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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 § BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

**TEXAS COAST UTILITIES COALITION'S
SECOND SET OF REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Texas Coast Utilities Coalition's ("TCUC") Second Set of Requests for Information ("RFIs") to CenterPoint Energy Houston Electric, LLC ("CenterPoint") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 816 Congress Avenue, Suite 950, Austin, Texas 78701, within twenty (20) calendar days of service hereof or no later than **May 16, 2019**, or as modified by any order issued subsequent to the service of these RFIs. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "CenterPoint," "CEHE," the "Company," and "Applicant" refer to CenterPoint Energy Houston Electric, LLC and its affiliates.
2. "You," "yours," and "your" refer to CenterPoint (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, 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. The term “communication” includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of CenterPoint.
5. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of CenterPoint or in the custody of its attorneys or other representatives or agents.
6. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, 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 RFI 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 RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.

4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If CenterPoint considers any RFI 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 CenterPoint objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. 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 between the time of the original response and the time of the hearings.

Respectfully submitted,

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**ATTORNEYS FOR TEXAS COAST
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CERTIFICATE OF SERVICE

I hereby certify that on this the 26th day of April 2019, a true and correct copy of the *TCUC's Second Set of RFIS to CenterPoint* was served upon all parties of record by facsimile and/or First-class United States mail, postage paid.

By: Mariann Wood
Mariann Wood

EXHIBIT A

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

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

**TEXAS COAST UTILITIES COALITION'S
SECOND SET OF REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Depreciation Data Requests

- 2-1. Please provide all property data utilized in the depreciation study, including, but not limited to, additions, retirements, transfers, sales, adjustments, cost of removal, and salvage data.
 - a. Please provide this data by account, placement, and experience year since the date of inception.
 - b. Please provide all survivors for each account as of the study date.
 - c. Please include all transaction codes and a description of each transaction code.
 - d. Please also provide a description of any production unit / group / location codes if applicable.
 - e. This data should allow for the reconstruction of the analysis and calculations performed as part of the depreciation study.
 - f. Please provide this information in Excel format with formulae intact where applicable.
- 2-2. Please provide all workpapers, schedules, tables, and exhibits used in the depreciation study or relied upon in conducting the depreciation study in Excel format with formulae intact where applicable.
- 2-3. Please provide all final observed life tables generated for each account in Excel format.
- 2-4. Please provide all remaining life calculations in Excel format.
- 2-5. Please provide the average age of survivors as of the study date for each production plant by account.

- 2-6. Please provide the book reserve (accumulated depreciation) balances for each account as of the depreciation study date.
- 2-7. Please identify and describe any changes in the depreciation system / methodology between the previous depreciation study and the depreciation study filed in this case.
- 2-8. Please provide a schedule showing the currently-approved survivor curves, net salvage rates, and depreciation rates for each account, along with the proposed survivor curves, net salvage rates, and depreciation rates for each account.
- 2-9. Please provide a copy of the most recent, previously-filed depreciation study.
- 2-10. Please provide a copy of the most recent Commission order(s) regarding currently-approved depreciation rates and probable retirement dates of any production units.
- 2-11. Please provide a copy of the Company's most recently-filed integrated resource plan; please also provide a copy of the most recently prepared integrated resource plan.
- 2-12. Please provide all notes taken during any meetings with Company personnel regarding the depreciation study. Identify by name and title, all Company personnel who provided the information, and explain the extent of their participation and the information they provided. Please explain how this information affected the depreciation study.
- 2-13. Please identify all plant tours taken in relation to the depreciation study. For each such tour:
 - a. Identify those in attendance and their titles and job descriptions.
 - b. Provide all conversation notes taken during the tour.
 - c. Provide all photographs and images taken during the tour.
 - d. Provide all written materials obtained during the tour.
- 2-14. Please specifically identify and describe any information obtained from any plant tour, field trip, or discussion with Company personnel, that would indicate that the average service lives of any life span or mass property would be shorter or longer than what is indicated by the retirement rate described by the Company's plant data.
- 2-15. Please identify and provide a copy of the Company's accounting policies and procedures for plant retirements and cost of removal.
- 2-16. Please identify and provide copies of Company programs and plans that might substantially affect the remaining lives of any plant assets.

- 2-17. Please provide copies of any internal memos, policies, studies, etc., identifying the appropriate allocation or treatment of costs between cost of removal and the installation of new investment when a retirement occurs and a replacement investment is installed at the same location. Further, provide all support, justification and related documents associated with establishing the allocation levels.
- 2-18. Please provide the updated plant balances to which the approved depreciation rates in this case will be applied.
- 2-19. Please state whether the recorded vintage years of retirement have been modified in the historical data used to conduct the depreciation study. If so, please specifically identify such modifications by account, and provide all justification and support for the same.