



Control Number: 49421



Item Number: 43

Addendum StartPage: 0

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

2019 APR 26 PM 3:41

APPLICATION OF CENTERPOINT §
ENERGY HOUSTON ELECTRIC, LLC §
FOR AUTHORITY TO CHANGE §
RATES §
§
§
BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

**ALLIANCE FOR RETAIL MARKETS' FIRST REQUEST FOR INFORMATION
TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Alliance for Retail Markets (ARM) requests CenterPoint Energy Houston Electric, LLC (CenterPoint), as defined in this First Request for Information (RFI), to respond to the questions and sub-questions in this RFI under oath. Please answer the questions and sub-questions in the order in which they are submitted, and include sufficient detail to provide a complete and accurate response. Also, please state the name of the witness who will sponsor the response to each question and sub-question and who can vouch for the truth of the response.

Definitions

As used in this RFI:

- (1) "CenterPoint", "Company", and "Applicant" refer to CenterPoint Energy Houston Electric, LLC and its affiliates, and any person acting or purporting to act on their behalf.
- (2) "CenterPoint Energy Inc." is the parent company of CenterPoint Energy Houston Electric, LLC (as defined above).
- (2) "You", "yours" and "your" refer to CenterPoint Energy Houston Electric, LLC (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
- (3) "Document", "documents", and "documentation" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (email), memoranda, notes, analyses, minutes, presentations, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements,

notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

- (4) “Test Year” refers to the 12-month period ending December 31, 2018.

Instructions

1. The Definitions, Instructions, and Claim of Privilege set forth in this RFI apply to these questions.
2. In answering these questions, furnish all information available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and identify the present location and custodian of any copy or summary of the document.
6. If any question appears confusing or the scope of the question is unclear, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and copy, at the top of the page, the question and any sub-questions being answered followed by the answer(s) to each.
8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical

assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.
12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
14. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.
15. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Respectfully submitted,

Stephen J. Davis w/ permission
Stephen J. Davis dpin
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**ATTORNEY FOR
ALLIANCE FOR RETAIL MARKETS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all parties on April 26, 2019 by first class mail.

Stephen J. Davis w/ permission
Stephen J. Davis dpin

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**ALLIANCE FOR RETAIL MARKETS’
FIRST REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

- ARM 1-1:** Does CenterPoint have any competitive affiliates, as defined by 16 TAC § 25.272(c)(2)? If so, please provide a complete list of all of CenterPoint’s competitive affiliates, including a description of the type of business conducted by the affiliate and the date upon which the competitive affiliate began doing business.
- ARM 1-2:** Does the invested capital CenterPoint seeks to include in rate base include any payments made to a competitive affiliate? If so, please provide an itemized list of each item or class of items; the competitive affiliate to which the payment was made; the date of the payment; and the amount of the payment.
- ARM 1-3:** Does the Test Year include any expenses relating to payments made to a competitive affiliate that CenterPoint seeks to recover? If so, please provide an itemized list of each item or class of items; the competitive affiliate to which the payment was made; the date of the payment; and the amount of the payment.
- ARM 1-4:** Did CenterPoint conduct any transactions with its competitive affiliates during the Test Year? If so, please provide a complete list of each transaction; documentation demonstrating that each listed transaction was conducted at arm’s length; and any amounts paid to or from CenterPoint in connection with each transaction.
- ARM 1-5:** Please identify the subsidiary or subsidiaries of CenterPoint Energy, Inc. responsible for the development, maintenance, and promotion of the CenterPoint Energy brand.
- a. Please provide the total costs incurred and expended by each subsidiary in connection with the development, maintenance, and promotion of the CenterPoint Energy brand in each year from 2014 to the present, including the Test Year.
 - b. With respect to CenterPoint’s response to subpart (a), please provide the total costs allocated to CenterPoint in each year from 2014 to the present, including the Test Year.
 - c. With respect to CenterPoint’s response to subpart (a), please provide the total costs allocated to any other subsidiary in each year from 2014 to the

present, including the Test Year. In answering this question, please provide the information for each identified subsidiary separately.

- d. Please quantify the amount of CenterPoint's total costs incurred during the Test Year relating to the development, maintenance and promotion of the CenterPoint Energy brand. Please verify whether CenterPoint seeks to recover those test-year costs.

ARM 1-6: Please confirm or deny that CenterPoint Intelligent Energy Solutions, LLC is a competitive affiliate of CenterPoint.

ARM 1-7: Please confirm or deny that CenterPoint Intelligent Energy Solutions, LLC manages and operates the TrueCost retail electric shopping portal.

ARM 1-8: Please provide by year the annual amount of costs allocated to CenterPoint since 2014 relating to the operation of the TrueCost retail electric shopping portal.

ARM 1-9: Please provide by year the annual amount of revenues received by CenterPoint since 2014 relating to the operation of the TrueCost retail electric shopping portal.

ARM 1-10: Is CenterPoint seeking the recovery of any costs associated with the TrueCost retail electric shopping portal in this proceeding?

ARM 1-11: Please provide all costs associated with the TrueCost retail electric shopping portal (if any) that have been allocated to, but excluded by, CenterPoint in the rate relief requested in this docket.

ARM 1-12: Please provide all documents, including but not limited to, emails, memorandum, and internal company presentations that reference the TrueCost retail electric shopping portal in relation to the preparation of the CenterPoint application filed in this docket on April 5, 2019.

ARM 1-13: Please identify the existing or new SAC-04 code CenterPoint plans to use to implement new Rider UEDIT — Unprotected Excess Deferred Income Tax.

ARM 1-14: Please identify the existing or new SAC-04 code CenterPoint plans to use to implement its requested new discretionary service charge for customer-requested service calls related to Unmetered Service Attachments?