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

**TEXAS COAST UTILITIES COALITION'S
FIFTH SET OF REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Texas Coast Utilities Coalition's ("TCUC") Fifth Set of Requests for Information ("RFIs") to CenterPoint Energy Houston Electric, LLC ("CenterPoint") is hereby filed in this docket. Responses to the RFIs set fifth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 816 Congress Avenue, Suite 950, Austin, Texas 78701, within two (2) calendar days of service hereof or no later than **June 26, 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. "You," "yours," and "your" refer to CenterPoint (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "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, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

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4. 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 CenterPoint.
5. “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 CenterPoint or in the custody of its attorneys or other representatives or agents.
6. “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.
7. “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.
8. 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 CenterPoint 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 CenterPoint 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 CenterPoint 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@herreralawpllc.com


Brennan J. Foley
State Bar No. 24055490
bfoley@herreralawpllc.com

Sergio E. Herrera
State Bar No. 24109999
sherrera@herreralawpllc.com
service@herreralawpllc.com

**ATTORNEYS FOR TEXAS COAST
UTILITIES COALITION**

CERTIFICATE OF SERVICE

I hereby certify that on this the 24th day of June 2019, a true and correct copy of the *TCUC's Fifth Set of RFIS to CenterPoint* was served on all known parties of record by electronic mail in compliance with SOAH Order No. 2.

By: 

Mariann Wood

EXHIBIT A

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

**APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC §
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- 5-1. Referring to Dane Watson's Rebuttal Testimony at page 10, lines 12-16, please provide a thorough explanation of what "extraordinary circumstances" would need to exist in order to justify reliance on the service lives of other utilities in setting depreciation rates.
- 5-2. Admit that reliance on the conformance index (CI) of a single experience band ignores the CIs for the remaining experience bands of an account for the time period under consideration.
- 5-3. Admit that consideration of the depreciation rates of other utilities is irrelevant in setting depreciation rates.
- 5-4. Please provide any learned treatise or academic study that supports the conclusion that reliance on the opinions of company employees of the estimated service life of an asset is more important than the experience of other utilities in establishing depreciation rates.
- 5-5. Please admit that Mr. Watson does not have a degree or certificate in the area of meteorology and is not being presented as an expert in the area of meteorology.
- 5-6. Please admit that Mr. Watson does not have a degree or certificate in the area of geography and is not being presented as an expert in the area of geography.
- 5-7. Please admit that Mr. Watson does not have a degree or certificate in the area of environmental studies and is not being presented as an expert in the area of environmental studies.
- 5-8. Referring to Dane Watson's rebuttal testimony at 20, line 20, to 21, line 23, please state the applicant utility's proposed average service lives were for each of the accounts noted, i.e. Accounts 353, 354, 362, and 366. Confirm that Dane Watson conducted the depreciation studies upon which TNMP's and ETI's proposed depreciation rates were based on in Docket Nos. 48401 and 48371 respectively.

- 5-9. Please whether Mr. Watson believes that it is unreasonable to discount the importance of information obtained by the preparer of a depreciation study from interviews with company employees regarding the estimated service life of an asset when that information has not been independently verified.
- 5-10. Please state whether Mr. Watson has ever encountered a situation where information obtained by the preparer of a depreciation study from interviews with company employees regarding the estimated service life of an asset has been independently verified.