CLERK  
§ OF  
§ ADMINISTRATIVE HEARINGS

**H-E-B, LP'S**  
**FIRST REQUEST FOR INFORMATION TO**  
**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**  
**QUESTION NOS. H-E-B 1-1 THROUGH H-E-B 1-21**

H-E-B, LP ("H-E-B") hereby files this First Request for Information ("First RFIs") in the above-styled docket. The First RFIs are attached as Exhibit A and are incorporated herein for all purposes. The First RFIs were served on counsel for CenterPoint Energy Houston Electric, LLC ("CenterPoint") on May 28, 2019.

Responses to the First RFIs should be served on Jennifer Littlefield, Haynes and Boone, LLP, 600 Congress Avenue, Suite 1300, Austin, Texas 78701, within 10 days of service of the First RFIs, or no later than June 10, 2019, in conformance with the requirements of 16 Tex. Admin. Code ("TAC") § 22.144(c) and SOAH Order No. 2.

These requests shall be deemed continuing so as to require further and supplemental responses if H-E-B receives or generates additional information within the scope of these requests after the original responses are served.

The responses shall further comply with 16 TAC § 22.144.

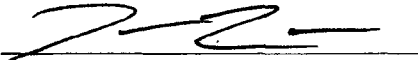
**Claim of Privilege**

If any document is withheld under any claim of privilege, please furnish the information required under the procedural rules of the Public Utility Commission of Texas ("PUCT" or "Commission"), including a list identifying each document for which a privilege is claimed,

together with the following information: date, author, sender, recipient, recipient of copies, subject matter of the document, and the basis upon which a privilege is claimed.

The Instructions and Definitions for responding to these First RFIs are set forth below.

Respectfully submitted,



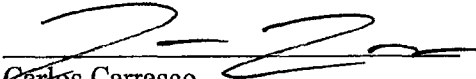
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ATTORNEYS FOR H-E-B, LP

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this document was served on all parties to this Docket on May 28, 2019.

  
Carlos Carrasco

## **I. DEFINITIONS and INSTRUCTIONS**

### **Definitions**

1. The term **“correspondence”** shall mean every manner or means of disclosure, transfer, meeting or exchange of information, and every disclosure, whether orally or by document or whether face-to-face, by telephone, mail, electronic mail, personal delivery or otherwise.
2. The terms **“data”** or **“report”** or **“analysis”** shall mean all original non-identical copies of papers, records, letters, photographs, correspondence, communications, facsimiles, memoranda, notes, reports, statements, summaries, analyses, agendas, notices, computer printouts, e-mail, invoices, kept by electronic, photographic or mechanical means, any notes or drafts relating to the foregoing. If any such document is only in electronic format, it should be printed and produced.
3. The term **“H-E-B, LP”** shall mean H-E-B, LP Corporation and its officers, directors, partners, members, employees, principals, agents, representatives, and attorneys. This term shall also include all predecessors and successors in interest.
4. The phrase **“regarding”** shall mean in addition to their customary and usual meaning, discussing, referring to, pertaining to, reflecting, evidencing, showing, or recording.

### **Instructions**

1. The terms **“and,” “or,”** and **“and/or”** shall be construed in their broadest form, and either conjunctively or disjunctively to expand the scope of the particular request and bring within the scope of the particular request any and all information which might otherwise be construed to be outside its scope.
2. The use herein of the word **“any”** or the word **“all”** is intended generally to mean **“each”** and **“every,”** but should be construed either broadly or narrowly, as necessary, to expand the scope of the particular request and bring within the scope of the particular request documents or information that might otherwise be considered outside its scope.
3. Without limitation of the term **“control”** as used herein, a document is deemed to be in a party or person’s control if they have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof.
4. In answering this request, you must furnish all information in your possession, custody or control regardless of whether this information is in your direct physical possession or is in the possession of your agents, employees, representatives, investigators or, unless privileged, by your attorneys or their agents, employees, representatives, or investigators.

## **II. REQUEST FOR ELECTRONIC DATA**

**H-E-B requests that to the extent responsive items, documents and records were created, edited, modified, or communicated on computer desktop, laptops, hard drives, or servers, that such items be produced in their native application. Documents that are produced electronically need not also be produced in hard copy form, provided that the electronic version is an exact replica of the hard copy, including any handwritten interlineations, notes, logos, insignias, etc.**

## **III. PRESERVATION OF ALL DATA**

**It is requested that all documents and tangible things that might reasonably impact on the subject matter of this Proceeding be immediately preserved and any ongoing process of document destruction involving such documents and tangible things cease.**

*EXHIBIT "A"*

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

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

Please provide all data, reports, or analysis performed or acquired by CenterPoint regarding its System Average Interruption Duration Index ("SAIDI") performance for each of the last five years. Please also provide this data separately for each customer class.

**H-E-B 1-2** Please provide all data, reports, or analysis performed or acquired by CenterPoint regarding its System Average Interruption Frequency Index ("SAIFI") performance for each of the last five years. Please also provide this data separately for each customer class.

**H-E-B 1-3** Please provide all internal and external correspondence regarding CenterPoint's SAIDI performance for each of the last five years.

**H-E-B 1-4** Please provide all internal and external correspondence regarding CenterPoint's SAIFI performance for each of the last five years.

**H-E-B 1-5** Please refer to the Direct Testimony of Julianne Sugarek. Please provide the number of equipment failures reduced for each of the last five years by CenterPoint's Infra-red program. Please also provide this data separately for each customer class.

**H-E-B 1-6** Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint identifying the associated reliability improvements and decrease in SAIDI for each of the last five years because of the Infra-red program. Please also provide this data separately for each customer class.

- H-E-B 1-7** Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint identifying the associated reliability improvements and decrease in SAIFI for each of the last five years because of the Infra-red program. Please also provide this data separately for each customer class.
- H-E-B 1-8** Please refer to the Direct Testimony of Julianne Sugarek. Please provide all action plans generated by CenterPoint for each of the last five years to address issues associated with circuits identified by the Root Cause Analysis Program.
- H-E-B 1-9** Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint for each of the last five years regarding the monitoring of circuit performance to determine if its analysis under the Root Cause Analysis Program was correct or if additional measures were necessary.
- H-E-B 1-10** Please refer to the Direct Testimony of Julianne Sugarek. Please provide all predictive data produced and/or reviewed by CenterPoint used to identify operational issues under the Root Cause Analysis Program.
- H-E-B 1-11** Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint for each of the last five years identifying the associated decrease in outage times experienced by customers because of the Distribution Automation Program. Please also provide this data separately for each customer class.
- H-E-B 1-12** Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint for each of the last five years identifying the associated reliability improvements experienced by customers because of the Distribution Automation Program. Please also provide this data separately for each customer class.
- H-E-B 1-13** Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint for each of the last five years identifying improved customer satisfaction as referenced by Ms. Sugarek because



of the Distribution Automation Program. Please also provide this data separately for each customer class.

- H-E-B 1-14** Please provide CenterPoint's Four Coincident Peak ("4CP") loads coincident with ERCOT's 4CP for the test year for each customer class.
- H-E-B 1-15** Please provide CenterPoint's non-coincident peak ("NCP") loads for the test year for each customer class.
- H-E-B 1-16** Please provide any internal or external correspondence, data, reports, or analysis performed, generated, or acquired by CenterPoint on the allocation of distribution system costs on a 4CP basis.
- H-E-B 1-17** Please explain why CenterPoint chose to use the 4CP demand methodology to allocate distribution system costs to customer classes.
- H-E-B 1-18** Please specify any Public Utility Commission of Texas rules, orders, regulations, or other guidelines or requirements justifying the use of the 4CP demand methodology to allocate distribution system costs customer classes.
- H-E-B 1-19** Please calculate the distribution system costs for each customer class on an NCP basis. Please provide a side-by-side comparison of the NCP allocation for each class and CenterPoint's proposed 4CP demand allocation.
- H-E-B 1-20** Please identify the number of repeat quality of service issues for which a customer was impacted more than five (5) times by outages for each customer class for the last five years.
- H-E-B 1-21** Please identify the average amount per customer that was spent by CenterPoint to address such repeat quality of service issues by customer class and identify the number of customers, by customer class, for which CenterPoint resolved such quality of service issues.