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

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

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

**OFFICE OF PUBLIC UTILITY COUNSEL'S
THIRD REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

The Office of Public Utility Counsel (OPUC) files and submits this Third Request for Information to CenterPoint Energy Houston Electric, LLC (CenterPoint Houston) in the captioned proceeding.

Under Commission Procedural Rules 22.141-.145, 16 Tex. Admin. Code Ch. 22, OPUC requests that CenterPoint, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

Definitions

As used in this introduction and in these questions,

(1) "CenterPoint Houston," "CenterPoint," the "Company," and "Applicant" refer to CenterPoint Energy Houston Electric, LLC and its affiliates;

(2) "You," "yours," and "your" refer to CenterPoint Houston (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.

(3) "Document" and "documents" 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 (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, 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

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of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
2. In answering these questions, furnish all information that is 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, however made, 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 give the present location and custodian of any copy or summary of the document.
6. If any question appears confusing, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
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. 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.

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- 3-1.** For each attorney and expert who worked on any of the dockets for which CenterPoint Houston is seeking recovery of rate-case expenses please provide the following:
- a. name;
 - b. company or firm name;
 - c. hourly billing rate;
 - d. type of service provided (legal, expert witness, accounting, etc.);
 - e. Docket No.(s) on which the person worked; and
 - f. total amount of time spent working on each docket.
- 3-2.** For each internal employee, including employees of Service Company and CERC, who provided services for which CenterPoint Houston seeks recovery in this case as part of its rate-case expenses, please provide the following:
- a. name;
 - b. job description;
 - c. salary;
 - d. benefit and payroll tax amounts;
 - e. the portion of their salary and benefit amounts that CenterPoint requested to recover in the rate case; and
 - f. Docket No.(s) the person worked on.
- 3-3.** For each docket for which CenterPoint Houston is seeking recovery of rate-case expenses, please provide the total amount of expenses incurred for:
- a. lodging;
 - b. meals and beverages; and
 - c. transportation (airfare, car rentals, Uber/Lyft/cabs, etc.).
- 3-4.** Referencing the response to OPUC 3-3, please identify what portion of the total expenses incurred for lodging, meals and beverages, and transportation in the current rate case were incurred on or after January 1, 2019, and provide the receipts, invoices, or other documents supporting those expenses.
- 3-5.** Referencing the Direct Testimony of Myles F. Reynolds at page 30, please provide a list of all task codes, project codes, billing codes, or other identifiers used to categorize and track rate-case expenses along with a description of the costs included in each code and the specific issue(s) in the rate case included in each code.
- 3-6.** Please explain CenterPoint Houston's policy for assigning expenses to the codes or other identifiers listed in response to OPUC 3-5. Please provide any related written policies and supporting documentation.

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- 3-7.** For each code or other identifier listed in response to OPUC 3-5, provide the total amount of rate-case expenses CenterPoint Houston has incurred under that code in connection with the current rate case, identify what portion of the total was incurred on or after January 1, 2019, and provide the receipts, invoices, or other documents supporting those amounts.
- 3-8.** Please provide the total rate-case expenses incurred on or after January 1, 2019, in connection with the current rate case that are not already included in the responses to OPUC 3-3 or 3-7 and provide all receipts, invoices, or other documents supporting those expenses.
- 3-9.** Please provide the hourly billing rates for all outside legal counsel that CenterPoint Houston has used in connection with proceedings before the Public Utility Commission of Texas from 2012 to the present and identify whether the rates were discounted rates.

May 3, 2019

Respectfully submitted,



Cassandra Quinn
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CERTIFICATE OF SERVICE

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I certify that today, May 3, 2019, I served a true copy of the foregoing Office of Public Utility Counsel's Third Request for Information to CenterPoint Energy Houston Electric, LLC on all parties of record via United States First-Class Mail, hand-delivery, facsimile, or electronic mail.



Cassandra Quinn