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PUC DOCKET NO. 49421

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

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BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
OF
ADMINISTRATIVE HEARINGS

Texas Energy Association for Marketers' (TEAM's)
Post-Hearing Reply Brief

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does not support a reversal of a credit used to set prior base rates as proposed by CenterPoint. TEAM agrees with OPUC's discussion of the applicable law regarding CenterPoint's calculations of the regulatory asset.²

III. Revenue Distribution and Rate Design

As noted in our initial brief the multitude of riders proposed in this proceeding have a potential to create significant customer confusion particularly when the rate rider is new and is unique to the utility at issue. Each of these riders creates the possibility of customer confusion. TEAM supports statements in Staff's Initial Brief. Further, to the extent the Commission approves cost recovery of multiple regulatory assets through riders, TEAM supports CenterPoint's suggestion that rather than instituting multiple riders, a single rider be calculated and applied.³

TEAM also supports the positions of Alliance for Retail Markets (ARM) and OPUC in opposing CenterPoint's proposal to recover lost revenues through the proposed Energy Efficiency Program Adjustment.

IV. Conclusion

TEAM appreciates the opportunity to participate in this proceeding. TEAM members are among the REPs who will directly pay the rates that are ultimately approved in this proceeding. TEAM requests that these rates be structured in a manner that does not include additional riders and rate elements. TEAM also requests that sufficient notice be provided after the determination of final rates in this proceeding prior to the effective date of those rates.

Respectfully submitted,



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² OPUC Initial Brief at 31-34.

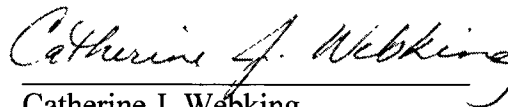
³ CenterPoint Initial Brief at 31.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served in accordance with the governing procedural orders to all parties of record in this proceeding on this 16th day of July, 2019.


Catherine J. Webking