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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
OFFICE CLERK

**City of Houston's Eighth 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,

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Counsel for City of Houston

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd 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 Eighth Request for Information

- 8-1. **Vegetation Management:** Please refer to the table on WP RMP-1, page 2 of 3, and provide the data included in this table by month for 2018.
- 8-2. **Vegetation Management:** Please refer to the table on WP RMP-1, page 2 of 3, and provide copies of work orders for proactive tree trimming in 2018.
- 8-3. **Vegetation Management:** Please refer to the table on WP RMP-1, page 2 of 3, and provide the data included on this table separately for transmission and distribution.
- 8-4. **Vegetation Management:** Please refer to the table on WP RMP-1, page 2 of 3, and provide the miles of transmission and distribution lines trimmed each year from 2011 through 2018.
- 8-5. **Vegetation Management:** Please refer the pre-filed Direct Testimony of Randal M. Pryor ("Pryor"), page 38, lines 18 through 22, and provide tree trimming expenditure associated with capital improvements each year from 2011 through 2018.
- 8-6. **Vegetation Management:** Please refer the pre-filed Direct Testimony of Mr. Prior, page 38, lines 15 through 18, and provide a map in electronic format showing the eight vegetation management regions and identifying the name or other nomenclature used to identify the region.
- 8-7. **Vegetation Management:** Please refer the pre-filed Direct Testimony of Mr. Prior, page 38, lines 15 through 18, and provide the tree trimming costs for each of the eight regions identified in the previous question for each year, 2011 through 2016, in the format of the table on WP RMP-1, page 2 of 3.
- 8-8. **Storm Damages:** Please provide the storm damages for the eight regions identified in the second previous question for each year 2011 through 2018.
- 8-9. **Vegetation Management:** Please refer the pre-filed Direct Testimony of Mr. Prior, page 43, lines 6 through 9, and provide a map in electronic format showing the seven vegetation management regions and identifying the name or other nomenclature used to identify the region.
- 8-10. **Vegetation Management:** Please refer the pre-filed Direct Testimony of Mr. Prior, page 43, lines 6 through 9, and provide the tree trimming costs for each of the seven regions identified in the previous question for each year, 2017 and 2018, in the format of the table on WP RMP-1, page 2 of 3.
- 8-11. **Storm Damages:** Please provide the storm damages for the seven regions identified in the second previous question for each year 2017 and 2018.
- 8-12. **Vegetation Management:** Please refer the pre-filed Direct Testimony of Mr. Prior, page 42, lines 10 through 15. Has CenterPoint updated its storm hardening plan since 2011,

either publicly or privately? If so, please provide a copy of the latest storm hardening plan.

- 8-13. **Vegetation Management:** Please provide CenterPoint's vegetation management budget for 2019 and 2020 in the format of the table on WP RMP-1, page 2 of 3, separately identifying amounts for transmission and distribution.
- 8-14. **Vegetation Management:** Please provide the amounts included in the revenue requirement for the tree trimming program for both transmission and distribution, preferable in the format of the table on WP RMP-1, page 2 of 3.