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

BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK
OF

ADMINISTRATIVE HEARINGS

JOINT INITIAL BRIEF OF THE
SOLAR ENERGY INDUSTRIES ASSOCIATION
AND ENEL X NORTH AMERICA, INC.

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COME NOW, the Solar Energy Industries Association (“SEIA”)¹ and Enel X North America, Inc. (“Enel X”) and jointly file this Post-Hearing Brief.

SUMMARY

In its Application, CenterPoint Energy Houston Electric, LLC (“CEHE”) requests authority to change its rates, including several non-rate changes to its Tariff for Retail Delivery Service (“Tariff”). In particular, CEHE proposes changes in its Distribution Generation Service – Rate DGS, including increasing the fees charged for pre-interconnection studies by as much as 404%. CEHE failed to meet its burden of proof to support the proposed fee increases. Accordingly, SEIA and Enel X respectfully request the ALJs reject CEHE’s proposal to increase these fees.

DISCUSSION

VIII. REVENUE DISTRIBUTION AND RATE DESIGN [PO Issues 4, 5, 49, 50]

F. Other Rate Design Issues

¹

The comments contained in this filing represent the position of SEIA as an organization, but do not necessarily reflect the views of any particular member with respect to any issue.

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In his Direct Testimony,² CEHE witness Troxle includes proposed changes to the Pre-Interconnection Study Fee Schedule in his exhibits, with the new proposed fees being reflected in Exhibit MAT-9 at page 297.³ However, CEHE provided no factual evidence in the record to support the revised fees. In his testimony, Mr. Troxle provides a high-level statement regarding the Company's proposal to update charges for certain Discretionary Services and describes the methodology it to use to develop the proposed charges for Discretionary Services,⁴ but there are no costs, details, or assumptions provided in the record to support the changes to these revised fees, even in Mr. Troxle's workpapers or the IV-J-2 Schedules. The only information CEHE provided in the record regarding the proposed changes to the fees are reflected in the deletion of the current fees in Exhibit MAT-8 at pages 100, 150, and 228⁵ and the statement of the new fees in Exhibit MAT-8 at pages 232-234⁶ and Exhibit MAT-9 at page 297.⁷ It is only by comparing the fees that were deleted with the new fees that it was apparent that CEHE requested to increase its current Pre-Interconnection Study Fees by as much as 404%.⁸ But, there is no factual information CEHE provided in the record to support this increase, much less the other increases.

CEHE bears the burden of proof on each point of its application in this proceeding under the laws, rules, and standards in Chapter 36 and other provisions of the Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.014, and the Commission's Rules. In this proceeding, CEHE has failed to meet its burden to provide sufficient factual information to support the proposed increases to its pre-interconnection study fees that it has proposed. As a result, SEIA and Enel X

² CEHE Ex. 30.

³ *Id.* at Bates No. 3668.

⁴ *Id.* at Bates Nos. 3039-3040.

⁵ *Id.* at Bates Nos. 3176, 3226, 3304.

⁶ *Id.* at Bates Nos. 3308-3310.

⁷ *Id.* at Bates No. 3668.

⁸ Fee for Non-Exporting 500+ to 2000 kW, Pre-certified, not on network increasing from \$650 to \$3,273. (Comparing current fee on Bates Nos. 3176, 3226, and 3304 to proposed fee on Bates No. 3668.)

respectfully request that the ALJs reject CEHE's proposal to increase the fees it charges for pre-interconnection studies.

CONCLUSION

WHEREFORE, premises considered, SEIA and Enel X respectfully request that the ALJs and the Commission reject CEHE's proposal to increase the fees it charges for pre-interconnection studies and adopt the following proposed finding of fact and conclusion of law and grant such other and further relief as SEIA and Enel X may show themselves entitled.

FOF _____. CEHE failed to provide adequate evidence to justify its proposed increases to its pre-interconnection studies and demonstrate that the increases are just and reasonable.

COL _____. CEHE failed to meet its burden of proof to demonstrate that its proposed increased fees for pre-interconnection studies are just and reasonable in accordance with PURA § 36.003.

Respectfully submitted,



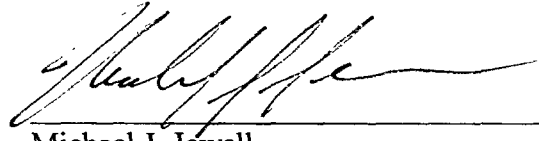
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AMERICA, INC.

CERTIFICATE OF SERVICE

I, Michael J. Jewell, Attorney and Representative for the Solar Energy Industries Association and Enel X North America, Inc., certify that a copy of this document was served on all parties of record in this proceeding on the 9th day of July, 2019 by hand-delivery, facsimile transmission, electronic mail, and/or First Class U.S. Mail, postage prepaid, to all parties of record.



Michael J. Jewell