

Control Number: 49421



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SOAH DOCKET NO. 474-19-3864  
PUC DOCKET NO. 49421

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

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

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO  
OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
QUESTION NOS. STAFF 4-1 THROUGH 4-5**

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, 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 20 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.

Dated: April 26, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Stephen Mack  
Managing Attorney



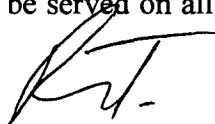
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Rachelle Nicolette Robles  
State Bar No. 24060508  
Steven M. Gonzalez  
State Bar No. 24109210  
Rashmin J. Asher  
State Bar No. 24092058  
Rustin Tawater  
State Bar No. 24110430  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7255  
(512) 936-7268 (facsimile)  
[rachelle.robles@puc.texas.gov](mailto:rachelle.robles@puc.texas.gov)

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on April 26, 2019, in accordance with 16 TAC § 22.74.



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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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**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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Payroll

**Staff 4-1** Please refer to the Direct Testimony of Lynne Harkel-Rumford, Page 17 of 46 *et seq.* Please identify, by FERC account, all amounts included in rates in CenterPoint's application relating to the three-percent "Competitive Pay Adjustments" on top of test-year payroll amounts that CenterPoint requests.

**Staff 4-2** Please identify each adjustment to payroll test year amounts (including categorizing each adjustment as relating to base pay, short-term incentive pay, long-term incentive pay, benefits, etc.) included in rates in CenterPoint's request in this proceeding. For each adjustment identified, please quantify, by FERC account, the amount of the adjustment and provide a description of and justification for the adjustment.

Metering

**Staff 4-3** Compare the functionality of CEHE's advanced metering system (AMS) meters with the functionality of the company's IDR meters and non-IDR meters that are not AMS meters.

**Staff 4-4** Please detail any plans CEHE has to replace its IDR meters and non-IDR meters that are not AMS meters with AMS meters that are capable of metering the loads of the company's IDR and non-IDR customers. If CEHE does not have any plans to replace its IDR meters and non-IDR meters that are not AMS meters with AMS meters, explain why not.

**Staff 4-5** Please list the benefits of and barriers to replacing the company's IDR meters and non-IDR meters that are not AMS meters with AMS meters capable of serving the load of the CEHE's IDR and non-IDR customers.