



Filing Receipt

Received - 2022-08-29 08:34:54 AM
Control Number - 53442
ItemNumber - 205

**SOAH DOCKET NO. 473-22-2353
PUC DOCKET NO. 53442**

APPLICATION OF CENTERPOINT	§	
ENERGY HOUSTON ELECTRIC,	§	BEFORE THE STATE OFFICE
LLC FOR APPROVAL TO AMEND	§	OF
ITS DISTRIBUTION COST	§	ADMINISTRATIVE HEARINGS
RECOVERY FACTOR	§	

**Houston Coalition of Cities’
Eleventh Requests for Information to CenterPoint Energy Houston Electric, LLC and
Sixth Requests for Production to CenterPoint Energy Houston Electric, LLC**

In connection with the Application of CenterPoint Energy Houston Electric, LLC (“the Company”) for Approval to Amend its Distribution Cost Recovery Factor, the Houston Coalition of Cities (“HCC”) requests the following information within ten (10) days of receipt of these requests, unless shortened or extended by agreement of the parties.

It is further requested that the answers to the requests for information be made under oath and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by the Company, such changed answer should be submitted immediately as supplement to the Company’s original answer.

Definitions and Explanatory Notes

1. When a request calls for identification of a “Person” or “Witness,” the identification shall include a name, employer name, job title, business address, and business telephone number.
2. The term “Document” is used in its broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms “document” and “documents” shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants’ reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms “non-privileged document” and “non-privileged documents” also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification of a “Document,” as defined herein, the identification should include the following:
 - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
 - b. the date of the document;
 - c. the title and/or ‘re’ of the document;
 - d. the subject matter of the document;
 - e. the full name and address of the recipient and every person who received copies of the document;

- f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
 - g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
5. The term “Studies” includes any Document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information with the subjects referred to in this proceeding.
6. The term “the Company” includes CenterPoint Energy Houston Electric, LLC and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

Respectfully submitted,

Arturo G. Michel
City Attorney

YuShan Chang
State Bar No. 24040670
Senior Assistant City Attorney
900 Bagby, 4th Floor
Houston, Texas 77002
(832) 393-6442
(832) 393-6259 Facsimile
yushan.chang@houstontx.gov

Counsel for the City of Houston

Alton J. Hall, Jr.
State Bar No. 08743740
Chelsea J. Lu
State Bar No. 24095439
ADAMS AND REESE LLP
LyondellBasell Tower
1221 McKinney St., Suite 4400
Houston, Texas 77010
(713) 308-0106
(713) 308-4032 (Fax)
alton.hall@arlaw.com
chelsea.lu@arlaw.com

By: /s/ Chelsea J. Lu
Chelsea J. Lu

Counsel for the Houston Coalition of Cities

Certificate of Service

I hereby certify that on this 29th day of August 2022, a true and correct copy of the foregoing document was served upon on all parties of record by email, facsimile and/or First Class Mail.

/s/ Chelsea J. Lu

Chelsea J. Lu

Houston Coalition of Cities' Eleventh Requests for Information to CenterPoint Energy Houston Electric, LLC

- 11-1. Provide the following data for the test year ending in December 2021:
 - a. The Monthly ERCOT Coincident Peak ("CP") at meter for each rate class.
- 11-2. Confirm that an A&E-4CP allocator was developed in the Company's last rate case (Docket No. 49421). If confirmed, answer the following:
 - a. Confirm that the calculation of the A&E-4CP allocator was included as WP-A&E_4CP in the filing of the Company's last rate case;
 - b. Identify the data used in the calculation of kWh usage, 4CP, and loss factors;
 - c. Confirm that the 4CP data used in the calculation was the ERCOT 4CP for each rate class. If confirmed, explain why the 4CP data for the Secondary > 10 kVA with IDR and the Primary > 10 kVA with IDR were not included in the calculation of the A&E-4CP;
 - d. Explain why an A&E-4CP allocator was developed in the last rate cast; and
 - e. Identify the costs allocated among rate classes based on the A&E-4CP allocator.

Houston Coalition of Cities' Sixth Requests for Production to CenterPoint Energy Houston Electric, LLC

- 6-1. In reference to the Company's answer to HCC RFI 11-2, if the Company confirms that an A&E-4CP allocator was developed in the Company's last rate case (Docket No. 49421), produce the documents, in native format with the working formulas, showing the detailed calculation of the A&E-4CP allocator in the last rate case.