



Control Number: 49421



Item Number: 368

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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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§

2019 MAY 31 PM 1:18  
BEFORE THE STATE OFFICE  
PUBLIC UTILITY COMMISSION  
FILING CLERK  
OF  
ADMINISTRATIVE HEARINGS

H-E-B, LP'S  
SECOND REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
QUESTION NOS. 2-1 THROUGH 2-5

H-E-B, LP's ("H-E-B") files this, its Second Request for Information ("Second RFIs") in the above-styled docket. The Second RFIs are attached as Exhibit A and are incorporated herein for all purposes. The Second RFIs were served on counsel for CenterPoint Energy Houston Electric, LLC ("CenterPoint") on May 31, 2019.

Responses to the Second 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 Second 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 CenterPoint 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.

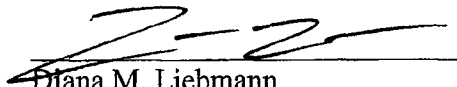
**Claim of Privilege**

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 Second RFIs are set forth below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Diana M. Liebmann", is written over a horizontal line.

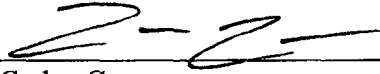
Diana M. Liebmann  
Texas State Bar No. 00797058  
Carlos Carrasco  
Texas State Bar No. 24092223  
Haynes and Boone LLP  
112 East Pecan Street, Suite 1200  
San Antonio, Texas 78205-1540

Jennifer N. Littlefield  
Texas State Bar No. 24074604  
Haynes and Boone, L.L.P.  
600 Congress Ave., Suite 1300  
Austin, Texas 78701-3285

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 31, 2019.

  
\_\_\_\_\_  
Carlos Carrasco

## **I. DEFINITIONS and INSTRUCTIONS**

### **Definitions**

1. The term **"H-E-B, LP"** shall mean H-E-B, LP and its officers, directors, partners, members, employees, principals, agents, representatives, and attorneys. This term shall also include all predecessors and successors in interest.

### **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>§</b>	<b>OF</b>
<b>FOR AUTHORITY TO CHANGE RATES</b>	<b>§</b>	
	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**H-E-B, LP'S REQUEST FOR INFORMATION TO CENTERPOINT ENERGY  
HOUSTON ELECTRIC, LLC  
QUESTION NOS. H-E-B 2-1 THROUGH H-E-B 2-5**

- H-E-B 2-1** Please admit or deny that CenterPoint spent money for transmission-related vegetation management and/or transmission-related tree trimming during the test year.
- H-E-B 2-2** If the answer to H-E-B 2-1 is "admit," please provide the amounts spent by CenterPoint for transmission-related vegetation management and/or transmission-related tree trimming during the test year. Please also provide the amounts spent by CenterPoint for each of the last five years.
- H-E-B 2-3** If the answer to H-E-B 2-1 is "deny," please provide the amounts spent by CenterPoint for distribution related vegetation management and/or distribution-related tree trimming for each of the last five years, including the test year. Please also provide the amounts spent by CenterPoint separately for each customer class for each of the last five years, including the test year.
- H-E-B 2-4** Please provide the amounts spent on distribution-related vegetation management and/or tree trimming during the test year and for each of the last five years.
- H-E-B 2-5** Please show how amounts spent for vegetation management have been allocated between transmission and distribution customers for the test year.