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SOAH DOCKET NO. 473-19-3864
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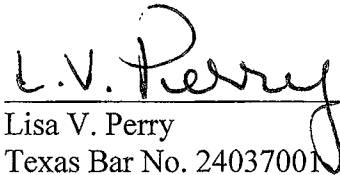
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APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC § OF
FOR AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

WALMART INC.'S RESPONSES TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S
FIRST REQUEST FOR INFORMATION TO WALMART INC.

Walmart Inc. ("Walmart") hereby file its responses to CenterPoint Energy Houston Electric, LLC's First Request for Information to Walmart. Walmart stipulates that the following responses may be treated by all parties as if the answers were filed under oath.

Dated: June 10, 2019



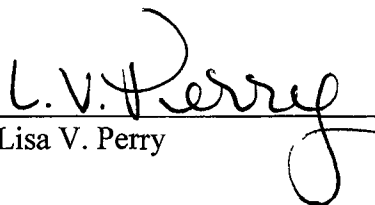
Lisa V. Perry
Texas Bar No. 24037001
ORAM & HOUGHTON, PLLC
402A W. Palm Valley Blvd., #370
Round Rock, TX 78664-4200
Telephone: (720) 507-3634
Facsimile: (720) 302-0441
lperry@oram-houghton.com

Attorneys for Walmart Inc.

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of **Walmart Inc.'s Responses to CenterPoint Energy Houston Electric, LLC's First Request for Information to Walmart Inc.** was served on all parties of record, as listed in the official Service List, on the 10th day of June, 2019, via electronic mail, hand delivery, facsimile, and/or United States First Class Mail.



Lisa V. Perry

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WALMART'S RESPONSES TO CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION

- 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:

All workpapers and documents in support of Mr. Chriss' testimony was included in and/or filed with his Direct Testimony and Exhibits filed with the Texas Public Utility Commission on June 6, 2019. Attached are Exhibits SWC-1 through SWC-4 to Mr. Chriss' Direct Testimony in their native formats.

Prepared by: Steve W. Chriss
Sponsored by: Steve W. Chriss

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WALMART'S RESPONSES TO CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION

- 1-2. For each of your testifying experts 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:

- 1-2.1. The case name, number and State Commission for all cases in which Mr. Chriss has submitted testimony as an expert are provided in the Witness Qualification Statement attached as Exhibit SWC-1 to Mr. Chriss' Direct Testimony filed with the Texas Public Utility Commission on June 6, 2019.
- 1-2.2. Copies of all prior testimony filed by Mr. Chriss in other utility matters, as listed in Exhibit SWC-1, are publicly available and may be obtained from the respective Commission's online database. Mr. Chriss has not authored any relevant articles, speeches, published materials and/or peer review materials.
- 1-2.3. Mr. Chriss is employed by Walmart Inc., and as an employee, does not charge a separate testifying expert fee.
- 1-2.4. In preparation for his testimony filed in this proceeding, Mr. Chriss relied upon CenterPoint Energy Houston Electric, LLC's Statement of Intent and Application for Authority to Change Rates, as supplemented and/or updated, and its accompanying exhibits, filed in this proceeding on April 5, 2019, and upon the publicly available outside sources referenced in Mr. Chriss' Direct Testimony filed in this proceeding.

Prepared by: Steve W. Chriss
Sponsored by: Steve W. Chriss

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WALMART'S RESPONSES TO CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION

- 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:

- 1-3.1. through 1-3.4. Mr. Chriss did not consult with or rely on a consulting expert when preparing his Direct Testimony filed in this proceeding.

Prepared by: Steve W. Chriss
Sponsored by: Steve W. Chriss