



Control Number: 49421



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

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

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§

BEFORE THE STATE OFFICE  
OF PUBLIC UTILITY COMMISSION  
ADMINISTRATIVE HEARINGS

RECEIVED  
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**City of Houston's Twenty-Third 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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By:   
Alton J. Hall, Jr.

**Counsel for City of Houston**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> 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.

  
Alton J. Hall, Jr.

**City of Houston's Twenty-Third Request for Information**

- 23-1. Please refer to CEHE answer to COH03-23. The question was to provide each pay period number of EE s, base pay, and other pay separately for CEHE and each affiliate. Attachment 3 is a summation of all Affiliates. Please provide data for each Affiliate that charges CEHE.
- 23-2. Please refer to COH03-23 Attachments 1 and 3. Please provide number of EE s for each labor category reported. Please provide these numbers of EE s reporting in future schedules and exhibits. Please show non-productive pay as separate pay category for each EE payroll category.
- 23-3. Please refer to COH03-24. The request was for a "...separate payroll annualization calculation in the Company's exhibits..." for the pay periods subsequent to the test year. There is no reference to this item in the Answer. Please advise where this information can be accessed.
- 23-4. Please refer to the Question for COH03-26, "Please provide this information separately for CenterPoint Houston Electric and for each affiliate or work group with costs allocated to CenterPoint Houston Electric.". The Answer, COH03-26 Attachment 3.xlsx for the 2015 through 2018 Affiliate data, provides overall affiliate or work group data. Please amend to provide the data for each affiliate or work group.

Please provide EE count by labor category.

- 23-5. Please refer to CEHE answer to COH03-26 Attachment 1.xlsx for direct payroll amounts paid. Please provide explanation of the basis for the calculation of the Bonuses paid for 2016 – 2018 for Non-Union and Union labor categories.
- 23-6. Please refer to WP II-D-3 Adj 2.1 column C, Overtime Exempt. Please provide definition of Exempt EE eligibility for earning OT and the number in this EE category.
- 23-7. Please refer to WP II D-3 Adj 2.1 cell L1047. Please provide explanation of how this adjustment for GL Account 515040, Bonus/Inc-Exempt is the only STI True -Up.