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

§  
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§  
§

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

PUBLIC UTILITY COMMISSION  
CLERK

**City of Houston's Sixth Request for Information to  
CenterPoint Energy Houston Electric, LLC**

In connection with the Application filed by CenterPoint Energy Houston Electric, LLC ("CEHE"), by and through its attorney of record, provides the following information within seven (7) days of receipt of these requests. It is further requested that the answers to the requests for information be made under oath and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as supplement to your original answer.

**Definitions and Explanatory Notes**

1. When a request calls for identification of a "person or witness," the identification shall include a full name, business address and business telephone number. The identification should also include a job title and name of employer.
2. The terms "document" and "documents" are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data,

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statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms "non-privileged document" and "non-privileged documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.

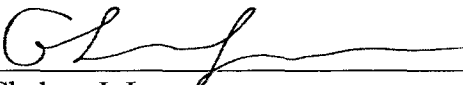
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification of a "document," the identification should include the following:
  - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
  - b. the date of the document;
  - c. the title and/or 're' of the document;
  - d. the subject matter of the document;
  - e. the full name and address of the recipient and every person who received copies of the document;
  - f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
  - g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
5. The term "studies" includes any document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information with the subjects referred to in this proceeding.
6. The term "CenterPoint" and/or "CEHE" includes CenterPoint Energy Houston Electric, LLC and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

Respectfully submitted,

Ronald C. Lewis  
City Attorney

YuShan Chang  
State Bar No. 24040670  
Senior Assistant City Attorney  
900 Bagby, 4th Floor  
Houston, Texas 77002  
(832) 393-6442  
(832) 393-6259 Facsimile  
[yushan.chang@houstontx.gov](mailto:yushan.chang@houstontx.gov)

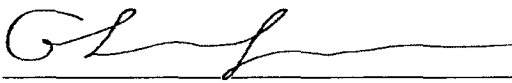
Alton J. Hall, Jr.  
State Bar No.: 08743740  
Chelsea J. Lu  
State Bar No. 24095439  
ADAMS AND REESE LLP  
LyondellBasell Tower  
1221 McKinney St., Suite 4400  
Houston, Texas 77010  
(713) 651-5151  
(713) 652-5152 (Fax)  
[alton.hall@arlaw.com](mailto:alton.hall@arlaw.com)  
[chelsea.lu@arlaw.com](mailto:chelsea.lu@arlaw.com)

By:   
Chelsea J. Lu

**Counsel for City of Houston**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of May, 2019, a true and correct copy of the foregoing document was served upon on all parties of record by email and to the Public Utilities Commission by Federal Express.

  
Chelsea J. Lu

**City of Houston's Sixth Request for Information**

- 6-1. Please refer to Page 1 of 2 of WP/Accts 585 and 596 and answer the following questions:
- a. Explain how the total \$228,000 shown on Line 7 in Column (3) was determined. Please provide the amount included this total that is related to LED operation and maintenance for the Street Lighting Service.
  - b. Explain how the total \$4,325,000 shown on Line 14 in Column (3) was determined. Please provide the amount included this total that is related to LED operation and maintenance for the Street Lighting Service.
  - c. Explain how the total \$35,000 shown on Line 7 in Column-Travel O&M (5) was determined. Please provide the amount included this total that is related to LED operation and maintenance for the Street Lighting Service.
  - d. Explain how the total \$671,000 shown on Line 14 in Column-Travel O&M (5) was determined. Please provide the amount included this total that is related to LED operation and maintenance for the Street Lighting Service.
  - e. Explain how the total \$89,000 shown on Line 7 in Column-Material Related O&M (5) was determined. Please provide the amount included this total that is related to LED operation and maintenance for the Street Lighting Service.
  - f. Explain how the total \$1,695,000 shown on Line 14 in Column-Material Related O&M (5) was determined. Please provide the amount included this total that is related to LED operation and maintenance for the Street Lighting Service.
- 6-2. Please refer to Page 2 of 2 of WP/Accts 585 and 596 and answer the following questions:
- a. Provide the amounts included in the \$255 and \$711 shown on Lines 1 and 2 in Column-Material Related O&M that are related to LED operation and maintenance.
  - b. Provide the amounts included in the \$111 and \$492 shown on Lines 1 and 2 in Column-Material O&M that are related to LED operation and maintenance.
- 6-3. Please refer to Page 1 of WP/Acct. 373 and provide the amount included in the \$601,890 shown on Line 1 in Column (d) that is related to LED Lighting.
- 6-4. Please refer to Schedule II-I-DIST and answer the following questions:
- a. Based on Page 60 and Line No. 40, provide a detailed breakdown of the total \$47,000 included in FERC account 5850 (Street Lights) for the Street Lighting Service. Please provide the amount included this total that is related to LED Lighting.
  - b. Based on Page 60 and Line No. 58, provide a detailed breakdown of the total \$3,223,000 included in FERC account 5960 (Maint. Of Street Lights) for the Street Lighting Service. Please provide the amount included this total that is related to LED Lighting.

- 6-5. Please refer to Page 2 of 2 of Exhibit MAT-4 included in Mr. Matthew Troxle's direct testimony and provide the amount included in the \$61,630,658 shown on Column-Current Adjusted Revenue for the Street Lighting Service that is related to LED Lighting.
- 6-6. Please provide all of workpapers supporting your responses to Request for Information 6-1 through 6-5 and, if any of the responses contain data or information shown in spreadsheet format, please provide electronic versions of the spreadsheets.