



Control Number: 49421



Item Number: 531

Addendum StartPage: 0

2019 JUL 13 AM 9:51

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

§  
§  
§  
§

BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

**City of Houston and Houston Coalition of Cities'  
Statement of Position**

City of Houston and Houston Coalition of Cities ("COH/HCC") file this Statement of Position. COH/HCC's position is that CenterPoint Energy Houston Electric, LLC's ("CEHE") application should be adjusted as provided in COH/HCC's direct testimony and as provided in the testimony of certain intervenors regarding issues not addressed by COH/HCC.

Specifically, COH/HCC agree with and support the positions provided, and adjustments proposed, by the following intervenors:

1. Gulf Coast Coalition of Cities ("GCCC") testimony of Lane Kollen regarding rate base, operating income, and Tax Cuts and Jobs Act;
2. Texas Coast Utilities Coalition ("TCUC") testimony of Randy Woolridge regarding rate of return and cost of capital;
3. TCUC testimony of David Garrett regarding depreciation;
4. Office of Public Utility Counsel ("OPUC") testimony of Karl Nalepa regarding weather normalization, functionalization of Harvey regulatory costs, functionalization of operations and maintenance costs, capital additions; and
5. H-E-B, LP ("HEB") testimony of George Presses regarding customer charges.

COH/HCC reserve the right to address any other issues raised at the hearing.

Respectfully submitted,

Ronald C. Lewis  
City Attorney

YuShan Chang  
State Bar No. 24040670  
Senior Assistant City Attorney  
900 Bagby, 4th Floor  
Houston, Texas 77002  
(832) 393-6442  
(832) 393-6259 Facsimile  
[yushan.chang@houstontx.gov](mailto:yushan.chang@houstontx.gov)

**Counsel for City of Houston**

Alton J. Hall, Jr.  
State Bar No.: 08743740  
Chelsea J. Lu  
State Bar No. 24095439  
ADAMS AND REESE LLP  
LyondellBasell Tower  
1221 McKinney St., Suite 4400  
Houston, Texas 77010  
(713) 651-5151  
(713) 652-5152 Facsimile  
[alton.hall@arlaw.com](mailto:alton.hall@arlaw.com)  
[chelsea.lu@arlaw.com](mailto:chelsea.lu@arlaw.com)

By: /s/ Alton J. Hall

Alton J. Hall, Jr.

**Counsel for City of Houston and  
Houston Coalition of Cities**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 12th day of June, 2019, a true and correct copy of the foregoing document was served upon the parties of record by email, facsimile and/or First Class Mail.

/s/ Alton J. Hall

Alton J. Hall, Jr.