



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**

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2019 JUN 12 PM 2:40
BEFORE THE STATE OFFICE
PUBLIC UTILITY REG. DIV.
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

**STATEMENT OF POSITION OF THE
SOLAR ENERGY INDUSTRIES ASSOCIATION**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW, the Solar Energy Industries Association (“SEIA”)¹ and files this Statement of Position pursuant to 16 Tex. Admin. Code § 22.124 (TAC) in the above-referenced proceeding and would respectfully show as follows:

CenterPoint Energy Houston Electric, LLC (“CEHE”) bears the burden of proof on each point of its application in this proceeding under the laws, rules, and standards in Chapter 36 and other provisions of the Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.014, and the Commission’s Rules. SEIA’s position is that CEHE has failed to meet its burden of proof on each point of its application submitted in this proceeding.

In its application, CEHE has proposed rate and non-rate increases that, if approved, would increase the cost to develop distributed generation resources in CEHE’s service area. SEIA opposes those increases because they are not just and reasonable.

In its application, CEHE has proposed to increase the retail delivery service rates paid by SEIA members. SEIA opposes those rate increases because they are not just and reasonable.

¹

The comments contained in this filing represent the position of SEIA as an organization, but do not necessarily reflect the views of any particular member with respect to any issue.

SEIA reserves the right to cross-examine witnesses and support and urge positions taken by other parties in their direct testimony or as may be developed in another party's statement of position, set out in the Commission's Preliminary Order, and/or raised by the parties or the ALJs at the hearing. SEIA also reserves the right to update its positions on the issues addressed as this proceeding progresses and to take additional positions to the extent the record raises new issues.

Respectfully submitted,



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ATTORNEY FOR THE SOLAR ENERGY
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CERTIFICATE OF SERVICE

I, Michael J. Jewell, Attorney and Representative for the Solar Energy Industries Association, certify that a copy of this document was served on all parties of record in this proceeding on the 12th day of June, 2019 by hand-delivery, facsimile transmission, electronic mail, and/or First Class U.S. Mail, postage prepaid, to all parties of record.



Michael J. Jewell