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SOAH DOCKET NO. 473-19-3864

PUC DOCKET NO. 49421

2019 JUN 17 PM 2:50

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

**TEXAS COAST UTILITIES COALITION'S
FIRST SET OF REQUESTS FOR INFORMATION TO
THE STAFF OF THE PUBLIC UTILITY COMMISSION OF TEXAS**

Texas Coast Utilities Coalition's ("TCUC") First Set of Requests for Information ("RFIs") to the Staff of the Public Utility Commission of Texas ("Staff," "Commission" or "Commission Staff") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 816 Congress Avenue, Suite 950, Austin, Texas 78701, within four (4) calendar days of service hereof or no later than **June 21, 2019**, or as modified by any order issued subsequent to the service of these RFIs. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "CenterPoint," "CEHE," the "Company," and "Applicant" refer to CenterPoint Energy Houston Electric, LLC and its affiliates.
2. "Commission," "Staff" and "Commission Staff" refer to the Staff of the Public Utility Commission of Texas.
3. "You," "yours," and "your" refer to Staff of the Public Utility Commission of Texas (as defined above).
4. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals,

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forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

5. The term “communication” includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of Commission Staff.
6. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of Commission Staff or in the custody of its attorneys or other representatives or agents.
7. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
8. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
9. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, 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 preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket

who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.

4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If Commission Staff considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if Commission Staff objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if Commission Staff receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

816 Congress Avenue, Suite 950

Austin, Texas 78701

(512) 474-1492 (voice)

(512) 474-2507 (fax)

By: 

Alfred R. Herrera

State Bar No. 09529600

aherrera@herrerlawpllc.com

Brennan J. Foley

State Bar No. 24055490

bfoley@herrerlawpllc.com

Sergio E. Herrera

State Bar No. 24109999

sherrera@herrerlawpllc.com

service@herrerlawpllc.com

**ATTORNEYS FOR TEXAS COAST
UTILITIES COALITION**

CERTIFICATE OF SERVICE

I hereby certify that on this the 17th day of June 2019, a true and correct copy of the *TCUC's First Set of RFIS to the Staff of the Public Utility Commission of Texas* was served upon all parties of record by facsimile and/or First-class United States mail, postage paid.

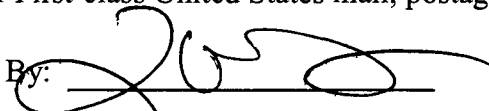
By: 
Leslie Lindsey

EXHIBIT A

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- 4-1.** Please identify all testimony previously submitted by Mr. Reginald J. Tuvilla that addresses depreciation.
- 4-2.** Please provide the Excel-based models, original formulas intact, to the extent not already provided, as referred to on page 2, line 21 of Mr. Tuvilla's direct testimony.
- 4-3.** Please provide a detailed description of the simulated plant-record (SPR) and actuarial analyses Mr. Tuvilla undertook in assessing CEHE's proposed depreciation rates.
- 4-4.** Please describe all differences, if any, in the SPR and actuarial analyses that Mr. Tuvilla conducted and the SPR and actuarial analyses forming the basis CEHE's proposed life characteristics of CEHE's plant assets.
- 4-5.** Referring to page 7, lines 8-12, and page 8, lines 18-21 of Mr. Tuvilla's direct testimony, please explain the circumstances under which it would have been appropriate to recommend an adjustment to Mr. Watson's proposed life parameters for the transmission, distribution, and general plant accounts.
- 4-6.** Please describe the weight Mr. Tuvilla gives to "information gathered from field personnel, engineers and managers," as referred to on page 3, lines 5-6 of Mr. Tuvilla's direct testimony, as a general matter in developing depreciation rates.
- 4-7.** In assessing CEHE's proposed depreciation rates, please explain whether Mr. Tuvilla gave any weight to the "information gathered from field personnel, engineers and managers" that CEHE witness Mr. Watson relied on in developing CEHE's proposed depreciation rates.
- 4-8.** Please confirm that Staff did not obtain "information gathered from field personnel, engineers and managers" independently from information provided by CEHE.

- 4-9. Please describe the extent to which Mr. Tuvilla evaluated TCUC witness Mr. David Garrett's recommendations and testimony.
- 4-10. Please provide all workpapers or other documentation showing all of Mr. Tuvilla's revisions, analyses or comments regarding Mr. Garrett's schedules and/or recommendations.