



Control Number: 49421



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

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

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S
MOTION TO ADMIT EVIDENCE DUE TO OPTIONAL COMPLETENESS**

CenterPoint Energy Houston Electric, LLC ("CEHE") files this Motion to Admit evidence to ensure Optional Completeness. During the hearing on the merits, CEHE reserved its right to optionally complete several exhibits admitted into the record by other parties. Today, CEHE provided copies of the optional completeness items to SOAH and all parties of record related to the exhibits noted below and, in the interest of efficiency, hereby incorporates these exhibits by reference.

CEHE Ex. 76 Op. Completeness to H-E-B Ex. 31	CEHE Ex. 98 Op. Comp. to TCUC Ex. 41
CEHE Ex. 77 Op. Completeness to Staff Ex. 10	CEHE Ex. 99 Op. Comp. to TCUC Ex. 42
CEHE Ex. 78 Op. Completeness to TIEC Ex. 30	CEHE Ex. 100 Op. Comp. to TCUC Ex. 43
CEHE Ex. 79 Op. Completeness to TIEC Ex. 33	CEHE Ex. 101 Op. Comp. to TCUC Ex. 44
CEHE Ex. 80 Op. Comp. to TCUC Ex. 3	CEHE Ex. 102 Op. Comp. to TCUC Ex. 45
CEHE Ex. 80a Op. Comp. to TCUC Ex. 3 CONF	CEHE Ex. 103 Op. Comp. to TCUC Ex. 46
CEHE Ex. 81 Op. Comp. to TCUC Ex. 11 CONF	CEHE Ex. 104 Op. Comp. to TCUC Ex. 47
CEHE Ex. 82 Op. Comp. to TCUC Ex. 17	CEHE Ex. 105 Op. Comp. to TCUC Ex. 48
CEHE Ex. 83 Op. Comp. to TCUC Ex. 21	CEHE Ex. 106 Op. Comp. to TCUC Ex. 49
CEHE Ex. 83a Op. Comp. to TCUC Ex. 21 CONF	CEHE Ex. 107 Op. Comp. to TCUC Ex. 50
CEHE Ex. 84 Op. Comp. to TCUC Ex. 27	CEHE Ex. 108 Op. Comp. to TCUC Ex. 51
CEHE Ex. 85 Op. Comp. to TCUC Ex. 28	CEHE Ex. 109 Op. Comp. to TCUC Ex. 52
CEHE Ex. 86 Op. Comp. to TCUC Ex. 29	CEHE Ex. 110 Op. Comp. to TCUC Ex. 53
CEHE Ex. 87 Op. Comp. to TCUC Ex. 30	CEHE Ex. 111 Op. Comp. to TCUC Ex. 54
CEHE Ex. 88 Op. Comp. to TCUC Ex. 31	CEHE Ex. 112 Op. Comp. to TCUC Ex. 55
CEHE Ex. 89 Op. Comp. to TCUC Ex. 32	CEHE Ex. 113 Op. Comp. to TCUC Ex. 56
CEHE Ex. 90 Op. Comp. to TCUC Ex. 33	CEHE Ex. 114 Op. Comp. to TCUC Ex. 57
CEHE Ex. 91 Op. Comp. to TCUC Ex. 34	CEHE Ex. 115 Op. Comp. to TCUC Ex. 58
CEHE Ex. 92 Op. Comp. to TCUC Ex. 35	CEHE Ex. 116 Op. Comp. to TCUC Ex. 59
CEHE Ex. 93 Op. Comp. to TCUC Ex. 36	CEHE Ex. 117 Op. Comp. to TCUC Ex. 60
CEHE Ex. 94 Op. Comp. to TCUC Ex. 37	CEHE Ex. 118 Op. Comp. to TCUC Ex. 61
CEHE Ex. 95 Op. Comp. to TCUC Ex. 38	CEHE Ex. 119 Op. Comp. to TCUC Ex. 62
CEHE Ex. 96 Op. Comp. to TCUC Ex. 39	CEHE Ex. 120 Op. Comp. to TCUC Ex. 67
CEHE Ex. 97 Op. Comp. to TCUC Ex. 40	CEHE Ex. 121 Op. Comp. to TCUC Ex. 74

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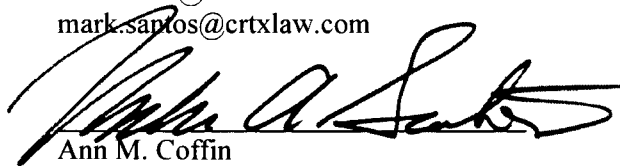
Accordingly, CEHE offers CEHE Exhibits 76 through 121 as reflected above and on the attached revised exhibit list and requests that these items be admitted into the record evidence.

Respectfully submitted,

Patrick H. Peters III
Associate General Counsel and
Director of Regulatory Affairs
CenterPoint Energy, Inc.
1005 Congress Avenue, Suite 650
Austin, Texas 78701
512.397.3032
512.397.3050 (fax)
patrick.peters@centerpointenergy.com

Mickey Moon
Assistant General Counsel
CenterPoint Energy, Inc.
1111 Louisiana, 19th Floor
Houston, Texas 77002
713.207.7231
713.454.7197 (fax)
mickey.moon@centerpointenergy.com

Coffin Renner LLP
1011 West 31st Street
Austin, Texas 78705
512.879.0900
512.879.0912 (fax)
ann.coffin@crtxlaw.com
mark.santos@crtxlaw.com

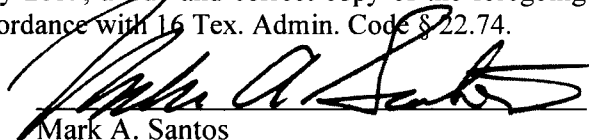


Ann M. Coffin
State Bar No. 00787941
Mark A. Santos
State Bar No. 24037433

**COUNSEL FOR CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of July 2019, a true and correct copy of the foregoing document was served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74.



Mark A. Santos

SOAH Dkt. No. 473-19-3864
PUC Dkt. No. 49421

Application of CenterPoint Energy Houston Electric, LLC
for Authority to Change Rates

REVISED CEHE EXHIBIT LIST

Ex. No.	Description	Offered	Admitted
1	Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates filed on April 5, 2019 (Includes all attachments, electronic files and non-confidential workpapers. Direct testimony, exhibits and testimony workpapers provided separately.)	✓	06/24/19
1a	Confidential Schedules and Schedule Workpapers filed April 5, 2019	✓	06/24/19
2	Errata 1 Schedules and Schedule Workpapers filed on June 19, 2019	✓	06/24/19
2a	Confidential Schedules and Schedule Workpapers filed June 19, 2019	✓	06/24/19
3	Petition for Review of Municipal Approval of Rate Change and Motion to Consolidate filed on June 7, 2017 and Consolidated on June 18, 2019	✓	06/24/19
4	Letter to ALJs re Petition for Review regarding Simonton, Wharton and Clute dated June 13, 2019	✓	06/24/19
5	Affidavit of Completion of Notice of Alice S. Hart	✓	06/24/19
6	Direct Testimony, Exhibits and Workpapers of Kenny M. Mercado (Includes Errata)	✓	06/24/19
7	Direct Testimony, Exhibits and Workpapers of Randal M. Pryor	✓	06/24/19
8	Direct Testimony and Workpapers of Martin W. Narendorf Jr.	✓	06/24/19
9	Direct Testimony, Exhibits and Workpapers of Dale Bodden (Includes Errata)	✓	06/24/19
10	Direct Testimony of Julianne P. Sugarek (Includes Errata)	✓	06/24/19
10a	Confidential Workpaper JPS-3 of Julianne P. Sugarek	✓	06/24/19
11	Direct Testimony, Exhibits and Workpapers of John R. Hudson	✓	06/24/19
12	Direct Testimony and Exhibits of Kristie L. Colvin (Includes Errata)	✓	06/24/19
12a	Confidential Exhibits KLC-04 and KLC-05 of Kristie L. Colvin	✓	06/24/19
13	Direct Testimony and Workpapers of Charles A. Pringle (Includes Errata)	✓	06/24/19
14	Direct Testimony of Justin J. Hyland (Includes Errata)	✓	06/24/19
15	Direct Testimony and Exhibits of Michelle M. Townsend	✓	06/24/19
16	Direct Testimony of John E. Slanina	✓	06/24/19
17	Direct Testimony and Exhibits of Shachella D. James (Includes Errata)	✓	06/24/19
18	Direct Testimony of Rebecca Demarr	✓	06/24/19
19	Direct Testimony and Exhibits of M. Shane Kimzey (Includes Errata)	✓	06/24/19

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Ex. No.	Description	Offered	Admitted
20	Direct Testimony of Kelly C. Gauger	✓	06/24/19
21	Direct Testimony and Workpapers of Diane M. Englet	✓	06/24/19
22	Direct Testimony, Exhibits and Workpapers of Lynne Harkel-Rumford	✓	06/24/19
22a	Confidential Voluminous Exhibits LHR-2 through LHR-9 and Confidential Workpaper LHR-2 of Lynne Harkel-Rumford	✓	06/24/19
23	Direct Testimony, Exhibits and Workpapers of John J. Reed	✓	06/24/19
24	Direct Testimony, Exhibits and Workpapers of Timothy S. Lyons	✓	06/24/19
25	Direct Testimony, Exhibits and Workpapers of Dane A. Watson (Includes Errata)	✓	06/24/19
26	Direct Testimony, Exhibits and Workpapers of Robert B. Hevert	✓	06/24/19
26a	Confidential and Voluminous Workpapers of Robert B. Hevert	✓	06/24/19
27	Direct Testimony, Exhibits and Workpapers of Robert B. McRae (Includes Errata)	✓	06/24/19
27a	Confidential and Voluminous Exhibits RBM-2 through RBM-5 of Robert B. McRae	✓	06/24/19
28	Direct Testimony, Exhibits and Workpapers of Gregory S. Wilson	✓	06/24/19
29	Direct Testimony and Exhibits of J. Stuart McMenamin	✓	06/24/19
30	Direct Testimony, Exhibits and Workpapers of Mathew A. Troxle (Includes Errata)	✓	06/24/19
31	Rebuttal Testimony, Exhibits and Workpapers of Randal M. Pryor (Includes Errata)	✓	06/24/19
32	Rebuttal Testimony and Exhibits of Martin W. Narendorf Jr.	✓	06/24/19
33	Rebuttal Testimony and Exhibits of Julianne P. Sugarek	✓	06/24/19
33a	Highly Sensitive Rebuttal Testimony and Exhibits R-JPS-2 through R-JPS-15 of Julianne P. Sugarek	✓	06/24/19
34	Rebuttal Testimony of John R. Hudson	✓	06/24/19
35	Rebuttal Testimony, Exhibits and Workpapers of Kristie L. Colvin	✓	06/24/19
36	Rebuttal Testimony of Charles A. Pringle	✓	06/24/19
37	Rebuttal Testimony and Exhibits of Michelle M. Townsend	✓	06/24/19
38	Rebuttal Testimony of Kelly C. Gauger	✓	06/24/19
39	Rebuttal Testimony and Exhibits of Lynne Harkel-Rumford	✓	06/24/19
40	Rebuttal Testimony of John J. Reed	✓	06/24/19
41	Rebuttal Testimony, Exhibits and Workpapers of Dane A. Watson (Includes Errata)	✓	06/24/19

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Ex. No.	Description	Offered	Admitted
42	Rebuttal Testimony, Exhibits and Workpapers of Robert B. Hevert (Includes Errata)	✓	06/24/19
42a	Confidential Rebuttal Workpapers of Robert B. Hevert	✓	06/24/19
43	Rebuttal Testimony and Workpapers of Robert B. McRae	✓	06/24/19
43a	Confidential Rebuttal Testimony and Exhibits R-RBM-1 through R-RBM-4 of Robert B. McRae	✓	06/24/19
44	Rebuttal Testimony, Exhibits and Workpapers of J. Stuart McMenamin	✓	06/24/19
45	Rebuttal Testimony and Exhibits of Mathew A. Troxle	✓	06/24/19
46	Rebuttal Testimony of George Sanger	✓	06/24/19
47	Rebuttal Testimony and Exhibits of Jeffrey S. Myerson	✓	06/24/19
47a	Highly Sensitive Rebuttal Testimony and Exhibit R-JSM-2 of Jeffrey S. Myerson	✓	06/24/19
48	Rebuttal Testimony, Exhibits and Workpapers of Ellen Lapson	✓	06/24/19
48a	Confidential Rebuttal Testimony and Exhibit R-EL-5 of Ellen Lapson	✓	06/24/19
49	PUC Dkt. No. 38339 Order on Rehearing	✓	06/25/19
50	Arkansas Dkt. No. 15-098-U, Direct Testimony of Billie S. LaConte	Withdrawn	06/25/19
51	Arkansas Dkt. No. 15-098-U, Direct Testimony of Jeffry Pollock	Withdrawn	06/25/19
52	Arkansas Dkt. No. 15-098-U, Redacted Direct Testimony of Kim O. Davis	Withdrawn	06/25/19
53	Tex. Util. Code §14.006	✓	06/25/19
54	H.B. 1767	✓	06/25/19
55	Staff's Response to TCUC 1-4	Not Offered	6/26/19
56	Staff's Response to TCUC 1-5	Not Offered	6/26/19
57	Staff's Response to TCUC 1-6	Not Offered	6/26/19
58	Staff's Response to TCUC 1-9	Not Offered	6/26/19
59	Staff's Response to TCUC 1-7	Not Offered	6/26/19
60	PUC Dkt. No. 16705 Direct Testimony of Darryl Tietjen	✓	6/26/19
61	Not Offered and Not Distributed	Not Offered	6/26/19
62	PUC Dkt. No. 39504 Direct Testimony Walter L. Fitzgerald	✓	6/26/19
63	PUC Dkt. No. 30706 Order	✓	6/26/19

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Ex. No.	Description	Offered	Admitted
64	Dkt. No. 39504 Direct Testimony of Darryl Tietjen	✓	6/26/19
65	Dkt No. 39504 CEHE's Submission of Unopposed Stipulation, Draft Final Order and Testimony Supporting Stipulation	✓	6/26/19
66	Dkt. No. 37200 Settlement Agreement	✓	6/26/19
67	Dkt. No. 37200 Financing Order	✓	06/26/19
68	Project No. 47945 CEHE Response to Request for Information	✓	06/26/19
69	CEHE's Cross Book of Mr. Woolridge	✓	06/26/19
70	CEHE's Cross Book of Mr. Gorman	✓	06/26/19
71	CEHE's Cross Book of Mr. Ordonez	✓	06/26/19
72	Moody's-Moody's affirms CEHE ratings; outlook change to negative dated June 26, 2019	✓	N/A Offer of Proof 06/26/19
73	Excerpt from Dkt. No. 38339 Order On Rehearing	✓	06/26/19
74	Dkt. No. 45414, Direct Testimony of Alicia Maloy	✓	06/26/19
75	Dkt. No. 45524. Direct Testimony of Alicia Maloy	✓	06/26/19
76	Op. Completeness to HEB Ex. 31	✓	
77	Op. Completeness to Staff Ex. 10	✓	
78	Op. Completeness to TIEC Ex. 30	✓	
79	Op. Completeness to TIEC Ex. 33	✓	
80	Op. Comp. to TCUC Ex. 3	✓	
80a	Op. Comp. to TCUC Ex. 3 CONF	✓	
81	Op. Comp. to TCUC Ex. 11 CONF	✓	
82	Op. Comp. to TCUC Ex. 17	✓	
83	Op. Comp. to TCUC Ex. 21	✓	
83a	Op. Comp. to TCUC Ex. 21 CONF	✓	
84	Op. Comp. to TCUC Ex. 27	✓	
85	Op. Comp. to TCUC Ex. 28	✓	
86	Op. Comp. to TCUC Ex. 29	✓	
87	Op. Comp. to TCUC Ex. 30	✓	
88	Op. Comp. to TCUC Ex. 31	✓	

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Ex. No.	Description	Offered	Admitted
89	Op. Comp. to TCUC Ex. 32	✓	
90	Op. Comp. to TCUC Ex. 33	✓	
91	Op. Comp. to TCUC Ex. 34	✓	
92	Op. Comp. to TCUC Ex. 35	✓	
93	Op. Comp. to TCUC Ex. 36	✓	
94	Op. Comp. to TCUC Ex. 37	✓	
95	Op. Comp. to TCUC Ex. 38	✓	
96	Op. Comp. to TCUC Ex. 39	✓	
97	Op. Comp. to TCUC Ex. 40	✓	
98	Op. Comp. to TCUC Ex. 41	✓	
99	Op. Comp. to TCUC Ex. 42	✓	
100	Op. Comp. to TCUC Ex. 43	✓	
101	Op. Comp. to TCUC Ex. 44	✓	
102	Op. Comp. to TCUC Ex. 45	✓	
103	Op. Comp. to TCUC Ex. 46	✓	
104	Op. Comp. to TCUC Ex. 47	✓	
105	Op. Comp. to TCUC Ex. 48	✓	
106	Op. Comp. to TCUC Ex. 49	✓	
107	Op. Comp. to TCUC Ex. 50	✓	
108	Op. Comp. to TCUC Ex. 51	✓	
109	Op. Comp. to TCUC Ex. 52	✓	
110	Op. Comp. to TCUC Ex. 53	✓	
111	Op. Comp. to TCUC Ex. 54	✓	
112	Op. Comp. to TCUC Ex. 55	✓	
113	Op. Comp. to TCUC Ex. 56	✓	
114	Op. Comp. to TCUC Ex. 57	✓	
115	Op. Comp. to TCUC Ex. 58	✓	
116	Op. Comp. to TCUC Ex. 59	✓	
117	Op. Comp. to TCUC Ex. 60	✓	

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Ex. No.	Description	Offered	Admitted
118	Op. Comp. to TCUC Ex. 61	✓	
119	Op. Comp. to TCUC Ex. 62	✓	
120	Op. Comp. to TCUC Ex. 67	✓	
121	Op. Comp. to TCUC Ex. 74	✓	