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SOAH DOCKET NO. 473-19-3864

PUC DOCKET NO. 49421

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

**COMMISSION STAFF'S RESPONSE TO CENTERPOINT
ENERGY HOUSTON ELECTRIC, LLC (CEHE)
FIRST REQUEST FOR INFORMATION
QUESTION NO. 1-1**

The Staff of the Public Utility Commission of Texas (Staff) stipulates that the following response(s) to request(s) for information/production/disclosure may be treated by all parties as if the answers were filed under oath.

Dated: June 18, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on June 18, 2019, in accordance with 16 TAC § 22.74.



Rashmin J. Asher

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**COMMISSION STAFF'S RESPONSE TO CENTERPOINT
ENERGY HOUSTON ELECTRIC, LLC (CEHE)
FIRST REQUEST FOR INFORMATION
QUESTION NO. 1-1**

1-1 Please refer to the Direct Testimony of Jorge Ordonez at page 35, lines 5-11.

- a. Please produce all of the U.S. Securities and Exchange Commission Form 10-K reports and the FERC Form 1 reports that Mr. Ordonez reviewed to form his conclusion that 14 of the 16 delivery-only electric utilities in the 2018 S&P Global Market Intelligence RRA Report purchase and sell electricity."
- b. If the answer refers to public records, please provide a link to the specific public record for each document Mr. Ordonez reviewed and specify the page or pages of that record that he relied on to form his conclusion.

RESPONSE: a. The 16 delivery-only electric utilities are listed in Confidential Workpaper JO-6, pages 11 and 12.

The reports reviewed can be found in Confidential Workpapers:

- JO-6.1, pages 4 and 13;
- JO-6.2, pages 7, and 8;
- JO-6.3, page 14;
- JO-6.4, pages 18, and 90;
- JO-6.5, pages 10, and 19;
- JO-6.6, page 14;
- JO-6.7, pages 14, and 257;
- JO-6.8, pages 5, and 15;
- JO-6.9, page 103;
- JO-6.10, pages 5, and 8;
- JO-6.11, page 8;
- JO-6.12, page 28;
- JO-6.13, pages 14, and 233,
- JO-6.14, pages 33, and 202;
- JO-6.15, pages 16, and 107;
- JO-6.16, page 35

b. N/A

Prepared by: Rashmin Asher
Sponsored by: Jorge Ordonez