



Control Number: 49421



Item Number: 489

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

**APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE 2019 JUN 10 PM 2:35  
ENERGY HOUSTON ELECTRIC, LLC § OF  
FOR AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S  
SECOND REQUEST FOR INFORMATION TO THE CITY OF HOUSTON  
AND HOUSTON COALITION OF CITIES**

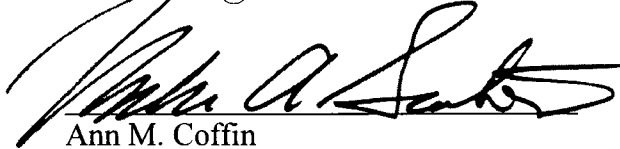
Pursuant to 16 Tex. Admin. Code § 22.144 and SOAH Order No. 2, CenterPoint Energy Houston Electric, LLC requests that the City of Houston and the Houston Coalition of Cities provide, within four (4) days, the information requested in the attached Exhibit A.

Respectfully submitted,

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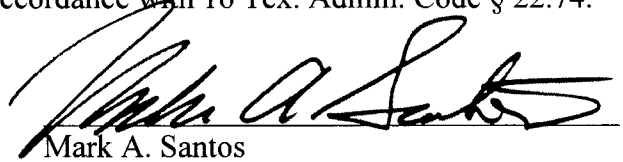


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**COUNSEL FOR CENTERPOINT ENERGY  
HOUSTON ELECTRIC, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of June 2019, a true and correct copy of the foregoing document was served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74.

  
Mark A. Santos

## **EXHIBIT A**

### **I. DEFINITION OF TERMS**

The singular herein includes the plural and vice versa; the words “and” and “or” shall be construed as “and/or” in order to bring all information within the scope of the Request. The words, “each,” “all,” and “any,” mean “any and all” or “each and every.”

“CenterPoint Houston” or “Company” means CenterPoint Energy Houston Electric, LLC.

“Communication” shall include all meetings, telephone calls, conversations, discussions, letters, memoranda, notes, and other forms of communication.

“Document” or “Documents” is used in the broadest sense possible and shall mean every writing or record of every type and description, such as drafts, corrections, memoranda, letters, tapes, stenographic or handwritten notes, studies, publications, work papers, books, pamphlets, diaries, desk calendars, interoffice communications, records, reports, analyses, bills, receipts, checks, check stubs, checkbooks, invoices, requisitions, papers and forms filed with a court or governmental body, notes, transportation and expense logs, work papers, contracts, statistical and financial statements, corporate records of any kind, charts, graphs, pictures, photographs, photocopies, films, voice recordings, and any other written, recorded or graphic material, however denominated, by whomever prepared, and to whomever addressed, which are in your possession, custody or control. The term “document” also includes all electronic and magnetic data, including e-mail. The term “document” includes all copies of every such writing or record that are not identical copies of the original or that contain any commentary, notes, or markings that do not appear on the original.

“Including” means “including but not limited to” and “including without limitation.”

“Identify” means to state as much information as you now have or that is now subject to your control, or that you may hereafter come to have or that hereafter becomes subject to your control, including the following:

- a. when used in reference to a natural person, state the person’s full name, title, present (or last known) address, telephone number, occupation, present business affiliation or employer, business address, and exact duties and responsibilities of such individual;
- b. when used in reference to an entity, state the full name of the company, organization, association, partnership, or other business enterprise; and
- c. when used in reference to a document, state the date and title of the document and, if already produced in this case, the Bates-number of such document.

“Relate” or “relating to” includes referring to, mentioning, reflecting, containing, pertaining to, evidencing, involving, describing, discussing, responding to, supporting, opposing, constituting or being a draft, copy or summary of, in whole or in part.

“You” and “Your” refers to the City of Houston, the Houston Coalition of Cities, and any of the attorneys or law firms that purport to represent you in this case.

## **II. INSTRUCTIONS**

1. Each request herein extends to any documents or information in your possession and the possession of any of the attorneys or law firms that purport to represent you in this case.
2. Each and every non-identical copy of a document, whether different from the original because of indications of the recipient(s), handwritten notes, marks, attachments, marginalia, or any other reason, is a separate document that must be produced.
3. If you object to any portion of a request on the ground of privilege, answer the nonprivileged portion of the Request by providing such non-privileged information as is responsive.
4. If you object to any portion of a request on any ground other than privilege, you should still provide documents responsive to the remaining non-objectionable portion.
5. Separately for each request to which you object in whole or in part, describe in detail and itemize each basis of your objection.
6. If the basis of an objection to any request, or any portion thereof, is a statute, contract or other agreement, or any other obstacle to production that you claim is based in the law, please identify the basis of that purported obstacle with specificity.
7. Each request herein shall be construed independently, and no request shall be viewed as limiting the scope of any other request. Please indicate where any portion of your document production in response to a request has been covered in your production in response to another request, and please specify the request numbers at issue.
8. If you claim that any document responsive to any request is lost or destroyed, (a) identify and describe such document, (b) describe how the document was lost or destroyed, and (c) identify when the document was lost or destroyed.
9. If you claim that any documents responsive to any request are already in the possession of CenterPoint Houston, please identify the document with sufficient specificity to allow CenterPoint Houston to locate the document.
10. The requests shall be deemed continuing so as to require additional answers if, after answering such requests, you obtain information upon the basis of which you determine that the answer was incorrect when made, or you become aware that the answer, though correct when made, is no longer true, and the circumstances are such that failure to amend the answer is in substance a knowing concealment.
11. Any document that is withheld from production pursuant to a claim of attorney/client, work product, party communication or investigative privilege shall be identified and shall be segregated and maintained for in camera submission, and a list identifying such withheld documents shall be furnished at the time and place of production. Such list shall state with

respect to each document: (a) the privilege under which the document is being withheld; (b) a description of the type of document; (c) a description of the subject matter and purpose of the document; (d) the date the document was prepared; (e) the author and/or signatory of the document; (f) the identity of the persons to whom the document was sent; and (g) the present custodian of the document.

12. As part of the response to each request for information, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparation of the response. Please also state the name of the witness in this docket who will sponsor the answer to the request and may verify the truth of the response.

### **III. REQUESTS FOR INFORMATION**

- 2-1. To the extent you have not already, please provide working excel versions of all workpapers with links intact.
- 2-2. Prior to filing her testimony, did Ms. Pevoto review the Commission-approved Commission Staff cost of service model in Docket No. 38339 that established CenterPoint's current rates?
- 2-3. Please identify all recommendations by Ms. Pevoto that deviate from the Commission's approved cost allocation for CenterPoint Houston in its final order in Docket No. 38339. Please confirm whether Ms. Pevoto is recommending the Company deviate from the final order in Docket No. 38339 for any of these recommendations and explain why.
- 2-4. Is it Ms. Pevoto's testimony that the Company's proposed allocation factors for the FERC Accounts listed on page 11, lines 12 – 15 of her testimony are inconsistent with the allocation factors approved in Docket No. 38339? If so, please explain and provide all support for your answer.
- 2-5. Per Final Order in Docket No. 38339, Finding of Facts No. 175, the Commission stated CenterPoint followed the principals of cost causation in allocating cost. With regards to Ms. Pevoto's recommendations, please indicate what facts, factors, analyses or other considerations have changed since Docket No. 38339 that require a different allocation methodology in order to comport with the principles of cost causation in allocating costs.
- 2-6. Does Ms. Pevoto acknowledge that the Company used a payroll allocator in functionalizing some costs but not in allocating costs to the different rate classes in Docket No. 38339?
- 2-7. Refer to Attachment COH-KP-2, pages 1 and 2, in Ms. Pevoto's direct testimony. Please identify the other approaches identified in the NARUC on these pages of the manual for functionalizing and allocating general plant and A&G expenses. Is it Ms. Pevoto's testimony that CEHE's proposed allocation methodology is inconsistent with these other recognized methodologies?
- 2-8. Prior to filing her testimony, did Ms. Pevoto review the cost of service studies and allocation methodologies of any other electric utilities in Texas?
- 2-9. Does Ms. Pevoto dispute that FERC Account 587 is for Customer Installation Expense and not Operation Meters as stated on page 11, line 7 of her testimony? If so, please explain. If not, please reconcile this fact with Ms. Pevoto's testimony regarding the allocation of costs in Account 587.
- 2-10. Please confirm and provide all supporting evidence for Ms. Pevoto's statement on page 11, lines 16-18 that the Company's allocated the costs in FERC Accounts 303.02, 389 through 395, 397 through 398, 920 through 923, 925 through 935, 4073 through 4074, 4081, and 4310 using total Operational and Maintenance expense.

- 2-11. Does Ms. Pevoto dispute that CenterPoint Houston's proposed residential customer and meter charge, when combined, (\$4.53) is an overall decrease compared to the current combined charge (\$5.47). Did Ms. Pevoto consider this fact in preparing her testimony?
- 2-12. Provide all documentation, analyses or other support for the statement on Page 16, lines 5-6 of Ms. Pevoto's direct testimony that payroll expenses better represent how commonly used facilities and equipment are used.
- 2-13. Provide all documentation, analyses or other support for the statement on Page 16, lines 6-9 of Ms. Pevoto's direct testimony that using O&M expenses as an allocation factor "distort[s] how these commonly used facilities and equipment are used."
- 2-14. Regarding Ms. Pevoto's recommended \$2.73 million reduction related to LED street lighting O&M on page 31 of her testimony, how did Ms. Pevoto determine this amount is the "operation and maintenance cost in the LED Street Lighting Service's TD rates"?
- 2-15. Regarding Ms. Pevoto's recommended \$2.73 million reduction related to LED street lighting O&M on page 31 of her testimony, how did Ms. Pevoto determine "no operation and maintenance costs were incurred in the last several years" for LED street lighting?