



Control Number: 49421



Item Number: 469

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

2019 JUN 10 PM 2:55
FILING CLERK

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

**H-E-B, LP'S RESPONSE TO CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION**

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The responses to CenterPoint 1-1 are Highly Sensitive Protected Materials and are being provided pursuant to the Protective Order issued in Docket No. 49421.

EXHIBITS

Exhibit H-E-B-CenterPoint 1-1

**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
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**H-E-B, LP'S RESPONSE TO CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION**

Pursuant to 16 Tex. Admin Code § 22.144 and SOAH Order No. 2, H-E-B, LP ("H-E-B") files its Response to CenterPoint Energy Houston Electric's ("CenterPoint") First Request for Information, Question Nos. 1-1 through 1-3.

H-E-B's written responses to CenterPoint's First RFIs are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. H-E-B's responses are made in the spirit of cooperation without waiving H-E-B's right to contest the admissibility of any of these matters at hearing. Pursuant to 16 Texas Administrative Code ("TAC") § 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and a sponsoring witness. Pursuant to 16 T.A.C. § 22.144(c)(2)(F), H-E-B stipulates that the responses may be treated by all parties as if filed under oath. Pursuant to 16 T.A.C. § 22.144(c)(1) and SOAH Order No. 2, these responses are timely filed.



HAYNES AND BOONE, LLP

Carlos Carrasco

Texas State Bar No. 24092223

112 East Pecan Street, Suite 1200

San Antonio, Texas 78205-1540

ATTORNEYS FOR H-E-B, LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served on counsel for the parties of record on June 10, 2019.


Carlos Carrasco

CenterPoint 1-1

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:

In addition to CenterPoint's Application, including CenterPoint's pre-filed direct testimonies, all materials supporting the testimony of H-E-B witness George W. Presses are included in attached Highly Sensitive Confidential Exhibit H-E-B-CenterPoint 1-1.

The attachments are Highly Sensitive Protected Materials and are being provided pursuant to the Protective Order issued in Docket No. 49421. Highly Sensitive Confidential Exhibit H-E-B-CenterPoint 1-1 is also voluminous and will be provided in electronic format on CD.

Prepared by: George W. Presses

Sponsoring witness: George W. Presses

CenterPoint 1-2

For each testifying expert that has provided testimony for you in this case, please provide (to the extent not provided earlier):

- 1-2.1. A list of all cases in which the testifying expert has submitted testimony, from 2014 to the present;
- 1-2.2. Copies of all prior testimony, articles, speeches, published materials and peer review materials written by the testifying expert, from 2014 to the present;
- 1-2.3. The testifying expert's billing rate for this proceeding; and
- 1-2.4. 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:

Not applicable. Mr. Presses is not a testifying expert.

Prepared by: George W. Presses

Sponsoring witness: George W. Presses

CenterPoint 1-3

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):

- 1-3.1. A list of all cases in which the consulting 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 consulting expert, from 2005 to the present;
- 1-3.3. The consulting expert's billing rate for this proceeding; and
- 1-3.4. 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:

Not applicable.

Prepared by: None

Sponsoring witness: None

Exhibit H-E-B CenterPoint 1-1

HIGHLY SENSITIVE CONFIDENTIAL PROTECTED MATERIALS SUBMITTED
SEPARATELY UNDER SEAL PURSUANT TO THE PROTECTIVE ORDER IN THIS
PROCEEDING