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

2019 JUN 12 PM 2:24

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

**TEXAS ENERGY ASSOCIATION FOR MARKETERS  
STATEMENT OF POSITION**


Texas Energy Association for Marketers ("TEAM") timely files this Statement of Position in the above-captioned docket in accordance with SOAH Order No. 6 and 16 Texas Administrative Code § 22.124. TEAM takes the position that regardless of what rates are approved in this proceeding, that adequate notice must be provided to allow incorporation of those rate changes into retail rates offered to customers. Further, with respect to individual rate riders or new discretionary services, such proposals should be carefully reviewed to the extent that they diverge from rate structures of other transmission and distribution utilities (TDUs). Lack of uniformity on rate structure among TDUs adds cost to providing retail service and has the potential to create customer confusion.

TEAM also has some concerns with regard to broad statements in the Application and supporting testimony concerning regulatory assets associated with bad debt claims against REPs. Further, TEAM has some concerns with regard to clarifying the extent to which CenterPoint Energy Houston Electric, LLC ("CenterPoint Energy Houston") has or has not included any costs in the Application for TDU rates that have the effect of financially supporting CenterPoint Energy Houston's competitive affiliates.

TEAM is currently reviewing the analyses of other parties in direct testimony and reserves the right to take a position regarding those arguments and those of the PUC Staff that are to be filed in this proceeding. TEAM also reserves the right to review and take a position regarding the rebuttal testimony filings of CenterPoint Houston, which have yet to be filed.

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Respectfully submitted,



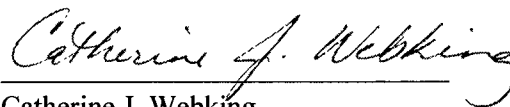
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**ATTORNEYS FOR TEAM**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served in accordance with the governing procedural orders to all parties of record in this proceeding on this 12<sup>th</sup> day of June, 2019.



Catherine J. Webking