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Addendum StartPage: 0

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APPLICATION OF CENTERPOINT
ENERGY HOUSTON ELECTRIC,
LLC TO ADJUST ENERGY
EFFICIENCY COST RECOVERY
FACTOR

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PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS

**COMMISSION STAFF'S RECOMMENDATION ON SUFFICIENCY OF
APPLICATION AND NOTICE**

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest and files this recommendation. Staff recommends that the application and notice be found sufficient for further review. In support thereof, Staff would show the following:

I. BACKGROUND

On May 31, 2019, CenterPoint Energy Houston Electric, LLC (CenterPoint) filed an application to adjust its energy efficiency cost recovery factor (EECRF). On June 3, 2019, the Commission issued an Order of Referral, referring this matter to the State Office of Administrative Hearings.

On June 6, 2019, the State Office of Administrative Hearings (SOAH) Administrative Law Judge (ALJ) issued SOAH Order No. 1, requiring Staff to file its comments on the sufficiency of the application and notice by June 28, 2019. This pleading, therefore, is timely filed.

II. SUFFICIENCY OF APPLICATION

Staff has reviewed CenterPoint's application and finds the application provides the information required under 16 Tex. Admin. Code (TAC) § 25.182(d). Specifically, pursuant to 16 TAC § 25.182(d)(8), a utility in an area in which customer choice is offered must file the application to adjust its EECRF by no later than June 1st of each year. Additionally, under 16 TAC § 25.182(d)(10), an EECRF application must include testimony and schedules in Excel format with intact formulas for each retail rate class for the prior program year and the proposed program year. The application, including testimonies and schedules, must address thirteen metrics identified under 16 TAC § 25.182(d)(10). Furthermore, under 16 TAC § 25.182(d)(11),

the application must address ten factors, as applicable, to support the recovery of energy efficiency costs.

Staff recommends CenterPoint's application be deemed sufficient. The application was filed by the June 1, 2019 deadline. The application includes testimony of three subject matter experts to support its application. In addition, CenterPoint provided Excel spreadsheets with formulas separated by retail rate class for 2018 and 2020. Staff's review indicates that CenterPoint provided, addressed, or at least attempted to address, all of the metric and factors listed under 16 TAC § 25.182(d)(10)-(11). Staff reserves the right to later assert certain thresholds required by the aforementioned provisions may require CenterPoint to supplement the application. Staff may also require CenterPoint to supplement its application following discovery.

III. SUFFICIENCY OF NOTICE

Staff has reviewed the proof of notice filed by CenterPoint and finds that the notice satisfies the requirements under 16 TAC § 25.182(d)(13)-(14). On June 6, 2019, CenterPoint filed its Affidavit of Proof of Notice within fourteen days of filing the application, as required pursuant to 16 TAC § 25.182(d)(14). Further, the affidavit attests that CenterPoint completed its notice via hand delivery, courier, or USPS first-class mail on May 31, 2019, which is within seven days of the application filing date, as required under 16 TAC § 25.182(d)(13).

Additionally, in accordance with 16 TAC § 25.182(d)(13), the affidavit attests that CenterPoint provided direct notice to: (1) all parties of record in CenterPoint's most recently completed EECRF docket (PUC Docket No. 48420¹); (2) all parties of record in CenterPoint's most recently completed base rate case (PUC Docket No. 38339²); and (3) to the state agency that administers the federal weatherization program, the Texas Department of Housing and Community Affairs.

¹ *Application of CenterPoint Energy Houston Electric, LLC to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 48420, Order (Dec. 10, 2018).

² *Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates*, Docket No. 38339, Final Order (May 12, 2011).

IV. CONCLUSION

For the reasons discussed above, Staff respectfully requests the entry of an order consistent with the above request.

Dated: June 27, 2019

Respectfully Submitted,

PUBLIC UTILITY COMMISSION OF TEXAS LEGAL DIVISION

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on this the 27th of June, 2019 in accordance with 16 TAC § 22.74.



Creighton R. McMurray