



Control Number: 49421



Item Number: 454

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

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S
PETITION FOR REVIEW OF MUNICIPAL APPROVAL
OF RATE CHANGE AND MOTION TO CONSOLIDATE**

In order to maintain uniform system-wide rates, CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston” or the “Company”) hereby appeals the approval of the proposed rate change by the cities of Brookside Village, Clute, Danbury, East Bernard, El Lago, Freeport, Jones Creek, Meadows Place, Oak Ridge North, Oyster Creek, Richmond, Richwood, Sandy Point, Shoreacres, Simonton, Southside Place, Stafford, Surfside Beach Village, Thompsons, Weston Lakes, Wharton, the Village of Fairchilds, the Village of Pleak, and the Town of Quintana (collectively, “Cities”).¹

I. CENTERPOINT HOUSTON'S REQUESTED RATE CHANGE

On April 5, 2019, CenterPoint Houston filed with the Public Utility Commission of Texas (“Commission”) in this proceeding a Statement of Intent and Application to increase its base rates to be charged in areas over which the Commission has original jurisdiction. Concurrently with that filing, CenterPoint Houston filed a similar Statement of Intent and Application with each city having original jurisdiction over the Company's rates within the city.

II. JURISDICTION

The Commission has jurisdiction over these appeals pursuant to Public Utility Regulatory Act (“PURA”) Sections 32.001, 33.051, 33.053, 33.054, and 36.001.

¹ The Company's appeal is based on the records that it has received from Cities to date.

III. PETITION FOR REVIEW OF THE CITIES' APPROVAL

Consistent with PURA § 36.102(a), CenterPoint Houston filed its Statement of Intent and Application 35 days before its proposed effective date, May 10, 2019. Most of the cities with original jurisdiction suspended the rate change request prior to the effective date pursuant to PURA § 36.108(a)(1). The cities that are the subject of this pleading did not suspend the rate change under PURA § 36.108 and did not take action to approve or deny the rate change request. Thus, under PURA § 36.108(c), the Cities are considered to have approved the rate change request on the effective date, May 10, 2019. Commission review of the Cities' approval of the rate change request is necessary so that CenterPoint Houston can charge uniform system-wide rates. CenterPoint Houston files this Petition with the Commission within the 30-day period set forth in PURA § 33.053(b) for appeal of actions by a municipality. CenterPoint Houston hereby appeals the Cities' approval of the proposed rate change and requests that the Commission exercise its appellate jurisdiction to conduct a *de novo* review of the Cities' approval.

IV. MOTION TO CONSOLIDATE

CenterPoint Houston requests that its appeals of the Cities' approval be consolidated with Docket No. 49421. These appeals involve issues of law and fact common to those in Docket No. 49421, and separate hearings of these appeals and Docket No. 49421 would result in unwarranted expense, delay, or substantial injustice.²

V. PRAYER

CenterPoint Houston respectfully requests that the Administrative Law Judge enter an order granting the Company's petition for review and consolidating these appeals of the Cities'

² See P.U.C. Proc. R. 22.34(a).

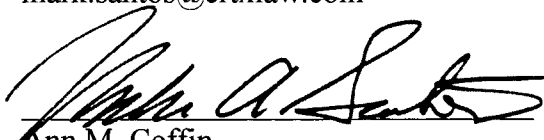
approvals with this docket. CenterPoint Houston also requests such further relief to which it may be entitled.

Respectfully submitted,

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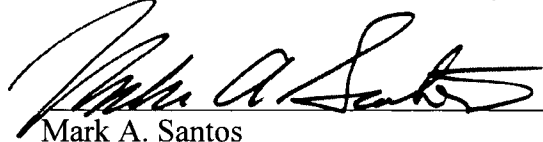
A handwritten signature in black ink, appearing to read "Mark A. Santos", is written over a horizontal line.

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**COUNSEL FOR CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of June 2019, a true and correct copy of the foregoing document was served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74.



Mark A. Santos