

Mid-Stream MTP

In 2020, the program included twelve HVAC distributors that performed over 3,000 HVAC and heat pump replacements and installed 457 thermostats. Six pool pump distributors participated and performed 910 variable speed pool pump changeouts. CenterPoint Houston projected to acquire 3,500 kW and 9,855,000 kWh from this program, and reporting verified savings of 3,516 kW and 10,308,961 kWh.

Targeted Low-Income MTP (Agencies in Action)

In 2020, the program reached 1,710 homes in the CenterPoint Houston electric territory. Of these homes, 1,427 were multi-family units and 167 were single family homes. Heat pumps were the leading measure installed and made up most of incentives paid. Other measures installed included: air infiltration, attic insulation, central AC, refrigerator replacement, solar screen, wall insulation, and window AC. In 2020, CenterPoint Houston projected to acquire 4,377 kW and 7,528,347 kWh from this program. 2020 verified and reporting savings totaled 4,818 kW and 7,774,579 kWh.

Retail Electric Provider MTP

CoolSaver - The CoolSaver portion of the REP MTP program provided free comprehensive air conditioning tune-ups to residential and small commercial customers in the CenterPoint Houston Electric service territory. The program was marketed by 14 retail electric providers, and tune-ups were performed by eighteen specially trained A/C contractors. As a result, 1,191 residential A/C tune-ups and 461 commercial A/C tune-ups were performed in 2020.

Efficiency Connection - In 2020, CenterPoint Houston continued the online Efficiency Connection website to promote and deliver energy efficient LED bulbs at a reduced price. The program was marketed by retail electric providers and yielded more than 58,000 Energy Star certified LED bulbs.

In 2020, the Company projected to capture a combined savings total of 2,126 kW and 6,599,341 kWh for the Residential and Commercial segments of the program. CenterPoint Houston verified and is reporting residential savings of 1,089 kW and 3,388,349 kWh, and commercial savings of 509 kW and 644,644 kWh.

Smart Thermostat Program

In 2020, CenterPoint Houston continued offering incentives for Energy Star Certified Smart Thermostats. Thermostats were made available to customers via an online marketplace and at participating retail stores. Customers were able to receive a cash discount by downloading an electronic coupon code for redemption at the register. In 2020, CenterPoint Houston projected savings of 4,470,000 kWh, and the program yielded savings of 2,741,600 kWh. 2,300 thermostats were incentivized through the 2020 program.

Multi-Family MTP Market Rate & Multi-Family MTP Hard to Reach

Water & Space Heating – The Water & Space Heating portion of the Multi-Family Program promotes the installation of energy efficient non-electric water heating and space heating in housing projects. In 2020, it paid incentives on ten market-rate apartment complexes with a total of 3,372 units in the CenterPoint Houston service area. These projects resulted in verified savings of 3,647 kW and 6,374,094 kWh.

Direct Install - The Direct Install portion of the Multi-Family Program promotes the installation of energy efficient measures at no cost to the developer, property owner, and tenants. In 2020, it paid incentives on nine apartment complexes with a total of 3,245 units in the CenterPoint Houston service area, all classified as Hard-To-Reach. These direct install measures produced verified savings of 173kW and 990,290 kWh.

High Efficiency New Construction - The High Efficiency New Construction program includes both low- and mid-rise projects to expand participation and to incorporate greater flexibility in estimating and documenting above-code energy savings. In 2020, the program incentivized the construction of four market rate properties, with a total of 970 units. These projects produced verified savings of 196 kW and 950,365 kWh.

In 2020, the Company projected to capture Multi-Family MTP savings of 1,199 kW and 1,914,570 kWh for market rate projects. Verified savings for market rate projects totaled 3,843 kW and 7,324,460 kWh.

X. Research and Development Results

Energy Efficiency Database

CenterPoint Houston's updated energy efficiency tracking system went live in 2020, and the Company continued to work with its vendor to configure this tool for each program in its energy efficiency portfolio.

Commercial Smart Thermostat

In 2020, CenterPoint Houston began an R&D initiative to target ENERGY STAR® Smart Thermostat installations in commercial businesses such as convenience stores, strip malls, converted residences, and retail stores. The objective of this initiative is to evaluate the energy savings potential of Smart Thermostats in commercial buildings and pursue a deemed savings methodology that can be included in the Technical Reference Manual. In 2020, participation in this project was very limited (partially due to the onset of the COVID-19 pandemic) but a total of seventeen thermostats were installed at six small commercial sites. The Company plans to continue this R&D initiative in 2021 and capture enough participants to assess the viability of commercial Smart Thermostat savings.

XI. Administrative Funds Expended

In 2020, CenterPoint Houston incurred administrative costs on categories such as continued support of its energy efficiency tracking database, employees' salaries, training, and travel, purchase of supplies, and other activities necessary and appropriate for successful program implementation. These costs meet the definition of administration costs as defined by the energy efficiency rule under 16 TAC § 25.181(g)(1) that states these type of costs "include all reasonable and necessary costs incurred by the utility in carrying out its responsibilities..." The spending in these cost categories is monitored throughout the year and mid-course corrections are made as necessary to ensure the success of our portfolio.

XII. Current Energy Efficiency Cost Recovery Factor (EECRF)

CenterPoint Houston's 2021 EECRF was approved by the Public Utility Commission of Texas in Docket No. 50908 on October 16, 2020 in the amount of \$48,796,013.

"The Commission approves CenterPoint Houston's 2021 EECRF in the amount of \$48,796,013, which is comprised of the following:

- a. CenterPoint Houston's forecasted energy-efficiency program costs of \$38,252,585 in program year 2021;
- b. EM&V expenses of \$541,294 for the evaluation of program year 2020;
- c. an adjustment of \$715,400 for the total over-recovery, including interest, of program year 2019 energy-efficiency costs;
- d. a performance bonus of \$11,435,654;
- e. rate-case expenses in the amounts of \$24,846 incurred by CenterPoint Houston and \$7,033 incurred by Cities in Docket No. 49583; and
- f. an adjustment to lower the EECRF revenue requirement by \$750,000."

XIII. Revenue Collected Through EECRF

In 2020, CenterPoint Houston collected a total of \$34,351,554 in energy efficiency program costs through the EECRF Rider.

XIV. Over or Under-Recovery of Energy Efficiency Program Costs

In Docket No. 49583, the PUCT approved CenterPoint Houston's 2020 EECRF in the amount of \$35,401.638 consisting of:

\$37,820,991	2020 Forecasted Program Costs
\$6,738,428	2018 Bonus
-\$6,101,507	2018 Over-Recovery
\$550,514	2020 Forecasted EM&V Expenses
-\$3,700,000	Adjustment/Lower EECRF Revenue Requirement
<u>\$93,211</u>	2018 EECRF Proceeding Expenses
\$35,401,638	Total EECRF Costs

In 2020, total energy efficiency related costs were \$37,281,888 which include program expenditures of \$36,001,242, EM&V costs of \$550,514, a prior period over-recovery of \$6,101,507, a program year 2018 performance bonus of \$6,738,428, and 2018 EECRF Proceeding expenses of \$93,211. Total revenues collected through the EECRF Rider were \$34,351,554, resulting in overall under-recovery of \$2,930,333.

XV. Under Served Counties

There were no counties within the CenterPoint Houston service territory that were under-served by the Company's energy efficiency programs in 2020. CenterPoint Houston's energy efficiency programs were accessible to all counties within the Company's electric service area. Appendix C lists the counties served by CenterPoint Houston and the amount of savings each county achieved in 2020 through the Company's energy efficiency programs.

Appendix A: Acronyms

ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
CCET	Center for the Commercialization of Electric Technologies
CLM	Commercial Load Management
DR	Demand Response
DSM	Demand Side Management
EEA	Energy Emergency Alert
EECRF	Energy Efficiency Cost Recovery Factor
EEP	Energy Efficiency Plan, which was filed as a separate document prior to April 2008
EEPR	Energy Efficiency Plan and Report
EER	Energy Efficiency Report, which was filed as a separate document prior to April 2008
ERCOT	Electric Reliability Council of Texas
HERS	Home Energy Ratings
HTR	Hard-To-Reach
IECC	International Energy Conservation Code
MTP	Market Transformation Program
PUCT	Public Utility Commission of Texas
RCx	Retro-Commissioning
REP	Retail Electrical Provider
RES	Residential
RESNET	Residential Energy Services Network
SCORE	Schools Conserving Resources
SOP	Standard Offer Program
SHEM	Smart Home Energy Management System

Appendix B: Glossary

Please refer to the glossary defined in 16 TAC § 25.181.

Appendix C: Reported Demand and Energy Reduction by County

Programs		C O U N T I E S											
		Austin	Brazoria	Chambers	Ft Bend	Galveston	Harris	Liberty	Matagorda	Montgomery	Waller	Wharton	Total
Commercial Standard Offer Program	kW	12	244	419	929	95	9,214	0	0	100	93	13	11,119
	kWh	39,976	1,510,588	2,336,079	4,348,500	397,600	42,785,827	0	0	764,014	584,897	88,522	52,856,003
SCORE	kW	1	0	0	773	15	4,408	0	0	0	0	27	5,225
	kWh	5,499	0	0	2,879,511	55,117	17,074,673	0	0	0	0	349,240	20,364,040
Healthcare	kW	0	0	0	37	0	766	0	0	23	0	0	826
	kWh	0	0	0	273,405	0	5,616,219	0	0	81,761	0	0	5,971,385
Data Centers Program	kW	0	0	0	0	0	398	0	0	0	0	0	398
	kWh	0	0	0	0	0	3,654,332	0	0	0	0	0	3,654,332
Commercial Load Management Standard Offer Program	kW	59	3,554	0	7,592	206	85,919	1,086	0	200	878	0	99,493
	kWh	352	21,324	0	45,549	1,234	515,511	6,514	0	1,203	5,271	0	596,959
Retro-Commissioning MTP	kW	0	90	13	0	13	1,013	0	0	0	0	0	1,129
	kWh	0	122,549	35,143	0	66,320	6,236,219	0	0	0	0	0	6,460,231
REP MTP (Commercial CoolSaver)	kW	8	27	0	90	11	311	0	0	58	0	4	509
	kWh	6,704	24,175	0	85,060	9,557	464,148	0	0	51,304	0	3,696	644,644
Advanced Lighting Commercial MTP	kW	0	12	0	38	9	239	0	0	9	0	0	307
	kWh	0	64,292	0	211,705	52,669	1,330,856	0	0	50,956	0	0	1,710,478
CenterPoint Energy High Efficiency Home MTP	kW	0	561	114	3,870	87	5,548	0	0	632	206	1	11,020
	kWh	0	1,672,949	385,881	10,423,192	244,476	14,782,130	0	0	1,798,907	558,114	4,525	29,870,174
Residential & Small Commercial Standard Offer Program	kW	19	16	0	32	15	386	0	0	9	3	0	480
	kWh	38,464	52,956	0	136,891	41,449	973,700	0	0	35,654	7,143	563	1,286,822
Smart Thermostat Program	kW	0	0	0	0	0	0	0	0	0	0	0	0
	kWh	4,768	165,688	14,304	487,528	76,288	1,878,592	1,192	1,192	101,320	8,344	2,384	2,741,600
Advanced Lighting Residential MTP	kW	0	219	0	721	179	4,534	0	0	174	0	0	5,828
	kWh	0	1,221,554	0	4,022,389	1,000,719	25,286,258	0	0	968,166	0	0	32,499,087
Midstream MTP (HVAC and Pool Pump Distributor)	kW	0	246	39	691	55	2,339	0	0	139	7	0	3,516
	kWh	0	659,698	99,655	2,004,207	137,143	6,916,363	0	0	468,826	23,069	0	10,308,961
REP MTP (Residential CoolSaver and Efficiency Connection)	kW	2	51	6	228	11	743	0	0	41	4	1	1,089
	kWh	7,353	165,557	18,038	687,038	43,068	2,316,997	2,500	0	130,628	12,278	4,892	3,388,349
Residential Load Management SOP	kW	19	1,219	141	4,183	212	13,811	7	0	858	96	6	20,552
	kWh	116	7,315	844	25,101	1,270	82,866	42	0	5,149	575	33	123,312
Multi-Family MTP Market Rate	kW	0	21	0	0	0	3,626	0	0	196	0	0	3,843
	kWh	0	81,695	0	0	0	6,566,147	0	0	676,618	0	0	7,324,460
Smart Home Energy Management System (Pilot)	kW	0	0	0	0	0	0	0	0	0	0	0	0
	kWh	0	0	0	0	0	0	0	0	0	0	0	0
Hard-to-Reach Standard Offer Program	kW	0	2	0	0	0	862	0	0	0	0	0	864
	kWh	0	2,138	0	0	0	1,020,050	0	0	0	0	0	1,022,189
Multi-Family MTP Hard-to-Reach	kW	0	0	0	0	0	171	0	0	0	0	0	171
	kWh	0	0	0	0	0	990,290	0	0	0	0	0	990,290
Targeted Low Income MTP (Agencies in Action)	kW	0	0	0	32	0	4,786	0	0	0	0	0	4,818
	kWh	0	0	0	48,254	0	7,726,325	0	0	0	0	0	7,774,579
Programs - TOTAL													
Total kW Savings		120	6,263	732	19,217	908	139,073	1,093	0	2,440	1,288	52	171,187
Total kWh Savings		103,233	5,772,480	2,889,945	25,678,329	2,126,912	146,217,503	10,248	1,192	5,134,506	1,199,691	453,856	189,587,894

STATE OF TEXAS §
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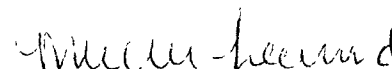
AFFIDAVIT OF MICHELLE MARIE TOWNSEND

BEFORE ME, the undersigned authority, on this day personally appeared Michelle M Townsend, who, having been placed under oath by me, did depose as follows:

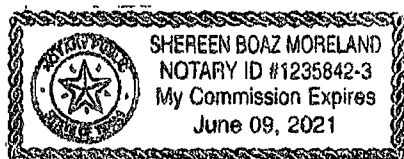
1. "My name is Michelle M. Townsend. I am over the age of eighteen and fully competent to make this affidavit. I am the Manager of Business Services Planning and Performance Management for CenterPoint Energy Service Company, LLC ("Service Company"). My business address is 1111 Louisiana Street, Houston, Texas 77002.
2. I am responsible for ensuring that the costs incurred by Service Company are properly billed to each of the CenterPoint Energy, Inc. ("CNP") business units, including CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston"). I am also responsible for providing Service Company information to the Regulatory Reporting Department to support regulatory filing requirements. I am familiar with the affiliate billings included in the Company's application in this proceeding, including Service Company's practices and billing methodologies and how other affiliate costs are charged to CenterPoint Houston.
3. Service Company provides a number of services to the various operating units within CNP, such as CenterPoint Houston or the Gas Operations regions within CenterPoint Energy Resources Corp. Service Company costs are billed to affiliates, including CenterPoint Houston, through either direct billings or by allocation. Direct billings represent costs for services incurred directly on behalf of a business unit. These costs are billed directly to the business unit automatically through the SAP accounting system.
4. During the 2020 energy efficiency program year, Service Company billed directly to CenterPoint Houston's energy efficiency department a total of \$68,434 in affiliate expenses related to information technology necessary to operate CenterPoint Houston's energy efficiency program and meet the requirements of PURA § 39.905 and 16 Tex. Admin. Code ("TAC") § 25.182. No adjustments have been made to these costs.
5. The Company's application does not include any affiliate costs that are deemed unrecoverable or prohibited by PURA or the Commission's rules, including contributions to political organizations or causes or legislative advocacy.
6. CenterPoint Houston's energy efficiency department would require the same types of services provided by its Service Company if it were a stand-alone business entity. Service Company services provided to CenterPoint Houston's energy efficiency department are necessary for CenterPoint Houston's operations regardless of whether the service is performed centrally, as is done at CNP, or on a decentralized basis and residing at the business unit level. These services are not duplicative of any of the services provided by CenterPoint Houston.

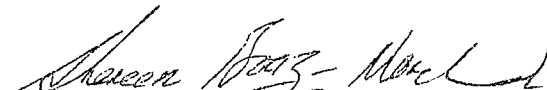
7. Affiliate costs directly billed to CenterPoint Houston are priced exactly the same as those provided to other affiliates. Each business unit is charged costs based on the same terms. Such equal treatment is necessary to ensure that all affiliates bear their appropriate costs. For services billed on the basis of time spent, each affiliate is charged the same rate per billable hour for the same service. To ensure all costs are billed each month, any residual unassigned amounts after billing service or billable hour units are billed to the affiliates based on planned activities. In addition, all transactions between Service Company and its affiliated business units are governed by the Service Level Agreements that are executed each year.
8. The Company employed the same methods that it used to prepare its affiliate billing information in the Company's last EECRF case, Docket No. 50908, *Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to Its Energy Efficiency Cost Recovery Factor*. The nature of the directly billed costs and the methodologies by which those costs are determined have not changed since Docket No. 50908.
9. For all of these reasons, CenterPoint Houston has complied with the statutory and regulatory standards used by the Commission to determine the reasonableness and necessity of expenses associated with affiliate transactions and their inclusion in rates. The affiliate costs charged to CenterPoint Houston are of the type enumerated in the definition of TAC § 25.272(c)(4) of 'corporate support services.' These costs are fully direct billed and otherwise comport with the applicable requirements of TAC § 25.272 and PURA § 36.058. The affiliate costs charged to CenterPoint Houston are reasonable and necessary and have been priced no higher than Service Company charges other affiliates for the same service. There is no preferential treatment among, or cross-subsidization of, affiliates.

Further affiant sayeth not.


Michelle M. Townsend

SUBSCRIBED AND SWORN TO BEFORE ME on this 27 day of May 2020.




Notary Public in and for the State of Texas

STATE OF TEXAS §
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AFFIDAVIT OF MARY A. KIRK

BEFORE ME, the undersigned authority, on this day personally appeared Mary A. Kirk,
who having been placed under oath by me did depose as follows:

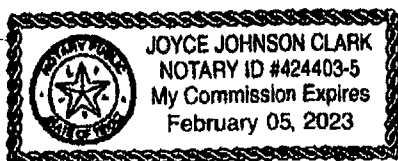
1. "My name is Mary A. Kirk. I am of sound mind and capable of making this affidavit. The facts stated herein are true and correct based on my personal knowledge.
2. I am Director Accounting at CenterPoint Energy Service Company, LLC ("Service Company"), which is a wholly-owned subsidiary of CenterPoint Energy Inc. ("CNP") that provides centralized support services to CNP's operation units, including CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston" or the "Company"). I assumed this position effective July 16, 2012.
3. As Director Accounting for CNP, I am responsible for the accounting books and records of CNP's regulated gas and electric businesses, including financial accounting for these business units, regulatory reporting, and gas cost accounting. More specifically, I am responsible for the books and records that support the schedules used to develop CenterPoint Houston's Application for Approval of an Adjustment to its Energy Efficiency Cost Recovery Factor ("Application") in this proceeding. I am also responsible for ensuring that CNP has adequate staff, processes and systems in place to meet the Company's financial and regulatory accounting and reporting requirements as required by the Public Utility Commission of Texas.
4. The schedules supporting the Company's Application were prepared from the books and records of the Company and are accurate summaries of the business records upon which they are based.
5. The Company's books, accounts, and records are kept in compliance with the FERC Uniform System of Accounts, as prescribed by Section 14.151 of the Public Utility Regulatory Act, and meet all applicable requirements of 16 TAC § 25.72."


Further affiant sayeth not.



Mary A. Kirk

SUBSCRIBED AND SWORN TO BEFORE ME on this 26 day of May, 2021.





Notary Public in and for the State of Texas

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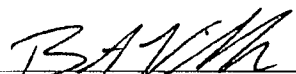
AFFIDAVIT OF BERTHA VILLATORO

BEFORE ME, the undersigned authority, on this day personally appeared Bertha Villatoro who having been placed under oath by me did depose as follows:

1. "My name is Bertha Villatoro. I am of sound mind and capable of making this affidavit. The facts stated herein are true and correct based upon my personal knowledge.
2. I am the Director, Compensation, at CenterPoint Energy Service Company, LLC ("Service Company"), which is a wholly-owned subsidiary of CenterPoint Energy Inc. ("CNP") that provides centralized support services to CNP's operating units, including CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston" or the "Company").
3. CNP's philosophy is to maintain the market competitiveness of its programs as measured from a "total compensation" perspective. This means that we will measure all of the components that make up total compensation and benchmark against competitor companies to ensure that our compensation program is sufficient to recruit, retain and motivate the workforce needed to serve our customers.
4. The components of total compensation at CNP are base pay, short-term incentives, long-term incentives and benefits.
5. By providing total compensation opportunities comparable to those an employee could find in other companies, CNP is able to ensure its customers that experienced and capable employees will be on the job to provide the reliable and reasonably priced energy services they rely on.
6. In order to monitor and determine market-based compensation and benefits for its employees, CNP uses a variety of survey data. CNP relies on this survey data to establish pay levels that approximate the median pay levels our peers and competitors provide for jobs that are similar to CNP's jobs. We collect objective, confidential pay data reflective of a broad representation of the market.
7. CNP's benefits philosophy is to provide a comprehensive set of benefits to meet employees' welfare and financial security needs in an affordable and efficient manner with the overall value targeted at the midpoint of the marketplace, which is similar to its compensation philosophy.
8. CNP leverages its size and the expertise of its Human Resource staff to get the best value for its benefits expenditures. For instance, for all insured plans, we partner with brokers to ensure that administrative services are competitively priced and periodically we solicit third-party bids on all insured plans to ensure that the premiums CNP pays are reasonable.

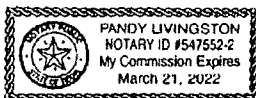
9. The compensation and benefits costs included in the Company's application are reasonable and necessary expenses to operate the Company's energy efficiency programs necessary to comply with the requirements of 16 TAC § 25.181. They are also necessary to provide safe, reliable and cost-effective service to the Company's customers.
10. The Company's energy efficiency program related compensation and benefit levels have been approved in previous dockets before this Commission, most recently in PUC Docket No. 50908, and they have not changed substantively since they were last approved.

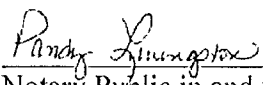
Further affiant sayeth not.



Bertha Villatoro

SUBSCRIBED AND SWORN TO BEFORE ME on this 26th day of May, 2021.





Notary Public in and for the State of Texas

AFFIDAVIT OF SE H. CHANG

STATE OF TEXAS §
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COUNTY OF HARRIS §

Before me, the undersigned authority, on this day personally appeared Se H. Chang, who, having been placed under oath by me, did depose as follows:

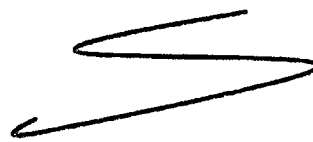
1. My name is Se H. Chang. I am over the age of 18 and fully competent to make this affidavit.
2. I am employed by CenterPoint Energy Service Company, LLC as Senior Counsel.
3. I have a BS in Finance from the University of Florida and a JD from The University of Texas School of Law. I am licensed to practice law in Texas. I am have appeared in state and federal courts in Texas.
4. After graduation from law school, I was employed as an associate with Brown McCarroll, L.L.P. n/k/a Husch Blackwell LLP, during which time I represented debtors, creditors, and trustees in bankruptcy and bankruptcy-related litigation matters.
5. In 2014, I began working at the Public Utility Commission of Texas (“PUCT”) as a staff attorney. As a staff attorney, I was involved in various matters involving electric utilities, water utilities, and sewer utilities. As it relates to energy efficiency filings, I was the staff attorney for the following matters:
 - *Application of Oncor Electric Delivery Company, LLC for 2015 Energy Efficiency Cost Recovery Factor*, Docket No. 42559 (Oct. 3, 2014);
 - *Application of CenterPoint Energy Houston Electric, LLC to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 44783 (Oct. 14, 2015); and
 - *Application of CenterPoint Energy Houston Electric, LLC to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 46014 (Nov. 2, 2016).
6. I have been employed by CenterPoint Energy Service Company, LLC as an attorney in its legal department since 2017. CenterPoint Energy Service Company, LLC, provides legal services to all business units of CenterPoint Energy, Inc., including its electric utility business, CenterPoint Energy Houston Electric, LLC (“CEHE”).

7. I have represented CEHE in various matters, including matters before the PUCT. Throughout my career, I have hired and managed outside counsel and testifying and consulting experts, in numerous matters. I have been responsible for reviewing and approving invoices from outside law firms and consultants. I am familiar with the rates of a broad range of lawyers, both those at small and large firms and solo practitioners, including the rates charged by such attorneys for work on PUCT matters
8. As it relates to energy efficiency filings, I represented CEHE for the following matters:
 - *Application of CenterPoint Energy Houston Electric, LLC to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 48420 (Dec. 10, 2018).
 - *Application of CenterPoint Energy Houston Electric, LLC to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 49583 (Oct. 14, 2019); and
 - *Application of CenterPoint Energy Houston Electric, LLC to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 50908 (Oct. 16, 2020).
9. In the 2020 *Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to Its Energy Efficiency Cost Recovery Factor* ("EECRF"), Docket No. 50908, CEHE was represented by outside counsel from the law firm Coffin Renner LLP ("CR"). The CR attorneys who worked on this matter have extensive experience representing utilities before the PUCT.
10. Mark Santos was the primary lawyer at PCR representing CEHE in its 2020 EECRF filing in Docket No. 50908. Mr. Santos has been one of CEHE's outside counsels in various PUCT proceedings for many years. Moreover, CEHE is not the only utility client he represents before the PUCT. Mr. Santos is therefore knowledgeable of and skilled in PUCT practices and procedures.
11. Mr. Santos has also been the lead outside lawyer for CEHE in each of its previous annual EECRF filings since 2010. Of CEHE's outside counsel, he is the most knowledgeable concerning energy efficiency projects and EECRF issues.
12. The invoices to CEHE from CR for work in Docket No. 50908 total \$44,698.07 and are attached. I have personally reviewed the invoices on behalf of CEHE.

13. I reviewed the above-referenced invoices taking into consideration the eight factors listed in Rule 1.04(b) of the Texas Disciplinary Rules of Professional Conduct:
 - a. The time and labor required, novelty and difficulty of the questions involved, and the skill requisite to perform the legal services properly;
 - b. The likelihood that acceptance of employment will preclude other employment by the attorney;
 - c. The customary fee charged in the locality for similar legal services;
 - d. The amount of time involved and result achieved;
 - e. Time limitation imposed by the client or circumstances;
 - f. The nature and length of the professional relationship with the client;
 - g. The experience, reputation, and ability of the lawyers involved; and
 - h. Whether the fee is fixed or contingent or uncertain of collection before the legal services are rendered.
14. I considered the factors delineated by the Third Court of Appeals in *City of El Paso v. Public Utility Comm'n of Texas*, 916 S.W.2d 515 (Tex. App.—Austin 1995, writ dismissed by agreement):
 - a. Time and labor required;
 - b. Nature and complexity of the case;
 - c. The amount of money or value of property or interest at stake;
 - d. Extent of responsibilities the attorney assumes;
 - e. Whether the attorney loses other employment because of the undertaking; and
 - f. Benefits to the client from the services.
15. I also considered the relevant criteria relating to the reasonableness of rate case expenses in 16 Tex. Admin. Code ("TAC") § 25.245(b):
 - a. The nature, extent, and difficulty of the work done by the attorney or other professional in the rate case;
 - b. The time and labor required and expended by the attorney or other professional;
 - c. The fees or other consideration paid to the attorney or other professional for the services rendered;
 - d. The expenses incurred for lodging, meals and beverages, transportation, or other services or materials;
 - e. The nature and scope of the rate case, including:
 - i. the size of the utility and number and type of consumers served;
 - ii. the amount of money or value of property or interest at stake;
 - iii. the novelty or complexity of the issues addressed;

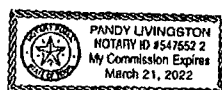
- iv. the amount and complexity of discovery;
 - v. the occurrence and length of a hearing; and
 - f. The specific issue or issues in the rate case and the amount of rate-case expenses reasonably associated with each issue.
16. As noted above, I am familiar with the rates for utility regulatory work in Texas and elsewhere. Generally speaking, the rates charged by any individual lawyer typically vary based on the level of experience possessed by the lawyer performing the work, the size and reputation of the law firm in which the lawyer works, and the technical nature of the work performed. While the hourly rate charged by outside counsel for work is an important factor, it is only one of many important factors to be considered. Equally important are factors such as the number of hours worked, the complexity of the issues involved, and the experience of the lawyers involved. An experienced lawyer in a complex case with an hourly rate at the high end of the range may be able to more efficiently do the work than a less experienced lawyer with an hourly rate at the low- or mid-point of the hourly rate range, such that the total amount paid for the work is reasonable, even if the hourly rates are at the high end of the range. Similarly, a lawyer working at an hourly rate at the low- or mid-point of the range may have spent so many hours on a matter that the total amount paid for the work is not reasonable, even though the hourly rate is low.
17. I am familiar with many regulatory lawyers in the Texas bar, and the lawyers at CR enjoy excellent reputations for providing a high level of quality work on both complex and routine matters. In my experience, the hourly rates of CR for work done in Docket No. 50908 are consistent with other Texas lawyers performing similar work in Texas. Rates for lawyers that practice before the PUCT, in my experience, have recently ranged between \$300 to more than \$700. The rates for CR's work in Docket No. 50908 are in this range.
18. The rates charged by CR for Docket No. 50908 were the same hourly rates the law firm charged CEHE and its affiliates for other matters I am familiar with, including matters for which rate case expense reimbursement was not available.
19. In my opinion, the hourly rates charged by CR in Docket No. 50908 are reasonable and in the range of rates charged in Texas by firms with the same level of depth and expertise. Similarly, in my opinion, the other expenses charged by CR (i.e. copying, delivery service, etc.) are also reasonable and in line with costs charged by other law firms providing these types of legal services.

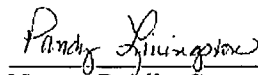
20. With regard to 16 TAC § 25.245(b) and (c) that relate to the determination of the reasonableness and necessity of the rate case expenses CEHE seeks to recover, the following information is relevant:
- a. The rate case expense documentation CEHE is filing shows that the fees paid to, tasks performed by, and time spent on a task by an attorney or other professional in these cases is not extreme or excessive;
 - b. The rate case expense documentation CEHE is filing shows that the expenses incurred for lodging, meals and beverages, transportation, or other services or materials were not extreme or excessive;
 - c. CEHE's applications, testimony, and related materials in Docket No. 50908 as well as the rate case documentation CEHE is filing show there was no unnecessary duplication of services or testimony;
 - d. CEHE's application, testimony, and related materials show that CEHE's EECRF application has a reasonable basis in law, policy and fact, and is warranted based on PUCT precedent in prior EECRF cases;
 - e. CEHE's rate case expenses in Docket No. 50908 as a whole are not disproportionate, excessive, or unwarranted in relation to the nature and scope of the rate case addressed by the evidence pursuant to 16 TAC § 25.245(b)(5) for the reasons noted above; and
 - f. Given the rate case expense documentation CEHE is filing, CEHE did not fail to comply with the requirements for providing sufficient information pursuant to 16 TAC § 25.245(b).
21. Based on my experience and after considering the factors listed in this affidavit, the \$44,698.07 in rate case expenses incurred by CEHE in Docket No. 50908 were reasonable and necessary for the work performed.



Se H. Chang

SUBSCRIBED AND SWORN TO BEFORE ME by the said Se H. Chang on the 24th day of May, 2021.




Notary Public, State of Texas

Matter Invoice List

Invoice Number	State	Invoice Date	Organization	Received Date	Invoiced	Discount	Adjustments	Tax	Net Amount
7718	Approved	06/25/2020	Coffin Renner LLP - 224267	06/29/2020 11:55 AM	12,143.50 USD	0.00 USD	0.00 USD	0.00 USD	12,143.50 USD
7742	Approved	07/21/2020	Coffin Renner LLP - 224267	07/21/2020 07:00 PM	12,612.27 USD	0.00 USD	0.00 USD	0.00 USD	12,612.27 USD
7770	Approved	08/24/2020	Coffin Renner LLP - 224267	08/24/2020 07:45 PM	15,480.30 USD	0.00 USD	0.00 USD	0.00 USD	15,480.30 USD
7795	Approved	09/23/2020	Coffin Renner LLP - 224267	09/23/2020 05:35 PM	1,164.00 USD	0.00 USD	0.00 USD	0.00 USD	1,164.00 USD
7819	Approved	10/20/2020	Coffin Renner LLP - 224267	10/20/2020 06:25 PM	2,522.00 USD	0.00 USD	0.00 USD	0.00 USD	2,522.00 USD
7839	Approved	11/06/2020	Coffin Renner LLP - 224267	11/06/2020 03:40 PM	776.00 USD	0.00 USD	0.00 USD	0.00 USD	776.00 USD

COFFIN RENNER LLP

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Austin, TX 78711
512-879-0900
Federal I.D. No. 27-0934461

Monica Karuturi
CenterPoint Energy Houston Electric LLC
P.O. Box 1332
Houston, TX 77251-1332

Statement Date: June 25, 2020
Statement No. 7718
Client No. 201.142
Page: 1

RE: 2020 EEPR & EECRF Filing

Fees

					Rate	Hours	
05/15/2020	MAS	L210	A104	Review/Analyze application and notice issues	485.00	1.20	582.00
05/18/2020	MAS	L210	A104	Review/Analyze draft application, EEPR, notice, and testimony	485.00	5.10	2,473.50
05/19/2020	MAS	L210	A104	Review/Analyze draft filing package	485.00	3.10	1,503.50
	MAS	L210	A103	Draft/Revise application, notice, and EEPR	485.00	1.30	630.50
05/20/2020	MAS	L410	A104	Review/Analyze J. Durland testimony, affidavits, and schedules	485.00	3.30	1,600.50
05/21/2020	MAS	L410	A104	Review/Analyze S. Richardson testimony and issues	485.00	2.40	1,164.00
	MAS	L210	A106	Communicate with client D. Hardcastle and S. Chang, et al. re filing package	485.00	1.10	533.50
05/22/2020	MAS	L410	A104	Review/Analyze J. Durland draft testimony issues	485.00	0.70	339.50
05/27/2020	MAS	L210	A104	Review/Analyze final application package	485.00	2.40	1,164.00
	ERA	L210	A103	Draft/Revise and cite check application and attachments	200.00	1.00	200.00
	ERA	L410	A104	Review/Analyze J. Durland testimony	200.00	1.10	220.00
05/28/2020	MAS	L210	A104	Review/Analyze final application and filing package	485.00	1.20	582.00
	ERA	L210	A104	Review/Analyze exhibits to application	200.00	1.00	200.00
05/29/2020	MAS	L210	A104	Review/Analyze final draft of filing package	485.00	1.30	630.50
	ERA	L410	A104	Review/Analyze and cite check S. Richardson testimony and exhibits	200.00	1.60	320.00
For Current Services Rendered						27.80	12,143.50

Recapitulation

Timekeeper	Hours	Rate	Total
Mark Santos	23.10	\$485.00	\$11,203.50
Emma Azarani	4.70	200.00	940.00

CenterPoint Energy Houston Electric LL
Account No. 201.142
RE: 2020 EEPR & EECRF Filing

Statement Date: 06/25/2020
Statement No. 7718
Page No. 2

Total Current Work 12,143.50

Balance Due \$12,143.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L210	Pleadings	8499.50	0.00
L200	Pre-Trial Pleadings and Motions	8,499.50	0.00
L410	Fact Witnesses	3644.00	0.00
L400	Trial Preparation and Trial	3,644.00	0.00

COFFIN RENNER LLP

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Federal I.D. No. 27-0934461

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Houston, TX 77251-1332

Statement Date: July 21, 2020
Statement No. 7742
Client No. 201.142
Page: 1

RE: 2020 EEPR & EECRF Filing

Fees

					Rate	Hours	
06/01/2020	MAS L210	A104	Review/Analyze final filing package		485.00	1.20	582.00
	ERA L210	A108	Communicate w/other external PUC Staff re EECRF filing		200.00	0.40	80.00
06/03/2020	MAS L210	A104	Review/Analyze filing issues re rule suspension		485.00	1.70	824.50
06/04/2020	MAS L210	A104	Review/Analyze filing and service issues re application		485.00	1.30	630.50
	CGA L250	A103	Draft/Revise procedural schedule		280.00	1.80	504.00
06/05/2020	MAS L250	A104	Review/Analyze procedural schedule issues		485.00	0.30	145.50
	CGA L210	A103	Draft/Revise proposed list of issues		280.00	2.10	588.00
06/08/2020	MAS L210	A104	Review/Analyze affidavit and notice issues		485.00	0.80	388.00
	CGA L250	A103	Draft/Revise procedural schedule		280.00	0.50	140.00
06/10/2020	CGA L210	A103	Draft/Revise proposed list of issues		280.00	0.50	140.00
06/11/2020	MLE L250	A104	Review/Analyze SOAH Order No. 1		175.00	0.30	52.50
	MAS L250	A104	Review/Analyze procedural issues		485.00	0.60	291.00
	MAS L310	A104	Review/Analyze potential discovery		485.00	0.60	291.00
06/12/2020	MAS L120	A104	Review/Analyze parties' list of issues		485.00	0.60	291.00
	CGA L250	A103	Draft/Revise procedural schedule based on potential conflicts		280.00	0.50	140.00
06/15/2020	MAS L250	A104	Review/Analyze procedural schedule issues		485.00	1.30	630.50
	MAS L250	A108	Communicate w/other external parties re procedural schedule issues		485.00	0.20	97.00
06/16/2020	MAS L250	A108	Communicate w/other external parties re procedural schedule		485.00	0.30	145.50
06/18/2020	MAS L310	A106	Communicate with client S. Richardson, et al. re draft responses to Staff and GCCC discovery		485.00	0.70	339.50
	MAS L310	A104	Review/Analyze Staff and TIEC discovery		485.00	0.80	388.00

CenterPoint Energy Houston Electric LL
Account No. 201.142
RE: 2020 EEPR & EECRF Filing

Statement Date: 07/21/2020
Statement No. 7742
Page No. 2

					Rate	Hours	
	ERA	L310	A106	Communicate with client J. Johnson-Clark re Staff 2nd RFI	200.00	0.30	60.00
	MLE	L310	A104	Review/Analyze Staff's 2nd RFI	175.00	0.20	35.00
06/19/2020	MAS	L310	A104	Review/Analyze responses for GCCC and Staff discovery	485.00	0.60	291.00
	ERA	L250	A108	Communicate w/other external SOAH re joint procedural schedule	200.00	0.20	40.00
06/22/2020	MAS	L250	A104	Review/Analyze preliminary order draft	485.00	0.40	194.00
	MAS	L310	A108	Communicate w/other external COH re discovery	485.00	0.30	145.50
06/24/2020	MAS	L310	A104	Review/Analyze Staff discovery responses	485.00	0.40	194.00
06/25/2020	MAS	L160	A106	Communicate with S. Chang, et. al re settlement conference	485.00	0.50	242.50
	ERA	L310	A103	Draft/Revise statement of confidentiality for response to Staff 1st RFI	200.00	0.50	100.00
	MLE	L310	A104	Review/Analyze SOAH Order No. 2	175.00	0.40	70.00
06/26/2020	MAS	L210	A104	Review/Analyze Staff comments on sufficiency of application and notice	485.00	0.80	388.00
	MAS	L210	A108	Communicate w/other external Staff re comments on application and notice	485.00	0.40	194.00
06/29/2020	MAS	L310	A106	Communicate with client A. Lewis, et al. re COH discovery	485.00	0.80	388.00
	MAS	L310	A104	Review/Analyze issues re COH discovery	485.00	1.10	533.50
	CGA	L310	A104	Review/Analyze confidential discovery response	280.00	0.40	112.00
	CGA	L310	A103	Draft/Revise statement of confidentiality re confidential discovery response	280.00	0.40	112.00
06/30/2020	MAS	L160	A101	Plan and prepare for settlement conference	485.00	1.20	582.00
	MAS	L160	A109	Appear for/attend settlement conference	485.00	0.70	339.50
	MAS	L160	A106	Communicate with client A. Lewis, et al. re settlement conference	485.00	1.00	485.00
	MAS	L160	A104	Review/Analyze GCCC settlement issues and position	485.00	1.10	533.50
	MAS	L210	A104	Review/Analyze issues re errata	485.00	1.00	485.00
	ERA	L210	A104	Review/Analyze documents for first errata	200.00	0.40	80.00
				For Current Services Rendered		29.60	12,293.00

Recapitulation

Timekeeper	Hours	Rate	Total
Mark Santos	20.70	\$485.00	\$10,039.50
Emma Azarani	1.80	200.00	360.00
Glenn Adkins	6.20	280.00	1,736.00
Melissa Ethridge	0.90	175.00	157.50

CenterPoint Energy Houston Electric LL
Account No. 201.142
RE: 2020 EEPR & EECRF Filing

Statement Date: 07/21/2020
Statement No. 7742
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Expenses

06/08/2020	L100	E102	Outside printing - Rainmaker - EECRF application	298.77
06/30/2020	L100	E101	Photocopies (205 copies at 10 cents per copy)	20.50
			Total Expenses	319.27
			Total Current Work	12,612.27
			Balance Due	<u>\$12,612.27</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L100		0.00	319.27
L120	Analysis/Strategy	291.00	0.00
L160	Settlement/Non-Binding ADR	2182.50	0.00
L100		<u>2,473.50</u>	<u>319.27</u>
L210	Pleadings	4380.00	0.00
L250	Other Written Motions and Submissions	2380.00	0.00
L200	Pre-Trial Pleadings and Motions	<u>6,760.00</u>	<u>0.00</u>
L310	Written Discovery	3059.50	0.00
L300	Discovery	<u>3,059.50</u>	<u>0.00</u>



PLEASE PAY FROM THIS INVOICE

Remit Payment to:
515 Congress Avenue
Suite F
Austin, Texas 78701

Invoice

Date Invoice #
6/8/2020 50913

Bill To
Coffin Renner Attn: Accounts Payable 1011 W. 31st Street Austin, TX 78705

Ship To
Coffin Renner 1011 W. 31st Street Austin, TX 78705

Ordered By	Reference Number	Terms	Rep	Project Number	Delivery Date	
Shelley Morgan	201.142	Due on receipt	AG	06200018	6/8/2020	
Description of Services Provided				Qty	Rate	Amount
Digital Black and White Prints - X12, two sided, 3-hole punched and placed in acco pressboards DEPO/ACCO Binding				2,460	0.10	246.00T
				12	2.50	30.00T
Customer Signature				Subtotal		\$276.00
				Sales Tax (8.25%)		\$22.77
				Total		\$298.77
Thank you for choosing Rainmaker Document Technologies!!						
Phone Number	Fax Number	Federal Tax ID Number		Payments/Credits		\$0.00
512.472.9911	512.472.6161	43-2033387		Balance Due		\$298.77

Password	Copy + Print_Total_Tc	Copy + Print_La	Copy + Print_Cop	Copy + Print_L	Copy + Print_Cop	Copy + Pri	Copy + Print_Tc	Copy + Print_Large size_Two-color
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Monica Karuturi
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Statement Date: August 24, 2020
Statement No. 7770
Client No. 201.142
Page: 1

RE: 2020 EEPR & EECRF Filing

Fees

					Rate	Hours	
07/01/2020	MAS	L160	A108	Communicate w/other external P. Dinnin and GCCC re settlement	485.00	1.20	582.00
07/02/2020	MAS	L310	A106	Communicate with client A. Lewis, et al. re discovery	485.00	0.50	242.50
	MAS	L310	A104	Review/Analyze discovery response issues	485.00	1.60	776.00
	MAS	L160	A103	Draft/Revise settlement agreement	485.00	1.10	533.50
	MLE	L310	A104	Review/Analyze and finalize confidential materials for CEHE's response to COH's 1st RFI	175.00	0.80	140.00
07/06/2020	MAS	L310	A106	Communicate with client S. Richardson re discovery	485.00	0.20	97.00
	MAS	L250	A104	Review/Analyze SOAH Order No. 3 procedural schedule issues	485.00	0.50	242.50
	MAS	L160	A106	Communicate with client S. Chang re settlement	485.00	0.30	145.50
07/08/2020	MAS	L210	A104	Review/Analyze issues re errata	485.00	0.70	339.50
	MAS	L250	A103	Draft/Revise letter to ALJ re compliance tariff	485.00	0.40	194.00
	MAS	L160	A108	Communicate w/other external P. Dinnin re settlement	485.00	0.40	194.00
	ERA	L210	A104	Review/Analyze errata filing	200.00	0.60	120.00
07/09/2020	MAS	L210	A104	Review/Analyze errata filing	485.00	1.60	776.00
	MAS	L160	A104	Review/Analyze invoices for production to Staff	485.00	0.80	388.00
	MAS	L160	A101	Plan and prepare for settlement conference	485.00	0.50	242.50
	MAS	L160	A108	Communicate w/other external parties re settlement	485.00	0.40	194.00
	MAS	L160	A106	Communicate with client D. Hardcastle, et al. re settlement	485.00	0.40	194.00
	MAS	L160	A104	Review/Analyze Staff position on bonus	485.00	0.70	339.50
	CGA	L210	A104	Review/Analyze errata materials to prepare statement of confidentiality	280.00	0.90	252.00
	ERA	L210	A104	Review/Analyze final errata filing	200.00	0.40	80.00
07/10/2020	CGA	L160	A103	Draft/Revise proposed order based on current settlement terms	280.00	3.70	1,036.00
07/13/2020	MAS	L160	A104	Review/Analyze issues re settlement	485.00	0.80	388.00

CenterPoint Energy Houston Electric LL
Account No. 201,142
RE: 2020 EEPR & EECRF Filing

Statement Date: 08/24/2020
Statement No. 7770
Page No. 2

					Rate	Hours	
07/14/2020	MAS	L160	A106	Communicate with client S. Chang re Staff settlement proposal	485.00	0.30	145.50
	MAS	L160	A104	Review/Analyze Staff settlement proposal	485.00	1.60	776.00
	MAS	L160	A108	Communicate w/other external Staff re settlement	485.00	0.30	145.50
	MAS	L160	A106	Communicate with client S. Chang re settlement	485.00	0.20	97.00
	MAS	L160	A108	Communicate w/other external GCCC re settlement	485.00	0.20	97.00
	CGA	L160	A103	Draft/Revise proposed order	280.00	5.10	1,428.00
07/15/2020	MAS	L160	A104	Review/Analyze Staff settlement position	485.00	0.90	436.50
	MAS	L160	A103	Draft/Revise settlement agreement	485.00	0.50	242.50
	MAS	L160	A106	Communicate with client S. Chang, et al. re settlement counter offer	485.00	0.30	145.50
	MAS	L160	A108	Communicate w/other external parties re settlement	485.00	0.20	97.00
07/16/2020	MAS	L160	A108	Communicate w/other external parties re settlement	485.00	0.60	291.00
07/17/2020	MAS	L250	A103	Draft/Revise abatement letter	485.00	0.20	97.00
	MAS	L250	A108	Communicate w/other external parties re abatement	485.00	0.30	145.50
	MAS	L160	A104	Review/Analyze Staff suggestion for settlement agreement	485.00	0.40	194.00
07/22/2020	MAS	L160	A103	Draft/Revise proposed order	485.00	1.60	776.00
07/23/2020	MAS	L160	A104	Review/Analyze issues re proposed order	485.00	0.70	339.50
07/24/2020	MAS	L160	A104	Review/Analyze proposed order	485.00	0.40	194.00
	MAS	L160	A106	Communicate with client A. Lewis, et al. re proposed order draft	485.00	0.50	242.50
	MAS	L160	A108	Communicate w/other external parties re settlement	485.00	0.20	97.00
07/28/2020	MAS	L160	A104	Review/Analyze Staff and Cities proposed changes to settlement and proposed order	485.00	0.70	339.50
07/29/2020	MAS	L160	A103	Draft/Revise proposed order	485.00	0.30	145.50
07/30/2020	MAS	L160	A104	Review/Analyze intervenor comments and settlement documents	485.00	0.70	339.50
	CGA	L460	A103	Draft/Revise motion to admit evidence and remand case to PUC	280.00	1.60	448.00
07/31/2020	MAS	L160	A108	Communicate w/other external Parties re settlement documents	485.00	0.40	194.00
	MAS	L250	A103	Draft/Revise motion to abate evidence	485.00	0.30	145.50
	MAS	L160	A104	Review/Analyze intervenor edits to proposed order	485.00	0.30	145.50
				For Current Services Rendered		37.30	15,241.00

Recapitulation

Timekeeper	Hours	Rate	Total
Mark Santos	24.20	\$485.00	\$11,737.00
Emma Azarani	1.00	200.00	200.00
Glenn Adkins	11.30	280.00	3,164.00

CenterPoint Energy Houston Electric LL
Account No. 201.142
RE: 2020 EEPR & EECRF Filing

Statement Date: 08/24/2020
Statement No. 7770
Page No. 3

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Melissa Ethridge	0.80	175.00	140.00

Expenses

07/31/2020	L100	E101	Photocopies (2393 at 10 cents per copy)	239.30
			Total Expenses	239.30
			Total Current Work	15,480.30
			Balance Due	<u>\$15,480.30</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L100		0.00	239.30
L160	Settlement/Non-Binding ADR	11145.50	0.00
L100		11,145.50	239.30
L210	Pleadings	1567.50	0.00
L250	Other Written Motions and Submissions	824.50	0.00
L200	Pre-Trial Pleadings and Motions	2,392.00	0.00
L310	Written Discovery	1255.50	0.00
L300	Discovery	1,255.50	0.00
L460	Post-Trial Motions and Submissions	448.00	0.00
L400	Trial Preparation and Trial	448.00	0.00

Password	Copy + Print_Total_Total
201001	0
201002	0
201003	0
201012	0
201030	0
201116	0
201117	0
201118	0
201119	0
201120	0
201123	0
201124	0
201125	0
201126	0
201127	0
201128	0
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201130	0
201131	0
201132	0
201133	0
201134	0
201135	0
201136	1309
201137	0
201138	0
201139	0
201140	0
201141	0
201142	2393
201143	0
300000	0
300001	0
300006	0
300008	0
300026	0
300028	0
300029	0
300030	0
300031	0
300032	0
300033	0
300034	0
300035	0
300036	0
300037	0

COFFIN RENNER LLP

P. O. Box 13366
Austin, TX 78711
512-879-0900
Federal I.D. No. 27-0934461

Monica Karuturi
CenterPoint Energy Houston Electric LLC
P.O. Box 1332
Houston, TX 77251-1332

Statement Date: September 23, 2020
Statement No. 7795
Client No. 201.142
Page: 1

RE: 2020 EEPR & EECRF Filing

Fees

					Rate	Hours	
08/04/2020	MAS	L160	A106	Communicate with client D. Hardcastle and S. Chang re settlement status	485.00	0.60	291.00
08/05/2020	MAS	L160	A108	Communicate w/other external Staff re settlement testimony status	485.00	0.20	97.00
08/07/2020	MAS	L160	A108	Communicate w/other external Staff re settlement status	485.00	0.20	97.00
	MAS	L210	A103	Draft/Revise letter re extension of abatement	485.00	0.30	145.50
08/13/2020	MAS	L160	A104	Review/Analyze final review of settlement package	485.00	0.60	291.00
	MAS	L160	A104	Review/Analyze Staff testimony issue re support of settlement	485.00	0.50	242.50
				For Current Services Rendered		2.40	1,164.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Mark Santos	2.40	\$485.00	\$1,164.00

Total Current Work 1,164.00

Balance Due \$1,164.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L160	Settlement/Non-Binding ADR	1018.50	0.00
L100		1,018.50	0.00
L210	Pleadings	145.50	0.00
L200	Pre-Trial Pleadings and Motions	145.50	0.00

COFFIN RENNER LLP

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Federal I.D. No. 27-0934461

Monica Karuturi
CenterPoint Energy Houston Electric LLC
P.O. Box 1332
Houston, TX 77251-1332

Statement Date: October 20, 2020
Statement No. 7819
Client No. 201.142
Page: 1

RE: 2020 EEPR & EECRF Filing

Fees

					Rate	Hours	
09/22/2020	MAS	L120	A104	Review/Analyze REP notice issue per CADM question	485.00	1.10	533.50
09/23/2020	MAS	L430	A104	Review/Analyze draft proposed order issues	485.00	1.30	630.50
09/24/2020	MAS	L120	A104	Review/Analyze computation administrative question from CADM	485.00	0.80	388.00
09/28/2020	MAS	L430	A104	Review/Analyze potential corrections to proposed order	485.00	0.80	388.00
09/29/2020	MAS	L430	A108	Communicate w/other external ARM re potential corrections to proposed order	485.00	0.30	145.50
09/30/2020	MAS	L430	A104	Review/Analyze proposed order potential corrections	485.00	0.50	242.50
	MAS	L430	A106	Communicate with client S. Chang, et al. re proposed order	485.00	0.40	194.00
				For Current Services Rendered		5.20	2,522.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Mark Santos	5.20	\$485.00	\$2,522.00

Total Current Work 2,522.00

Balance Due \$2,522.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L120	Analysis/Strategy	921.50	0.00
L100		921.50	0.00

CenterPoint Energy Houston Electric LL
Account No. 201.142
RE: 2020 EEPR & EECRF Filing

Statement Date: 10/20/2020
Statement No. 7819
Page No 2

		<u>Fees</u>	<u>Expenses</u>
L430	Written Motions and Submissions	1600.50	0.00
L400	Trial Preparation and Trial	<u>1,600.50</u>	<u>0.00</u>

COFFIN RENNER LLP

P O. Box 13366
Austin, TX 78711
512-879-0900
Federal I.D. No 27-0934461

Monica Karuturi
CenterPoint Energy Houston Electric LLC
P.O. Box 1332
Houston, TX 77251-1332

Statement Date: November 6, 2020
Statement No. 7839
Client No. 201.142
Page: 1

RE: 2020 EEPR & EECRF Filing

Fees

					Rate	Hours	
10/01/2020	MAS	L430	A106	Communicate with client S. Chang and D. Hardcastle, et al. re proposed order	485.00	0.20	97.00
	MAS	L430	A104	Review/Analyze proposed order calculation issues	485.00	0.60	291.00
10/06/2020	MAS	L430	A106	Communicate with client P. Peters and S. Bezechny re proposed order language	485.00	0.30	145.50
10/08/2020	MAS	L460	A104	Review/Analyze Cities exceptions and Commission memo	485.00	0.20	97.00
10/16/2020	MAS	L230	A109	Appear for/attend Open Meeting for discussion on EECRF	485.00	0.30	145.50
				For Current Services Rendered		1.60	776.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Mark Santos	1.60	\$485.00	\$776.00

Total Current Work 776.00

Balance Due \$776.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L230	Court Mandated Conferences	145.50	0.00
L200	Pre-Trial Pleadings and Motions	145.50	0.00
L430	Written Motions and Submissions	533.50	0.00
L460	Post-Trial Motions and Submissions	97.00	0.00
L400	Trial Preparation and Trial	630.50	0.00

**SOAH DOCKET NO. 473-20-3918
PUC DOCKET NO. 50908**

APPLICATION OF CENTERPOINT	§	BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC	§	
TO ADJUST ITS ENERGY EFFICIENCY	§	OF
COST RECOVERY FACTOR	§	
	§	ADMINISTRATIVE HEARINGS

**AFFIDAVIT OF JAMIE L. MAULDIN RELATED TO THE
GULF COAST COALITION OF CITIES
RATE CASE EXPENSES IN PUC DOCKET NO. 50908**

STATE OF TEXAS §
 §
COUNTY OF TRAVIS §

BEFORE ME, the undersigned authority, on this day personally appeared Jamie L. Mauldin who being by me first duly sworn, on oath deposed and said the following:

1. My name is Jamie L. Mauldin. I am a principal with the law firm of Lloyd Gosselink Rochelle and Townsend, P.C. (Lloyd Gosselink) and counsel for the Gulf Coast Coalition of Cities (GCCC) in Docket No. 50908. I have been practicing public utility law since 2011 and have represented municipalities in numerous rate cases and various proceedings before the Public Utility Commission of Texas (Commission) and the Railroad Commission of Texas.

2. I am familiar with the work performed by Lloyd Gosselink and the technical consultant on behalf of GCCC in connection with Docket No. 50908 concerning the *Application of CenterPoint Energy Houston Electric, LLC's to Adjust its Energy Efficiency Cost Recovery Factor*. I am over the age of 18 years and am not disqualified from making this affidavit. My statements are true and correct.

3. I have reviewed the billings of Lloyd Gosselink submitted to GCCC for legal services performed in Docket No. 50908. I affirm that those billings accurately reflect the time spent and expenditures incurred by Lloyd Gosselink on GCCC's behalf. Those billings were accurately calculated before they were tendered, and there was no double billing. None of the charges billed to GCCC have been recovered through reimbursement for other expenses. The expenses charged were associated with the review of CenterPoint Energy Houston Electric, LLC's (CEHE or Company) proposed Energy Efficiency Cost Recover Factor (EECRF) in Docket No. 50908 and were necessary to advise GCCC and accomplish tasks in that proceeding. Total rate

case expenses (inclusive of legal fees, consultant charges, and other expenses) for Docket No. 50908 are summarized in the chart attached to this Affidavit as **Exhibit A** and are as follows:

4. For the period June 2020 through October 2020, Lloyd Gosselink requests approval of \$10,881.90 for legal services in Docket No. 50908. This figure includes legal fees and expenses. The fees and expenses incurred through October 2020 were necessary to advise GCCC on rates, review the application, identify issues, retain and work with consultants, engage in discovery, and participate in settlement negotiations.

5. The attorneys' hourly rates of \$265-\$375, upon which the billings are based, are the same hourly rates charged other clients for comparable services during the same time frame. Our firm's rates are at the lower end of the range compared to the rates charged by other lawyers with similar experience providing similar services. The hours spent to perform the tasks assigned to Lloyd Gosselink were necessary to complete those tasks in a professional manner on a timely basis. Our experience in participating in utility rate cases at the Commission aids in our efforts to keep rate case expenses reasonable. Additionally, Lloyd Gosselink minimized rate case expenses by using associates and paralegals where possible to take advantage of lower billing rates.

6. The invoices submitted by Lloyd Gosselink include a description of services performed and time expended on each activity. The invoices for Docket No. 50908 are attached to this filing as **Exhibit B** and have been submitted to the Commission Staff and the Company, and are available for review by other parties. Lloyd Gosselink has documented all charges with time sheets, invoices, and records. The documentation in this case is similar to that provided in many previous rate cases at the Commission.

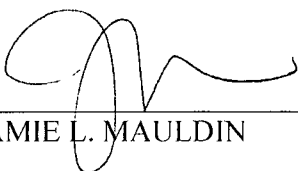
7. Invoices from Lloyd Gosselink also include fees and expenses incurred charges from ReSolved Energy Consulting, LLC for work performed by Karl Nalepa in the amount of \$4,563. Mr. Nalepa has testified before the Commission on many prior occasions. The hourly rate for Mr. Nalepa in Docket No. 50908 is \$270. This is the same or similar hourly rate charged other clients for comparable services during the same time period. Mr. Nalepa reviewed the Company's filings in Docket No. 50908, prepared discovery questions, prepared direct testimony, and provided technical support.

8. Neither Lloyd Gosselink nor any consultants for GCCC have charged for luxury items, including first-class airfare, limousine service, entertainment, or alcoholic beverages. No

meals were charged in excess of \$25 per person, and no individual billed for more than 12 hours per day.

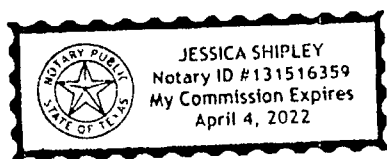
9. The issues addressed by GCCC each have a reasonable basis in law, policy, or fact. GCCC's attorneys reviewed the relevant law and Commission rule provisions to ensure that the issues raised by GCCC's case were reasonably grounded and relevant to this matter.

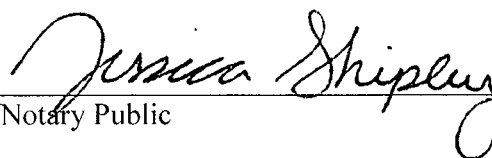
10. The total amount requested for rate case expenses through October 2020 in the amount of \$15,444.90 for Docket No. 50908 is reasonable given the complexity of the case and the nature of GCCC's analysis in this matter.



JAMIE L. MAULDIN

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this 12th day of May, 2021.





Notary Public

2021 CenterPoint EECRF
Docket No. 50908

	Invoice Date	Invoice No.	Billing Period	Through Period	Invoice Amount	Total Billed to Date	
Lloyd Gosselink							
	7/10/2020	97512330R	6/1/2020	6/30/2020	\$ 3,895.00	\$ 3,895.00	
	8/13/2020	97513760	7/1/2020	7/31/2020	\$ 5,885.60	\$ 9,780.60	
	9/9/2020	97514643	8/1/2020	8/31/2020	\$ -	\$ 9,780.60	
	10/19/2020	97515306	9/1/2020	9/30/2020	\$ 79.50	\$ 9,860.10	
	11/6/2020	97516341R	10/1/2020	10/31/2020	\$ 1,021.80	\$ 10,881.90	
							\$ 10,881.90
Resolved Energy Consulting, LLC (Nalepa)							
	7/2/2020	4625	6/1/2020	6/30/2020	\$ 3,240.00	\$ 3,240.00	
	8/4/2020	4640	7/1/2020	7/31/2020	\$ 1,323.00	\$ 4,563.00	
							\$ 4,563.00
Lloyd Gosselink + Consultants							
	7/10/2020	97512330	6/1/2020	6/30/2020	\$ 7,135.00	\$ 7,135.00	
	8/13/2020	97513760	7/1/2020	7/31/2020	\$ 7,208.60	\$ 14,343.60	
	9/9/2020	97514643	8/1/2020	8/31/2020	\$ -	\$ 14,343.60	
	10/19/2020	97515306	9/1/2020	9/30/2020	\$ 79.50	\$ 14,423.10	
	11/6/2020	97516341	10/1/2020	10/31/2020	\$ 1,021.80	\$ 15,444.90	
							\$ 15,444.90
Total							\$ 15,444.90



Exhibit B
816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532
www.lglawfirm.com

July 10, 2020

Gulf Coast Coalition of Cities
Attn Bobby Gervais
P O Box 187
Manvel, TX USA 77578

Invoice: 97512330R
Client: 1720
Matter: 41
Billing Attorney: TLB

INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2020:

RE: CenterPoint 2021 EECRF Filing

Professional Services	\$ 3,895.00
Total Disbursements	\$.00
TOTAL THIS INVOICE	\$ 3,895.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Exhibit B

Lloyd Gosselink Rochelle & Townsend, P.C.

Gulf Coast Coalition of Cities
CenterPoint 2021 EECRF Filing
I.D.1720-41-TLB

July 10, 2020
Invoice: 97512330R

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
6/01/20	TLB	Review filing; discuss filing with clients; coordinate consultants and attorney assignments (Administration).	.50
6/02/20	WPD	Draft engagement agreement; edit and finalize engagement agreement; draft motion to intervene (Administration).	.60
6/02/20	HEC	Proofread engagement letter with ReSolved Energy.	.10
6/03/20	TLB	Review and finalize Motion to Intervene (Administration).	.20
6/03/20	WPD	Edit engagement agreement (Administration) (NO CHARGE .20)	.00
6/04/20	TLB	Prepare and distribute consultant agreements; review filing and precedent; discuss case with K. Nalepa; prepare client communication regarding filing; prepare engagement agreement (Administration) (NO CHARGE .20).	2.00
6/04/20	WPD	Send CenterPoint filing to T. Brocato; update engagement agreement; update motion to intervene; edit engagement agreement and motion to intervene; prepare documents for filing; review and analyze proposed procedural schedule; discuss with T. Brocato; call K. Nalepa regarding procedural schedule (Administration) (NO CHARGE .20).	.80
6/05/20	WPD	Review and analyze PUC EECRF rules (Administration).	.20
6/05/20	HEC	Review Order of Referral; case management; calendar deadline.	.10
6/08/20	TLB	Review filing and precedent.	.50
6/10/20	WPD	Prepare protective order certification cover letter and certifications; edit list of issues and send to K. Nalepa (Administration).	.50
6/10/20	HEC	Discuss protective order certification filing with project team.	.10
6/11/20	TLB	Review filing (Administration).	.50
6/11/20	WPD	Review and analyze EECRF application; draft summary of company's request (Administration).	.80
6/11/20	HEC	Review SOAH Order No. 1; case management; calendar deadlines.	.20
6/12/20	TLB	Review List of Issues (Administration).	.20
6/12/20	WPD	Review and finalize edits to list of issues (Administration).	.10
6/15/20	WPD	Email M. Santos regarding procedural schedule, call with K. Nalepa about procedural schedule and settlement conference date; email M. Santos about settlement conference and procedural schedule; prepare and finalize protective order certification filings (Administration).	.50
6/16/20	WPD	Email response to parties regarding Staff's proposed hearing date (Administration).	.10
6/17/20	TLB	Prepare client engagement letters (Administration).	.20
6/17/20	WPD	Review and edit first RFI to CenterPoint (Discovery).	.10
6/22/20	WPD	Review procedural deadlines and emails regarding settlement conference date and time; call with K. Nalepa regarding preparation of settlement position and settlement conference dates (Administration).	.20
6/23/20	WPD	Call K. Nalepa regarding scheduling settlement conference (Administration).	.10
6/24/20	SJW	Review SOAH Order No. 2 and calendar procedural schedule deadlines (Admin.).	.30
6/25/20	WPD	Call with K. Nalepa regarding settlement issues; email CenterPoint regarding	.30

Lloyd Gosselink Rochelle & Townsend, P.C.

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Exhibit B

Lloyd Gosselink Rochelle & Townsend, P.C.

Gulf Coast Coalition of Cities
CenterPoint 2021 EECRF Filing
I.D.1720-41-TLB

July 10, 2020
Invoice: 97512330R

Date	Atty	Description Of Services Rendered	Hours
6/29/20	WPD	scheduling settlement conference (Administration). Call with T. Brocato to update him on rate case issues and settlement status; call with K. Nalepa regarding issues and adjustments for settlement conference; email CenterPoint regarding confidential documents; confer with J. Mauldin and K. Nalepa regarding settlement terms and counter-offer; draft counter-offer and send to CenterPoint (Administration).	.70
6/29/20	WPD	Review RFI responses (Discovery).	.30
6/30/20	WPD	Review CenterPoint RFI responses and K. Nalepa issues for settlement; attend settlement meeting; discussion with K. Nalepa on update to issues and presenting adjustments to the company; call with Staff regarding settlement issues; call with K. Nalepa regarding Staff's position on our settlement issues; call with Y. Chang regarding Houston's position on GCCC's issues; draft summary of GCCC's issues; research rules and Commission rulemakings; call with T. Brocato regarding CenterPoint settlement and steps going forward (Administration).	3.20

TOTAL PROFESSIONAL SERVICES

\$ 4,076.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Rate	Hours	Amount	N/C Hr	N/C
Thomas L Brocato	Principal	375.00	4.10	1,537.50	.20	75.00
W Patrick Dinnin	Associate	265.00	8.50	2,252.50	.40	106.00
Sam J Weaver	Paralegal	125.00	.30	37.50	.00	.00
Hanna E Campbell	Paralegal	135.00	.50	67.50	.00	.00
TOTALS			13.40	\$3,895.00	.60	\$181.00

TOTAL THIS INVOICE

\$ 3,895.00



Exhibit B
6 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532
www.lglawfirm.com

August 13, 2020

Gulf Coast Coalition of Cities
Attn Bobby Gervais
P O Box 187
Manvel, TX USA 77578

Invoice: 97513760
Client: 1720
Matter: 41
Billing Attorney: TLB

INVOICE SUMMARY

For professional services and disbursements rendered through July 31, 2020:

RE: CenterPoint 2021 EECRF Filing

Professional Services	\$ 5,846.00
Total Disbursements	<u>\$ 4,602.60</u>
TOTAL THIS INVOICE	\$ 10,448.60

Lloyd Gosselink Rochelle & Townsend, P.C.



E-MAILED
8-26-20

Exhibit B

Lloyd Gosselink Rochelle & Townsend, P.C.

Gulf Coast Coalition of Cities
CenterPoint 2021 EECRF Filing
I.D.1720-41-TLB

August 13, 2020
Invoice: 97513760

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
7/01/20	TLB	Review filings, settlement strategy and options (Administration).	.40
7/01/20	WPD	Review email from M. Santos, responding to GCCC's settlement proposals; call with K. Nalepa regarding settlement issues and CenterPoint's response; call with J. Mauldin regarding CenterPoint issues; call with T. Brocato regarding response to M. Santos settlement email; draft response to M. Santos email regarding settlement issues; send to T. Brocato for review (Administration).	1.50
7/02/20	TLB	Review settlement documents (Administration).	.30
7/02/20	WPD	Call with M. Santos regarding settlement negotiations; call with K. Nalepa regarding CenterPoint's settlement talks; call with T. Brocato regarding CenterPoint's settlement talks (Administration).	.90
7/06/20	WPD	Prepare for call with Staff; call with J. Harrison regarding CenterPoint settlement issues; call with K. Nalepa regarding CenterPoint settlement issues; review past settlement and proposed order terms to analyze approach to settlement of Cities' issues in this case (Administration).	2.10
7/07/20	WPD	Discuss EECRF settlement issues with T. Brocato (Administration).	.20
7/08/20	TLB	Prepare and distribute settlement material to client cities (Administration).	.60
7/08/20	WPD	Prepare for settlement discussion with M. Santos; call with M. Santos; call with K. Nalepa regarding CenterPoint settlement issues; call with PUC Staff regarding CenterPoint settlement issues; call with K. Nalepa regarding CenterPoint settlement issues and Staff's position (Administration).	1.00
7/08/20	SJW	Update expense tracking chart and assemble invoices (Administration).	.10
7/09/20	TLB	Prepare and distribute client settlement update (Administration).	.30
7/09/20	WPD	Review settlement agreement; call with K. Nalepa regarding settlement issues; call to Y. Chang with City of Houston; continue reviewing settlement agreement; call with K. Nalepa to update him on Staff and Houston positions; call with T. Brocato regarding update on settlement offer by CenterPoint and positions by Staff and Houston; call with CenterPoint, Staff, and intervenors regarding settlement of the EECRF; arrange call between K. Nalepa and B. Abbott with PUC Staff (Administration).	1.60
7/10/20	WPD	Arrange delivery of confidential information to P. Dinnin and K. Nalepa (Administration).	.10
7/13/20	TLB	Review CNP settlement offers and options (Administration).	.60
7/14/20	SJW	Review SOAH Order No. 4 and calendar deadlines (Administration).	.10
7/15/20	WPD	Review CenterPoint's amended settlement agreement, respond to M. Santos email; call K. Nalepa about changed settlement terms; draft letter to Cities for client approval (Administration).	1.50
7/16/20	TLB	Prepare and distribute client communication regarding settlement (Administration).	.60
7/16/20	WPD	Discussion with T. Brocato regarding client approval and settlement; discuss settlement status and abatement with M. Santos (Administration).	.40

Lloyd Gosselink Rochelle & Townsend, P.C.

Page|2

Exhibit B

Lloyd Gosselink Rochelle & Townsend, P.C.

Gulf Coast Coalition of Cities
CenterPoint 2021 EECRF Filing
I.D.1720-41-TLB

August 13, 2020
Invoice: 97513760

Date	Atty	Description Of Services Rendered	Hours
7/17/20	WPD	Review motion to abate; send email agreeing to motion (Administration).	.20
7/18/20	TLB	Communication with client regarding settlement (Administration).	.30
7/20/20	WPD	Draft and edit rate case expense testimony and affidavit (Rate Case Expenses).	1.30
7/20/20	WPD	Review settlement documents (Administration).	1.00
7/20/20	HEC	Proofread Direct Testimony of K. Nalepa; proofread affidavit of T. Brocato (Administration/Case Management).	.80
7/21/20	TLB	Review settlement documents (Administration).	.70
7/22/20	TLB	Review and edit settlement documents (Administration).	.80
7/22/20	WPD	Edit stipulation and settlement agreement; prepare K. Nalepa's direct testimony and affidavit of T. Brocato for filing; amend affidavit wording; edit Cities' draft stipulation and settlement agreement; send the same to company and parties (Administration).	1.20
7/28/20	TLB	Review settlement documents (Administration).	.60
7/28/20	WPD	Review and analyze Staff's proposed edits to settlement documents; call with J. Harrison regarding potential errors in Staff's proposed changes to settlement documents; follow-up call with J. Harrison asking Cities to make clarifying changes to Staff's proposed changes; email parties regarding clarifying changes to proposed order (Administration).	.80
7/30/20	WPD	Analyze and edit proposed order (Administration).	.20
7/31/20	WPD	Review and analyze final settlement documents (Administration).	.20

TOTAL PROFESSIONAL SERVICES

\$ 5,846.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Thomas L Brocato	Principal	5.20	375.00	1,950.00
W Patrick Dinnin	Associate	14.20	265.00	3,763.00
Sam J Weaver	Paralegal	.20	125.00	25.00
Hanna E Campbell	Paralegal	.80	135.00	108.00
TOTALS		20.40		\$ 5,846.00

DISBURSEMENTS

Date	Description	Amount
6/30/20	ReSolved Energy Cons Voucher # - 000105441 ReSolved Energy Consulting, LLC, Consultant Services, Professional services for June 2020 regarding CEHE 20 EECRF 50908 project, 07/02/2020	3,240.00
7/10/20 7/15/2020	Corporate Couriers Check # - 000010386 Corporate Couriers, Courier services,	39.60

Lloyd Gosselink Rochelle & Townsend, P.C.

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Exhibit B

Lloyd Gosselink Rochelle & Townsend, P.C.

Gulf Coast Coalition of Cities
CenterPoint 2021 EECRF Filing
I.D.1720-41-TLB

August 13, 2020
Invoice: 97513760

Date	Description	Amount
7/31/20	ReSolved Energy Cons Voucher # - 000105719 ReSolved Energy Consulting, LLC, Consultant Services, Professional services for July 2020 regarding CEHE 20 EECRF 50908 project, 08/04/2020	1,323.00

TOTAL DISBURSEMENTS **\$ 4,602.60**

TOTAL THIS INVOICE **\$ 10,448.60**

Lloyd Gosselink Rochelle & Townsend, P.C.

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Exhibit B

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420
Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
7/2/2020	4625

BILL TO
Thomas Brocato Lloyd Gosselink 816 Congress Ave, # 1900 Austin, Tx 78701

PROJECT			
LG CEHE 20 EECRF 50908			
DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	12	270.00	3,240.00
Work Completed thru - June 30, 2020		TOTAL DUE	\$3,240.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
June 10, 2020	Review filing. (A/CM 0.30)	0.30
June 11, 2020	Review filing. Review and edit issues list. (A/CM 1.20)	1.20
June 12, 2020	Complete edits and send to P. Dinnin for review. (A/CM 1.0)	1.00
June 16, 2020	Work on discovery. (A/CM 1.20)	1.20
June 17, 2020	Complete discovery and send to P. Dinnin for review. Work on analysis. (A/CM 1.0; A&G 0.80)	1.80
June 18, 2020	Work on analysis. (A&G 1.0)	1.00
June 22, 2020	Call with P. Dinnin to discuss case status and schedule. Work on analysis. (A/CM 0.20; A&G 0.50)	0.70
June 23, 2020	Work on analysis. (A&G 0.80)	0.80
June 26, 2020	Review discovery. (A&G 0.30)	0.30
June 29, 2020	Review responses to discovery. Work on adjustments. (A&G 1.70)	1.70
June 30, 2020	Work on adjustments. Send to P. Dinnin for review. Participate on settlement call with parties. Calls with P. Dinnin to discuss. (A&G 0.50; A/CM 1.50)	2.00

12.00

A/CM = Administration/Case Management

A&G = Administrative & General

Exhibit B

Exhibit SAR-6
Page 13 of 25

Exhibit B

INVOICE

CORPORATE COURTESY AND
LOGISTICS
2335 KRAMER LAKE, SUITE F
AUSTIN, TX 78758

Invoice No.	1201
60404	1201
Invoice Date	7/15/20
7/15/20	546.00

LLOYD GOSSELINK ATTORNEYS AT LAW
816 CONGRESS AVE
SUITE 1900
AUSTIN, TX 78701

ON-DEMAND DELIVERIES 24/7
ASK ABOUT OUR WAREHOUSE
THANKS FOR YOUR BUSINESS
(512) 478-4007

Customer No.		Invoice No.		Period Ending		Amount Due		Pg	
1201		60404		7/15/20		546.00		3	
Date	Ord No.	Qty	Service/Notes				Base	Fuel Surchg	Charges
7/10/20	970912	2HR	LLOYD GOSSELINK ATTORNEYS AT LAW 816 CONGRESS AVE AUSTIN TX 78701 Caller: OFFICE SERVICES Time: 11:50 Signed: PATRICK D				PATRICK DINNIN 2108 MARQUETTE LAKE AUSTIN TX 78723 Wght: 1 Lbs	Base : 17.00 Fuel Surchg: 1.70	18.70
7/10/20	970913	2HR	LLOYD GOSSELINK ATTORNEYS AT LAW 816 CONGRESS AVE AUSTIN TX 78701 Caller: OFFICE SERVICES Time: 11:52 Signed: KARL N				RESOLVED ENERGY CONSULTING, LLC 11044 RESEARCH BLVD AUSTIN TX 78759 Wght: 1 Lbs	Base : 19.00 Fuel Surchg: 1.80	20.80
Total Charges for Ref. - WPD 1720-41:							39.60		

INVOICE PAYMENT DUE UPON RECEIPT

Exhibit B

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420
Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
8/4/2020	4640

BILL TO
Thomas Brocato Lloyd Gosselink 816 Congress Ave, # 1900 Austin, Tx 78701

PROJECT			
LG CEHE 20 EECRF 50908			
DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	4.9	270.00	1,323.00
Work Completed thru - July 31, 2020		TOTAL DUE	\$1,323.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
July 1, 2020	Prepare and send description of proposed bonus adjustment to P. Dinnin for review. Call to discuss.	0.70
July 2, 2020	Call with P. Dinnin to discuss case issues. Review responses to discovery.	0.50
July 8, 2020	Call with P. Dinnin to discuss case issues. Review responses to discovery.	0.50
July 9, 2020	Call with Parties and CEHE staff to discuss settlement terms. Call with P. Dinnin to discuss.	0.70
July 10, 2020	Call with B. Abbott, Staff, regarding rate adjustment for settlement.	0.20
July 14, 2020	Emails with P. Dinnin regarding testimony. Outline draft testimony.	0.80
July 15, 2020	Prepare RCE testimony and send to P. Dinnin for review. Call with P. Dinnin regarding settlement terms. Review proposed settlement rates. Review errata.	1.30
July 22, 2020	Review filed testimony.	0.20
		4.90



Exhibit B
816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532
www.lglawfirm.com

September 9, 2020

Gulf Coast Coalition of Cities
Attn Bobby Gervais
P O Box 187
Manvel, TX USA 77578

Invoice: 97514643
Client: 1720
Matter: 41
Billing Attorney: TLB

INVOICE SUMMARY

For professional services and disbursements rendered through August 31, 2020:

RE: CenterPoint 2021 EECRF Filing

Professional Services	\$.00
Total Disbursements	<u>\$.00</u>
TOTAL THIS INVOICE	\$.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Lloyd Gosselink Rochelle & Townsend, P.C.

Gulf Coast Coalition of Cities
CenterPoint 2021 EECRF Filing
I.D.1720-41-TLB

September 9, 2020
Invoice: 97514643

TOTAL THIS INVOICE

\$.00



Exhibit B
6 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532
www.lglawfirm.com

October 19, 2020

Gulf Coast Coalition of Cities
Attn Bobby Gervais
P O Box 187
Manvel, TX USA 77578

Invoice: 97515306
Client: 1720
Matter: 41
Billing Attorney: TLB

INVOICE SUMMARY

For professional services and disbursements rendered through September 30, 2020:

RE: CenterPoint 2021 EECRF Filing

Professional Services	\$ 79.50
Total Disbursements	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 79.50

Lloyd Gosselink Rochelle & Townsend, P.C.



E-MAILED
OCT 20 2020

Exhibit B

Lloyd Gosselink Rochelle & Townsend, P.C.

Gulf Coast Coalition of Cities
CenterPoint 2021 EECRF Filing
I.D.1720-41-TLB

October 19, 2020
Invoice: 97515306

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
9/30/20	WPD	Review proposed order for any exceptions or corrections (Administration).	.30

TOTAL PROFESSIONAL SERVICES \$ 79.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
W Patrick Dinnin	Associate	.30	265.00	79.50
TOTALS		.30		\$ 79.50

TOTAL THIS INVOICE \$ 79.50

Lloyd Gosselink Rochelle & Townsend, P.C.

Page|2

Exhibit B



816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532
www.lglawfirm.com

October 19, 2020

Gulf Coast Coalition of Cities
Attn Bobby Gervais
P O Box 187
Manvel, TX 77578 USA

Client: 1720
Matter: 41
Billing Atty.: TLB

REMINDER STATEMENT

RE: CenterPoint 2021 EECRF Filing

Invoice Number	Invoice Date	Fees	Expenses	Invoice Total	Payments / Credits	Balance
97512330	July 10, 2020	4,076.00	0.00	4,076.00	0.00	4,076.00
97513760	August 13, 2020	5,846.00	4,602.60	10,448.60	0.00	10,448.60
Total Amount Due:						\$14,524.60

AGED ACCOUNTS RECEIVABLE

0 - 30 Days	31 - 60 Days	61 - 90 Days	91 - 120 Days	Over 120 Days
-	-	10,448.60	4,076.00	-

Lloyd Gosselink Rochelle & Townsend, P.C.



Exhibit B
816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532
www.lglawfirm.com

November 6, 2020

Gulf Coast Coalition of Cities
Attn Bobby Gervais
c/o City of Manvel
P O Box 187
Manvel, TX USA 77578

Invoice: 97516341R
Client: 1720
Matter: 41
Billing Attorney: TLB

Tax ID # 74-2308445

INVOICE SUMMARY

For professional services and disbursements rendered through October 31, 2020:

RE: CenterPoint 2021 EECRF Filing

Professional Services	\$ 1,019.50
Total Disbursements	<u>\$ 2.30</u>
TOTAL THIS INVOICE	\$ 1,021.80

Lloyd Gosselink Rochelle & Townsend, P.C.

Exhibit B

Lloyd Gosselink Rochelle & Townsend, P.C.

Gulf Coast Coalition of Cities
CenterPoint 2021 EECRF Filing
I.D.1720-41-TLB

November 6, 2020
Invoice: 97516341R

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
10/05/20	WPD	Review Proposed Order, check math on total cost recovery; discuss with T. Brocato Staff's changes to agreed proposed order; call with Matt Arth regarding findings on ARM's questions about total cost recovery (Administration).	1.50
10/06/20	WPD	Draft and edit Notice of Exceptions to PUC's Proposed Order (Administration).	1.50
10/07/20	WPD	Review S. Weaver's edits to Notice of Exceptions, finalize and send to J. Shipley for filing (Administration).	.30
10/07/20	SJW	Review and edit Exceptions to Proposed Order (Administration).	.10
10/16/20	WPD	Watch/Attend open meeting for potential action on CenterPoint EECRF (Administration) (NO CHARGE .50).	.50

TOTAL PROFESSIONAL SERVICES \$ 1,019.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Rate	Hours	Amount	N/C HR	N/C
W Patrick Dinnin	Associate	265.00	3.80	1,007.0	.50	132.50
Sam J Weaver	Paralegal	125.00	.10	12.50	.00	.00
TOTALS			3.90	1,019.50	.50	\$ 132.50

DISBURSEMENTS

Description	Amount
Photocopying	2.30

TOTAL DISBURSEMENTS \$ 2.30

TOTAL THIS INVOICE \$ 1,021.80

Exhibit B

Alysheba	10/13/2020	1720	41	1
Alysheba	10/13/2020	1720	41	2
Alysheba	10/13/2020	1720	41	18
Alysheba	10/13/2020	1720	41	1
Deepblue	10/13/2020	1720	41	1

Photocopies – 23 @ \$.10/each = \$2.30

Exhibit B



816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532
www.lglawfirm.com

November 06, 2020

Gulf Coast Coalition of Cities
Attn Bobby Gervais
c/o City of Manvel
P O Box 187
Manvel, TX 77578 USA

Client: 1720
Matter: 41
Billing Atty.: TLB

REMINDER STATEMENT

RE: CenterPoint 2021 EECRF Filing

Invoice Number	Invoice Date	Fees	Expenses	Invoice Total	Payments / Credits	Balance
97512330	July 10, 2020	4,076.00	0.00	4,076.00	0.00	4,076.00
97513760	August 13, 2020	5,846.00	4,602.60	10,448.60	0.00	10,448.60
97515306	October 19, 2020	79.50	0.00	79.50	0.00	79.50
Total Amount Due:						\$14,604.10

AGED ACCOUNTS RECEIVABLE

0 - 30 Days	31 - 60 Days	61 - 90 Days	91 - 120 Days	Over 120 Days
79.50	-	10,448.60	4,076.00	-

Lloyd Gosselink Rochelle & Townsend, P.C.

APPLICATION OF CENTERPOINT	§	PUBLIC UTILITY COMMISSION
ENERGY HOUSTON ELECTRIC, LLC TO	§	
ADJUST ITS ENERGY EFFICIENCY COST	§	
RECOVERY FACTOR	§	OF TEXAS

**AFFIDAVIT OF ALISA TALLEY
IN SUPPORT OF CITY OF HOUSTON'S
RATE CASE EXPENSES**

STATE OF TEXAS §

COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Alisa Talley, who being by me first duly sworn, on oath deposed and said the following:

1. My name is Alisa Talley. I am Division Manager with the City of Houston Administration and Regulatory Affairs and was the business representative for the City of Houston ("COH") in CenterPoint's Application to Adjust its Energy Efficiency Cost Recovery Factor in Docket No. 50908. I also supervised the expert consultant that performed work on behalf of COH for Docket No. 50908.

2. I am personally familiar with the consulting services of NewGen Strategies and Solutions, on behalf of COH. I am over the age of 18 years and am qualified to make this Affidavit. The statements in this Affidavit are true and correct.

3. I have reviewed the billings of NewGen Strategies and Solutions for consulting services performed in Docket No. 50908. These billings accurately reflect the time spent and expenditures incurred by NewGen Strategies, on behalf of COH. These billings accurately reflect the time spent and expenditures incurred by NewGen Strategies. None of the charges billed to COH have been recovered through reimbursement for other expenses. The expenses charged were associated with the

review of CenterPoint's proposed adjustment in Docket No. 50908 and were necessary to represent the interests of COH in this matter.

4. For the period through July 2020, COH incurred \$8,920 from NewGen Strategies and Solutions, for consulting services. The fees and expenses incurred from NewGen Strategies and Solutions were necessary to accomplish the following: 1) review and analyze CenterPoint's filing; 2) advise COH on the Company's proposed EECRF request; 3) identify issues in the filing; and 4) work with COH.

5. The expert consulting services performed by NewGen Strategies and Solutions on behalf of COH were managed and supervised by me. The services rendered through July 31, 2020, included those items set forth in Paragraph 4 above. The hours spent by NewGen Strategies and Solutions for work assigned to us in this proceeding was reasonable and necessary to complete those tasks in a professional manner and on a timely basis. I used my knowledge and experience in these matters before the Public Utility Commission of Texas ("PUC") to assure that the work being done and the expenses incurred were reasonable.

6. The consulting services performed for COH were conducted by Mr. Anthony M. Georgis, Constance T. Cannady, and DeShark Consulting, LLC. Ms. Cannady has testified before the PUC on numerous occasions over the past 35 years. Her hourly rate in Docket No. 50908 is \$250.00/hr. This is the same or a lower hourly rate charged other clients for comparable services during the same time period.

7. Mr. Georgis has over 20 years of consulting experience concerning the utility industry and has testified before the PUC concerning several EECRF rate proceedings. His hourly rate in Docket No. 50908 is \$260.00/hr. This is the same or a lower hourly rate charged other clients for comparable services during the same time period.

8. The work performed by Ms. Cannady and Mr. Georgis included review of the filing; review of Commission precedent on various EECRF issues; preparation of RFIs; review of settlement options. This work was reasonable and necessary to assist COH in this proceeding.

9. The work performed by NewGen Strategies and Solutions' subcontractor, DeShark Consulting, LLC, included accounting and tax related matters and providing assistance with respect to certain EECRF proposed administrative expenses. The firm's hourly rate in Docket No. 50908 is \$250.00/hr. This is the same or similar hourly rate charged other clients for comparable services during the same time period.

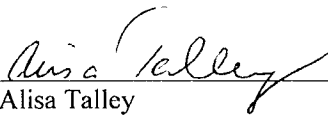
10. The actual invoices submitted by NewGen Strategies and Solutions and DeShark Consulting, LLC, for services and expenses through July 31, 2020, are submitted as Attachment A to this Exhibit.

11. The actual invoices include a description of services performed and time expended on a daily basis. All expenses are supported by backup documentation. The documentation in this case is similar to that provided in many previous rate cases at the PUC.

12. Pursuant to PUC Subst. R. §25.245(b), NewGen Strategies and Solutions and DeShark Consulting, LLC recorded time spent on this matter by issue category to the extent possible. Time entries on the attached invoices indicate the issue subject matter of each entry, to the extent possible.

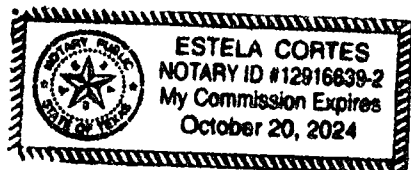
13. The expenses incurred by NewGen Strategies and Solutions comply with PUC Practice and Procedure Rules Sec. 25.245. NewGen Strategies and Solutions did not charge for luxury items, including first-class airfare, limousine service, entertainment, or alcoholic beverages. No meals were charged in excess of \$25 per person, and no individual billed for more than 12 hours in a single day.

14. The total amount requested for rate case expenses through July 31, 2020, in the amount of \$8,920 for Docket No. 50908 is reasonable and necessary, in light of all the factors discussed above and, therefore, in compliance with PUC Subst. R. § 25.245. These fees and expenses are in proportion to the nature and scope of the case at issue.



Alisa Talley
Division Manager
City of Houston, Texas

SUBSCRIBED AND WORN TO BEFORE ME, the undersigned authority, on this the 25 day
of May 2021.



Estela Cortes
NOTARY PUBLIC STATE OF TEXAS

EXHIBIT A

Ms. Alisa Talley
City of Houston
611 Walker Street, 13th Floor
Houston, TX 77002-

Invoice

Invoice Date: Jul 31, 2020

Invoice Num: 9949

Billing Through: Jul 31, 2020

Houston Utility Consulting Svc: TO3- CenterPoint EECRF Docket No 50908 (Houston Utility Consulting Services
AMA-ER2071:Task 3) - PO#: SRO #4500319232 - Managed by (Cannady, Constance.)

Professional Services:

Employee	Description	Hours	Rate	Amount
Anthony M. Georgis	Managing Director	5.00	\$260.00	\$1,300.00
Constance T. Cannady	Executive Consultant	3.50	\$250.00	\$875.00
Total Services:				\$2,175.00
Project (Houston Utility Consulting Services AMA-ER2071:Task 3) Total Amount Due:				\$2,175.00

This invoice is due on 8/30/2020

8/28/2020

DocuSigned by:

Alisa Talley

BCF73D669A3143E...

Time Detail and Notes Follow on Next Page

Electronic Copy

Economics

Strategy

Stakeholders

Sustainability

www.newgenstrategies.net



275 W. Campbell Road, Suite 440
 Richardson, TX 75080
 Tel: 972-680-2000 Fax: 972-680-2007

Invoice

Invoice Date: Jul 31, 2020

Invoice Num: 9949

Billing Through: Jul 31, 2020

Ms. Alisa Talley
 City of Houston
 611 Walker Street, 13th Floor
 Houston, TX 77002-

Project (Name) - Houston Utility Consulting Services AMA-ER2071:Task 3 (Houston Utility Consulting Svc: TO3- CenterPoint EECRF Docket No 50908)

Georgis, Anthony

7/1/2020	Anthony M. Georgis	1.00	Coord call with client/review issues and analyses
7/2/2020	Anthony M. Georgis	1.00	Review filings, prep analysis for settlement calls
7/6/2020	Anthony M. Georgis	0.50	Review of Prior EECRF filings/costs
7/7/2020	Anthony M. Georgis	1.50	Tracking EECRF cost / EE program historical costs
7/8/2020	Anthony M. Georgis	1.00	EECRF analysis, A&G costs and projected reductions/adjustments

Total Georgis, Anthony: 5.00

Cannady, Constance.

7/2/2020	Constance T. Cannady.	0.50	conference call with client
7/9/2020	Constance T. Cannady	2.00	Review of CenterPoint Proposal; discussion with Internal City team; conference call with all parties
7/15/2020	Constance T. Cannady.	1.00	Review settlement proposal and schedules; review write up by City Staff

Total Cannady, Constance.: 3.50

Total Houston Utility Consulting Services 8.50

**AMA-ER2071:Task 3 - Houston Utility
 Consulting Svc: TO3- CenterPoint EECRF
 Docket No 50908 :**

Economics

Strategy

Stakeholders

Sustainability

www.newgenstrategies.net



275 W. Campbell Road, Suite 440
Richardson, TX 75080
Tel: 972-680-2000 Fax: 972-680-2007

Ms. Alisa Talley
City of Houston
611 Walker Street, 13th Floor
Houston, TX 77002-

Invoice

Invoice Date: Jun 30, 2020

Invoice Num: 9813

Billing Through: Jun 30, 2020

Houston Utility Consulting Svc: TO3- CenterPoint EECRF Docket No 50908 (Houston Utility Consulting Services
AMA-ER2071:Task 3) - PO#: SRO #4500319232 - Managed by (Cannady, Constance.)

Professional Services:

Employee	Description	Hours	Rate	Amount
Anthony M. Georgis	Professional Fees	12.00	\$260.00	\$3,120.00
Constance T. Cannady.	Professional Fees	8.50	\$250.00	\$2,125.00
Total Services:				\$5,245.00

Reimbursable Expenses:

Employee	Description	Amount
DeShark Consulting, LLC	SubContractor Expenses - (6/30/2020)	\$1,500.00
Total Expenses:		\$1,500.00

Project (Houston Utility Consulting Services AMA-ER2071:Task 3) Total Amount Due: \$6,745.00

This invoice is due on 7/30/2020

Time Detail and Notes Follow on Next Page

Electronic Copy

Reviewed AT

7/13/2020

Economics

Strategy

Stakeholders

Sustainability

www.newgenstrategies.net

DocuSigned by:

Alisa Talley
Page 1 of 3
BCF73D689A3143E

Ms. Alisa Talley
City of Houston
611 Walker Street, 13th Floor
Houston, TX 77002-

Invoice

Invoice Date: Jun 30, 2020

Invoice Num: 9813

Billing Through: Jun 30, 2020

Project (Name) - Houston Utility Consulting Services AMA-ER2071:Task 3 (Houston Utility Consulting Svc: TO3- CenterPoint EECRF Docket No 50908)

Georgis, Anthony

6/9/2020	Anthony M. Georgis	3.00	City of Houston EECRF filing and review of issues
6/10/2020	Anthony M. Georgis	2.00	Houston EECRF: Review testimony, update Issues, send Issues list
6/12/2020	Anthony M. Georgis	2.00	review testimony, finalize Initial issues and data research
6/25/2020	Anthony M. Georgis	3.00	Issues development, analyses of EECRF
6/26/2020	Anthony M. Georgis	2.00	coordination call with client, review prior EE plans, develop issues analyses

Total Georgis, Anthony: 12.00

Cannady, Constance.

6/4/2020	Constance T. Cannady.	0.25	Coordinate with team members on Docket No. 50908
6/5/2020	Constance T. Cannady.	1.00	Prepare for and participate in kick-off for City of Houston Project 50908
6/10/2020	Constance T. Cannady.	0.50	Review and submit preliminary list of issues in Houston SOW Docket No. 50908
6/11/2020	Constance T. Cannady.	1.50	Prepare Draft Issues list for Docket No. 50908 for June 12 filing
6/17/2020	Constance T. Cannady.	0.25	Project management activities on EECRF including review of RFIs submitted by others
6/23/2020	Constance T. Cannady.	2.00	Continue to identify potential issues; discuss work with internal team
6/24/2020	Constance T. Cannady.	1.50	Develop RFIs for EECRF filing; discuss potential issues with Tony
6/26/2020	Constance T. Cannady.	1.00	Call with client, review prior dockets; discuss tasks with subcontractor
6/29/2020	Constance T. Cannady.	0.25	Review RFI responses
6/30/2020	Constance T. Cannady.	0.25	Followup on potential issues

Total Cannady, Constance.: 8.50

Total Houston Utility Consulting Services 20.50

AMA-ER2071:Task 3 - Houston Utility Consulting Svc: TO3- CenterPoint EECRF Docket No 50908 :

DeShark Consulting,LLC
17629 El Camino Real, Ste #110
Houston, TX 77058 US
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www.desharksolutions.com



INVOICE

BILL TO

New Gen Strategies& Solutions
LLC
275 W. Campbell, Suite 440
Richardson, TX 75080

INVOICE # 1338

DATE 06/30/2020

DUE DATE 06/30/2020

TERMS Due on receipt

ACTIVITY	QTY	RATE	AMOUNT
Consultation 06/30/20-Task Order #1-EECRF Review of Outside Consulting Services	1.50	250.00	375.00
Consultation 06/30/20-Task Order #1-EECRF Review of Administrative and General & Research and Development Expenses	1.50	250.00	375.00
Consultation 06/29/30-Task Order #1-EECRF Review of Consumer Price Index (CPI)	1	250.00	250.00
Consultation 06/30/20-Task Order #1-EECRF Review of reasonableness of Reimbursable Employee expenses	1	250.00	250.00
Consultation 06/18/20-Task Order #1-EECRF Task Order requirements review meeting	1	250.00	250.00

BALANCE DUE

\$1,500.00

WORKPAPERS
OF
SHEA A. RICHARDSON

SARWP1

Line Loss Value

	Residential	Secondary < 10 kVA	Secondary > 10 kVA	Primary	Transmission	Total Line Loss Value
2020 kW Savings at Meter	52,181	935	95,141	20,196	2,733	
% of Total Savings	30%	1%	56%	12%	2%	
Line Loss Value From Docket 49421	6.10%	6.09%	6.08%	3.86%	1.96%	
Weighted Line Loss Value	1.860%	0.033%	3.379%	0.455%	0.031%	5.76%
2020 kW Savings at Source	55,365	992	100,927	20,976	2,786	181,045

	Residential	Secondary < 10 kVA	Secondary > 10 kVA	Primary	Transmission	Total Line Loss Value
2020 kWh Savings at Meter	97,329,821	4,900,511	70,685,745	16,655,420	16,396	
% of Total Savings	51.34%	2.58%	37.28%	8.79%	0.01%	
Line Loss Value From Docket 49421	5.80%	5.83%	5.83%	3.28%	1.89%	
Weighted Line Loss Value	2.980%	0.151%	2.172%	0.289%	0.000%	5.59%
2020 kWh Savings at Meter	102,979,609	5,186,346	74,803,234	17,202,464	16,705	200,188,358

	2018				2019				2020			
	Actual Demand Reduction (MW)	Actual Energy Savings (MWH)	Program Cost	Total \$/kW	Actual Demand Reduction (MW)	Actual Energy Savings (MWH)	Program Cost	Total \$/kW	Actual Demand Reduction (MW)	Actual Energy Savings (MWH)	Program Cost	Total \$/kW
TNMP	13.76	17,204	\$ 5,078,630.00	\$ 368.98	10.43	15,629	\$ 4,772,998.00	\$ 457.62	12.47	16,792	\$ 4,855,279.00	\$ 389.48
XCEL	9.57	18,908	\$ 3,802,005.00	\$ 397.12	9.57	23,328	\$ 3,789,634.00	\$ 395.87	11.67	25,663	\$ 3,916,471.00	\$ 335.54
El Paso	16.85	20,726	\$ 4,053,585.00	\$ 240.63	19.42	24,826	\$ 4,272,216.00	\$ 219.95	20.74	30,704	\$ 4,983,108.00	\$ 240.27
Entergy TX	19.67	48,100	\$ 6,975,871.00	\$ 354.74	21.00	44,554	\$ 7,098,781.00	\$ 338.04	20.01	44,885	\$ 6,394,584.00	\$ 319.60
Oncor	172.41	218,304	\$ 48,165,650.00	\$ 279.37	167.45	243,152	\$ 48,253,073.00	\$ 288.16	199.20	243,152	\$ 48,808,959.00	\$ 245.02
SWEPCO	13.96	17,017	\$ 3,947,827.00	\$ 282.82	11.83	16,233	\$ 3,896,836.00	\$ 329.35	10.52	16,246	\$ 4,064,341.00	\$ 386.38
AEP North	8.95	12,669	\$ 3,123,252.00	\$ 349.12	6.58	11,968	\$ 3,099,360.00	\$ 471.17	5.79	12,768	\$ 3,178,790.00	\$ 548.82
AEP Central	43.81	62,417	\$ 13,656,618.00	\$ 311.71	39.70	58,389	\$ 13,571,420.00	\$ 341.87	50.45	59,259	\$ 13,794,310.00	\$ 273.44
CenterPoint	176.36	162,440	\$ 30,509,259.00	\$ 172.99	194.83	215,620	\$ 35,778,847.00	\$ 183.64	171.19	189,588	\$ 36,001,242.00	\$ 210.30

2019 EEPR Docket: Project No. 49297 <http://interchange.puc.texas.gov/Search/Filings?UtilityType=A&ControlNumber=49297&ItemMatch=Equal&DocumentType=ALL&SortOrder=Ascending>

2020 EEPR Docket: Project No. 50666 <http://interchange.puc.texas.gov/Search/Filings?UtilityType=A&ControlNumber=50666&ItemMatch=Equal&DocumentType=ALL&SortOrder=Ascending>

2021 EEPR Docket: Project No. 51672 <http://interchange.puc.texas.gov/search/filings/?UtilityType=A&ControlNumber=51672&ItemMatch=Equal&DocumentType=ALL&SortOrder=Ascending>

Workpaper SARWP3 is confidential. A copy of this material will be provided pursuant to the protective order issued in this docket.

SARWP5**Avoided Cost by Measure Life****2020**

2020 Avoided Cost Data	
Avoided Cost per kW	\$80
Avoided Cost per kWh	\$0.11366
Inflation Rate	2.0%
Discount Rate	8.2%

Uniform Present Worth Formula			
Modified Avoided Costs by			
Measure Life			
EUL	kW	kWh	
1.0	75.41	\$	0.107
2.0	146.49	\$	0.208
3.0	213.49	\$	0.303
4.0	276.65	\$	0.393
5.0	336.18	\$	0.478
6.0	392.30	\$	0.557
7.0	445.19	\$	0.633
8.0	495.05	\$	0.703
9.0	542.05	\$	0.770
10.0	586.35	\$	0.833
11.0	628.11	\$	0.892
12.0	667.47	\$	0.948
13.0	704.58	\$	1.001
14.0	739.55	\$	1.051
15.0	772.52	\$	1.098
16.0	803.60	\$	1.142
17.0	832.89	\$	1.183
18.0	860.50	\$	1.223
19.0	886.52	\$	1.260
20.0	911.06	\$	1.294
21.0	934.18	\$	1.327
22.0	955.98	\$	1.358
23.0	976.53	\$	1.387
24.0	995.89	\$	1.415
25.0	1,014.15	\$	1.441
26.0	1,031.36	\$	1.465
27.0	1,047.58	\$	1.488
28.0	1,062.87	\$	1.510
29.0	1,077.28	\$	1.531
30.0	1,090.87	\$	1.550

2020 Spending (\$)			
Incentives		\$	32,142,258
Total Admin & R&D		\$	3,858,983
Administration		\$	3,540,755
R&D			318,228
Total Program Costs		\$	36,001,242
Itemized Admin and R&D Expenses			
	Labor		\$ 2,473,216
	Consultants		\$ 924,674
	R&D Project Costs		\$ 318,228
	Sponsorships		\$ 16,969
	Expenses		\$ 17,477
	Shared Services		\$ 10,051
	IT Services		\$ 68,434
	Misc. Equipment and Services		\$ 35,342
	Forfeited C&I Project Deposits		\$ (5,408)

Workpaper SARWP7 is confidential. A copy of this material will be provided pursuant to the protective order issued in this docket.

PY 2021

Utility	Year	Sector	Program	kW	kWh	kW %	kWh %	Priority	Priority Weight	Priority %	Blended %	kWh Cost	Priority Cost	Blended Cost
CenterPoint	2021	Com	Advanced Lighting Commercial MTP	196	1,044,835	0%	0%	Low	1	2%	1%	\$2,661	\$11,483	\$7,072
CenterPoint	2021	Com	Commercial Load Management Standard Offer Program	104,761	628,566	61%	0%	Medium	3	6%	3%	\$1,601	\$34,448	\$18,025
CenterPoint	2021	Com	Commercial MTP (SCORE, Healthcare, Data Center)	7,300	47,500,000	4%	22%	High	5	11%	17%	\$120,976	\$57,414	\$89,195
CenterPoint	2021	Com	Commercial Standard Offer Program	11,700	75,000,000	7%	35%	High	5	11%	23%	\$191,015	\$57,414	\$124,214
CenterPoint	2021	Com	REP MTP (Commercial CoolSaver)	550	1,400,000	0%	1%	Low	1	2%	1%	\$3,566	\$11,483	\$7,524
CenterPoint	2021	Com	Retro-Commissioning MTP	3,100	10,800,000	2%	5%	Medium	3	6%	6%	\$27,506	\$34,448	\$30,977
CenterPoint	2021	HTR	Hard-to-Reach Standard Offer Program	876	915,251	1%	0%	High	5	11%	6%	\$2,331	\$57,414	\$29,872
CenterPoint	2021	HTR	Multi-Family MTP Hard-to-Reach	325	645,000	0%	0%	Low	1	2%	1%	\$1,643	\$11,483	\$6,563
CenterPoint	2021	LI	Targeted Low Income MTP (Agencies in Action)	4,377	7,528,347	3%	4%	High	5	11%	7%	\$19,174	\$57,414	\$38,294
CenterPoint	2021	Res	Advanced Lighting Residential MTP	3,725	19,851,862	2%	9%	Low	1	2%	6%	\$50,560	\$11,483	\$31,021
CenterPoint	2021	Res	CenterPoint Energy High Efficiency Home MTP	8,000	17,500,000	5%	8%	Low	1	2%	5%	\$44,570	\$11,483	\$28,026
CenterPoint	2021	Res	Commercial High Efficiency Foodservice MTP (Pilot)	470	4,082,215	0%	2%	Low	1	2%	2%	\$10,397	\$11,483	\$10,940
CenterPoint	2021	Res	Midstream MTP (HVAC and Pool Pump Distributor)	3,500	9,855,000	2%	5%	Low	1	2%	3%	\$25,099	\$11,483	\$18,291
CenterPoint	2021	Res	Multi-Family MTP Market Rate	2,000	3,200,000	1%	2%	Low	1	2%	2%	\$8,150	\$11,483	\$9,816
CenterPoint	2021	Res	REP MTP (Residential CoolSaver and Efficiency Connection)	2,600	7,000,000	2%	3%	Low	1	2%	3%	\$17,828	\$11,483	\$14,655
CenterPoint	2021	Res	Residential & Small Commercial Standard Offer Program	600	1,000,000	0%	0%	High	5	11%	6%	\$2,547	\$57,414	\$29,980
CenterPoint	2021	Res	Residential Load Management Standard Offer Program	17,550	105,300	10%	0%	Medium	3	6%	3%	\$268	\$34,448	\$17,358
CenterPoint	2021	Res	Smart Home Energy Management System (Pilot)	0	46,538	0%	0%	Medium	3	6%	3%	\$119	\$34,448	\$17,283
CenterPoint	2021	Res	Smart Thermostat Program	0	3,800,000	0%	2%	Low	1	2%	2%	\$9,678	\$11,483	\$10,580

DOCKET NO. _____

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

DIRECT TESTIMONY OF

JOHN DURLAND

FOR

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

June 1, 2021

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TABLE OF EXHIBITS

<u>Exhibit</u>	<u>Description</u>
Exhibit JRD-1	Professional Qualifications of John Durland
Exhibit JRD-2	Calculation of Rider EECRF Charges
Exhibit JRD-3	Rider EECRF – Annotated
Exhibit JRD-4	Rider EECRF – Clean Copy

DIRECT TESTIMONY OF JOHN DURLAND

I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

A. My name is John Durland. I am the Manager of Rates for CenterPoint Energy Service Company, LLC. My business address is 1111 Louisiana St., Houston, Texas 77002.

Q. PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. Exhibit JRD-1, included with this direct testimony, summarizes my education and professional experience.

Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES?

A. My duties include the development and implementation of cost of service, cost allocation, rate design, and tariffs for energy delivery.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston" or the "Company").

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS ("COMMISSION")?

A. Yes. I have previously filed testimony at the Commission. A list of these proceedings is provided in Exhibit JRD-1.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to explain and support: (1) the Company's energy efficiency costs included in its 2022 Rider EECRF; (2) the calculation of rates included in the Company's 2022 Rider EECRF for the various rate classes; and (3) the Company's 2022 Rider EECRF tariff.

1 **Q. WHAT EXHIBITS HAVE YOU INCLUDED WITH YOUR TESTIMONY?**

2 A. In addition to Exhibit JRD-1, I have included Exhibits JRD-2 (Calculation of Rider
3 EECRF Charges), JRD-3 (Rider EECRF – Annotated), and JRD-4 (Rider EECRF –
4 Clean Copy), all of which were prepared under my direct supervision.

5 **Q. HOW DOES YOUR TESTIMONY RELATE TO THE DIRECT TESTIMONY**
6 **OF CENTERPOINT HOUSTON WITNESS SHEA RICHARDSON?**

7 A. My testimony primarily focuses on the design of the Company's Rider EECRF, and
8 the underlying calculations used to determine the rates included in Rider EECRF.
9 Mr. Richardson's testimony discusses the Company's estimated 2022 program costs,
10 program designs, and historical program spending.

11 **II. SUMMARY OF ENERGY EFFICIENCY COST RECOVERY**

12 **Q. WHAT LEVEL OF ENERGY EFFICIENCY COSTS IS CENTERPOINT**
13 **HOUSTON PROPOSING TO RECOVER THROUGH ITS RIDER EECRF IN**
14 **2022?**

15 A. In 2022, CenterPoint Houston is requesting to recover a total of \$63,367,922 through
16 Rider EECRF. This amount includes:

- 17 • 2022 program costs;
- 18 • 2020 EECRF under-recovery;
- 19 • Under-recovery interest;
- 20 • The Company's earned performance bonus for 2020;
- 21 • 2020 EECRF rate case expenses for both the Company and participating
22 municipalities; and

- Evaluation, Measurement & Verification (“EM&V”) costs for 2022 program years that were allocated to CenterPoint Houston by the Commission Staff.

Q. PLEASE PROVIDE AN ACCOUNTING OF THE TOTAL EECRF COSTS BY CATEGORY.

A. Please see Table 1 below:

Table 1 – EECRF COSTS

2022 Program Costs	\$37,713,993
2020 Under-Recovery	\$2,930,333
Under-Recovery Interest	\$93,456
2020 Earned Performance Bonus	\$22,021,388
2022 EM&V Costs	\$539,688
2020 EECRF Rate Case Expenses	\$69,063 ¹
Total:	\$63,367,922

III. CALCULATION OF RIDER EECRF CHARGES

Q. HOW DID YOU CALCULATE THE PROPOSED RIDER EECRF CHARGES?

A. Consistent with 16 TAC §§ 25.181 and 25.182, the Rider EECRF charges are the sum of: (1) the Company’s 2022 energy efficiency program costs, including an adjustment to the amount collected through rates in 2020 noted below; (2) a charge for the under-recovery of 2020 energy efficiency program costs; (3) a charge for the under-recovery interest related to the 2020 under-recovery; (4) the 2020 energy efficiency program performance bonus earned by the Company; (5) 2022 EM&V costs; and (6) 2020 EECRF rate case expenses. These cost categories comprise the total energy efficiency

¹ This amount includes both the Company’s incurred expenses for its 2020 EECRF proceeding, *Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to Its Energy Efficiency Cost Recovery Factor*, Docket No. 50908 (Oct. 16, 2020), and the expenses incurred by municipalities that participated in that proceeding. Pursuant to 16 Tex. Admin. Code (“TAC”) § 25.181(g), EECRF proceeding expenses are considered administrative expenses, which are included in the Company’s 2021 program costs calculation; however, in its Application, the Company has presented these expenses separately so that they are more easily identifiable.

1 program revenue requirement, which is then divided by forecasted billing determinants
 2 for each rate class to arrive at the specific rates for each rate class. The Company's
 3 total EECRF revenue requirement request is \$63,367,922. The resulting proposed
 4 Rider EECRF charges are shown in Schedule A of Exhibit JRD-2.

5 **Q. ARE THE EECRF COSTS ASSIGNED OR ALLOCATED TO RATE CLASSES**
 6 **REASONABLE AND CONSISTENT WITH PURA § 39.905(b)(4) AND 16 TAC**
 7 **§ 25.182?**

8 A. Yes. PURA § 39.905(b)(4)² directs the Commission to provide oversight and adopt
 9 rules for the energy-efficiency program, including ensuring that the costs associated
 10 with the program and any earned performance bonus are borne by the rate classes that
 11 receive the services under the program. As discussed in my testimony, the costs
 12 assigned or allocated to rate classes are reasonable and consistent with PURA and
 13 16 TAC § 25.182(d)(2), and they should be approved by the Commission.

14 **IV. 2022 PROGRAM COSTS ALLOCATION**

15 **Q. WHAT IS THE TOTAL AMOUNT OF PROJECTED 2022 PROGRAM COSTS**
 16 **THE COMPANY IS SEEKING TO RECOVER IN THIS PROCEEDING?**

17 A. The Company is seeking to recover \$37,713,993 in program costs for its 2022 program
 18 year. This amount includes the projected cost of incentives, all actual or allocated
 19 research and development costs, and administration costs related to the Company's
 20 2022 energy efficiency programs. In addition, the Company is requesting recovery of
 21 \$69,063 for 2020 Company and municipal EECRF rate case expenses, which are
 22 considered administrative expenses under 16 TAC § 25.181(g).

² Public Utility Regulatory Act, Tex. Util. Code Ann. §§ 11.001-66.016 (Supp.).

1 **Q. HOW DOES CENTERPOINT HOUSTON PROPOSE TO ALLOCATE ITS**
2 **2022 ENERGY EFFICIENCY PROGRAM COSTS AMONG THE VARIOUS**
3 **RATE CLASSES?**

4 A. 16 TAC § 25.182(d)(2) requires that EECRF costs be directly assigned to each rate
5 class that receives services under the programs to the maximum reasonable extent
6 possible. The Company has made a direct assignment of the costs of each of its 2022
7 energy efficiency programs to the appropriate rate classes to the maximum extent
8 reasonably possible. This calculation is provided in Exhibit JRD-2, Schedule B.

9 **Q. PLEASE EXPLAIN THE DIFFERENCE BETWEEN A RATE CLASS AND A**
10 **CUSTOMER CLASS.**

11 A. 16 TAC § 25.182(c)(2) defines a rate class as the retail rate classes approved in the
12 utility's most recent base rate proceeding, excluding non-eligible customers. A
13 customer class is a generic designation used to differentiate residential, commercial,
14 and industrial customers.

15 **Q. HAVE 2022 PROGRAM COSTS BEEN DIRECTLY ASSIGNED AS**
16 **REQUIRED BY THE RULE?**

17 A. Yes. All costs that are directly assignable to a specific rate class have been directly
18 assigned.

19 **Q. DOES THE COMPANY HAVE ANY PROJECTED 2022 PROGRAM COSTS**
20 **THAT ARE NOT DIRECTLY ASSIGNABLE TO A SPECIFIC RATE CLASS?**

21 A. Yes. Some of the Company's administration expenses are not directly assignable to
22 specific rate classes because they are not directly related to any specific program or rate

1 class but, rather, are related to administration of the Company's entire energy efficiency
2 program.

3 **Q. WHAT IS THE TOTAL ADMINISTRATIVE EXPENSE ASSOCIATED WITH**
4 **THE COMPANY'S 2022 ENERGY EFFICIENCY PROGRAMS?**

5 A. The Company's total requested projected administrative expense for 2022 is
6 \$4,315,289.³ This includes all reasonable and necessary costs incurred by the
7 Company to administer its programs as well as all related research and development
8 costs.

9 **Q. HAS THE COMPANY COMPLIED WITH 16 TAC § 25.182(d) IN**
10 **ALLOCATING THESE ADMINISTRATIVE EXPENSES TO THE**
11 **APPROPRIATE RATE CLASSES FOR 2020 EXPENSES?**

12 A. Yes. The non-assignable administrative expenses were allocated among the programs
13 in proportion to the Company's 2020 actual program costs, consistent with 16 TAC
14 § 25.182(d)(10)(F). The allocation of non-assignable administrative expenses of the
15 Company's administrative expense is contained within the program costs shown in the
16 workpapers supporting the schedules attached as Exhibit JRD-2, Schedule F to my
17 testimony.

18 **Q. DOES THE COMPANY HAVE ANY DIRECTLY ASSIGNED**
19 **ADMINISTRATIVE EXPENSE ADJUSTMENTS?**

20 A. No.

³ See Direct Testimony of Shea A. Richardson, Ex. SAR-1 at 25, CenterPoint Houston's Revised Energy Efficiency Plan and Report, Table 6 (Jun. 1, 2021).

V. 2022 EM&V COSTS

Q. HOW DOES 16 TAC § 25.181 ADDRESS THE RECOVERY OF EM&V COSTS THROUGH EECRF RATES?

A. Per 16 TAC § 25.181(o)(10), all utilities are assigned EM&V costs in proportion to their annual program costs.

Q. WHAT AMOUNT OF EM&V COSTS HAS BEEN ASSIGNED TO CENTERPOINT HOUSTON FOR 2022?

A. As noted in the testimony of Mr. Richardson, the amount assigned to CenterPoint Houston by Commission Staff for 2022 is \$539,688.

Q. HAS THE COMPANY INCLUDED RECOVERY OF ITS ASSIGNED EM&V AMOUNT IN THE PROPOSED RIDER EECRF?

A. Yes.

Q. HOW ARE THESE COSTS ALLOCATED TO THE VARIOUS RATE CLASSES?

A. These costs are allocated to the rate classes in proportion to actual program costs in 2020.

VI. PERFORMANCE BONUS

Q. DID CENTERPOINT HOUSTON EARN A BONUS FOR ITS 2020 PROGRAM PERFORMANCE?

A. Yes. Consistent with the standard articulated in 16 TAC § 25.182(e), the Company's performance bonus for 2020 program performance is \$22,021,388. Calculation of the Company's net benefits and performance bonus for the 2020 program year is shown in Schedule E of Exhibit JRD-2.

1 **Q. HOW WAS THE BONUS CALCULATED?**

2 A. The Company calculated the 2020 performance bonus using the prescribed method
3 detailed in 16 TAC §§ 25.181(d)(3)(A) and 25.182(e). In accordance with that
4 methodology, the value of kWh and kW determined by the Electric Reliability Council
5 of Texas (“ERCOT”) and approved by the Commission in Project No. 38578 is
6 weighed against the cost to obtain the kWh and kW in determining the cost vs benefit
7 for customers. For the 2020 program year, using the methodology required in 16 TAC
8 § 25.181(d)(3)(A), the weighted average avoided cost of energy approved by ERCOT
9 and the Commission was \$113.66 per MWh or \$0.11366 per kWh.

10 **Q. WHAT IMPACT DID THE AVOIDED COST OF ENERGY APPROVED BY**
11 **THE COMMISSION FOR THE 2020 PROGRAM YEAR HAVE ON THE**
12 **COMPANY’S PERFORMANCE BONUS?**

13 The higher value of energy in the ERCOT market led to an increased value of avoided
14 consumption in 2020, increasing the value of all Texas energy efficiency programs,
15 and most utility performance bonuses.

16 **Q. HAS THIS AMOUNT BEEN INCLUDED IN THE PROPOSED EECRF**
17 **CHARGES REQUESTED IN THIS APPLICATION?**

18 A. Yes.

19 **Q. PLEASE DESCRIBE HOW THE PERFORMANCE BONUS IS ALLOCATED.**

20 A. CenterPoint Houston has allocated its 2020 performance bonus of \$22,021,388 to rate
21 classes in proportion to the 2020 program costs associated with meeting the demand
22 and energy goals, per 16 TAC § 25.182(e)(6).

VII. EECRF COST CAPS

Q. WHAT WERE THE COMPANY'S OVERALL EECRF RESIDENTIAL AND COMMERCIAL COST CAPS FOR 2020?

A. The cost caps were \$0.001332 for Residential and \$0.000833 for Commercial.

Q. HOW DID THE COMPANY CALCULATE ITS OVERALL 2022 COST CAPS?

A. For the 2016 program year and thereafter, the residential and commercial cost caps are increased or decreased by a rate equal to the most recently available calendar year's percentage change in the South urban CPI, as determined by the Federal Bureau of Labor Statistics. The calculation is provided in the workpaper file labelled JRDWP1 EECRF Cost Cap Calculation for 2022.

Q. ARE CENTERPOINT HOUSTON'S PROPOSED RATES UNDER THE OVERALL COST CAPS REQUIRED BY 16 TAC § 25.182(D)(7)?

A. Yes.

VIII. (OVER)/UNDER-RECOVERY OF 2020 EECRF COSTS

Q. PLEASE DESCRIBE THE CALCULATION FOR UNDER-RECOVERY OF 2020 PROGRAM COSTS.

A. For 2020, the Company's EECRF rates were designed to recover \$35,401,638 in energy efficiency costs. This consisted of \$37,820,991 in forecasted program costs, a performance bonus of \$6,738,428, a previous period over-recovery of \$5,920,293, interest on the previous period over-recovery of \$181,214, 2020 EM&V costs of \$550,514, 2018 settlement adjustment to reduce the amount in rates collected through the EECRF tariff of \$3,700,000 and rate case expenses of \$93,211.⁴ These amounts

⁴ *Id.* at 37.

1 were approved by the Commission in Docket No. 49583.⁵ In 2020, the Company's
2 actual program costs were \$36,001,242 plus actual EM&V costs of \$550,514 for
3 \$36,551,756 or approximately \$1.8 million less than those similar costs authorized in
4 the Commission's Final Order in Docket No. 49583. However, because parties agreed
5 via settlement in Docket No. 49583 to design the EECRF rates to collect \$3,700,000
6 less than they otherwise normally would (thereby reducing the total amount collected
7 through the 2020 EECRF tariff) the actual recovery was much less. When taking into
8 account the program costs, the performance bonus, the previous period over-recovery,
9 interest on the previous period over-recovery, the EM&V costs and the rate case
10 expenses, the Company's total actual energy efficiency-related program costs were
11 \$37,281,888 in 2020. Total revenues collected through the EECRF Rider were only
12 \$34,351,554, resulting in an overall under-recovery of \$2,930,333. The calculation for
13 under-recovery of 2020 program costs is provided in Exhibit JRD-2, Schedule H.

14 **Q. HOW HAS THE COMPANY ASSIGNED THE UNDER-RECOVERY**
15 **AMOUNT TO THE VARIOUS RATE CLASSES?**

16 A. Pursuant to 16 TAC §25.182(d)(2), an under- or over-recovery of costs shall be
17 calculated as the difference between actual EECRF revenues and actual costs for each
18 specific rate class. The Company has followed this methodology and allocated any
19 under- or over-recovery directly to the rate classes from which those costs were under-
20 or over-recovered in proportion to their actual program costs in 2020. The calculation
21 is provided in Exhibit JRD-2, Schedule H, page 2.

⁵ *Id.*

1 **Q. WERE THERE ANY ADDITIONAL AMOUNTS ASSOCIATED WITH THE**
2 **UNDER-RECOVERY AMOUNT?**

3 A. Yes. Pursuant to 16 TAC § 25.182(d)(2), the Company has calculated interest on its
4 under-recovery in the amount of \$91,055. This amount represents the 2020 (2.35%)
5 interest applied to the under-recovery and the 2021 (0.82%) interest applied to the total
6 of the under-recovery with the included 2020 interest. The calculation is provided in
7 Exhibit JRD-2, Schedule H, page 2.

8 **Q. HOW HAS THE COMPANY ASSIGNED THE INTEREST ASSOCIATED**
9 **WITH THE UNDER-RECOVERY AMOUNT TO THE VARIOUS RATE**
10 **CLASSES?**

11 A. The Company has followed the same methodology as the under-recovery costs above
12 and is provided in Exhibit JRD-2, Schedule H, page 2.

13 **IX. COMPLIANCE WITH 16 TAC § 25.182(d)(4)**

14 **Q. WERE ANY OF THE COMPANY'S ENERGY EFFICIENCY PROGRAM**
15 **COSTS IN 2020 RECOVERED THROUGH BASE RATES?**

16 A. No. All of the Company's 2020 energy efficiency program costs were collected
17 through its EECRF.

18 **X. BILLING DETERMINANTS**

19 **Q. WHAT BILLING DETERMINANTS ARE USED TO CALCULATE THE**
20 **PROPOSED RIDER EECRF CHARGES?**

21 A. I have designed the Company's 2022 EECRF charges on a per kWh (energy) basis.
22 The calculation of billing determinants for each rate class is included in Schedule G of
23 Exhibit JRD-2.

1 **Q. OVER WHAT TIME PERIOD ARE THE BILLING DETERMINANTS**
2 **FORECASTED?**

3 A. I have designed Rider EECRF with an effective date of March 1, 2022, and used
4 forecasted billing units from March 2022 through February 2023. Schedule G of
5 Exhibit JRD-2 provides forecasted billing units by month and the latest annual actual
6 billing units at the time of filing.

7 **Q. DID CENTERPOINT HOUSTON RECEIVE ANY OPT-OUT APPLICATIONS**
8 **FROM DISTRIBUTION-LEVEL INDUSTRIAL CUSTOMERS?**

9 A. Yes. Pursuant to 16 TAC § 25.181(u), industrial customers taking service at
10 distribution voltage may opt-out of participation in energy efficiency programs if they
11 submit timely notice to the Company identifying the distribution accounts for which
12 they elect to opt-out. A total of one industrial customer opted-out of participation in
13 the Company's 2020 energy efficiency programs through the identification notice
14 process provided in the rule. Customers are opted-out for three years before having to
15 file an updated notice. For the 2021 energy efficiency program year, a total of 36
16 industrial customer opted-out for the next three years. For the 2022 energy efficiency
17 program year, a total of 5 industrial customers opted-out for the next three years. Thus,
18 a total of 42 industrial customers have opted-out for the 2022 energy efficiency
19 program year. These customers account for approximately 1.0 million kWh per year.

20 **Q. HOW IS THE KWH ASSOCIATED WITH THESE OPT-OUT CUSTOMERS**
21 **REFLECTED IN THIS FILING?**

22 A. The load associated with these opt-out customers has been removed from the
23 calculation of the energy efficiency demand reduction goals pursuant to 16 TAC

§ 25.181(u). The Company has also removed the associated kWh from the billing determinant forecasts used to establish the EECRF rates. The calculation and reduction detail of the customer opt-outs can be found in the Summary of Rates tab of the Confidential EECRF Billing Determinants 2021 (2022-25) file attached as a workpaper to my testimony.

Q. WERE SYSTEM LOSSES OR LINE LOSSES USED IN CALCULATING THE RIDER EECRF CHARGES?

A. No. The proposed EECRF rates are based solely on energy usage at the meter and require no adjustment for system losses or line losses.

Q. IS THE COMPANY'S ESTIMATE OF ITS BILLING DETERMINANTS FOR 2022 REASONABLE?

A. Yes. The Company's billing determinant forecast has used the methodology as in each EECRF proceeding since 2009, and the Commission has found that its calculation of billings determinants was reasonable in each case.

XI. TARIFF FOR RETAIL DELIVERY SERVICE

Q. HAVE YOU PREPARED AN UPDATED RIDER EECRF TO BE INCLUDED IN THE TARIFF FOR RETAIL DELIVERY SERVICE?

A. Yes. Exhibit JRD-4 presents the updated Rider EECRF rate schedule, which shows the Rider EECRF charges by rate class consistent with 16 TAC § 25.182.

Q. WHAT IS THE PROPOSED EFFECTIVE DATE OF THE UPDATED RIDER EECRF?

A. Pursuant to 16 TAC § 25.182(d)(8), the Company proposes an effective date of March 1, 2022.

XII. SUMMARY AND RECOMMENDATIONS

Q. PLEASE SUMMARIZE YOUR TESTIMONY AND RECOMMENDATIONS.

A. The adjustments to Rider EECRF are consistent with the Commission's Substantive Rules and the Commission's applicable decisions in previous CenterPoint Houston EECRF cases. The proposed 2022 Rider EECRF is calculated correctly. I recommend approval of the adjusted Rider EECRF with an effective date of March 1, 2022.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes.

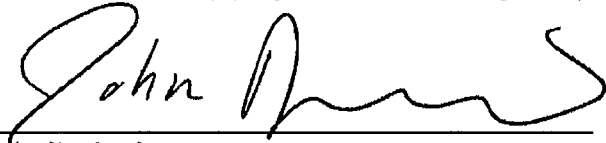
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The State of Texas §

County of Harris §

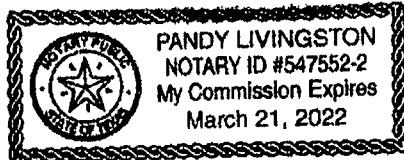
BEFORE ME, the undersigned notary public, this day personally appeared John Durland, to me known, whom being duly sworn according to law, deposes and says:

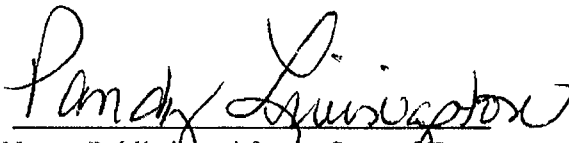
“My name is John Durland. I am of legal age and a resident of the State of Texas. The foregoing testimony and the opinions stated therein are, in my judgment and based upon my professional experience, true and correct.”



John Durland

SWORN TO AND SUBSCRIBED before me on the 27th day of May, 2021.





Notary Public in and for the State of Texas

John Durland
Manager of Rates
CenterPoint Energy Service Company, LLC
1111 Louisiana Street, Houston, Texas 77002

CURRENT RESPONSIBILITIES (2018 – Present)

Overall responsibilities include assisting in the development and implementation of strategy around cost of service, cost allocation, rate design, and tariffs for delivery rates in the ERCOT and Texas jurisdictions.

PREVIOUS PROFESSIONAL EMPLOYMENT

CenterPoint Energy Service Company, LLC, 2016-2018
Manager of Energy Efficiency Compliance

CPS Energy, 2010 – 2016
Energy Efficiency Programs Manager

EDUCATION

Texas A&M Kingsville, MBA
Eastern Kentucky University, BBA

PREVIOUS TESTIMONY:

Public Utility Commission of Texas

Docket No. 50508 – *Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to its Energy Efficiency Cost Recovery Factor*

Docket No. 50653 – *Application of CenterPoint Energy Houston Electric, LLC For Interim Update of Wholesale Transmission Rates*

Docket No. 49583 – *Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to its Energy Efficiency Cost Recovery Factor*

Docket No. 48420 – *Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to its Energy Efficiency Cost Recovery Factor*

Docket No. 47232 – *Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to its Energy Efficiency Cost Recovery Factor*

Exhibit JRD-2
CenterPoint Energy Houston Electric March 2022 Annual EECRF Filing
Docket No.
Schedules A - I

<u>Schedule</u>	<u>Description</u>
Schedule A	Calculation of 2022 Rider EECRF
Schedule B	2022 Energy Efficiency Program Costs
Schedule C	2020 kWh Savings
	Schedule C WP1: 2020 kW and kWh savings breakout
Schedule D	2020 kW Savings
Schedule E	Calculation of 2020 Performance Bonus (By Rate Class)
	Schedule E WP1: Calculation of Performance Bonus based on 2020 Performance
Schedule F	Calculation of 2022 EM&V Costs (By Rate Class)
	Schedule F PG2: Calculation of 2020 Rate Case Expenses (By Rate Class)
	Schedule F PG3: Calculation of 2020 Administrative Expense Adjustments (By Rate Class)
Schedule G PG1-PG4	Rider EECRF Billing Determinants (includes opt-out customers removed from the commercial class)
Schedule H PG1, PG2	Calculation of Over/Under Amounts for Over/Under Recovery of Energy Efficiency Costs and Allocation to Rate Classes
Schedule I	2020 Actual Expenditures (By Rate Class)

Schedule A

CENTRALPOINT ENERGY HOUSTON ELECTRIC, LLC
Calculation of Rider LL CRF (Energy Efficiency Cost Recovery Factor)
Effective March 2022 - February 2024 Billing Months

Customer Class	2021 Energy Efficiency Costs	2019 Performance Bonus Recovery	2019 (Over) Under-Recovery of Program Costs and Revenue	2020 (Over) Under-Recovery Interest	2022 Rider LL CRF Recovery	2022 - 2023 Billing Determinants	Preliminary Rider LL CRF Charges	2022 LM&V Costs	2020 CEIE Rate Case Expenses	2020 Mun. Rate Case Exp.	2020 Administrative Expenses Adjustments	2022 Total Rider EECRF Recovery	Total 2022 - 2023 Billing Determinants	Total Rider EECRF Charges Effective March 1, 2022
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
					(1) - (2) - (3) - (4)		(5) - (6)					(9) - (10) - (11) - (12)		(12) / (13)
Residential	\$ 18,275,650	\$ 11,104,835	\$ 895,457	\$ 28,559	\$ 30,364,500	31,094,421.049	\$0.000975	\$ 218,370	\$ 22,540	\$ 12,287	\$ -	\$ 30,537,697	31,094,421.049	\$0.000983
Secondary <=10 kVA	\$ 632,489	\$ 417,305	\$ 44,342	\$ 1,414	\$ 1,095,551	1,042,351.207	\$0.001051	\$ 20,752	\$ 847	\$ 462	\$ -	\$ 1,117,612	1,042,351.207	\$0.001072
Secondary >10 kVA	\$ 15,080,702	\$ 7,966,069	\$ 458,205	\$ 14,613	\$ 23,519,590	32,189,254.266	\$0.000731	\$ 229,420	\$ 16,169	\$ 8,814	\$ -	\$ 23,773,993	32,189,254.266	\$0.000739
Primary Service	\$ 1,621,185	\$ 2,472,910	\$ 1,501,599	\$ 47,890	\$ 7,643,584	4,001,222.289	\$0.001910	\$ 70,434	\$ 5,019	\$ 2,736	\$ -	\$ 7,721,773	4,001,222.289	\$0.001930
Transmission Non-Profit Governmental	\$ 163,967	\$ 60,269	\$ 30,794	\$ 982	\$ 196,012	869,060.000	\$0.000225	\$ 712	\$ 122	\$ 67	\$ -	\$ 196,913	869,060.000	\$0.000227
Transmission Services	\$ -	\$ -	\$ -	\$ -	\$ -	22,747,286.201	\$0.000000	\$ -	\$ -	\$ -	\$ -	\$ -	22,747,286.201	\$0.000000
Lighting	\$ -	\$ -	\$ (64)	\$ (2)	\$ (66)	247,992.548	\$0.000000	\$ -	\$ -	\$ -	\$ -	\$ (66)	247,992.548	\$0.000000
Total	\$ 37,713,993	\$ 22,021,388	\$ 2,930,333	\$ 93,456	\$ 62,759,171	92,191,527.561		\$ 539,688	\$ 44,698	\$ 24,365	\$ -	\$ 63,367,922	92,191,527.561	
Check	\$ 37,713,993	\$ 22,021,388	\$ 2,930,333	\$ 93,456	\$ 62,759,171	92,191,527.561		\$ 539,688	\$ 44,698	\$ 24,365	\$ -	\$ 63,367,922	92,191,527.561	

	Charge per kWh (includes Rate Case Exp. & Admin. Adjust.)	2014 Cost Caps per kWh (includes 2.12% CPI)	2015 Cost Caps per kWh (includes 1.56% CPI)	2016 Cost Caps per kWh (includes 1.69% CPI)	2017 Cost Caps per kWh (does not include -18% CPI)	2018 Cost Caps per kWh (includes 1.11% CPI)	2019 Cost Caps per kWh (includes 2.05% CPI)	2020 Cost Caps per kWh (includes 2.22% CPI)	2021 Cost Caps per kWh (includes 1.45% CPI)	2022 Cost Caps per kWh (includes 96% CPI)	
Residential	\$0.000974	\$0.001225	\$0.001244	\$0.001266	\$0.001264	\$0.001277	\$0.001303	\$0.001332	\$0.001351	\$0.001364	Satisfactory
Commercial	\$0.000851	\$0.000766	\$0.000778	\$0.000791	\$0.000791	\$0.000798	\$0.000815	\$0.000833	\$0.000845	\$0.000853	Satisfactory

2022 Energy Efficiency Program Costs - CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule B

2022 EE Costs per Program for EECRF	Program Amount:	RESIDENTIAL	SECONDARY < 10 kVA	SECONDARY > 10 kVA	PRIMARY	TRANSMISSION	TOTAL
Commercial:	\$ 19,438,343						
Commercial Standard Offer Program (SOP)		\$ -	\$ 123,500	\$ 4,674,284	\$ 2,274,263	\$ -	\$ 7,072,047
Commercial MTP (SCORE, Healthcare, Data Center)		\$ -	\$ 415,499	\$ 5,302,551	\$ 733,079	\$ -	\$ 6,451,130
Commercial Load Management (SOP)		\$ -	\$ -	\$ 2,905,640	\$ 570,824	\$ 98,181	\$ 3,574,645
Retro-Commissioning MTP		\$ -	\$ -	\$ 1,018,320	\$ 262	\$ -	\$ 1,018,582
REP (Commercial CoolSaver)		\$ -	\$ 5,078	\$ 134,146	\$ -	\$ -	\$ 139,224
Advanced Lighting Commercial		\$ -	\$ 54,471	\$ -	\$ -	\$ -	\$ 54,471
Mid-Stream MTP (Commercial Kitchen Equipment)		\$ -	\$ 31,962	\$ 844,338	\$ -	\$ -	\$ 876,300
R&D		\$ -	\$ 1,979	\$ 201,422	\$ 42,758	\$ 5,785	\$ 251,944
Residential:	\$ 12,648,727						
REP (Residential CoolSaver and Efficiency Connection)		\$ 1,298,779					\$ 1,298,779
Residential Demand Response SOP		\$ 972,800					\$ 972,800
CenterPoint Energy High Efficiency Homes MTP		\$ 4,477,856					\$ 4,477,856
Residential & Small Commercial (SC) SOP		\$ 356,591					\$ 356,591
Advanced Lighting Residential		\$ 1,034,955					\$ 1,034,955
Mid-Stream MTP (A/C and Pool Pump Distributor)		\$ 2,772,443					\$ 2,772,443
Multi-Family MTP		\$ 841,523					\$ 841,523
Smart Thermostat Program (Pilot)		\$ 645,724					\$ 645,724
Smart Home Energy Management System (Pilot)		\$ -					\$ -
R&D		\$ 248,056					\$ 248,056
Hard-to-Reach:	\$ 5,626,923						
Hard-to-Reach SOP		\$ 627,769					\$ 627,769
Multi-Family MTP (HTR)		\$ 551,903					\$ 551,903
Targeted Low Income MTP (Agencies in Action)		\$ 4,447,251					\$ 4,447,251
TOTAL		\$18,275,650	\$632,489	\$15,080,702	\$3,621,185	\$103,967	\$37,713,993
Breakout of Planned 2022 Program Expenditures:							
		RESIDENTIAL	SECONDARY < 10 kVA	SECONDARY > 10 kVA	PRIMARY VOLTAGE	TRANSMISSION VOLTAGE	
2022 TOTAL - ALL PROGRAMS		\$18,275,650	\$632,489	\$15,080,702	\$3,621,185	\$103,967	\$37,713,993
		48.46%	1.68%	39.99%	9.60%	0.28%	

2020 kWh Savings - CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule C

2020 kWh Savings	RESIDENTIAL	SECONDARY < 10 kVA	SECONDARY > 10 kVA	PRIMARY VOLTAGE	TRANSMISSION VOLTAGE
Large Commercial					
Commercial Standard Offer Program (SOP)	-	769,363	40,076,522	12,010,118	-
Commercial MTP (SCORE, Healthcare , Data Center)	-	2,401,269	23,325,161	4,263,327	-
Commercial Load Management (SOP)	-	-	485,236	95,326	16,396
Retro-Commissioning MTP	-	-	6,173,582	286,649	-
REP (Commercial CoolSaver)	-	19,401	625,243	-	-
Advanced Lighting Commercial	-	1,710,478	-	-	-
Residential and Small Commercial Customers:					
CenterPoint Energy High Efficiency Homes MTP	29,870,174	-	-	-	-
Residential & Small Commercial (SC) SOP	1,286,822	-	-	-	-
Smart Thermostat Program (Pilot)	2,741,600	-	-	-	-
Advanced Lighting Residential	32,499,087	-	-	-	-
Mid-Stream MTP (A/C and Pool Pump Distributor)	10,308,961	-	-	-	-
REP (Residential CoolSaver and Efficiency Connection)	3,388,349	-	-	-	-
Residential Demand Response SOP	123,312				
Multi-Family MTP	7,324,460	-	-	-	-
Hard-to-Reach Customers:					
Hard-to-Reach SOP	1,022,189	-	-	-	-
Multi-Family MTP HTR	990,290	-	-	-	-
Targeted Low Income MTP (Agencies in Action)	7,774,579				
TOTALS	97,329,821	4,900,511	70,685,745	16,655,420	16,396
	RESIDENTIAL	SECONDARY < 10 kVA	SECONDARY > 10 kVA	PRIMARY VOLTAGE	TRANSMISSION VOLTAGE
2020 kWh Savings - ALL PROGRAMS	97,329,821	4,900,511	70,685,745	16,655,420	16,396
	51.34%	2.58%	37.28%	8.79%	0.01%
				kWh Sum:	189,587,894
Source: Schedule C WP1					

2020 Savings and Breakout by Commercial Class - CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule C - Workpaper 1

			Secondary < 10 kVA		Secondary > 10 kVA		Primary		Transmission		Secondary < 10 kVA	Secondary > 10 kVA	Primary	Transmission
	kW	Total kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	%	%	%	%
Large Commercial Customers:	119,005	92,258,073												
Commercial Standard Offer Program (SOP)	11,119	52,856,003	194	769,363	7,349	40,076,522	3,576	12,010,118	0	0	2%	66%	32%	0%
Commercial MTP (SCORE, Healthcare, Data Center)	6,449	29,989,757	415	2,401,269	5,300	23,325,161	733	4,263,327	0	0	6%	82%	11%	0%
Commercial Load Management (SOP)	99,493	596,959	0	0	80,873	485,236	15,888	95,326	2,733	16,396	0%	81%	16%	3%
Retro-Commissioning MTP	1,129	6,460,231	0	0	1,129	6,173,582	0	286,649	0	0	0%	100%	0%	0%
REP (Commercial CoolSaver)	509	644,644	19	19,401	491	625,243	0	0	0	0	4%	96%	0%	0%
Advanced Lighting Commercial	307	1,710,478	307	1,710,478	0	0	0	0	0	0	100%	0%	0%	0%
Residential and Small Commercial Customers:											0 8%	79 9%	17 0%	2 3%
CenterPoint Energy High Efficiency Homes MTP	11,020	29,870,174												
Residential & Small Commercial (SC) SOP	480	1,286,822												
Smart Thermostat Program (Pilot)	0	2,741,600												
Advanced Lighting Residential	5,828	32,499,087												
Mid-Stream MTP (A/C and Pool Pump Distributor)	3,516	10,308,961												
REP (Residential CoolSaver and Efficiency Connection)	1,089	3,388,349												
Residential Demand Response SOP	20,552	123,312												
Multi-Family MTP	3,843	7,324,460												
Hard-to-Reach Customers:														
Hard-to-Reach SOP	863	1,022,189												
Multi-Family MTP (HTR)	172	990,290												
Targeted Low Income MTP (Agencies in Action)	4,818	7,774,579												
	171,187	189,587,894												

Source: 2021 EEPR and EECRF Data Tables

2020 kW Savings - CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule D

2020 kW Savings	RESIDENTIAL	SECONDARY < 10 kVA	SECONDARY > 10 kVA	PRIMARY	TRANSMISSION
Large Commercial Customers:					
Commercial Standard Offer Program (SOP)	-	194.17	7,349.04	3,575.66	-
Commercial MTP (SCORE, Healthcare, Data Center)	-	415.33	5,300.39	732.78	-
Commercial Load Management (SOP)	-	-	80,872.74	15,887.75	2,732.68
Retro-Commissioning MTP	-	-	1,128.63	0.29	-
REP (Commercial CoolSaver)	-	18.57	490.57	-	-
Advanced Lighting Commercial	-	306.72	-	-	-
Residential and Small Commercial Customers:					
CenterPoint Energy High Efficiency Homes MTP	11,020	-	-	-	-
Residential & Small Commercial (SC) SOP	480	-	-	-	-
Smart Thermostat Program (Pilot)	0	-	-	-	-
Advanced Lighting Residential	5,828				
Mid-Stream MTP (A/C and Pool Pump Distributor)	3,516	-	-	-	-
REP (Residential CoolSaver and Efficiency Connection)	1,089	-	-	-	-
Residential Demand Response SOP	20,552				
Multi-Family MTP	3,843	-	-	-	-
Hard-to-Reach Customers:					
Hard-to-Reach SOP	863	-	-	-	-
Multi-Family MTP HTR	172				
Targeted Low Income MTP (Agencies in Action)	4,818	-	-	-	-
TOTAL	52,181.27	934.79	95,141.36	20,196.48	2,732.68

	RESIDENTIAL	SECONDARY < 10 kVA	SECONDARY > 10 kVA	PRIMARY VOLTAGE	TRANSMISSION VOLTAGE
2020 kW Savings - ALL PROGRAMS	52,181.27	934.79	95,141.36	20,196.48	2,732.68
	30.48%	0.55%	55.58%	11.80%	1.60%
				Sum kW:	171,186.59

Source: Schedule C WP1

Calculation of 2020 Performance Bonus (By Rate Class)

Schedule E

Customer Class		2020
		Performance
	% of 2020 Actual	Bonus
	EE Expenditures	\$22,021,388
Residential	50.43%	\$ 11,104,835.07
Secondary <=10 kVA	1.89%	\$ 417,305.18
Secondary > 10 kVA	36.17%	\$ 7,966,068.97
Primary	11.23%	\$ 2,472,909.72
Transmission Non-Profit Governmental	0.27%	\$ 60,269.50
Transmission - Industrial	0.00%	\$ -
Lighting	0.00%	\$ -
Total	100.00%	\$ 22,021,388

Class	2020 Actual Energy Efficiency Expenditures	% of Total
Residential	\$18,154,525	50.43%
Secondary <= 10 kVA	\$682,223	1.89%
Secondary > 10 kVA	\$13,023,174	36.17%
Primary	\$4,042,789	11.23%
Transmission Non-Profit Governmental	\$98,530	0.27%
Transmission - Industrial	\$0	0.00%
Lighting	\$0	0.00%
Total	\$36,001,242	100.00%

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule E - Workpaper 1

<u>Performance Incentive Calculation for Calendar Year 2020</u>	kW	kWh
2020 Program Goals	62,820	110,061,000
2020 Program Savings	171,187	189,587,894
<i>Reported/Verified Total (including HTR, measures with 10yr EUL, and measures with EULs < or > 10 years)</i>	171,187	189,587,894
<i>Reported/Verified Hard-to-Reach</i>	5,854	9,787,058
Avoided Cost		
<i>per kW</i>		\$80
<i>per kWh</i>		\$0.05084
<i>Inflation Rate</i>		2.0%
<i>Discount Rate</i>		8.21%
Total Avoided Cost (see avoided cost savings table)		\$263,551,040
2020 Program Costs*		\$43,337,156
Net Benefits = Total Avoided Cost - Total Program Costs		
Net Benefits		\$220,213,884
Bonus based on 10% of Net Benefits		\$22,021,388
Source: Project No. 50666, EEPR 2021		

*Program costs include 2020 bonus recovery which is based on the 2018 bonus of \$6,738,428

2020 Actual Commercial Expenditures By Rate Class Per Program - CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule F

	Secondary < 10 kVA	Secondary > 10 kVA	Primary	Transmission	Total Commercial Programs	Residential	Total All Programs
	Total 2020						
1 Residential Programs						\$ 17,992,533	\$ 17,992,533
2 Commercial Standard Offer Program (SOP)	\$ 87,713	\$ 1,098,153	\$ 2,641,368	\$ -	\$ 6,827,674		\$ 6,827,674
3 Commercial MTP (SCORE, Healthcare, Data Center)	\$ 528,599	\$ 4,850,670	\$ 737,278	\$ -	\$ 6,116,546		\$ 6,116,546
4 Commercial Load Management (SOP)	\$ -	\$ 2,871,888	\$ 369,811	\$ 97,632	\$ 3,542,334		\$ 3,542,334
5 Retro-Commissioning MTP	\$ -	\$ 950,982	\$ 59,171	\$ -	\$ 1,010,153		\$ 1,010,153
6 REP (Commercial CoolSaver)	\$ 4,840	\$ 133,935	\$ -	\$ -	\$ 138,775		\$ 138,775
7 Advanced Lighting Commercial	\$ 54,999	\$ -	\$ -	\$ -	\$ 54,999		\$ 54,999
8 R&D	\$ 6,073	\$ 114,246	\$ 35,018	\$ 898	\$ 156,235	\$ 161,992	\$ 318,228
Total by Rate Class	\$ 682,223	\$ 13,023,174	\$ 4,042,789	\$ 98,530	\$ 17,846,716	\$ 18,154,525	\$ 36,001,242

	Secondary < 10 kVA	Secondary > 10 kVA	Primary	Transmission	Check	Residential
	Total 2019					
Commercial Standard Offer Program (SOP)	1.28%	60.03%	38.69%	0.00%	100.00%	
Commercial MTP (SCORE, Healthcare, Data Center)	8.64%	79.30%	12.05%	0.00%	100.00%	
Commercial Load Management (SOP)	0.00%	81.16%	16.00%	2.76%	100.00%	
Retro-Commissioning MTP	0.00%	94.14%	5.86%	0.00%	100.00%	
REP (Commercial CoolSaver)	3.49%	96.51%	0.00%	0.00%	100.00%	
Advanced Lighting Commercial	100.00%	0.00%	0.00%	0.00%	100.00%	
R&D	3.89%	73.12%	22.41%	0.57%	100.00%	100.00%
Residential & Hard to Reach	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%

Program	Sector	Allocation Per Tetra Tech, EM&V Costs 2021	Secondary < 10 kVA	Secondary > 10 kVA	Primary	Transmission	Residential	Total	Check
Commercial Standard Offer Program	Nonresidential	\$ 133,006.69	\$ 1,708.69	\$ 79,840.03	\$ 51,457.97	\$ -	\$ -	\$ 133,006.69	\$ -
Commercial MTP (SCORE, Healthcare, Data Center)	Nonresidential	\$ 97,979.62	\$ 8,467.51	\$ 77,701.83	\$ 11,810.29	\$ -	\$ -	\$ 97,979.62	\$ -
Commercial Load Management SOP	Nonresidential	\$ 23,287.61	\$ -	\$ 18,899.76	\$ 3,746.01	\$ 641.84	\$ -	\$ 23,287.61	\$ -
REP MTP (Commercial CoolSaver)	Nonresidential	\$ 9,278.86	\$ -	\$ 8,735.34	\$ 543.52	\$ -	\$ -	\$ 9,278.86	\$ -
Retro-Commissioning MTP	Nonresidential	\$ 36,243.08	\$ 1,264.15	\$ 34,978.93	\$ -	\$ -	\$ -	\$ 36,243.08	\$ -
Advanced Lighting Commercial MTP	Nonresidential	\$ 8,826.48	\$ 8,826.48	\$ -	\$ -	\$ -	\$ -	\$ 8,826.48	\$ -
Commercial High Efficiency Foodservice MTP (Pilot)	Nonresidential	\$ 12,695.23	\$ 485.23	\$ 9,263.84	\$ 2,876.10	\$ 70.06	\$ -	\$ 12,695.23	\$ -
Residential & Small Commercial Standard Offer Program	Residential	\$ 23,760.71	\$ -	\$ -	\$ -	\$ -	\$ 23,760.71	\$ 23,760.71	\$ -
Smart Thermostat Program	Residential	\$ 27,327.10	\$ -	\$ -	\$ -	\$ -	\$ 27,327.10	\$ 27,327.10	\$ -
Multi-Family MTP Market Rate	Residential	\$ 11,571.54	\$ -	\$ -	\$ -	\$ -	\$ 11,571.54	\$ 11,571.54	\$ -
Advanced Lighting Residential MTP	Residential	\$ 32,781.21	\$ -	\$ -	\$ -	\$ -	\$ 32,781.21	\$ 32,781.21	\$ -
Midstream MTP (HVAC and Pool Pump Distributor)	Residential	\$ 20,048.09	\$ -	\$ -	\$ -	\$ -	\$ 20,048.09	\$ 20,048.09	\$ -
Residential Load Management Standard Offer Program	Residential	\$ 22,621.12	\$ -	\$ -	\$ -	\$ -	\$ 22,621.12	\$ 22,621.12	\$ -
REP MTP (Residential CoolSaver and Efficiency Connection)	Residential	\$ 16,411.65	\$ -	\$ -	\$ -	\$ -	\$ 16,411.65	\$ 16,411.65	\$ -
CenterPoint Energy High Efficiency Home MTP	Residential	\$ 29,785.62	\$ -	\$ -	\$ -	\$ -	\$ 29,785.62	\$ 29,785.62	\$ -
Hard-to-Reach Standard Offer Program	Hard-to-Reach	\$ 8,661.43	\$ -	\$ -	\$ -	\$ -	\$ 8,661.43	\$ 8,661.43	\$ -
Multi-Family MTP Hard-to-Reach	Hard-to-Reach	\$ 8,317.21	\$ -	\$ -	\$ -	\$ -	\$ 8,317.21	\$ 8,317.21	\$ -
Targeted Low Income MTP (Agencies in Action)	Hard-to-Reach	\$ 17,084.61	\$ -	\$ -	\$ -	\$ -	\$ 17,084.61	\$ 17,084.61	\$ -
Total		\$ 539,687.85	\$ 20,752.05	\$ 229,419.73	\$ 70,433.88	\$ 711.91	\$ 218,370.27	\$ 539,687.85	\$ -

Calculation of 2020 Rate Case Expenses (By Rate Class)

Schedule F - Page 2

Customer Class		2020	2020
		CEHE Rate Case	Muni. Rate Case
		Expenses	Expenses
	% of 2020 Actual EE Expenditures	\$ 44,698.07	\$ 24,364.90
Residential	50.43%	\$ 22,540.12	\$ 12,286.61
Secondary <=10 kVA	1.89%	\$ 847.03	\$ 461.71
Secondary > 10 kVA	36.17%	\$ 16,169.19	\$ 8,813.82
Primary	11.23%	\$ 5,019.41	\$ 2,736.08
Transmission Non-Profit Governmental	0.27%	\$ 122.33	\$ 66.68
Transmission - Industrial	0.00%	\$ -	\$ -
Lighting	0.00%	\$ -	\$ -
Total	100.00%	\$ 44,698	\$ 24,365

Calculation of 2020 Administrative Expense Adjustments (By Rate Class)

Schedule F - Page 3

Rate Class		2020
		Administrative Expense
	% of 2020 Actual	Adjustments
	EE Expenditures	\$0
Residential	50.43%	\$ -
Secondary <=10 kVA	1.89%	\$ -
Secondary > 10 kVA	36.17%	\$ -
Primary	11.23%	\$ -
Transmission Non-Profit Governmental	0.27%	\$ -
Transmission - Industrial	0.00%	\$ -
Lighting	0.00%	\$ -
Total	100.00%	\$ -

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule G Page 1

Rider EECRF Billing Determinants

Actuals through February 2021 Forecast for remainder of 2021 and through February 2023 From the 2021-25 Business Plan

Rate Class	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
Residential Service	2,040,393,796	1,650,931,446	1,744,748,970	0	0	0	0	0
Secondary Service Less Than or Equal to 10 kVA	85,044,034	70,252,869	72,722,303	0	0	0	0	0
Secondary Service Greater Than 10 kVA	2,585,976,590	2,183,508,280	2,360,607,694	-15,520	-17,280	-16,800	-28,000	-22,240
Primary Service	367,350,841	301,918,572	344,047,374	0	0	0	0	0
Transmission Non-Profit/Governmental	65,808,941	65,866,418	63,317,109	71,790,690	72,463,755	74,877,275	72,171,236	73,238,695
Transmission Service	2,275,618,761	2,440,940,732	2,248,140,880	-74,525,857	-73,856,079	-76,422,026	-73,926,279	-75,281,842
Lighting Services	19,777,615	19,499,159	19,767,324	0	0	0	0	0
Total	7,439,970,578	6,732,917,475	6,853,351,654	-2,750,686	-1,409,604	-1,561,551	-1,783,042	-2,065,387

* Billing Determinants include the reduction in energy demand of 42 commercial customers that qualified under the opt-out provision in the amended energy efficiency rules

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
Rider EECRF Billing Determinants

Schedule G Page 2
Forecast Forecast

Rate Class	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21
Residential Service	0	0	0	0	0	0	1,756,622,054	1,939,388,962	2,722,173,994
Secondary Service Less Than or Equal to 10 kVA	0	0	0	0	79,929,040	73,624,181	80,470,344	77,484,352	80,510,779
Secondary Service Greater Than 10 kVA	-21,600	-24,640	-26,880	-30,560	2,432,774,474	2,263,831,898	2,375,327,342	2,428,048,443	2,560,833,530
Primary Service	0	0	0	0	309,258,885	304,725,426	316,797,237	328,441,400	346,700,159
Transmission Non-Profit/Governmental	72,569,859	70,210,030	71,644,157	71,041,834	65,808,941	65,866,418	62,629,366	72,567,190	71,987,990
Transmission Service	-75,846,594	-71,370,534	-73,042,371	-73,828,641	1,682,438,721	1,844,847,908	1,940,625,877	1,960,487,991	1,955,954,421
Lighting Services	0	0	0	0	19,727,243	19,724,078	20,192,631	20,206,062	20,217,388
Total	-3,298,335	-1,185,144	-1,425,093	-2,817,367	4,589,937,304	4,572,619,908	6,552,664,852	6,826,624,400	7,758,378,262

* Billing Determinants include the reduction in energy demand

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule G Page 3

Rider EECRF Billing Determinants

	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast
Rate Class	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22
Residential Service	3,586,134,806	3,970,158,939	3,935,196,721	2,969,899,798	2,286,853,018	1,715,003,290	2,085,663,592	2,084,938,311	1,741,783,015
Secondary Service Less Than or Equal to 10 kVA	82,249,165	90,151,694	92,546,348	89,603,190	92,670,127	88,138,334	85,464,652	84,812,881	77,088,913
Secondary Service Greater Than 10 kVA	2,680,144,931	3,151,755,831	3,210,916,398	3,012,963,215	2,787,948,002	2,488,714,151	2,559,239,486	2,443,123,144	2,272,315,396
Primary Service	364,051,524	376,196,672	377,479,553	366,504,008	342,448,095	316,937,138	315,589,758	301,999,376	296,269,045
Transmission Non-Profit/Governmental	74,296,237	71,527,997	72,580,663	73,365,936	70,164,967	71,803,402	72,256,654	68,670,103	68,031,068
Transmission Service	1,943,884,646	1,985,046,097	1,908,263,112	1,882,341,330	1,917,873,222	1,838,279,934	1,756,557,716	1,712,485,070	1,868,306,877
Lighting Services	20,231,623	20,295,382	20,240,771	20,452,929	20,618,005	20,263,214	21,140,807	20,039,514	20,038,873
Total	8,750,992,932	9,665,132,612	9,617,223,565	8,415,130,405	7,518,575,436	6,539,139,463	6,895,912,666	6,716,068,398	6,343,833,186

* Billing Determinants include the reduction in energy demand

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule G Page 4

Rider EECRF Billing Determinants

	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast
Rate Class	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22
Residential Service	1,776,021,021	1,958,564,561	2,749,574,326	3,624,169,291	4,012,086,962	3,975,394,087	2,997,544,648	2,305,023,224	1,727,988,203
Secondary Service Less Than or Equal to 10 kVA	83,156,274	79,041,525	82,139,520	83,937,105	92,023,026	94,488,841	91,515,594	94,672,485	89,945,329
Secondary Service Greater Than 10 kVA	2,385,122,327	2,437,471,818	2,573,135,794	2,697,364,980	3,175,136,299	3,235,359,127	3,034,215,239	2,806,168,097	2,508,065,004
Primary Service	311,752,786	324,016,068	342,091,343	359,466,273	372,000,222	373,724,383	362,918,864	338,516,837	313,215,607
Transmission Non-Profit/Governmental	64,198,605	74,525,857	73,856,079	76,422,026	73,926,279	75,281,842	75,846,594	71,370,534	73,042,371
Transmission Service	1,959,819,357	1,980,312,323	1,975,304,872	1,962,696,291	1,985,046,097	1,908,263,112	1,882,341,330	1,917,873,222	1,838,279,934
Lighting Services	20,517,860	20,533,355	20,546,794	20,563,480	20,631,228	20,577,479	20,794,312	20,963,613	20,603,986
Total	6,600,588,231	6,874,465,507	7,816,648,728	8,824,619,446	9,730,850,112	9,683,088,870	8,465,176,581	7,554,588,011	6,571,140,434

* Billing Determinants include the reduction in energy demar

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Schedule G Page 5

Rider EECRF Billing Determinants

	Forecast	Forecast	Forecast	
Rate Class	Dec-22	Jan-23	Feb-23	Total
Residential Service	2,102,935,748	2,105,880,511	1,759,238,468	31,094,421,049 KWH
Secondary Service Less Than or Equal to 10 kVA	87,196,722	86,039,721	78,195,065	1,042,351,207 KWH
Secondary Service Greater Than 10 kVA	2,582,114,539	2,464,388,056	2,290,712,986	32,189,254,266 KWH
Primary Service	311,963,603	298,668,216	292,888,086	4,001,222,289 KWH
Transmission Non-Profit/Governmental	73,828,641	68,670,103	68,031,068	869,000,000 KWH
Transmission Service	1,756,557,716	1,712,485,070	1,868,306,877	22,747,286,201 KWH
Lighting Services	21,497,558	20,381,046	20,381,838	247,992,548 KWH
Total	6,936,094,528	6,756,512,724	6,377,754,389	92,191,527,561

* Billing Determinants include the reduction in energy demand

2020 EECRF Estimated Over/Under Calculation and Allocation to Rate Classes

Schedule H Page 1

Calculation of 2020 Over/(Under) Calculation

Revenue Requirement	Actual	Approved EECRF	Source	
2020 Program Costs	\$36,001,242	\$37,820,991	CEHE for 2020 Actual 2020 Budget from EECRF filing	-\$1,819,750
2018 Bonus	\$6,738,428	\$6,738,428		
2018 Over Recovery	-\$5,920,293	-\$5,920,293		
2018 & 2019 Over Recovery Int	-\$181,214	-\$181,214		
2020 EM&V Costs	\$550,514	\$550,514		
2018 Rate Case Expenses	\$93,211	\$93,211		
2020 Settlement Adjust	\$0	(\$3,700,000)		\$3,700,000
Total	\$37,281,888	\$35,401,638		\$1,880,250

Negative value represents
"approved but not spent"

Revenue

EECRF

January	\$ 2,863,309.65	CenterPoint Energy Revenue Statistics for 2020
February	\$ 2,365,670.47	" "
March	\$ 2,310,639.11	" "
April	\$ 2,395,600.72	" "
May	\$ 2,468,561.73	" "
June	\$ 3,268,947.67	" "
July	\$ 3,834,304.82	" "
August	\$ 3,577,717.18	" "
September	\$ 3,644,112.12	" "
October	\$ 2,976,449.34	" "
November	\$ 2,148,403.63	" "
December	\$ 2,497,837.77	" "
Total EECRF	\$34,351,554.21	Total of above

Total 2020 Revenue	\$34,351,554.21	\$ 1,880,250.49 Over-Expenditures - "Approved but not spent"
EECRF Over/(Under)	-\$2,930,333.47	\$ (1,050,082.98) Under-collection from approved revenue
		\$ (2,930,333.47) Total Under-recovery to be returned through 2022 EECRF

"Under-collection"

Positive value represents over-collection
from actual 2020 expenditures and revenues

Allocation of 2020 Over/(Under) Calculation to Rate Classes

Schedule H Page 2

Class	2020 Over/(Under)-Expenditure Class Calculation			2020 Over/(Under)-Collection Class Calculation			True-Up	Interest Calculation		Net True-Up
								2020	2021	
	2020 Actual Energy Efficiency Expenditures (includes bonus, EM&V over/under recovery, historical admin adj, and rate case exp) (1)	2020 Budgeted Energy Efficiency Costs (includes bonus, EM&V, over/ under recovery, historical admin adj, settlement adj, and rate case exp) (2)	2020 (Over)/Under Expenditure (3) = (1)-(2)	Approved 2020 EECRF Total Requirement Amount (4)	2020 EECRF Actual Recovery Amount (5)	2020 EECRF Over / (Under) Collection of Revenue (6) = (5) - (4)	2020 Over/ (Under) Recovery (7) = -(3) + (6)	2020 Over/(Under) Recovery with 2020 Interest (8)	2020 Over/(Under) Recovery with 2020 & 2021 Interest (9)	Net 2020 Over/ (Under) Recovery (10) = (7) + (8) + (9)
Residential	\$18,229,408	\$16,843,423	\$1,385,985	\$16,843,423	\$17,333,951	\$490,528	(\$895,457)	(\$21,043)	(\$7,515)	(\$924,015)
Secondary <= 10 kVA	\$243,323	\$230,451	\$12,872	\$230,451	\$198,981	(\$31,470)	(\$44,342)	(\$1,042)	(\$372)	(\$45,757)
Secondary > 10 kVA	\$13,598,446	\$14,465,087	(\$866,641)	\$14,465,087	\$13,140,241	(\$1,324,846)	(\$458,205)	(\$10,768)	(\$3,846)	(\$472,819)
Primary	\$4,982,602	\$3,660,165	\$1,322,437	\$3,660,165	\$3,481,003	(\$179,162)	(\$1,501,599)	(\$35,288)	(\$12,602)	(\$1,549,489)
Transmission Non-Profit Governmental	\$228,172	\$202,576	\$25,596	\$202,576	\$197,378	(\$5,198)	(\$30,794)	(\$724)	(\$258)	(\$31,776)
Transmission - Industrial	\$0	\$-	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Lighting	(\$64)	(\$64)	\$0	-\$64	\$0	\$64	\$64	\$2	\$1	\$66
Total	\$37,281,887	\$35,401,638	\$1,880,249	\$35,401,638	\$34,351,554	(\$1,050,084)	(\$2,930,333)	(\$68,863)	(\$24,593)	(\$3,023,789)

chk

Ties to 2021 EEPR Section XIV

2020 Actual Expenditures

Schedule I

	2020 Actual Exp.	2018 Bonus	2018 Rate Case Exp	2020 EM&V Costs	2018 & 2019 Over Recovery Int	2018 (Over)/Under	Total Per/Class
Residential	\$18,154,525	\$3,389,024	\$46,880	\$ 280,540	(\$108,154)	(\$3,533,407)	\$18,229,408
Sec< 10	\$682,223	\$105,876	\$1,465	\$ 25,057	(\$16,967)	(\$554,331)	\$243,323
Sec >10	\$13,023,174	\$2,629,994	\$36,380	\$ 194,187	(\$67,873)	(\$2,217,416)	\$13,598,446
Primary	\$4,042,789	\$596,348	\$8,249	\$ 50,256	\$8,463	\$276,498	\$4,982,602
Trans. Non-Profit	\$98,530	\$17,185	\$238	\$ 473	\$3,319	\$108,426	\$228,172
Trans. Indus.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Lighting	\$0	\$0	\$0	\$0	(\$2)	(\$62)	(\$64)
Totals	\$36,001,242	\$6,738,428	\$93,211	\$550,514	(\$181,214)	(\$5,920,293)	\$37,281,887

Class	2018 Actual Energy Efficiency Expenditures	% of Total	2018 Performance Bonus	2020 EM&V Costs spent of \$550,514	2018 CEHE Rate Case Expenses	2018 Admin. Exp Adj
Residential	\$15,344,322	50.29%	\$3,389,024	\$ 280,540	\$46,880	\$0
Secondary <= 10 kVA	\$479,371	1.57%	\$105,876	\$ 25,057	\$1,465	\$0
Secondary > 10 kVA	\$11,907,701	39.03%	\$2,629,994	\$ 194,187	\$36,380	\$0
Primary	\$2,700,056	8.85%	\$596,348	\$ 50,256	\$8,249	\$0
Transmission Non- Profit/ Govt	\$77,809	0.26%	\$17,185	\$ 473	\$238	\$0
Transmission - Industrial	\$0	0.00%	\$0	\$0	\$0	\$0
Lighting	\$0	0.00%	\$0	\$0	\$0	0
Total	\$30,509,259	100.00%	6,738,428	550,514	93,211	0

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

6.1.1.6.9 RIDER EECRF – ENERGY EFFICIENCY COST RECOVERY FACTOR

AVAILABILITY

Pursuant to Public Utility Regulatory Act §39.905 and Public Utility Commission of Texas Substantive Rule §25.181 and 25.182, the energy efficiency cost recovery factor (EECRF) is a non-bypassable charge applicable to all Retail Customers.

METHOD OF CALCULATION

EECRF charges shall be calculated annually and shall equal by rate class the sum of: forecasted energy efficiency costs, any adjustment for past over-recovery or under-recovery of EECRF costs, any energy efficiency performance bonus, any previous year's EECRF proceeding rate case expenses, and any allocated Evaluation, Measurement & Verification ("EM&V") costs; divided by the forecasted billing units for each class.

MONTHLY RATE

A Retail Customer's EECRF for the billing month shall be determined by multiplying the appropriate EECRF charge shown below by the Retail Customer's applicable billing unit for the current month.

Rate Class	EECRF Charge	Billing Unit	
Residential Service	\$0.000983	Per kWh	I
Secondary Service Less than or Equal to 10 kVA	\$0.001072	Per kWh	R
Secondary Service Greater than 10 kVA	\$0.000739	Per kWh	I
Primary Service	\$0.001930	Per kWh	I
Transmission Non-Profit Governmental	\$0.000227	Per kWh	I
Transmission Service – Industrial	\$0.000000	Per kWh	I
Lighting Services	N/A		

NOTICE

This Rate Schedule is subject to the Company's Tariff and Applicable Legal Authorities.

Revision Number: 13th

Effective: 3/1/22 T

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

6.1.1.6.9 RIDER EECRF – ENERGY EFFICIENCY COST RECOVERY FACTOR

AVAILABILITY

Pursuant to Public Utility Regulatory Act §39.905 and Public Utility Commission of Texas Substantive Rule §25.181 and 25.182, the energy efficiency cost recovery factor (EECRF) is a non-bypassable charge applicable to all Retail Customers.

METHOD OF CALCULATION

EECRF charges shall be calculated annually and shall equal by rate class the sum of: forecasted energy efficiency costs, any adjustment for past over-recovery or under-recovery of EECRF costs, any energy efficiency performance bonus, any previous year's EECRF proceeding rate case expenses, and any allocated Evaluation, Measurement & Verification ("EM&V") costs; divided by the forecasted billing units for each class.

MONTHLY RATE

A Retail Customer's EECRF for the billing month shall be determined by multiplying the appropriate EECRF charge shown below by the Retail Customer's applicable billing unit for the current month.

Rate Class	EECRF Charge	Billing Unit
Residential Service	\$0.000983	Per kWh
Secondary Service Less than or Equal to 10 kVA	\$0.001072	Per kWh
Secondary Service Greater than 10 kVA	\$0.000739	Per kWh
Primary Service	\$0.001930	Per kWh
Transmission Non-Profit Governmental	\$0.000227	Per kWh
Transmission Service – Industrial	\$0.000000	Per kWh
Lighting Services	N/A	

NOTICE

This Rate Schedule is subject to the Company's Tariff and Applicable Legal Authorities.

WORKPAPERS
OF
JOHN R. DURLAND

CPI - South Urban Index

Year	Annual	% Change	Source
2011	218.6		
2012	223.2	2.115105%	
2013	226.7	1.558399%	
2014	230.6	1.689742%	http://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR03005A0,CUUS03005A0
2015	230.1	-0.175665%	http://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR03005A0,CUUS03005A0
2016	232.7	1.105800%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR03005A0,CUUS03005A0
2017	237.5	2.047300%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR03005A0,CUUS03005A0
2018	242.7	2.224000%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR03005A0,CUUS03005A0
2019	246.3	1.453400%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR03005A0,CUUS03005A0
2020	248.6	0.964000%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR03005A0,CUUS03005A0

Click Links Below to View Annual Consumer Price Index Data For Cost Caps

[2015 Data](#)[2016 Data](#)[2017 Data](#)[2018 Data](#)[2019 Data](#)[2020 Data](#)[2021 Data](#)

Cost Caps

	Res Cap \$/kWh	Comm Cap \$/kWh	Source
2013	\$ 0.001200	\$ 0.000750	per EE Rule Section f)(7)(E)
2014	\$ 0.001225	\$ 0.000766	escalated based on most recent data at the time in which the 2014 costs were set -- they do not plan to recalculate this number
2015	\$ 0.001244	\$ 0.000778	escalated based on most recent data -- 2015 cost cap as confirmed in docket 42449, Item 37, Therese Harris's testimony, page 11
2016	\$ 0.001266	\$ 0.000791	Hard-wired values (no calculation or rounding, based on revised EE Rule, docket 46388)
2017	\$ 0.001266	\$ 0.000791	Hard-wired values (no calculation or rounding, based on revised EE Rule, docket 46388)
2018	\$ 0.001277	\$ 0.000799	Hard-wired values (with calculation based on docket 46388)
2019	\$ 0.001303	\$ 0.000815	Calculated based on docket 46388
2020	\$ 0.001332	\$ 0.000833	Calculated in line with 46388, based on new EE Rule under docket 48692
2021	\$ 0.001351	\$ 0.000845	Calculated in line with 46388, based on new EE Rule under docket 48692
2022	\$ 0.001364	\$ 0.000853	Calculated in line with 46388, based on new EE Rule under docket 48692

Source

Sec. 25.182 EECRF (d)(7)(C) For the 2019 program year and thereafter, the residential and commercial cost caps shall be calculated to be the prior period's cost caps increased or decreased by a rate equal to the most recently available calendar year's percentage change in the South urban CPI, as determined by the Federal Bureau of Labor Statistics

CPI for All Urban Consumers (CPI-U)**Original Data Value**

Series Id: CUUR0300SA0,CUUS0300SA0

Not Seasonally Adjusted

Series Title: All items in South urban, all urban consumers, not seasonally

Area: South

Item: All items

Base Period: 1982-84=100

Years: 2011 to 2021

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
2011	213.589	214.735	217.214	218.820	219.820	219.318	219.682	220.471	220.371	219.969	219.961	219.469	218.618	217.249	219.987
2012	220.497	221.802	223.314	224.275	223.356	223.004	222.667	223.919	225.052	224.504	223.404	223.109	223.242	222.708	223.776
2013	223.933	225.874	226.628	226.202	226.289	227.148	227.548	227.837	227.876	227.420	226.811	227.082	226.721	226.012	227.429
2014	227.673	228.664	230.095	231.346	231.762	232.269	232.013	231.611	231.762	231.131	229.845	228.451	230.552	230.302	230.802
2015	226.855	227.944	229.337	229.957	230.886	232.026	231.719	231.260	230.913	230.860	230.422	229.581	230.147	229.501	230.793
2016	229.469	229.646	230.977	231.975	232.906	233.838	233.292	233.561	234.069	234.337	234.029	234.204	232.692	231.469	233.915
2017	235.492	236.052	236.154	236.728	236.774	237.346	236.942	237.892	239.649	239.067	238.861	238.512	237.456	236.424	238.487
2018	239.772	241.123	241.595	242.486	243.279	243.770	243.776	243.605	243.640	244.163	243.484	242.150	242.737	242.004	243.470
2019	242.547	243.856	245.554	246.847	246.667	246.515	247.250	246.953	246.891	247.423	247.385	247.289	246.265	245.331	247.199
2020	248.005	248.412	248.136	246.254	245.696	247.223	248.619	249.639	250.193	250.542	250.255	250.693	248.639	247.288	249.990
2021	252.067	253.386													

Workpaper JRDWP2 is confidential. A copy of this material will be provided pursuant to the protective order issued in this docket.