



Control Number: 49583



Item Number: 14

Addendum StartPage: 0

**PUC DOCKET NO. 49583  
SOAH DOCKET NO. 473-19-5243**

2019 JUN 13 PM 12:29

<b>APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR APPROVAL OF AN ADJUSTMENT TO ITS ENERGY EFFICIENCY COST RECOVERY FACTOR</b>	§ § § § §	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
--	-----------------------	--

**THE GULF COAST COALITION OF CITIES'  
LIST OF ISSUES**

The Gulf Coast Coalition of Cities (GCCC) files this List of Issues pursuant to the Order of Referral dated June 3, 2019. GCCC respectfully shows as follows:

**I. INTRODUCTION**

GCCC presents this list of issues based solely on a preliminary analysis of CenterPoint Energy Houston Electric, LLC's (CenterPoint) application to adjust its Energy Efficiency Cost Recovery Factor (EECRF). GCCC anticipates that a more detailed review of the application may result in the identification of additional issues. Accordingly, GCCC reserves the right under the Administrative Procedure Act<sup>1</sup> to submit evidence and argument on each and every issue raised by CenterPoint's filing, regardless of whether or not the issues are specifically identified in this pleading.

**II. LIST OF ISSUES**

GCCC intends to investigate the following issues:

1. Whether CenterPoint's demand reduction goal and energy savings goal for 2020 is consistent with 16 Tex. Admin. Code (TAC) § 25.181.
2. Whether CenterPoint appropriately calculated the energy efficiency performance bonus.

---

<sup>1</sup> Administrative Procedure Act, Tex. Gov't Code Ann. § 2001.051(2).

3. Whether incurred and projected expenditures costs are reasonable and necessary and comply with the Public Utility Regulatory Act (PURA)<sup>2</sup> and 16 TAC § 25.181.
4. Whether the proposed energy efficiency programs comply with 16 TAC § 25.181.
5. Whether the costs for administration and research and development comply with the spending caps in 16 TAC § 25.181.
6. Whether CenterPoint's over-recovery calculation is consistent with 16 TAC § 25.181 and PURA § 39.905 and whether the allocation of that over-recovery to customer classes is reasonable.
7. Whether the causes of CenterPoint's over-recoveries are reasonable.
8. Whether CenterPoint's proposed billing units for 2020 are reasonable.
9. Whether the methodology to assign or allocate energy efficiency program costs to customer classes is reasonable.
10. Whether the EECRFs for each rate class are consistent with 16 TAC § 25.181(f).
11. Whether the incentive payments for each customer class in each program year comply with 16 TAC § 25.181(g).
12. Whether rate case expenses to be included in this docket are reasonable.
13. Whether the line loss factors calculated by CenterPoint are reasonable.

### **III. CONCLUSION**

GCCC requests that these issues be included in any preliminary order issued by the Public Utility Commission (Commission) in this case. Further, GCCC requests that the preliminary order include language, historically included in Commission preliminary orders, that the list of issues is preliminary and parties are not precluded from identification and presentation of other issues relevant to CenterPoint's application.

---

<sup>2</sup> Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016 (PURA).

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

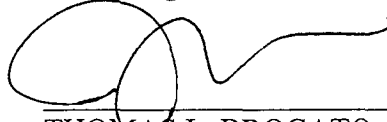
Austin, Texas 78701

(512) 322-5800

(512) 472-0532 (Fax)

[tbrocato@lglawfirm.com](mailto:tbrocato@lglawfirm.com)

[jmauldin@lglawfirm.com](mailto:jmauldin@lglawfirm.com)



---

THOMAS L. BROCATO

State Bar No. 03039030

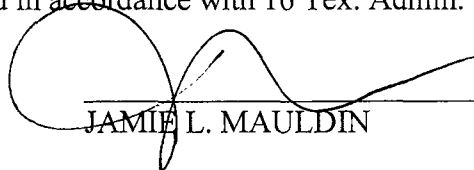
JAMIE L. MAULDIN

State Bar No. 24065694

ATTORNEYS FOR THE GULF COAST  
COALITION OF CITIES

**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2019, a true and correct copy of the foregoing document was transmitted to the parties of record in accordance with 16 Tex. Admin. Code § 22.74.



---

JAMIE L. MAULDIN