

Control Number: 49421



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

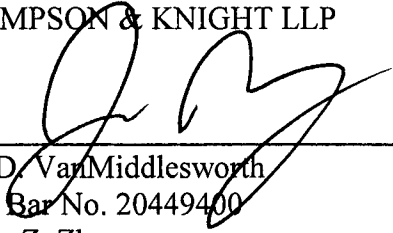
APPLICATION OF CENTERPOINT §  
ENERGY HOUSTON ELECTRIC, LLC §  
FOR AUTHORITY TO CHANGE §  
RATES §

2019 JUL 10 PM 3:02  
BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

**MCCORD DEVELOPMENT, INC.'S RESPONSE TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S  
FIRST REQUEST FOR INFORMATION**

McCord Development, Inc. ("McCord") files the following responses to the First Request for Information ("RFI") to McCord filed by CenterPoint Energy Houston Electric, LLC ("CEHE"). The request was filed at the Commission and received by McCord on June 6, 2019. Accordingly, pursuant to the procedural schedule entered in this case, McCord's response is timely filed. McCord's responses to specific questions are set forth as follows, in the order of the questions asked. Pursuant to 16 T.A.C. § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

THOMPSON & KNIGHT LLP



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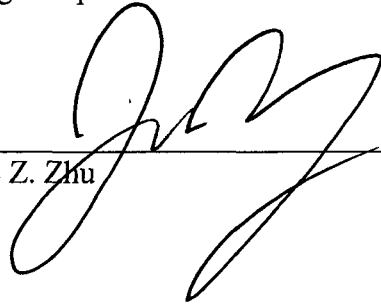
Rex D. VanMiddlesworth  
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Austin, Texas 78701  
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(512) 469.6180 (fax)

**ATTORNEYS FOR MCCORD  
DEVELOPMENT, INC.**

## CERTIFICATE OF SERVICE

I, James Z. Zhu, Attorney for McCord, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 10th day of June, 2019 by electronic mail, facsimile and/or First Class, U.S. Mail, Postage Prepaid.

James Z. Zhu

A handwritten signature in black ink, consisting of stylized cursive letters, is written over a horizontal line. The signature appears to be 'JZ Zhu'.

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

<b>APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § § §</b>	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**MCCORD DEVELOPMENT, INC.'S RESPONSE TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S  
FIRST REQUEST FOR INFORMATION**

**Question No. CEHE-MCCORD 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:**

McCord has not filed direct testimony in this proceeding.

Prepared by: Counsel

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

<b>APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES</b>	§ § § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**MCCORD DEVELOPMENT, INC.'S RESPONSE TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S  
FIRST REQUEST FOR INFORMATION**

**Question No. CEHE-MCCORD 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:**

McCord has not filed direct testimony in this proceeding.

Prepared by: Counsel

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

<b>APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § § §</b>	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**MCCORD DEVELOPMENT, INC.'S RESPONSE TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S  
FIRST REQUEST FOR INFORMATION**

**Question No. CEHE-MCCORD 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:**

McCord has not filed direct testimony in this proceeding.

Prepared by: Counsel