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

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

June 10, 2019

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**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
DOCKET 49421-SOAH DOCKET NO. 473-19-3864**

**H-E-B
REQUEST NO.: HEB01-01**

QUESTION:

Please provide all data, reports, or analysis performed or acquired by CenterPoint regarding its System Average Interruption Duration Index ("SAIDI") performance for each of the last five years. Please also provide this data separately for each customer class.

ANSWER:

CenterPoint Houston is providing every weekly, monthly and annual reliability report dealing with SAIDI and SAIFI that the Company regularly produces, both internally and externally to the PUC. Also, CenterPoint Houston is providing all internal special reports, and the Company is providing all of the system outage data for the last five years. This data is not available by customer class. This is a voluminous response.

The requested information is voluminous and will be provided to the propounding party only in electronic format on USB Flash drive. Please contact Alice Hart at (713) 207-5322 to request a copy of the USB Flash drive. Please see index of voluminous material below.

Date	Title of Folder	Sub Folder	Preparer	Page	Files	MB
6/4/2019	HEB01-01 Ckt Evaluation Forms	Evaluation Forms 2014	Dale Bodden	N/A	144	12.3
		Evaluation Forms 2015	Dale Bodden	N/A	144	15.1
		Evaluation Forms 2016	Dale Bodden	N/A	145	14.2
		Evaluation Forms 2017	Dale Bodden	N/A	145	13.2
		Evaluation Forms 2018	Dale Bodden	N/A	144	5.38
6/4/2019	HEB01-01 Ckt Outage History	Outage History 2014	Dale Bodden	N/A	12	147
		Outage History 2015	Dale Bodden	N/A	12	209
		Outage History 2016	Dale Bodden	N/A	12	184
		Outage History 2017	Dale Bodden	N/A	12	172
		Outage History 2018	Dale Bodden	N/A	12	107
6/4/2019	HEB01-01 Production Reports	Production Repts 2014	Dale Bodden	N/A	236	183
		Production Repts 2015	Dale Bodden	N/A	229	234
		Production Repts 2016	Dale Bodden	N/A	232	211
		Production Repts 2017	Dale Bodden	N/A	133	199

		Production Repts 2018	Dale Bodden	N/A	358	244
6/4/2019	HEB01-01 PUC Reports	None	Dale Bodden	N/A	29	16.1
6/4/2019	HEB01-01 Reliability Reports	Reliability Repts 2014	Dale Bodden	N/A	433	3,100
		Reliability Repts 2015	Dale Bodden	N/A	339	1,540
		Reliability Repts 2016	Dale Bodden	N/A	422	1,770
		Reliability Repts 2017	Dale Bodden	N/A	342	1,630
		Reliability Repts 2018	Dale Bodden	N/A	251	1,390
6/4/2019	HEB01-01 Special Reports	None	Dale Bodden	N/A	1	0.45
6/4/2019	HEB01-01 Storm Reports	Storm Reports 2014	Dale Bodden	N/A	58	3.23
		Storm Reports 2015	Dale Bodden	N/A	59	3.56
		Storm Reports 2016	Dale Bodden	N/A	42	3.99
		Storm Reports 2017	Dale Bodden	N/A	32	4.23
		Storm Reports 2018	Dale Bodden	N/A	78	21.1
6/4/2019	HEB01-01 Ten Percent Ckts	Ten Percent 2014	Dale Bodden	N/A	151	62.5
		Ten Percent 2015	Dale Bodden	N/A	378	58.8
		Ten Percent 2016	Dale Bodden	N/A	361	94.3
		Ten Percent 2017	Dale Bodden	N/A	366	73.6
		Ten Percent 2018	Dale Bodden	N/A	93	44.3

SPONSOR (PREPARER):
Dale Bodden (Dale Bodden)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-02**

QUESTION:

Please provide all data, reports, or analysis performed or acquired by CenterPoint regarding its System Average Interruption Frequency Index ("SAIFI") performance for each of the last five years. Please also provide this data separately for each customer class.

ANSWER:

See response to HEB01-01.

SPONSOR (PREPARER):
Dale Bodden (Dale Bodden)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**H-E-B
REQUEST NO.: HEB01-03**

QUESTION:

Please provide all internal and external correspondence regarding CenterPoint's SAIDI performance for each of the last five years.

ANSWER:

After negotiation among counsel, CenterPoint Houston and HEB have reached an agreement to limit the scope of this RFI and to extend the deadline for this response to June 14.

SPONSOR (PREPARER):

Julienne Sugarek (Julienne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-04**

QUESTION:

Please provide all internal and external correspondence regarding CenterPoint's SAIFI performance for each of the last five years.

ANSWER:

After negotiation among counsel, CenterPoint Houston and HEB have reached an agreement to limit the scope of this RFI and to extend the deadline for this response to June 14.

SPONSOR (PREPARER):

Julienne Sugarek (Julienne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
DOCKET 49421-SOAH DOCKET NO. 473-19-3864**

**H-E-B
REQUEST NO.: HEB01-05**

QUESTION:

Please refer to the Direct Testimony of Julianne Sugarek. Please provide the number of equipment failures reduced for each of the last five years by CenterPoint's Infra-red program. Please also provide this data separately for each customer class.

ANSWER:

The number of equipment failures reduced for each of the last five years by CenterPoint Houston's Infra-red program is shown below. This data is not available by customer class.

Year	Equipment Failures Reduced
2014	289
2015	535
2016	320
2017	284
2018	197

SPONSOR (PREPARER):

Julianne Sugarek (Julianne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-06**

QUESTION:

Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint identifying the associated reliability improvements and decrease in SAIDI for each of the last five years because of the Infra-red program. Please also provide this data separately for each customer class.

ANSWER:

The Infra-red reports generated by CenterPoint Houston for each of the last five years associated with the Infra-red program are provided as responsive documents. CenterPoint Houston does not track the decrease in SAIDI directly related to the Infra-red program. This data is not available by customer class.

The requested information is voluminous and will be provided to the propounding party only in electronic format on USB Flash drive. Please contact Alice Hart at (713) 207-5322 to request a copy of the information. Please see index of voluminous material below.

Date	Title of Folder	Preparer	Page	Files	Megabytes
6/3/2019	HEB01-06 Infrared 2014	Julienne Sugarek	N/A	194	188
6/3/2019	HEB01-06 Infrared 2015	Julienne Sugarek	N/A	395	483
6/3/2019	HEB01-06 Infrared 2016	Julienne Sugarek	N/A	333	380
6/3/2019	HEB01-06 Infra-red 2017	Julienne Sugarek	N/A	214	279
6/3/2019	HEB01-06 Infra-red 2018	Julienne Sugarek	N/A	151	194

SPONSOR (PREPARER):

Julienne Sugarek (Julienne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-07**

QUESTION:

Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint identifying the associated reliability improvements and decrease in SAIFI for each of the last five years because of the Infra-red program. Please also provide this data separately for each customer class.

ANSWER:

The Infra-red reports generated by CenterPoint Houston for each of the last five years associated with the Infra-red program are provided in response to HEB01-06. CenterPoint Houston does not track the decrease in SAIFI directly related to the Infra-red program. This data is not available by customer class.

SPONSOR (PREPARER):

Julianne Sugarek (Julianne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-08**

QUESTION:

Please refer to the Direct Testimony of Julianne Sugarek. Please provide all action plans generated by CenterPoint for each of the last five years to address issues associated with circuits identified by the Root Cause Analysis Program.

ANSWER:

The action plans generated by CenterPoint Houston for each of the last five years to address issues associated with circuits identified by the Root Cause Analysis Program are provided as responsive documents.

The requested information is voluminous and will be provided to the propounding party only in electronic format on USB Flash drive. Please contact Alice Hart at (713) 207-5322 to request a copy of the USB Flash drive. Please see index of voluminous material below.

Date	Title of Folder	Preparer	Page	Files	Megabytes
6/3/2019	HEB01-08 Action Plans 2014	Julienne Sugarek	N/A	194	57
6/3/2019	HEB01-08 Action Plans 2015	Julienne Sugarek	N/A	234	69
6/3/2019	HEB01-08 Action Plans 2016	Julienne Sugarek	N/A	236	47
6/3/2019	HEB01-08 Action Plans 2017	Julienne Sugarek	N/A	228	91
6/3/2019	HEB01-08 Action Plans 2018	Julienne Sugarek	N/A	253	117

SPONSOR (PREPARER):

Julienne Sugarek (Julienne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-09**

QUESTION:

Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint for each of the last five years regarding the monitoring of circuit performance to determine if its analysis under the Root Cause Analysis Program was correct or if additional measures were necessary.

ANSWER:

CenterPoint Houston monitors circuit performance throughout the year for every circuit within the electric footprint to determine if further analysis is necessary. If the performance of these circuits improves according to subsequent reports, then the analysis under the Root Cause Analysis Program was correct and no further action is necessary.

Please see the annual Service Quality Report submitted to the PUC shown in the index folder labeled HEB01-01 PUC Reports in response to HEB01-01 for all individual circuit SAIDI & SAIFI.

SPONSOR (PREPARER):

Julianne Sugarek (Julianne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-10**

QUESTION:

Please refer to the Direct Testimony of Julianne Sugarek. Please provide all predictive data produced and/or reviewed by CenterPoint used to identify operational issues under the Root Cause Analysis Program.

ANSWER:

The testimony states that "An essential element of the program is to create a proactive response to 10% circuit outages. It is designed to identify and initiate corrective actions on circuits with issues before they become a repeating 10% circuit. In order to accomplish this, a circuit's indices are analyzed against predictive data that indicates operational issues." In this context, predictive means that historical outage data and outage trends are utilized to predict future outages.

SPONSOR (PREPARER):

Julienne Sugarek (Julienne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-11**

QUESTION:

Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint for each of the last five years identifying the associated decrease in outage times experienced by customers because of the Distribution Automation Program. Please also provide this data separately for each customer class.

ANSWER:

Please see the response to COH 10-23 for the System SAIDI savings for each of the last five years due to the Distribution Automation Program (IGSD – Intelligent Grid Switching Device). This information is not available by customer class.

SPONSOR (PREPARER):

Dale Bodden/Julianne Sugarek (Dale Bodden/Julianne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**H-E-B
REQUEST NO.: HEB01-12**

QUESTION:

Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint for each of the last five years identifying the associated reliability improvements experienced by customers because of the Distribution Automation Program. Please also provide this data separately for each customer class.

ANSWER:

Please see the response to COH10-23 for the System SAIDI savings for each of the last five years due to the Distribution Automation Program. This represents the associated reliability improvements experienced by customers. This information is not available by customer class.

SPONSOR (PREPARER):

Dale Bodden/Julianne Sugarek (Dale Bodden/Julianne Sugarek)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**H-E-B
REQUEST NO.: HEB01-13**

QUESTION:

Please refer to the Direct Testimony of Julianne Sugarek. Please provide all data, reports, or analysis performed by CenterPoint for each of the last five years identifying improved customer satisfaction as referenced by Ms. Sugarek because of the Distribution Automation Program. Please also provide this data separately for each customer class.

ANSWER:

The Company asserts that the Distribution Automation Program likely improves customer satisfaction by reducing the duration of outages.

Please see response to COH01-32.

SPONSOR (PREPARER):

Julianne Sugarek/Rebecca Demarr (Julianne Sugarek/Rebecca Demarr)

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-14**

QUESTION:

Please provide CenterPoint's Four Coincident Peak ("4CP") loads coincident with ERCOT's 4CP for the test year for each customer class.

ANSWER:

Please refer to TIEC05-01

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**H-E-B
REQUEST NO.: HEB01-15**

QUESTION:

Please provide CenterPoint's non-coincident peak ("NCP") loads for the test year for each customer class.

ANSWER:

Please refer to Schedule H,I,J and CA.

The CenterPoint non-conincident peak loads for the test year for each customer class are found on pages 3 and 4 of Schedule II-H-1.3.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-16**

QUESTION:

Please provide any internal or external correspondence, data, reports, or analysis performed, generated, or acquired by CenterPoint on the allocation of distribution system costs on a 4CP basis.

ANSWER:

Please refer to Schedule H, I, J and CA and the supporting workpapers provided in the Application. The Company has no other internal or external correspondence, data, reports, or analysis.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-17**

QUESTION:

Please explain why CenterPoint chose to use the 4CP demand methodology to allocate distribution system costs to customer classes.

ANSWER:

Please refer to page 21, lines 7 through 17, from the Direct Testimony of Matthew A. Troxle.

Additionally, please see the response to PUC01-21.

The distribution plant is built to meet the Company's maximum coincident peak demand on the distribution system as a whole, not the maximum demands of each individual distribution rate class (meaning it was not built to meet the non-coincident peak of each customer). The Company's distribution system is a locally integrated system serving all distribution classes from the same substations and lines. The use of a coincident peak allocator recognizes the cost causal basis for the investment.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
DOCKET 49421-SOAH DOCKET NO. 473-19-3864**

**H-E-B
REQUEST NO.: HEB01-18**

QUESTION:

Please specify any Public Utility Commission of Texas rules, orders, regulations, or other guidelines or requirements justifying the use of the 4CP demand methodology to allocate distribution system costs customer classes.

ANSWER:

Please refer to the Order on Rehearing in Docket No. 38339.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
DOCKET 49421-SOAH DOCKET NO. 473-19-3864**

**H-E-B
REQUEST NO.: HEB01-19**

QUESTION:

Please calculate the distribution system costs for each customer class on an NCP basis. Please provide a side-by-side comparison of the NCP allocation for each class and CenterPoint's proposed 4CP demand allocation.

ANSWER:

The Company has not performed the requested analysis.

SPONSOR (PREPARER):
Matthew Troxle (Matthew Troxle)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-20**

QUESTION:

Please identify the number of repeat quality of service issues for which a customer was impacted more than five (5) times by outages for each customer class for the last five years.

ANSWER:

CenterPoint Houston does not track this information. This information is not available.

SPONSOR (PREPARER):
Dale Bodden (Dale Bodden)

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2019 CEHE RATE CASE
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**H-E-B
REQUEST NO.: HEB01-21**

QUESTION:

Please identify the average amount per customer that was spent by CenterPoint to address such repeat quality of service issues by customer class and identify the number of customers, by customer class, for which CenterPoint resolved such quality of service issues.

ANSWER:


CenterPoint Houston does not track this information. This information is not available.

SPONSOR (PREPARER):
Dale Bodden (Dale Bodden)

RESPONSIVE DOCUMENTS:
None

CERTIFICATE OF SERVICE

I hereby certify that on this 10th 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.

_____