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

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BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

**ALLIANCE FOR RETAIL MARKETS' SECOND REQUEST FOR INFORMATION
TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Alliance for Retail Markets (ARM) requests CenterPoint Energy Houston Electric, LLC (CenterPoint), as defined in this Second Request for Information (RFI), to respond to the questions and sub-questions in this RFI under oath. Please answer the questions and sub-questions in the order in which they are submitted, and include sufficient detail to provide a complete and accurate response. Also, please state the name of the witness who will sponsor the response to each question and sub-question and who can vouch for the truth of the response.

Definitions

As used in this RFI:

- (1) "CenterPoint", "Company", and "Applicant" refer to CenterPoint Energy Houston Electric, LLC and its affiliates, and any person acting or purporting to act on their behalf.
- (2) "CenterPoint Energy Inc." is the parent company of CenterPoint Energy Houston Electric, LLC (as defined above).
- (2) "You", "yours" and "your" refer to CenterPoint Energy Houston Electric, LLC (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
- (3) "Document", "documents", and "documentation" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (email), memoranda, notes, analyses, minutes, presentations, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements,

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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.

- (4) “Test Year” refers to the 12-month period ending December 31, 2018.

Instructions

1. The Definitions, Instructions, and Claim of Privilege set forth in this RFI apply to these questions.
2. In answering these questions, furnish all information available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and identify the present location and custodian of any copy or summary of the document.
6. If any question appears confusing or the scope of the question is unclear, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and copy, at the top of the page, the question and any sub-questions being answered followed by the answer(s) to each.
8. As part of the response to each question, 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 question 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 question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question 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 you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.
12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
14. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.
15. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

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.

Respectfully submitted,



Stephen J. Davis
State Bar No. 05547750

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**ATTORNEY FOR
ALLIANCE FOR RETAIL MARKETS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all parties on May 1, 2019 by first class mail.



Stephen J. Davis

SOAH DOCKET NO. 473-19-3864

PUC DOCKET NO. 49421

**ALLIANCE FOR RETAIL MARKETS'
SECOND REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

ARM 2-1: In new Subsection 2.5 of the Construction Services Policy in Chapter 6.1.2.2 of its proposed Tariff, CenterPoint proposes to provide “a construction allowance of up to \$18,000 (the “EV Construction Allowance”) toward the cost of a single phase or 3-phase Distribution Voltage Facility Extension requested by a Retail Customer for (a) commercially-owned electric vehicle (EV) charging stations that will be open to the public....”

- a. Please define the term “commercially-owned” in proposed new Subsection 2.5. In your response, please state whether this term requires the Retail Customer to engage in a business involving the sale of goods or services at the premise where the EV charging station is installed to qualify for the EV Construction Allowance.
- b. Please define the phrase “open to the public” in proposed new Subsection 2.5. Would limited public access to the EV charging station (that is, access to selected persons, as opposed to any person) meet the “open to the public” requirement?
- c. Other than the specific types of Retail Customers referenced in new Subsection 2.5 (*e.g.*, apartment and condominium complexes, rapid and other public transit authorities), please provide examples of a “commercially-owned electric vehicle (EV) charging station that will be open to the public” that would qualify for the EV Construction Allowance.

ARM 2-2: Would the proposed EV Construction Allowance be available to a residential Retail Customer? If your response is “no”, please explain the justification for limiting the availability of the EV Construction Allowance to only non-residential Retail Customers if “[t]he purpose of this additional allowance is to better facilitate the growth of EV charging stations in the Company’s service territory,” as stated in the Direct Testimony of Julianne Sugarek (Bates Page 682, lines 14-16).

ARM 2-3: Please explain why new proposed Subsection 2.5 requires the EV charging station to “contain EV charging equipment of sufficient capacity to collectively require the delivery of greater than 50 kVA of Electric Power and Energy from Company’s Delivery System” to qualify for the EV Construction Allowance.

ARM 2-4: Please explain why CenterPoint “anticipates that most public EV charging stations will require 3-phase underground facilities,” as stated in the Direct Testimony of Julianne Sugarek (Bates Page 683, lines 12-13).

- ARM 2-5:** What is the approximate cost per foot of the typical three-phase underground Distribution Voltage Facility Extension? Please explain how you calculated this cost measurement.
- ARM 2-6:** Please provide the total number of underground single-phase and three-phase Distribution Voltage Facility Extensions for EV stations requested by Retail Customers and constructed by CenterPoint during the Test Year. In your response, separately state the number of single-phase and three-phase facility extensions.
- ARM 2-7:** Please provide the total number of underground single-phase and three-phase Distribution Voltage Facility Extensions for EV stations requested by Residential Retail Customers and constructed by CenterPoint during the Test Year. In your response, separately state the number of single-phase and three-phase facility extensions.
- ARM 2-8:** In addition to the proposed EVCA, does CenterPoint plan to upgrade its distribution system and/or initiate other measures to support the broad adoption of EVs? If so, please provide all CenterPoint studies, reports, and other documents addressing any such alternatives.
- ARM 2-9:** Does CenterPoint take the position it either had or has the option to install and own EV charging stations to support the broad adoption of EVs, in view of the Direct Testimony of Julianne Sugarek (Bates Page 685, lines 15-19)?
- ARM 2-10:** If your response to ARM 2-9 is other than “no”, please explain why CenterPoint to date has not chosen to pursue the option of installing and owning EV charging stations to support the broad adoption of EVs,