

Control Number: 49421

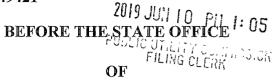


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#### SOAH DOCKET NO. 473-19-3864 PUC DOCKET NO. 49421

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



ADMINSTRATIVE HEARINGS

# RESPONSE OF ALLIANCE FOR RETAIL MARKETS TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION

The Alliance for Retail Markets (ARM) timely files its Response to CenterPoint Energy Houston Electric, LLC's (CenterPoint Houston) First Request for Information (RFI) served on June 6, 2019. ARM stipulates all parties may treat this response as if filed under oath. ARM provides this response without waiver of its right to contest the admissibility of any element of the response upon hearing.

Respectfully submitted,

Stephen J. Davis

State Bar No. 05547750

LAW OFFICES OF STEPHEN J. DAVIS, P.C. 919 Congress Avenue, Suite 900 Austin, Texas 78701 (512) 479-9995 (512) 479-9996 (Fax) davis@sidlawoffices.com

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 June 10, 2019 by email per the agreement of the parties.

Stephen J. Davis

#### **CenterPoint Houston-ARM 1-1**

Please provide a list of all members comprising ARM that are participating in this proceeding. Supplement your response if additional members begin to participate or if currently participating members cease to participate.

#### Response

The participating ARM members are: Direct Energy, LP; the NRG Retail Companies; and TXU Energy Retail Company LLC. The NRG Companies include Reliant Energy Retail Services LLC, Green Mountain Energy Company, Everything Energy LLC, US Retailers LLC, and XOOM Energy Texas LLC.

## **CenterPoint Houston-ARM 1-2**

If not provided with your direct testimony in this case, please provide, in native format, all workpapers and documents supporting the testimony of each witness filing testimony on your behalf in this proceeding.

#### Response

ARM did not file direct testimony in this docket.

#### **CenterPoint Houston-ARM 1-3**

For each of your testifying experts in this case, please provide (to the extent not provided earlier):

- 1-3.1. A list of all cases in which the testifying expert has submitted testimony, from 2014 to the present;
- 1-3.2. Copies of all prior testimony, articles, speeches, published materials and peer review materials written by the testifying expert, from 2014 to the present;
- 1-3.3. The testifying expert's billing rate for this proceeding; and
- 1-3.4. All documents provided to, reviewed by, or prepared by or for the testifying expert in anticipation of the testifying expert filing testimony in this proceeding.

#### Response

- 1-3.1. ARM did not file direct testimony in this docket.
- 1-3.2. ARM did not file direct testimony in this docket.
- 1-3.3. ARM did not file direct testimony in this docket.
- 1-3.4. ARM did not file direct testimony in this docket.

#### **CenterPoint Houston-ARM 1-4:**

For each consulting expert whose mental impressions or opinions have been reviewed by one or more of your testifying experts in this case, please provide (to the extent not provided earlier):

- 1-4.1. A list of all cases in which the consulting expert has submitted testimony, from 2014 to the present;
- 1-4.2. Copies of all prior testimony, articles, speeches, published materials and peer review materials written by the consulting expert, from 2005 to the present;
- 1-4.3. The consulting expert's billing rate for this proceeding; and
- 1-4.4. All documents provided to, reviewed by, or prepared by or for the consulting expert in anticipation of the testifying expert filing testimony in this proceeding.

#### Response

- 1-4.1. ARM did not file direct testimony in this docket.
- 1-4.2. ARM did not file direct testimony in this docket.
- 1-4.3. ARM did not file direct testimony in this docket.
- 1-4.4. ARM did not file direct testimony in this docket.