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

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STATE UTILITY COMMISSION  
FILING CLERK

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

STATE OFFICE  
OF ADMINISTRATIVE HEARINGS

**TEXAS ENERGY ASSOCIATION FOR MARKETERS'**  
**FIRST REQUEST FOR INFORMATION**  
**TO CENTERPOINT HOUSTON ELECTRIC, LLC**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Texas Energy Association for Marketers (TEAM) requests CenterPoint Houston Electric, LLC (“CenterPoint Houston”), as defined in this First Request for Information (RFI), to respond to the questions and sub-questions in this RFI under oath, and in accordance with the definitions, explanatory notes, and instructions provided in these Requests. 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, EXPLANATORY NOTES, AND INSTRUCTIONS**

1. “CenterPoint Houston,” “Company,” “Applicant,” “you,” and “the utility,” refer to CenterPoint Energy Houston Electric, LLC and its affiliates, and any person acting or purporting to act on their behalf.
2. "Test Year" refers to the 12-month period ending December 31, 2018.
3. The term “identify,” “identity,” or “identification” when used in reference to an individual person, means to state that person’s full name and business address, including zip code, telephone number, and present or last-known business position and duties.
4. The term “identify,” “identity,” or “identification” when used in reference to a business organization, means to state the corporate, partnership, or proprietorship name or names, and locations, full addresses and telephone numbers of its principal place of business, and

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all other business locations that should be denoted for a full and complete response to an inquiry, interrogatory, or request for information.

5. The term “identify,” “identity” or “identification” when used in reference to a document or study, means to state the type of document or the study format (e.g., book, magazine article, circular, ledger, letter, memorandum, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author, volume and page number or other means of general identification, its approximate size and number of pages, and the date on which it was made, prepared, or taken. If any such document was, but is no longer, in your possession or subject to your control, describe the disposition.
6. The term “identify,” “identity,” or “identification” when used in reference to anything other than a person, business organization, document, or study means to state the nature and present location of the item, a description of its form, the name or title by which the item is commonly known, and the person or business organization that has custody of or responsibility to maintain the item.
7. The term “study” or “studies” means any analysis, investigation, summary of data, listing, or report, the results of which were made known, formally or informally, where the author thereof reached an objective or subjective conclusion or presented information upon which others could or did reach an objective or subjective conclusion.
8. The terms “document” and “documents” are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms “document” and “documents” shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, e-mails, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants’ reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made. The terms “document” and “documents” also


include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.

9. When a request calls for the identification of a “document” or “documents,” the identification should include the following:
  - (a) the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
  - (b) the date of the document;
  - (c) the title or “re:” line, and the subject of the document;
  - (d) the subject matter of the document;
  - (e) the full name and address of the recipient and every person who received copies of the document;
  - (f) the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
  - (g) if the document has been lost, shredded, or destroyed (whether intentionally or unintentionally), an explanation of the reasons for and causes of such loss, shredding or destruction.
10. If any requested information or document cannot be provided in its entirety, it shall be provided to the greatest extent possible, with an indication of the portion of the information or document that cannot be provided and the reason it cannot be provided.
11. The respondent to requests for information must provide not only the information or documents in its physical possession, custody, or control, but all information and documents in the physical possession, custody, or control of any other person acting or purporting to act on behalf of the respondent, including, but not limited to, contractors, attorneys, consultants, and witnesses.
12. The term “communication” shall mean any transmission of information by oral, graphic, written, pictorial, or other means, including, but not limited to, telephone, conversations, letters, telegrams, e-mails, text messages, and personal conversations.
13. “To each” means to identify separately information, facts, data, and documents for each of the individual items or things designated as the subject of the specific inquiry or request.

14. Terms expressed in the masculine gender shall be regarded as including the feminine or neuter; terms expressed in the singular shall be regarded as being expressed in the plural, and vice versa; terms expressed in the past tense shall be regarded as being expressed in the present tense, and vice versa; and the term “and” shall be regarded as the term “or,” and vice versa, so as to not limit the scope of any request.
15. In answering each request, please restate the request prior to providing the response. Each request and its response should begin on a separate page. Where there are subparts to a request, the answer to each subpart should be separately labeled.
16. If any question appears confusing or the scope of the question is unclear, please request clarification from the undersigned counsel. Similarly, 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, please call the undersigned counsel as soon as possible.
17. If any of the information requested is claimed to be privileged or proprietary, then the response should identify such information, identify all persons who participated in the preparation of the information or who received a copy, read, or examined the information or knows of its substance, state the present location of the information and all copies of it, and identify each person having custody or control of the information or any of the copies.
18. If any requested information is not available in the form requested, provide the information in the form that it currently exists, explain why the data cannot be provided in the form requested, and describe the work or process needed to provide the information in the form requested.
19. 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.
20. 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.

Respectfully submitted,

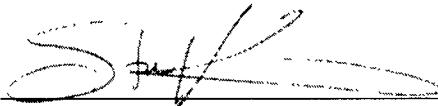
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ATTORNEYS FOR TEXAS ENERGY  
ASSOCIATION FOR MARKETERS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served in accordance with the governing procedural orders to all parties of record in this proceeding on this 10<sup>th</sup> day of June 2019.

  
Stephanie C. Kover

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

APPLICATION OF CENTERPOINT § STATE OFFICE  
ENERGY HOUSTON ELECTRIC, LLC § OF  
FOR AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS  
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**TEXAS ENERGY ASSOCIATION FOR MARKETERS’  
FIRST REQUEST FOR INFORMATION  
TO CENTERPOINT HOUSTON ELECTRIC, LLC**

- TEAM 1-1:** Please refer to page 13 of Mr. Hudson’s Direct Testimony. Mr Hudson states that “[t]he Company’s unadjusted test year bad debt expense for 2018 was approximately \$65,000 consisting primarily of uncollectible ARO, which was written off.” Please confirm or deny that the \$65,000 of unadjusted test year bad debt expense to which Mr. Hudson refers does not include any competitive retailer uncollectible debt.
- TEAM 1-2:** Please reconcile Ms. Colvin’s statement in her Direct Testimony at page 12 that adjustment to test year costs for CenterPoint Houston’s requested bad debt related regulatory asset has been “functionalized to Metering,” with Schedule II-D-2-2a.1, which shows functionalization to “TDCS.”
- TEAM 1-3:** Please refer to Schedule II-D-2.2a.1; for each of the retailers that are associated with the expense labeled as bad debt, please provide the amount of any deposits requested and deposits held by CenterPoint for each of those retailers.
- TEAM 1-4:** Please identify any and all payments, disbursements, or monies (together, “payments”) received by CenterPoint Houston after the final default of any of the defaulted competitive retailers listed on Schedule II-D-2.2a.1 that was intended to aid in satisfying the defaulted competitive retailer’s outstanding debt with CenterPoint Houston. For each of the payments identified, please specify the payment source, date, and amount, and describe whether and how the payment is reflected in Schedule II-D-2.2a.1.
- TEAM 1-5:** Please refer to WP/Acct. 904. Please explain why CenterPoint Houston chose a to allocate 87.30% its bad debt related regulatory asset to the residential class and 12.70% of its bad debt related regulatory asset to the secondary volt. =< 10kva class.

- TEAM 1-6:** Please provide WP/II-D-1 Adj. 3 referenced in Ms. Colvin's Direct Testimony at page 12 or specific instructions on how to access that work paper, which we have been unable to locate.
- TEAM 1-7:** Please describe the amortization and any recovery of the Competitive Retailer Bad Debt in Rates, which is shown in Schedule II-D-2-2a.1 as allocating approximately \$1.058 million to Texas.
- TEAM 1-8:** Does CenterPoint consider the Natural Gas Standby Generator program to be a competitive energy service? For reference, the program can be found at <https://www.centerpointenergy.com/en-us/residential/services/natural-gas/natural-gas-appliances/natural-gas-standby-generators?sa=ho>.
- TEAM 1-9:** What affiliate of CenterPoint Houston provides the Natural Gas Standby Generator Program? Does CenterPoint Houston consider that company a competitive affiliate? Please explain the basis for this determination.