

H.B. No. 2483

1 (f) A transmission and distribution utility shall, when
2 reasonably practicable, use a competitive bidding process to lease
3 facilities under Subsection (b)(1).

4 (g) A transmission and distribution utility that leases and
5 operates facilities under Subsection (b)(1) or that procures, owns,
6 and operates facilities under Subsection (b)(2) shall include in
7 the utility's emergency operations plan filed with the commission,
8 as described by Section 186.007, a detailed plan on the utility's
9 use of those facilities.

10 (h) The commission shall permit:

11 (1) a transmission and distribution utility that
12 leases and operates facilities under Subsection (b)(1) to recover
13 the reasonable and necessary costs of leasing and operating the
14 facilities, including the present value of future payments required
15 under the lease, using the rate of return on investment established
16 in the commission's final order in the utility's most recent base
17 rate proceeding; and

18 (2) a transmission and distribution utility that
19 procures, owns, and operates facilities under Subsection (b)(2) to
20 recover the reasonable and necessary costs of procuring, owning,
21 and operating the facilities, using the rate of return on
22 investment established in the commission's final order in the
23 utility's most recent base rate proceeding.

24 (i) The commission shall authorize a transmission and
25 distribution utility to defer for recovery in a future ratemaking
26 proceeding the incremental operations and maintenance expenses and
27 the return, not otherwise recovered in a rate proceeding,

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1 associated with the leasing or procurement, ownership, and
2 operation of the facilities.

3 (j) A transmission and distribution utility may request
4 recovery of the reasonable and necessary costs of leasing or
5 procuring, owning, and operating facilities under this section,
6 including any deferred expenses, through a proceeding under Section
7 36.210 or in another ratemaking proceeding. A lease under
8 Subsection (b)(1) must be treated as a capital lease or finance
9 lease for ratemaking purposes.

10 (k) This section expires September 1, 2029.

11 SECTION 2. Not later than January 1, 2029, the Public
12 Utility Commission of Texas shall:

13 (1) analyze the effects of authorizing transmission
14 and distribution utilities to lease, operate, procure, or own the
15 facilities described by Section 39.918(b), Utilities Code, as added
16 by this Act; and

17 (2) submit a report to the legislature that includes
18 the analysis produced under Subdivision (1) of this section and a
19 recommendation of whether the legislature should allow Section
20 39.918, Utilities Code, as added by this Act, to expire.

21 SECTION 3. This Act takes effect September 1, 2021.

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President of the Senate

Speaker of the House

I certify that H.B. No. 2483 was passed by the House on April 21, 2021, by the following vote: Yeas 145, Nays 1, 1 present, not voting; that the House refused to concur in Senate amendments to H.B. No. 2483 on May 27, 2021, and requested the appointment of a conference committee to consider the differences between the two houses; and that the House adopted the conference committee report on H.B. No. 2483 on May 30, 2021, by the following vote: Yeas 143, Nays 0, 1 present, not voting.

Chief Clerk of the House

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I certify that H.B. No. 2483 was passed by the Senate, with amendments, on May 22, 2021, by the following vote: Yeas 30, Nays 0; at the request of the House, the Senate appointed a conference committee to consider the differences between the two houses; and that the Senate adopted the conference committee report on H.B. No. 2483 on May 29, 2021, by the following vote: Yeas 31, Nays 0.

Secretary of the Senate

APPROVED: _____

Date

Governor

Accounting and Control Policies
Capitalization Policy**Policy Number: 21**

Policy	Company expenditures for items that have a useful life greater than one year or that extend the useful life of an existing asset by more than one year, that meet the minimum dollar thresholds, and that are not intended for sale in the ordinary course of business shall be capitalized as per the guidance outlined below. Capitalization of software is covered under the Company's Capitalization of Computer Software Policy and construction overhead is covered under the Company's Construction Overhead Policy.
Purpose	<p>The purpose of this Capitalization Policy is to provide the criteria for expenditure capitalization and addition to the capital base. Adherence to this policy is designed to:</p> <ul style="list-style-type: none">• Ensure the integrity of the financial data by defining consistent criteria for capitalization across all Business Units• Provide a consistent basis for determining when expenditures are recorded as capital assets• Provide a defined expectation for assets to be added to or removed from the capital base.
Capital Additions	<p>Timing</p> <p>Capital orders are considered to be field complete at the end of the capitalization period, i.e., when the asset is substantially complete and ready for intended use. At that time, the status of the order in SAP should be changed to field complete (FC) or a status equivalent to field complete, such as Contractor Complete (CTCC). Setting a capital order to a FC status will ensure interest or AFUDC, as applicable, is no longer capitalized and will allow the asset to be moved into Construction Complete Not Classified (CCNC) and begin depreciation.</p> <p>Subsequent to the Field Complete status, a capital order will updated to Technically Complete (TECO) status. The TECO status indicates that all capital materials associated with the order have been properly entered. Specifically, this means that all installed materials have been appropriately charged and all actual retirement components have been properly itemized on the work order.</p> <p>Property Accounting strives to unitize work orders within 60 days but no later than 120 days from the end of the calendar month in which an order is placed in TECO status. Sufficient information must be contained on the work order in order to facilitate unitization analysis. Additionally, work orders tied to Superior Projects are not unitized until all related work orders are placed in TECO status. When an order is unitized, Property Accounting will move the asset from CCNC into</p>



Accounting and Control Policies Capitalization Policy

Policy Number: 21

Capital Additions continued

Plant in Service (PIS). Depreciation will continue to be accrued monthly after the asset is moved to PIS.

Retirement Unit

The addition of a complete Retirement Unit (RU), a complete Substantial Minor Item (SMI), or a Betterment can increase the capital base of an Entity. In addition, certain assessment costs, excluding Pipeline Integrity, incurred in conjunction with major capital rehabilitation projects can be included in the capital base of the associated retirement unit. Only retirement of a complete RU can decrease the capital base. The treatment for each follows:

- When an identical or different RU replaces an existing RU, the old unit must always be retired and the new unit added to the capital base. A minimum threshold may also be required to capitalize a replacement of an RU of pipe, i.e., 50 feet of plastic pipe.
- The addition of an RU shall be capitalized.
- For Electric Companies and Local Distribution Companies (LDCs), RUs are defined in their respective retirement unit catalogs.
- For regulated entities, the removal cost associated with an RU shall be included as capital by charging accumulated depreciation at the Business Unit level for regulatory reporting purposes. For external reporting purposes, removal cost is reclassified to the regulatory liability for rate-regulated entities that apply the guidance of Accounting Standards Codification (ASC) 980, "Regulated Operations."¹

Substantial Minor Item

- The addition of an SMI to an existing RU is defined as a "substantial addition" and is capitalized.
- When an existing SMI is replaced, the entire replacement cost is charged to maintenance expense.
- An SMI is considered integral to the underlying retirement unit. Consequently, an SMI should never be removed without being replaced. Any costs associated with the removal or replacement of an SMI independent of the RU of which it is part would be considered maintenance expense.

¹ See the CenterPoint Energy, Inc. Accounting for Rate-Regulation Policy for information on ASC 980.



Accounting and Control Policies
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**Capital
Additions**
continued

- When an SMI is replaced and the conditions of a "Betterment" are met, the excess cost of the new SMI over the cost of "like replacement" is capitalized and the estimated "like replacement cost" is charged to maintenance expense. An estimate of the cost of making the change without a Betterment must be submitted with the work order request. All charges are to be made to the work order. The cost of making the change without Betterment will be transferred to maintenance expense by Property Accounting Services. The excess cost of the Betterment over the estimated cost at current prices of replacing without Betterment will remain in Construction Work In Progress until the work order is cleared to Plant In Service. The RU value will then be increased by the Betterment amount. No retirement from plant is made.
- When an SMI is modified and the conditions of a Betterment are met, the cost is capitalized. After the completion of this work, the work order will be cleared to Plant In Service and the RU value increased by the Betterment amount.

Less than Substantial Minor Items

Due to the relative cost of such items in relation to the cost of the RU of which they are a part, the addition of a Less than Substantial Minor Item (LSMI) is not a "substantial addition" and such costs are charged to maintenance expense.

The addition of an LSMI is normally charged to maintenance expense. The addition of an LSMI is charged to capital only when installing new facilities or when an LSMI is part of a related capital work order.

Betterment

The costs incurred that meet the definition of betterment are capitalized.



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Capital Additions *continued*

Determining the treatment	The following table shall be used to determine the treatment of costs as capital or expense for a property item type.		
Property Item Type	Adding Property	Removing & Replacing Property	Removing Property – No Replacement
Retirement Unit	Capitalize	Capitalize	Capitalize
Substantial Minor Item of Property	Capitalize	Expense (Capitalize a Betterment)	Expense
Less than a Substantial Minor Item of Property	Expense (Capitalize if installing new facilities or part of a capital work order)	Expense (Capitalize if installing new facilities or part of a capital work order)	Expense

Assessment Costs

Generally, costs incurred to inspect, test and report on the condition of existing assets in order to determine the need for repairs or replacements are considered expense. Additionally, costs incurred as part of an ongoing inspection, testing or maintenance programs are also recorded as expense. Pipeline Integrity is an example of ongoing maintenance costs that should be expensed.

However, assessment costs incurred when the work is being performed in conjunction with a major rehabilitation program may be capitalized if certain conditions are met:

- 1) The assessment costs must be incurred subsequent to determining the need for a major rehabilitation program
- 2) The rehabilitation project involves a significant number of capital replacements and modification of facilities
- 3) The rehabilitation project must extend the overall service life of the asset beyond its original useful life and serviceability
- 4) The scope of the rehabilitation project must be clearly defined with a projected completion date
- 5) The rehabilitation project must be separately budgeted as a capital item

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	Approval from the Director of Financial Accounting is required before any capital assessment costs are planned. Such approval should be given if there is a strong probability of regulatory recovery of capital assessment costs
Retirement Unit Catalog/ Capitalization Guidelines	<p>Property Accounting will maintain a property unit catalog (catalog) or capitalization guidelines for all Entities. Additions or changes to the catalog or guidelines must meet one of the following criteria for consideration.</p> <ul style="list-style-type: none"> • Relative dollar value to the current RU • For SMI's, the frequency of replacement without removing the associated RU • Change in technology • Approval of a regulator
Retirement – Property Unit Catalog Example (Electric)	<p>Catalog Section: Distribution Plant Retirement-Property Unit Code: FCA 364 Fixed Capital Account (FCA): Poles, Towers & Fixtures Expense Account(s): 583 and 593 Retirement-Property Unit: Poles, Wood, Length Unit of Measure: Each</p> <p>Description includes installed cost for treated wood poles, all classes, complete with framing, hardware and supports used singly or in multi-pole structures.</p> <p>Minor Items Of Property:</p> <ul style="list-style-type: none"> • Crossarms* • Anchor Rod • Vertical Brackets • Guy Wire • Crossarm Braces • Guy Hook • Pins • Guy Grip • Cluster Racks* • Secondary Rack • Secondary Fork • Miscellaneous Wood Pole Hardware • Bolts, Nuts, Washers (BNW) • Bus Support Structure • Bracket • Pole Bracing* • Anchor

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*Substantial Minor Items – Addition of a substantial minor item shall be charged to Account 364.

Costs Chargeable To Maintenance:

- Repair and/or replacement of any part of the above RU without replacement of the entire RU shall be charged to expense.
- Addition of any minor item other than a substantial minor item shall be charged to expense.

Retirement – Property Unit Catalog Example

(Gas)

Capital Projects

All Mains

- All new installation and replacement activities that involve adding or retiring pipe footage
- Relocation or offsets that involve adding or retiring pipe footage
- Abandonments or removal without a replacement main installation
- Reinstatement of previously abandoned pipe
- First-time installation of Weld Over Sleeves

Expense Items

All Mains

- Relocation that does not involve adding or retiring pipe footage
- Repairs to mains that do not require adding or retiring pipe footage
- Replacement or addition of clamps, valves, pipe coating, couplings, and supports, unless the work is done as part of a capital project Pipeline Integrity Assessment Costs

General Plant and Miscellaneous Equipment

General Plant and Miscellaneous Equipment purchases, new or replacement, must be greater than \$500 and have a useful life of more than one year in order to be capitalized.

Exception: The initial outfitting and equipment of a new facility or vehicle (i.e. a new laboratory, machine shop, office building, service center, truck, etc.) shall be capitalized.



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Responsibilities This table lists the responsibilities for this Policy:

Position	Responsibility
Business Units	<ul style="list-style-type: none">▪ Capitalizing costs incurred using the capitalization criteria▪ Updating the FC and TECO status of capital orders▪ Controlling the use and security of movable and fixed assets in its possession▪ Periodically reviewing the retirement unit catalog/capitalization guidelines and proposing catalog/capitalization guidelines changes to Property Accounting
Chief Accounting Officer and Controller	<ul style="list-style-type: none">▪ Administering this Policy
Director of Financial Accounting	<ul style="list-style-type: none">▪ Reviewing proposed capital assessment programs to vet the probability of regulatory recovery before costs are planned and incurred
Property Accounting	<ul style="list-style-type: none">▪ Maintaining the retirement unit catalogs/capitalization guidelines▪ Providing assistance to the Business Unit with questions on capitalization▪ Transfer of like replacement costs to maintenance expense as needed▪ Reviewing and approving all proposed changes to the definition of an RU within the retirement unit catalog/capitalization guidelines

Definitions This table provides definitions of terms used in this policy:

Term	Definition
Betterment	Cost incurred to replace an SMI with a nonequivalent SMI or an SMI modification without replacement <u>AND</u> the <u>primary aim</u> is to make the affected RU more efficient, of greater durability, or of a greater capacity <u>AND</u> (A) The total installed expenditure for the SMI is 20% or more of the total installed cost of the RU to which the SMI is related (provided such SMI expenditures exceeds \$25,000), or (B) The SMI expenditure is \$250,000 or more.
Business Unit	The functional operating area that maintains and reports operating financial information.

Continued on next page



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Term	Definition
Capital Assessment	Assessment costs incurred in conjunction with a major rehabilitation project intended to extend the life of an existing retirement unit beyond the original useful life.
Company	CenterPoint Energy, Inc.
Construction Complete Not Classified (CCNC)	General ledger and FERC account reflecting original cost of utility plant owns and used in utility operations, prior to determination of final retirement units.
Director of Financial Accounting	A Director in accounting who is responsible for oversight of one or more accounting managers who maintain the books of a Business Unit.
Entity	The Company or any corporation, partnership, trust, joint venture, firm, association, unincorporated organization, legal entity, or other enterprise in which the Company holds, directly or indirectly, a greater than 50% control.
Field Complete (FC)	FC applies to assets that are substantially complete and ready for intended use.
Financial Planning	The organizations within each Business Unit assigned the responsibility of planning and financial analysis
Less Than Substantial Minor Items of Property (LSMI)	Items that are parts of an RU or SMI.
Plant in Service (PIS)	General ledger and FERC account reflecting original cost of utility plant owned and used in utility operations and classified into distinct retirement units.
Property Accounting	The department responsible for the accounting and reporting of capitalized Company property, including assets under construction.
Retirement Unit (RU)	The basic units to which the capital assets of the Company are identified. An RU is the smallest item of property, which, on replacement or removal from service, is removed from the capital assets records. An RU may be an item (a 35 foot wood pole), a group of items (yard lighting system), or a unit of measure associated with bulk material (pounds of copper conductor or foot of pipe). Unit costs are associated with each RU (a 35 foot wood pole @ \$77.56 each installed or bare copper conductor @ \$2.1136 per pound installed). Each Electric or Gas RU has an identifying code and is listed in the corresponding Retirement Unit Catalog.

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Term	Definition
Substantial Minor Items of Property (SMI)	Items that are part of an RU. Examples include the following: <ul style="list-style-type: none">• Crossarm• Gas monitoring equipment on main power transformers• Switch interrupters
Superior Project	A large multi-phase construction project that is associated with multiple work orders.
Technically Complete (TECO)	TECO is an order status in SAP which should be updated by the business unit when appropriate. A TECO'd work order should include installed materials and any required retirement components.
Titles, Offices, and Officers	Those of the Company unless otherwise specified.

Authorization The Controller will make final determination on all exception items or items under special circumstances.

Compliance Employees must comply with this policy. Failure to comply with this Policy may result in disciplinary action up to and including termination.

Document History

Introduction This policy was implemented in separate components for the Business Units at various times.

Document history Below are at least the last three revisions of this document, including all revisions within the last three months.

Date	By	Description
12/2013	Manager, Accounting Research	Revised to address the capitalization of assessment costs per FERC (Docket No. AC09-27-000)
08/2014	Manager, Accounting Research	Removed weld-over sleeves from expensed items
12/2018	Accounting Integration Team	Modified policy to incorporate changes related to integration of legacy Vectren companies.
09/2019	Property Accounting	Removed designated minimum footages for mains from the excerpt from the Retirement Unit Catalog
07/2021	Property Accounting	Modified policy to incorporate changes related to enterprise integration.

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Capitalization of Computer Software Policy

Purpose

The purpose of this document is to ensure the integrity of financial data through appropriate capitalization of computer software costs. ASC 350-40 *Internal Use Software* is the source document for all accounting guidance included in this policy.

Note: This policy does not apply to any internally developed software that will be sold or marketed. See Controller for guidance.

Policy

The lifecycle of an internal use software project is separated into three stages. The accounting treatment of expenditures is based upon the stage. Costs of computer software that is developed or obtained for internal use may be capitalized only when a project is in the Application Development Stage, and all the following criteria are met:

- The costs meet the minimal cost and capitalization requirements as outlined in this policy
- Portfolio Management has verified that the project is budgeted and approved as part of the five-year capital plan or has received approval from the Executive Committee.
- The project has a useful life greater than one year
- Generally, software license costs must be paid upfront to qualify for capitalization. Licenses paid out over time must be evaluated by Accounting Research to determine if the agreement contains a financing component.

Expensed costs: All costs related to software development and incurred during the Preliminary Project Planning Stage and the Post-Implementation/Operation Stage, are expensed, not capitalized, regardless as to the nature of the cost.

Exception to expensed costs: First year maintenance in the year of initial deployment of new software can be capitalized.

When capitalization ceases

Capitalization of costs cease when a computer software project is substantially complete and ready for use.

Substantially complete includes a "Hypercare" phase for a reasonable period of time after the project has been transferred to the production environment. For most projects, four weeks is considered a reasonable time for hypercare. For larger projects, a request for an extended hypercare period can be approved by Property Accounting.



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Impaired cost If it is no longer probable the computer software will be completed and placed in service, no further costs are to be capitalized, and the costs previously charged to capital are expensed immediately.

Compliance Employees must comply with this policy. Failure to comply with this Policy may result in disciplinary action up to and including termination.

Minimal cost requirement The below table lists the minimum cost requirements.
Important: Each project must meet both the minimum dollar threshold and have a useful life of 1+ year(s) to be capitalized.

Source	Minimum Dollar Threshold
Purchased, including <ul style="list-style-type: none">• Total licenses for LAN-based and enterprise software• Individual licenses for desktop software	\$10,000 or greater
Internally developed software	\$100,000 or greater
Upgrades and enhancements to existing internally developed software resulting in additional specified functionality	
Implementation costs for cloud computing arrangements that are a service contract ¹	
Implementation costs for upgrades and enhancements to existing cloud computing arrangements that are service contracts, resulting in additional specified functionality ¹	

Project costs that are incurred, both internal and third party, during the Preliminary Project Stage and Post-Implementation/Operation Stage of the project are expensed, not capitalized.

Preliminary Project Stage The below table lists examples of activities that must be completed prior to entering the Application Development stage. Costs incurred in this stage must be expensed and not capitalized.

¹ Hosting fees for cloud computing arrangements and other SaaS fees continue to be expensed as incurred. The cloud arrangement term must be greater than 1 year to capitalize implementation costs.

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Description	Example Activities
Conceptual formation of alternatives	<ul style="list-style-type: none"> • Make strategic decisions to allocate resources between alternative projects at a given point in time. <i>Example:</i> Should programmers develop a new payroll system or direct their efforts toward correcting existing problems in an operating payroll system? • Determine the following for the computer software project it has proposed to undertake: <ul style="list-style-type: none"> ○ Performance requirements (what software should do) ○ System(s) requirements
Evaluation of alternatives	<ul style="list-style-type: none"> • Invite vendors to perform demonstrations of how their software will fulfill the project needs. • Explore other means for achieving specified performance requirements. <i>Examples:</i> Should the Company make or buy the software? Should the software run on a mainframe or a client server system?
Determination of existence of needed technology	Evaluate and perform activities to determine the performance and system requirements exist, as necessary.
Final selection from alternatives	<ul style="list-style-type: none"> • Select vendors if software is to be purchased. • Select consultants to assist in the development or installation of the software.

Application Development Stage

Costs incurred during the Application Development Stage and related to the purchase, design, development, configuration or testing of computer software may be capitalized. The project does not enter the Application Development Stage, and costs may not be capitalized, until all activities associated with the Preliminary Project Stage have been completed and documented on the Application Development Stage – Approval Form, which is retained by the Technology Strategic Planning and Portfolio Management Office. A form is required for all capitalized software development, regardless of whether the software was purchased with hardware².

² Purchases of hardware only do not require an Application Development Stage - Approval Form.

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Capitalization of Computer Software Policy

Business Units/Departments should engage with IT when the need for a software solution has been identified. Once a project has been fully vetted and the Preliminary Project Stage is complete, IT will assist the Business Unit in the preparation and submission of the Application Development Stage – Approval Form.

This table lists examples of capitalizable activities when incurred during the Application Development Stage:

Description	Example Activities
External direct costs of materials and services consumed in developing or obtaining internal-use computer software	<ul style="list-style-type: none"> • Fees paid to third parties for services provided to develop the computer software during the Application Development Stage • Costs incurred to obtain computer software or hardware from third parties
Payroll and payroll-related costs for employees who are directly associated with and devoted time to the internal-use computer software project, to the extent of the time is spent directly on the project	<ul style="list-style-type: none"> • Hours spent by Information Technology employees on the development of the project • Core Team members, other than Information Technology employees, who have been substantially reassigned from their normal duties to spend time on the development of the project (for a duration of approximately 80 hours or more) • Travel expenses incurred by employees in their duties associated with developing software <p>Important: Hours spent by any employee related to general and administrative tasks, such as scheduling projects, hiring personnel, meeting with vendors or performing other administrative functions should not be capitalized.</p>
Training materials and other technical documentation	<ul style="list-style-type: none"> • Preparation of user manuals, computer-based training applications and documentation that relates to the coding or design.

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Allowance for Funds Used During Construction (AFUDC)	<p>The project should receive an allocation for AFUDC or Capitalized Interest.</p> <p>Important: It should not receive overhead allocations, general and administrative costs, maintenance costs or training costs.</p>
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Post-Implementation/Operation Stage

This table lists activities that must be expensed and not capitalized:

Support of the Go-Live	<ul style="list-style-type: none"> • Convert and/or clean up data. • Train end users. • Maintain application after a reasonable Hypercare time period. For most projects, four weeks is considered a reasonable time for hypercare. For larger projects, a request for an extended hypercare period can be approved by Property Accounting.
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Allocation of third-party costs

Payments to third parties, incurred during the Application Development Stage, that contain elements of both capital and expense should allocate these costs appropriately to capital or expense based on the standalone selling price of the elements in the contract.

Alternative development methods

Technology projects are not always developed utilizing discreet, chronological stages. Some projects will be completed using an agile development method. Instead of a large-scale deliverable at the end of the project, smaller, fully functional product components are developed in sprints, which are typically measured in weeks.

When utilizing the agile development method, it is still required to distinguish the appropriate stage associated with each activity. Costs associated with activities considered preliminary-project and post-implementation stages are required to be expensed. Only costs associated with application development activities can be capitalized.

The established capitalization threshold is applicable to projects developed using the agile method. In aggregate, the entire project should meet the minimum dollar threshold for capitalization (\$100,000). Individual components of functionality comprised of one

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Capitalization of Computer Software Policy

or multiple sprints may be less than \$100,000. As individual components are deployed to production, the costs will be unitized to plant-in-service. Each component will have a separate amortization schedule.

Responsibilities The table below contains position responsibilities:

Position	Responsibility
Chief Accounting Officer and Controller	<ul style="list-style-type: none"> • Administering this Policy • Reviewing exceptions to this policy that fall under special circumstances <i>Example:</i> GAAP requirements
Business Units/Departments	<ul style="list-style-type: none"> • Engaging IT for any identified projects for software purchases, developments, or enhancements. • Providing assistance to IT in the preparation of the Application Development Stage – Approval Form
Accounting Research	<ul style="list-style-type: none"> • Assisting Property Accounting regarding the proper accounting treatment of software purchases that contain a financing component.
Property Accounting	<ul style="list-style-type: none"> • Providing assistance to IT and the Business Units/Departments to determine the proper treatment of computer software expenditures • Maintaining the Application Development Stage - Approval Form template • Approving exceptions to “Hypercare” guidance
Information Technology (IT)	<ul style="list-style-type: none"> • Advising the Business Units/Departments on proposed software projects • Providing adequate documentation to Property Accounting to support: <ul style="list-style-type: none"> ○ the stage of each computer software project and ○ the nature of each capitalizable costs coded to a capital software project during the Application Development Stage ○ extensions to “hypercare” guidance of four weeks • Discussing any financing arrangements or terms with Property Accounting and Research Accounting <u>prior</u> to executing agreements
Technology Strategic Planning & Portfolio Management	<ul style="list-style-type: none"> • Approving and retaining documentation to support the Application Development Stage Approval Form for each project • Verifying that each project has been properly budgeted and approved



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Capitalization of Computer Software Policy

**Document
History**

Policy was implemented in January 2003

Below are at least the last three revisions of this document,
including all revisions within the last three months.

Date	By	Description
10/2014	Manager, Accounting Research	Policy was revised to more clearly depict the three stages of computer software development and capitalization criteria for each stage.
12/2018	Accounting Integration Team	Modified policy to incorporate changes related to integration of legacy Vectren companies.
03/2020	Property Accounting	Minor updates, including additional references for updated guidance on cloud computing, ASU 2018-15.
07/2021	Property Accounting	Modified policy to incorporate change in technology department name. Minor formatting changes.

EXHIBIT MAK-03 IS VOLUMINOUS AND IS
BEING PROVIDED IN ELECTRONIC
FORMAT ONLY



Accounting and Control Policies Construction Overhead Policy

Policy Number: 09

Policy Per the Federal Energy Regulatory Commission (FERC), the cost of construction properly includible in the plant accounts shall include, where applicable, direct and overhead costs. "Overhead construction costs, such as engineering, supervision, general office salaries and expenses, construction engineering and supervision by others than the accounting utility, law expenses, insurance, injuries and damages, relief and pensions, taxes and interest, shall be charged to particular jobs or units on the basis of the amount of such overheads reasonably applicable thereto."¹

CenterPoint applies two types of capital overheads to eligible work order charges, Engineering and Supervision (E&S) and Administrative and General (A&G). Current month capital charges on capital work orders will be loaded with the applicable overheads on a monthly basis.

Engineering & Supervision Costs (E&S) As is common in the utility industry and allowed for by regulation, certain costs related to "engineering and supervision" and "engineering services" are capitalized into utility plant per FERC plant instructions. This "includes the portion of the pay and expenses of engineers, surveyors, draftsmen, inspectors, superintendents, and their assistants applicable to construction work." This also includes "amounts paid to other companies, firms, or individuals engaged by the utility to plan, design, prepare estimates, supervise, inspect, or give general advice and assistance in connection with construction work."

Engineering and supervision work related to capital work orders but not directly attributable to specific construction jobs have their time charged to an E&S construction overhead pool that is cleared each month over all open construction work orders receiving charge activity.

Administrative and General Costs (A&G) Additionally, certain costs of various administrative and general corporate functions are capitalized to construction projects. FERC defines eligible A&G charges as the portion of the pay and expenses of the general officers and administrative and general expenses applicable to construction work. Functions that are typically included are accounting, legal, HR, payroll, accounts payable, purchasing, etc. Based on time studies or other timing estimations periodically performed, each of these areas determines the approximate amount of time each employee spends supporting the construction program. This study drives an annual amount of A&G charged to an A&G construction overhead pool that is allocated to active construction jobs on a monthly basis.



Accounting and Control Policies Construction Overhead Policy

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Other Entities not regulated by state or local commission, local jurisdictions or the Federal Energy Regulatory Commission (FERC) shall follow Generally Accepted Accounting Principles (GAAP) for Construction Overhead. The GAAP guidance states that indirect capital costs that clearly relate to several capital projects should be capitalized and allocated to the capital projects to which the costs relate.¹

A Company standard survey document shall be used by all Entities to determine, by cost center, the charges to include in COH. The E&S and A&G time surveys are conducted annually.

E&S Exceptions Occasionally, there are projects where internal E&S resources are not utilized in the same manner as a typical internally engineered / supervised work order. In these cases, special consideration is given to these work orders to determine the amount of E&S costs to allocate to that work order, if any at all. As an example, a work order may have all of the engineering and supervision outsourced and those contractor costs are charged directly to the construction work order. As a result, the internal engineering and supervision costs likely should not be allocated to this work order since those costs are not applicable to that project. This policy establishes guidelines when a capital work order is eligible to be exempt or receive an adjustment from the monthly E&S allocation. The Director of Property Accounting will review all E&S Exceptions and make the determination of whether an exemption should be applied. Property Accounting will maintain a list of all exceptions.

E&S is currently defaulted in the capital work order system for most construction capital projects. If a project is eligible to receive an E&S exemption and/or adjustment, the project manager and/or project initiator must request this from Property Accounting during the capital work order initiation process. The project initiator must complete a "Plant E&S Exemption Form" in order to finalize the process. Capital work that is already started will not be eligible for an exemption or adjustment if the question is not raised/addressed with Property Accounting prior to the project receiving its financial authorization.

¹ Per ASC 970-360-25-2 through 25-3.

Accounting and Control Policies
Construction Overhead Policy**Policy Number: 09**

A&G Exceptions Occasionally, there are large projects that are staffed/organized with their own support team such that the services of the typical functions outlined above are not employed. In these cases, special consideration is given to these projects in determining the amount of A&G costs to allocate to that project. For example, certain large projects may employ a general contractor to manage all sub-contractor activity including bidding, invoice payment and processing, etc. such that corporate purchasing provides no significant service to the project. Another example might include situations where specific outside legal counsel is retained to address project specific issues. All of these costs are charged directly to the construction project and, as a result, the corporate function's costs should likely not be allocated to the project since they are not providing the service.

As mentioned above major projects that have the type of dedicated project support as outlined above are rare. To determine whether a project should be considered a major project, the Director of Property Accounting must be consulted. All projects that are considered a major project or that are projected to incur more than \$500,000 must be approved by the Director of Property Accounting prior to the exemption being implemented.

Once determined to be a major project by the project manager and the Property Accounting Director, a flat A&G rate will be applied to the project. It will be incumbent on the project manager to inform Property Accounting of project events that may change its designation as a major project. Generally, the rate to be applied to these qualifying projects will be 1% (subject to change). Though the 1% is not directly supported by a time study, it represents a reasonable estimate of the overall support provided by the corporate functions.

Purpose

The purpose of this Construction Overhead Policy is to document the requirements for the inclusion of costs in Construction Overhead. Adherence to this policy is designed to:

- Ensure the integrity of the financial data by recognizing costs in accordance with regulatory and accounting guidance;
 - Provide assurance that documentation is retained and available for regulatory purposes; and
 - Provide a defined expectation to review costs for compliance.
-

Accounting and Control Policies Construction Overhead Policy

Policy Number: 09

Responsibilities This table lists the responsibilities for this Policy:

Position	Responsibility
Chief Accounting Officer and Controller	<ul style="list-style-type: none"> Administering this Policy
Business Services	<ul style="list-style-type: none"> Working with the administrative corporate functions to complete time studies or other timing estimations used to develop the A&G rate Communicating with Business Unit Finance Directors to update the A&G rate as necessary
Business Unit Finance Directors	<ul style="list-style-type: none"> Distributing the E&S standard survey along with the planning instructions each year during the Strategic Planning process Determining the cost components of COH each year, within FERC guidelines, taking into consideration the regulatory environment in which the Entity resides Reviewing the surveys from their respective Business Units for compliance with FERC or GAAP regulations as applicable Reviewing the cost components submitted on the surveys with the Property Accounting for approval prior to inclusion in the annual planning process On a regular basis, reviewing and monitoring actual costs included in the COH applicable to their respective Business Unit and shall make any necessary changes to the COH rate
Property Accounting	<ul style="list-style-type: none"> Maintaining the required documentation for annual external reporting. Per FERC, this information shall include the following: <ul style="list-style-type: none"> the total amount of each overhead for each year the amount of each overhead expenditure charged to each construction work order and to each utility plant account the basis of distribution of such costs Calculating, reviewing and monitoring property accounting components of COH and resolving significant or unexplained variances with the respective Business Units. Working with Business Units and Finance Directors to determine if special overhead rates should be applied to large projects Maintaining documentation on overhead exceptions
Property Accounting Director	<ul style="list-style-type: none"> Approving E&S and A&G exceptions on projects greater than \$500,000 Reviewing the cost components submitted on the surveys with the Finance Directors



Accounting and Control Policies
Construction Overhead Policy

Policy Number: 09

Definitions This table provides definitions of terms used in the policy:

Term	Definition
Administrative & General (A&G) Overhead	Costs of various administrative and general corporate functions that are capitalized to construction projects. These include accounting, human resources, payroll, accounts payable, etc.
Business Unit	The functional operating area that maintains and reports operating financial information
Capital Order	The order established to capture specific capital costs related to a capital project
Company	CenterPoint Energy, Inc.
Construction Overhead (COH)	The overhead costs incurred during construction that cannot be more accurately charged directly to a capital order
Engineering & Supervision (E&S) Overhead	Engineering and supervision work related to capital work orders but not specifically attributable to specific construction jobs. Includes the pay and expenses of engineers, surveyors, draftsmen, inspectors, etc.
Entity	The Company or any corporation, partnership, trust, joint venture, firm, association, unincorporated organization, legal entity, or other enterprise in which the Company holds, directly or indirectly, a greater than 50% control
Finance Director	Any Director in Finance who has been assigned ownership and associated responsibilities of one or more Business Units
Property Accounting	The department responsible for the accounting and reporting of capitalized Company property, including assets under construction
Titles, Offices, and Officers	Those of the Company unless otherwise specified

Documentation Requirements The survey documentation shall be maintained and archived by the Finance Directors to ensure the data is readily available to support audits, rate cases or other regulatory inquiries.

Compliance Employees must comply with this policy. Failure to comply with this Policy may result in disciplinary action up to and including termination.

Document History

Introduction This policy was implemented in June 2004.



Accounting and Control Policies
Construction Overhead Policy

Policy Number: 09

Document History Below are at least the last three revisions of this document, including all revisions within the last three months.

Date	By	Description
01/2014	Manager Accounting Research	Update property accounting's responsibilities
12/2018	Accounting Integration Team	Modified policy to incorporate changes related to integration of legacy Vectren companies.
07/2021	Property Accounting	Modified policy to incorporate changes related to enterprise integration.
10/2021	Accounting Research	Clarified what constitutes "time studies"

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
2021 Mobile Generation Accounting

Long Term Accounting Entries					Regulated Entries (dr/(cr))	
Line No	Description	Category	FERC Account	General Ledger Account	Income Statement	Balance Sheet
1	Enter into lease agreement	Capital Lease	1011	174996		\$ 178,774,088
2		Capital Lease Short Term	1650	144010		(3,830,395)
3		Capital Lease Long Term	1860	188010		(24,897,566)
4		Capital Lease Long Term Equipment	1860	188010		(149,703,583)
5		Decommissioning Liability	2270	282010		(342,544)
6						
7						
8	Prepay Capital Lease	Cash	1310	111999		(178,431,544)
9		Lease Expense	9310	572030	\$ 149,703,583	
10		Prepaid O&M Short Term	1650	144010		3,830,395
11		Prepaid O&M Long Term	1860	188010		24,897,566
12						
13	Reverse the lease agreement					
14		Capital Lease	1011	174996		(178,774,088)
15		Capital Lease Short Term	1650	144010		3,830,395
16		Capital Lease Long Term	1860	188010		24,897,566
17		Capital Lease Long Term Equipment	1860	188010		149,703,583
18		Decommissioning Liability	2270	282010		342,544
19						
20	Record Decommissioning Liability					
21		Decommissioning Liability	2270	282010		(342,544)
22		Regulatory Asset	1823	179054		342,544
23						
24	Defer lease expense	Lease Expense	9310	572030	(149,703,583)	
25		Regulatory Asset	1823	179054		149,703,583
26						
27	Record carrying costs	Debt Carrying Cost	4190	491010	(11,943)	
28		Equity Carrying Cost	4190	491010	(23,189)	
29		Regulatory Asset	1823	179054		35,132
30						
31	Incur O&M Expense	Cash	1310	111999		(829,795)
32		Operating Expense	Various	Various	829,795	
33						
34	Defer O&M expense	Operating Expense	Various	Various	(829,795)	
35		Regulatory Asset	1823	179054		829,795
36						
37	Record contra for equity	Contra-Regulatory Asset Equity	1823	179058		(23,189)
38		Contra-Equity Carrying Cost	4190	491010	23,189	
39						
40	Total Long-Term Accounting Entries				\$ (11,943)	\$ 11,943

Short Term Accounting Entries					Regulated Entries (dr/(cr))	
	Description	Category	FERC Account	General Ledger Account	Income Statement	Balance Sheet
41	Incur lease and O&M expense	Cash	1310	111999		\$ (20,160,660)
42		Lease Expense	5670	574030	\$ 19,882,307	
43		Operating & Maintenance Expense	Various	531030/572030	278,353	
44						
45	Defer lease and O&M expense	Lease Expense	5670	574030	(19,882,307)	
46		Operating & Maintenance Expense	Various	531030/572030	(278,353)	
47		Regulatory Asset	1823	179052		20,160,660
48						
49	Record carrying costs	Debt Carrying Cost	4190	491010	(37,155)	
50		Equity Carrying Cost	4190	491010	(72,144)	
51		Regulatory Asset	1823	179052		109,298
52						
53	Record contra for equity	Contra-Regulatory Asset Equity	1823	179058		(72,144)
54		Contra-Equity Carrying Cost	4190	491010	72,144	
55						
56	Total Short Term Accounting Entries				\$ (37,155)	\$ 37,155

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
Long-Term Carrying Cost Recognition Comparison
Exhibit MAK-06
2021 Mobile Generation Long-term

Line		2021 [1]	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
1	Long Term Regulatory Asset											
2	Debt Carrying Cost	\$ 11,943										
3	Equity Carrying Cost	23,189										
4	Prepayment	178,431,544										
5	Total	\$178,466,676										
6												
7	Recovery beginning September 1, 2022											
8	7.5 year straight line											
9	Debt Carrying Cost	\$ 531	\$ 1,592	\$ 1,592	\$ 1,592	\$ 1,592	\$ 1,592	\$ 1,592	\$ 1,592	\$ 1,592	\$ 265	\$ 11,943
10	Equity Carrying Cost	1,031	3,092	3,092	3,092	3,092	3,092	3,092	3,092	3,092	515	23,189
11	Prepayment	7,930,291	23,790,872	23,790,872	23,790,872	23,790,872	23,790,872	23,790,872	23,790,872	23,790,872	3,965,145	\$178,431,544
12	Total	\$ 7,931,852	\$ 23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$ 3,965,926	\$178,466,676
13												
14	Proposed Prioritization											
15	Debt Carrying Cost	\$ 11,943	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 11,943
16	Equity Carrying Cost	23,189	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 23,189
17	Prepayment	7,896,720	23,795,557	23,795,557	23,795,557	23,795,557	23,795,557	23,795,557	23,795,557	23,795,557	3,965,926	\$178,431,544
18	Total	\$ 7,931,852	\$ 23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$23,795,557	\$ 3,965,926	\$178,466,676
19												
20	Difference											
21	Debt Carrying Cost	\$ 11,412	\$ (1,592)	\$ (1,592)	\$ (1,592)	\$ (1,592)	\$ (1,592)	\$ (1,592)	\$ (1,592)	\$ (1,592)	\$ (265)	\$ -
22	Equity Carrying Cost	22,159	(3,092)	(3,092)	(3,092)	(3,092)	(3,092)	(3,092)	(3,092)	(3,092)	(515)	-
23	Expenses	(33,571)	4,684	4,684	4,684	4,684	4,684	4,684	4,684	4,684	781	-
24	Total	\$ (0)	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ -
25												
26												

2022 Mobile Generation

Long Term Regulatory Asset

Estimated Debt Carrying Cost
Estimated Equity Carrying Cost
Prepayment
Total

2022 [1]	2023	2024	2025	2026	2027	2028	2029	2030	2031	Total
\$ 541,367										
1,051,172										
-										
\$ 1,592,539										
Recovery beginning September 1, 2022										
7.5 year straight line										
Debt Carrying Cost	\$ 24,061	\$ 72,182	\$ 72,182	\$ 72,182	\$ 72,182	\$ 72,182	\$ 72,182	\$ 72,182	\$ 12,030	\$ 541,367
Equity Carrying Cost	46,719	140,156	140,156	140,156	140,156	140,156	140,156	140,156	23,359	1,051,172
Prepayment	-	-	-	-	-	-	-	-	-	-
Total	\$ 70,780	\$ 212,339	\$ 212,339	\$ 212,339	\$ 212,339	\$ 212,339	\$ 212,339	\$ 212,339	\$ 35,390	\$ 1,592,539
Proposed Prioritization										
Debt Carrying Cost	\$ 541,367	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 541,367
Equity Carrying Cost	1,051,172	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	1,051,172
Prepayment	(1,521,759)	212,339	212,339	212,339	212,339	212,339	212,339	212,339	35,390	-
Total	\$ 70,780	\$ 212,339	\$ 212,339	\$ 212,339	\$ 212,339	\$ 212,339	\$ 212,339	\$ 212,339	\$ 35,390	\$ 1,592,539
Difference										
Debt Carrying Cost	\$ 517,306	\$ (72,182)	\$ (72,182)	\$ (72,182)	\$ (72,182)	\$ (72,182)	\$ (72,182)	\$ (72,182)	\$ (12,030)	\$ -
Equity Carrying Cost	1,004,453	(140,156)	(140,156)	(140,156)	(140,156)	(140,156)	(140,156)	(140,156)	(23,359)	-
Expenses	(1,521,759)	212,339	212,339	212,339	212,339	212,339	212,339	212,339	35,390	-
Total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (0)	\$ -

[1] Source: WP Mobile Generation

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
Short-term Carrying Cost Recognition Comparison
Exhibit MAK-06
2021 Mobile Generation Short-term

Line		2021 [1]	2022	2023	Total
1	Short Term Regulatory Asset				
2	Debt Carrying Cost	\$ 37,155			
3	Equity Carrying Cost	72,144			
4	Expenses	20,160,660			
5	Total	\$ 20,269,958			
6					
7	Recovery beginning September 1 2022				
8	12 month straight line				
9	Debt Carrying Cost		\$ 12,385	\$ 24,770	\$ 37,155
10	Equity Carrying Cost		24,048	48,096	72,144
11	Expenses		6,720,220	13,440,440	20,160,660
12	Total		\$ 6,756,653	\$ 13,513,306	\$ 20,269,958
13					
14	Proposed Prioritization Carrying Costs First				
15	Debt Carrying Cost		\$ 37,155	\$ -	\$ 37,155
16	Equity Carrying Cost		72,144	-	72,144
17	Expenses		6,647,354	13,513,306	20,160,660
18	Total		\$ 6,756,653	\$ 13,513,306	\$ 20,269,958
19					
20	Difference				
21	Debt Carrying Cost		\$ 24,770	\$ (24,770)	\$ -
22	Equity Carrying Cost		48,096	(48,096)	-
23	Expenses		(72,866)	72,866	-
24	Total		\$ (0)	\$ (0)	\$ -

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

AFFIDAVIT OF MARY A. KIRK

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

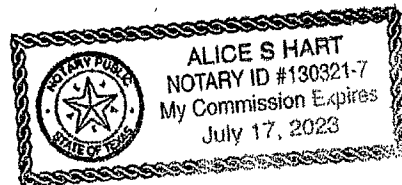
1. "My name is Mary A. Kirk. I am of sound mind and capable of making this affidavit. The facts stated herein are true and correct based on my personal knowledge. My current position is Director of Accounting for CenterPoint Energy Service Company, LLC.
2. The foregoing direct testimony and the attached exhibits have been prepared by me or under my direct supervision and are true and correct to the best of my knowledge."

Further affiant sayeth not.

Mary A. Kirk
Mary A. Kirk

SUBSCRIBED AND SWORN TO BEFORE ME on this 17th day of March, 2022.

Alice S Hart
Notary Public in and for the State of Texas



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DOCKET NO. _____

APPLICATION OF CENTERPOINT	§	
ENERGY HOUSTON ELECTRIC,	§	PUBLIC UTILITY COMMISSION
LLC FOR APPROVAL TO AMEND	§	
ITS DISTRIBUTION COST	§	OF TEXAS
RECOVERY FACTOR	§	

DIRECT TESTIMONY OF

JOHN R. DURLAND

FOR

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

April 5, 2022

TABLE OF CONTENTS

I.	INTRODUCTION AND BACKGROUND	1
II.	OVERVIEW OF DCRF RULE	2
III.	SCOPE OF DCRF APPLICATION AND PROCEEDING	4
IV.	REQUIREMENTS OF DCRF APPLICATION	5
V.	PROPOSED RIDER DCRF AND EFFECTIVE DATE	10
VI.	SUMMARY AND RECOMMENDATIONS.....	11

TABLE OF EXHIBITS AND WORKPAPERS

<u>Exhibits</u>	<u>Description</u>
Exhibit JRD-1	Professional Qualifications of John R. Durland
Exhibit JRD-2	Electronic Schedules from Docket No. 49421
Exhibit JRD-3	History of DCRF Revenue Requirement
Exhibit JRD-4	History of DCRF Charges
Exhibit JRD-5	Revised Tariff Pages – Clean Copy
Exhibit JRD-6	Revised Tariff Pages – Annotated
Exhibit JRD-7	Docket Nos. 44572, 45747, 47032, and 48226 Final Approved Schedule J

<u>Workpapers</u> (as provided in DCRF-RFP Workpapers)	<u>Description</u>
WP/Schedule H/1	Billing Determinants-Rate Case
WP/Schedule H/2	Billing Determinants-DCRF
WP/Schedule H/3	Weather and Year End Customer Adjustments
WP/Schedule J/1	Baseline Rate Case Values
WP/Schedule J/2	Distribution Revenue Growth
WP/Schedule J/3	DCRF Baseline Rate Case Values

DIRECT TESTIMONY OF JOHN R. DURLAND

I. INTRODUCTION AND BACKGROUND

1

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

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

5 **Q. PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL**
6 **EXPERIENCE.**

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

9 **Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES?**

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

12 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

13 A. I am testifying on behalf of CenterPoint Energy Houston Electric, LLC (“CenterPoint
14 Houston” or the “Company”).

15 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE PUBLIC**
16 **UTILITY COMMISSION OF TEXAS (“COMMISSION”)?**

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

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

20 A. The purpose of my testimony is to support the application of CenterPoint Houston for a
21 Distribution Cost Recovery Factor (“DCRF”) filed pursuant to 16 Tex. Admin. Code

1 (“TAC”) §25.243(c). Specifically, I sponsor the calculation of CenterPoint Houston’s
2 proposed DCRF rates and the proposed Rider DCRF.

3 **Q. WHAT EXHIBITS AND WORKPAPERS HAVE YOU INCLUDED WITH YOUR**
4 **TESTIMONY?**

5 A. I have prepared or supervised the preparation of the exhibits and workpapers listed in the
6 table of contents.

7 **Q. WHAT SCHEDULES ARE YOU SPONSORING?**

8 A. I sponsor Schedules H and J of the Company’s DCRF Rate Filing Package (“DCRF-RFP”).

9 **Q. HOW DOES YOUR DIRECT TESTIMONY RELATE TO THE TESTIMONY OF**
10 **OTHER COMPANY WITNESSES?**

11 A. I speak directly to the calculation of the DCRF rate, and I sponsor the proposed Rider
12 DCRF. Company witness Mary A. Kirk supports the Company’s revenue requirement, the
13 supporting schedules and calculations required by the Commission’s DCRF--RFP
14 instructions, and inclusion of amounts for the temporary emergency electric energy
15 facilities which I refer to as “mobile generation facilities” in the Company’s DCRF request.
16 Company witness Brad A. Tutunjian sponsors and supports the distribution-related projects
17 included in the DCRF filing. Company witness Martin W. Narendorf Jr. discusses mobile
18 generation facilities included in the DCRF filing.

19 **II. OVERVIEW OF DCRF RULE**

20 **Q. PLEASE GIVE A GENERAL OVERVIEW OF 16 TAC §25.243.**

21 A. 16 TAC § 25.243 is the DCRF Rule, which implements Public Utility Regulatory Act
22 (“PURA”) §36.210. PURA § 36.210 states that the Commission may approve a rate

1 schedule that may be periodically adjusted based upon changes in the utility's invested
2 capital that are categorized as distribution plant, distribution-related intangible plant, and
3 distribution-related communication equipment. Under the DCRF Rule, an eligible utility
4 can file an application to include a DCRF in its Commission-approved Tariff. The DCRF
5 for each rate class is determined by a formula that reflects changes in Net Distribution
6 Invested Capital, Depreciation Expense, Federal Income Taxes, and Other Taxes adjusted
7 for changes in Distribution Revenue due to growth in billing determinants.

8 **Q. HAS CENTERPOINT HOUSTON PREVIOUSLY FILED A DCRF**
9 **APPLICATION?**

10 A. Yes. The Company has filed four previous DCRF applications in 2015, 2016, 2017 and
11 2018 in Docket Nos. 44572, 45747, 47032, and 48226, respectively. Those applications
12 addressed investment for the periods January 1, 2010 through December 31, 2014, January
13 1, 2010 through December 31, 2015, January 1, 2010 through December 31, 2016, and
14 January 1, 2010 through December 31, 2017, respectively. Exhibit JRD-7 contains the
15 final approved DCRF revenues and rates for Docket Nos. 44572, 45747, 47032, and 48226.
16 CenterPoint Houston has not filed for a DCRF since its last comprehensive base rate case
17 Docket No. 49421.

18 **Q. WHEN WAS THE LAST COMPREHENSIVE BASE RATE PROCEEDING FOR**
19 **CENTERPOINT HOUSTON?**

20 A. CenterPoint Houston's last comprehensive base rate case was Docket No. 49421,
21 *Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates*,
22 filed on April 5, 2019 and final order issued on March 9, 2020.

1 **Q. WAS THE DCRF BASELINE APPROVED IN THE LAST COMPREHENSIVE**
 2 **BASE RATE PROCEEDING?**

3 A. Yes. The test year in Docket No. 49421 ended December 31, 2018 and established the
 4 baseline determinations used by the Company to develop its proposed DCRF rates. The
 5 parties in Docket No. 49421 entered into a settlement agreement that was approved by the
 6 Commission.

7 **Q. DID THE COMPANY UTILIZE THE BASELINE VALUES APPROVED BY THE**
 8 **COMMISSION IN ITS LAST BASE RATE CASE IN THE DCRF APPLICATION?**

9 A. Yes. As stated in the Docket No. 49421 Ordering Paragraph #9, CenterPoint Houston must
 10 use the baseline values set forth in Exhibit I to the settlement agreement when it files an
 11 application for a DCRF under 16 TAC § 25.243. These baseline values are described
 12 below.

13 **III. SCOPE OF DCRF APPLICATION AND PROCEEDING**

14 **Q. PLEASE GIVE A BRIEF DESCRIPTION OF THE AMOUNTS INCLUDED IN**
 15 **CENTERPOINT HOUSTON'S DCRF APPLICATION.**

16 A. CenterPoint Houston's DCRF application reflects the additions and retirements of
 17 distribution investment capital since Docket No. 49421 test year end. As a result, this
 18 DCRF application includes distribution invested capital from January 1, 2019 through
 19 December 31, 2021. The various schedules and workpapers included in this filing reflect
 20 the additions and retirements in distribution invested capital; the appropriate after-tax rate
 21 of return; the appropriate depreciation expense, federal income taxes, other associated
 22 taxes; as well as the growth in distribution revenues due to billing determinant growth; and

the allocation to the customer classes. The total revenue requirement increase requested in this DCRF application is \$145,680,810 as shown in column (3) of Schedule J. The revenue requirement increase by customer class is shown in the table below:

Table 1: DCRF Revenue Requirement

Customer Class	DCRF Revenue Requirement
Residential	\$83,754,841
Secondary <= 10 KVA	\$2,187,530
Secondary > 10 KVA	\$44,357,339
Primary	\$3,440,500
Transmission	\$363,258
Lighting	\$11,577,342

IV. REQUIREMENTS OF DCRF APPLICATION

Q. IS THE INFORMATION PROVIDED WITH THE FILING TAKEN FROM THE ACCOUNTS AND RECORDS PRESCRIBED IN THE FEDERAL ENERGY REGULATORY COMMISSION (“FERC”) CHART OF ACCOUNTS, PURSUANT TO GENERAL INSTRUCTION NO. 1 OF THE DCRF-RFP?

A. Yes.

Q. DOES YOUR TESTIMONY SUPPORT THE REQUIRED SCHEDULES AND WORKPAPERS, AS REQUIRED BY GENERAL INSTRUCTION NO. 2?

A. Yes. My testimony supports schedules H and J of the Company’s DCRF-RFP along with associated workpapers described in the Table of Exhibits and Workpapers. Ms. Kirk sponsors the remaining schedules and workpapers required by General Instruction No. 2.

Q. PURSUANT TO GENERAL INSTRUCTION NO. 2, ARE THE WORKPAPERS PROVIDED IN NATIVE ELECTRONIC FORMAT INCLUDING ACTIVE EXCEL

1 **WORKBOOKS, LINKED, AND WITH ALL FORMULAS, CELL REFERENCES,**
 2 **AND LINKS INTACT?**

3 A. Yes, except where Excel data was derived from a non-Excel source and was directly
 4 entered into the Excel spreadsheet. Otherwise all workbooks are “active” as described in
 5 General Instruction No. 2. Additionally, as the schedules sponsored by Ms. Kirk were
 6 developed at the same time as my schedules, some values had to be directly entered into
 7 the WP/Schedule J Excel sheets. These values have been highlighted and noted in the
 8 Excel workpapers.

9 **Q. ARE THERE ANY OTHER VALUES THAT ARE NOT LINKED WITHIN THE**
 10 **EXCEL SHEETS?**

11 A. Yes. While the full Docket No. 49421 rate case model has been provided in Exhibit JRD-2,
 12 to preserve the integrity of the DCRF schedules, it is necessary to copy relevant data from
 13 the Docket No. 49421 schedules into the Schedule J workpapers to serve as the starting
 14 point for the fully active, linked, and intact DCRF schedules.

15 **Q. IN REFERENCE TO GENERAL INSTRUCTION NO. 3, ARE THE COSTS AND**
 16 **RETURN CALCULATED IN COMPLIANCE WITH 16 TAC §25.243?**

17 A. Yes. The Company has included in its DCRF calculation the costs and return necessary to
 18 comply with 16 TAC §25.243.

19 **Q. CONSISTENT WITH GENERAL INSTRUCTION NO. 5, HAVE THE**
 20 **SCHEDULES THAT YOU ARE SUPPORTING BEEN PREPARED AS NOTED IN**
 21 **THE DCRF-RFP SAMPLE FORMS?**

22 A. Yes.

1 **Q. IN ACCORDANCE WITH GENERAL INSTRUCTION NO. 5, NOTE 3, HAVE**
2 **YOU PROVIDED WORKPAPERS TO SUPPORT THE ALLOCATION**
3 **METHODS AND WEATHER ADJUSTMENTS?**

4 A. Yes. WP/Schedule J/3 shows the allocation percentages to the customer classes and
5 WP/Schedule H/2 shows the weather adjustments to billing determinants as required by
6 General Instruction No. 5, Note 3.

7 **Q. IN ACCORDANCE WITH GENERAL INSTRUCTION NO. 6, HAVE YOU**
8 **PROVIDED A COPY OF THE DISTRIBUTION SCHEDULES OR AMOUNTS**
9 **APPROVED IN THE COMPANY’S LAST COMPREHENSIVE BASE RATE**
10 **PROCEEDING?**

11 A. Yes. The electronic schedules from Commission Staff’s final model in Docket No. 49421
12 are provided as Exhibit JRD-2. These electronic schedules include both Transmission and
13 Distribution. As the DCRF-RFP requires all Excel workbooks to be “active” and
14 “functioning,” it is not possible to break the Transmission schedules out of the Commission
15 Staff’s model and still have the model function properly.

16 **Q. IN ACCORDANCE WITH GENERAL INSTRUCTION NO. 6, HAVE YOU**
17 **PROVIDED A COMPARISON THAT SUMMARIZES THE DCRF AND DCRF**
18 **UPDATES APPROVED BY THE COMMISSION SINCE THE COMPANY’S LAST**
19 **COMPREHENSIVE BASE RATE CASE?**

20 A. No. This DCRF-RFP requirement is not applicable, because this is the Company’s first
21 DCRF filing since its last comprehensive base rate case in Docket No. 49421.

1 **Q. PURSUANT TO GENERAL INSTRUCTION NO. 7, HAVE YOU PROVIDED A**
 2 **SCHEDULE THAT SHOWS THE HISTORY OF THE DCRF RATES APPROVED**
 3 **IN PREVIOUS DCRF FILINGS?**

4 A. Yes. Exhibit JRD-4 contains the rates for the four previously filed DCRFs in Docket Nos.
 5 44572, 45747, 47032, and 48226 along with the proposed rates within this DCRF
 6 application. Each of these DCRF filings preceded the Company's last comprehensive base
 7 rate case in Docket No. 49421.

8 **Q. HAVE YOU PROVIDED A TARIFF RIDER REFLECTING THE PROPOSED**
 9 **DCRF RATES CALCULATED IN ACCORDANCE WITH THE FORMULA**
 10 **PRESCRIBED IN 16 TAC §25.243?**

11 A. Yes. Consistent with General Instruction No. 8, the proposed Tariff Rider is included in
 12 Exhibits JRD-5 and 6. The DCRF rates reflected in the proposed Tariff Rider are calculated
 13 in accordance with the DCRF Rule. The specific calculation is shown in Schedule J of the
 14 DCRF-RFP.

15 **Q. WERE THE BILLING DETERMINANTS USED IN THE DCRF-RFP WEATHER**
 16 **NORMALIZED?**

17 A. Yes. Per the requirements of 16 TAC §25.243(d) and the definition of the term
 18 "weather -normalized" found in subsection (b)(5) of the DCRF rule, the weather data has
 19 been normalized for the most recent ten calendar years based on the same methodology
 20 utilized in the Company's last general rate case in Docket No. 49421. The weather
 21 normalization adjustment can be found in Schedule H, with additional detail in
 22 WP/Schedule H/2, and WP/Schedule H/3.

1 **Q. WHAT RETURN ON INVESTED CAPITAL HAVE YOU USED IN THIS FILING?**

2 A. 16 TAC §25.243(d)(2) sets forth the return on invested capital that is to be used in the
3 DCRF formula. Subsection (d)(2) states that if the final order approving the rate of return
4 was issued less than three years before the application for a DCRF was filed, the rate of
5 return is the rate of return approved by the Commission in the electric utility's last
6 comprehensive base-rate proceeding per the DCRF Rule. The Order in Docket No. 49421
7 approved a rate of return of 6.51% and was issued on March 9, 2020, which is less than
8 three years ago. The calculation of the ROR is shown below and in WP/Schedule J/3.2,
9 and yields a rate of return of 6.51%.

Component	Capital Structure	Cost of Capital	WACC	Pre-Tax WACC
Long-Term Debt	57.50%	4.38%	2.52%	2.52%
Common Equity	42.50%	9.40%	4.00%	5.06%
TOTAL	100%		6.51%	7.58%

10

11 **Q. WHAT IS THE INTENT OF THE GROWTH ADJUSTMENT IN THE DCRF**
12 **FORMULA?**

13 A. The growth adjustment is intended to reflect changes in revenue resulting from changes in
14 the number of customers and usage since the Company's last base rate case.¹ Base rates
15 were set to recover an amount of revenue to cover costs based on the number of customers
16 and their associated usage at that time, for which FIT expense is included. Any change in
17 the number of customers and usage will change the amount of revenue collected through
18 base rates, including revenue required to cover current FIT expense. The growth

¹ 16 Texas Admin. Code §25.243(d)(1).

adjustment considers this change in revenue already collected and factors that into the net DCRF revenue requirement.

Q. HAS THE COMPANY CALCULATED THE GROWTH ADJUSTMENT ACCORDING TO THE DCRF RULE?

A. Yes. Please see WP-H3.

V. PROPOSED RIDER DCRF AND EFFECTIVE DATE

Q. HAVE YOU PREPARED A PROPOSED RIDER DCRF?

A. Yes. The proposed Rider DCRF is presented in Exhibits JRD-5 and 6. The proposed Rider DCRF appropriately allocates the DCRF Revenue Requirement increase to the customer classes and designs the DCRF rates per the guidance in 16 TAC §25.243(d)(1). The proposed DCRF rates are shown below:

Table 2: Proposed DCRF Rates

Customer Class	Proposed DCRF Rate Effective 9/1/2022	Per
Residential	\$ 0.002758	kWh
Secondary <= 10 KVA	\$ 0.002499	kWh
Secondary > 10 KVA	\$ 0.422682	Billing KVA
Primary	\$ 0.273246	Billing KVA
Transmission	\$ 0.009995	4CP KVA
Lighting	\$ 0.050782	kWh

Q. WHAT IS THE PROPOSED EFFECTIVE DATE OF RIDER DCRF?

A. Consistent with 16 TAC §25.243(e)(6)(C), CenterPoint Houston requests a system-wide effective date for its DCRF rates of September 1, 2022.

**Direct Testimony of John R. Durland
CenterPoint Energy Houston Electric, LLC
Distribution Cost Recovery Factor Filing**

1 **Q. ARE THE RATES CALCULATED ON A SYSTEM-WIDE BASIS IN**
2 **ACCORDANCE WITH PURA AND 16 TAC § 25.243(e)(6)(C)?**

3 A. Yes, they are.

4 **Q. DOES THE PROPOSED DCRF RATE INCLUDE ANY ADJUSTMENT FOR THE**
5 **PORTION OF A NON-FUEL RATE RELATING TO THE GENERATION OF**
6 **ELECTRICITY?**

7 A. No.

8 **Q. HAS CENTERPOINT PROPOSED A WHOLESALE DCRF?**

9 A. No, it has not.

10 **Q. HOW ARE THE MOBILE GENERATION PROGRAM COSTS ALLOCATED?**

11 A. The costs associated with the mobile generation program are included with the incremental
12 revenue requirement as shown on Schedule A, Line 15. These costs are allocated in
13 WP-Schedule J-1 based on the customer class percentages presented in WP/Schedule J/3
14 from Docket No. 49421.

15 **Q. DID THE USE OF MOBILE GENERATION IMPACT BILLING**
16 **DETERMINANTS?**

17 A. No. The usage reported to the REPs for billing purposes excluded retail customer usage
18 of the mobile generation facilities.

19 **VI. SUMMARY AND RECOMMENDATIONS**

20 **Q. PLEASE SUMMARIZE YOUR TESTIMONY AND RECOMMENDATIONS.**

21 A. My direct testimony supports the filed Schedule H: Summary of Historic Year Billing
22 Determinants and Schedule J: Rate Design. Both schedules have been prepared per the

1 guidance of the Commission's DCRF Rule as well as the DCRF-RFP, in Excel format with
2 active links. Workpapers have been provided as necessary to effectuate the calculations
3 and adjustments required by the DCRF Rule and described in the DCRF-RFP. Similarly,
4 the Federal Income Taxes and Other Taxes from the previous rate case have been scaled to
5 accurately reflect the values at issue in this DCRF proceeding. The Schedule J calculated
6 rates have been carried over into the new, proposed Rider DCRF. Per 16 TAC §25.243, I
7 recommend that the calculated DCRF rates be approved as filed, and the proposed Rider
8 DCRF be adopted on a system-wide basis, with an effective date of September 1, 2022.

9 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

10 **A.** Yes, it does.

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

CURRENT RESPONSIBILITIES (2018 – Present)

Overall responsibilities include the implementation of strategy around cost of service, cost allocation, rate design, and tariffs for electric delivery rates in the ERCOT and Texas jurisdictions and natural gas cost allocation and rate design for CenterPoint Energy natural gas delivery.

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. 52194 - *Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to its Energy Efficiency Cost Recovery Factor*

Docket No. 50908 - *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 IS VOLUMINOUS AND IS
BEING PROVIDED IN ELECTRONIC
FORMAT ONLY

HISTORY DCRF REVENUE REQUIREMENT

Description	D-38339 DCRF Rule for 2015	D-44572 Eff. 9-1-2015	D-45747 Eff. 9-1-2016	¹ D-47032 Eff. 9-1-2017	¹ D-47032 Eff. 3-1-2018	² D-48226 Eff. 9-1-2018	² D-48226 Eff. 3-1-2019	² D-48226 Eff. 9-1-2019	D-49421 Baseline	Proposed Eff. 9-1-2022
Residential	\$ 233,076,329	\$ 6,899,295	\$ 23,882,175	\$ 8,780,232	\$ 10,096,357	\$ 18,753,168	\$ 24,563,843	\$ 33,795,772	\$ 326,939,916	\$83,754,841
Secondary Less Than or Equal to 10 KVA	\$ 9,957,337	\$ 274,345	\$ 949,657	\$ 822,262	\$ 841,984	\$ 849,354	\$ 873,115	\$ 1,343,864	\$ 9,409,374	\$2,187,530
Secondary Greater Than 10 KVA	\$ 153,522,920	\$ 4,565,055	\$ 15,802,112			\$ 14,239,783	\$ 14,421,772	\$ 22,361,639	\$ 169,859,727	\$44,357,339
Non-IDR				\$ 13,632,262	\$ 14,128,718					
IDR				\$ 400,588	\$ 416,068					
Primary	\$ 6,986,824	\$ 213,809	\$ 740,108			\$ 670,469	\$ 671,924	\$ 1,047,330	\$ 13,231,986	\$3,440,500
Non-IDR				\$ 255,803	\$ 269,089					
IDR				\$ 438,003	\$ 460,842					
Transmission	\$ 1,201,244	\$ 17,983	\$ 62,250	\$ 59,838	\$ 60,182	\$ 56,465	\$ 56,444	\$ 88,091	\$ 2,452,315	\$363,258
Lighting Services	\$ 35,799,276	\$ 1,029,512	\$ 3,563,697	\$ 3,400,450	\$ 3,470,425	\$ 3,313,986	\$ 3,149,776	\$ 5,043,003	\$ 43,789,546	\$11,577,342
Total	\$ 440,543,931	\$ 13,000,000	\$ 45,000,000	\$ 27,789,438	\$ 29,743,664	\$ 37,883,224	\$ 43,736,875	\$ 63,679,700	\$ 565,682,864	\$ 145,680,810
Source:	D-38339 & WP/Schedule J/3	D-44572 Exhibit LABK-7 Docket 44572 Settlement Schedule J	D-45747 Schedule J	D- 47032 Schedule J	D- 47032 Schedule J	D- 48226 Schedule J	D- 48226 Schedule J	D- 48226 Schedule J	D-49421 WP/Schedule J/3	Schedule J
				¹ Includes AMS Reconciliation Refund Docket No. 47364		² Includes Settlement TCJA Deferral and Unprotected EDIT				

HISTORY OF DCRF RATES

Description: Test Year	2014 DCRF	2015 DCRF	2016 ¹ DCRF 9/1/2017	2016 ¹ DCRF 3/1/2018	2017 ² DCRF 9/1/2018	2017 ² DCRF 3/1/2019	2017 ² DCRF 9/1/2019	Rate Case 2018 DCRF 4/23/2020	Proposed 2021 DCRF 9/1/2022	Billing Unit Per
Residential	\$0.000241	\$0.000795	\$0.000652	\$0.000624	\$0.000762	\$0.000655	\$0.001145	\$0.000000	\$0.002758	kWh
Secondary Less Than or Equal to 10 KVA	\$0.000319	\$0.001061	\$0.001836	\$0.001831	\$0.000964	\$0.000812	\$0.001488	\$0.000000	\$0.002499	kWh
Secondary Greater Than 10 KVA	\$0.040087	\$0.136574			\$0.127888	\$0.107617	\$0.192072	\$0.000000	\$0.422682	Billing KVA
Non-IDR			\$0.247880	\$0.247349						
IDR			\$0.264460	\$0.264460						
Primary	\$0.017653	\$0.060299			\$0.057826	\$0.048612	\$0.086847	\$0.000000	\$0.273246	Billing KVA
Non-IDR			\$0.112709	\$0.112687						
IDR			\$0.113386	\$0.113386						
Transmission	\$0.000787	\$0.002657	\$0.004977	\$0.004977	\$0.002219	\$0.001865	\$0.003333	\$0.000000	\$0.009995	4CP KVA
Lighting Services	\$0.003375	\$0.011658	\$0.023973	\$0.023973	\$0.012569	\$0.015120	\$0.018877	\$0.000000	\$0.050782	kWh
Docket Number	44572	45747	47032	47032	48226	48226	48226	49421		
Effective Date	9/1/2015	9/1/2016	9/1/2017	3/1/2018	9/1/2018	3/1/2019	9/1/2019	4/23/2020		
Date of Commission Order	5-Aug-15	20-Jul-16	28-Jul-17	12-Jan-18	30-Aug-18	30-Aug-18	30-Aug-18	9-Mar-20		

¹ Includes AMS Reconciliation Refund Docket No. 47364

² Includes Settlement TCJA Deferral and Unprotected EDIT

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

6.1.1.6.13 RIDER DCRF - DISTRIBUTION COST RECOVERY FACTOR

APPLICABILITY

Each Retail Customer connected to the Company's distribution system will be assessed a nonbypassable distribution service charge adjustment pursuant to this rider. The charges derived herein, pursuant to Substantive Rule §25.243, are necessitated by incremental distribution costs not included in the Company's last general rate case proceeding before the Commission.

MONTHLY RATE

The REP, on behalf of the Retail Customer, will be assessed this distribution service charge adjustment based on the monthly per unit cost (DCRF) multiplied times the Retail Customer's appropriate monthly billing determinant (kWh, Billing kVA, or 4 CP kVA).

The DCRF shall be calculated for each rate according to the following formula:

DCRF =

$$\begin{aligned} & [((DIC_C - DIC_{RC}) * ROR_{AT}) + (DEPR_C - DEPR_{RC}) + (FIT_C - FIT_{RC}) + (OT_C - \\ & OT_{RC}) - \sum (DISTREV_{RC-CLASS} * \%GROWTH_{CLASS})] * ALLOC_{CLASS} / BD_{C-CLASS} \end{aligned}$$

Where:

DIC_C = Current Net Distribution Invested Capital.

DIC_{RC} = Net Distribution Invested Capital from the last comprehensive base-rate proceeding.

ROR_{AT} = After-Tax Rate of Return as defined in Substantive Rule §25.243(d)(2).

$DEPR_C$ = Current Depreciation Expense, as related to Current Gross Distribution Invested Capital, calculated using the currently approved depreciation rates.

$DEPR_{RC}$ = Depreciation Expense, as related to Gross Distribution Invested Capital, from the last comprehensive base-rate proceeding.

FIT_C = Current Federal Income Tax, as related to Current Net Distribution Invested Capital, including the change in federal income taxes related to the change in return on rate base and

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

synchronization of interest associated with the change in rate base resulting from additions to and retirements of distribution plant as used to compute Net Distribution Invested Capital.

FIT_{RC} = Federal Income Tax, as related to Net Distribution Invested Capital from the last comprehensive base-rate proceeding.

OT_c = Current Other Taxes (taxes other than income taxes and taxes associated with the return on rate base), as related to Current Net Distribution Invested Capital, calculated using current tax rates and the methodology from the last comprehensive base-rate proceeding, and not including municipal franchise fees.

OT_{RC} = Other Taxes, as related to Net Distribution Invested Capital from the last comprehensive base-rate proceeding, and not including municipal franchise fees.

$DISTREV_{RC-CLASS}$ (Distribution Revenues by rate class based on Net Distribution Invested Capital from the last comprehensive base-rate proceeding) = $(DIC_{RC-CLASS} * RORAT) + DEPR_{RC-CLASS} + FIT_{RC-CLASS} + OT_{RC-CLASS}$.

$\%GROWTH_{CLASS}$ (Growth in Billing Determinants by Class) = $(BD_{c-CLASS} - BD_{RC-CLASS}) / BD_{RC-CLASS}$

$DIC_{RC-CLASS}$ = Net Distribution Invested Capital allocated to the rate class from the last comprehensive base-rate proceeding.

$DEPR_{RC-CLASS}$ = Depreciation Expense, as related to Gross Distribution Invested Capital, allocated to the rate class in the last comprehensive base-rate proceeding.

$FIT_{RC-CLASS}$ = Federal Income Tax, as related to Net Distribution Invested Capital, allocated to the rate class in the last comprehensive base-rate proceeding.

$OT_{RC-CLASS}$ = Other Taxes, as related to Net Distribution Invested Capital, allocated to the rate class in the last comprehensive base-rate proceeding, and not including municipal franchise fees.

$ALLOC_{CLASS}$ = Rate Class Allocation Factor approved in the last comprehensive base-rate proceeding, calculated as: total net distribution plant allocated to rate class, divided by total net distribution plant. For situations in which data from the last comprehensive base-rate proceeding are not available to perform the described calculation, the Rate Class Allocation Factor shall be calculated as the total distribution revenue requirement allocated to the rate class (less any identifiable amounts explicitly unrelated to Distribution Invested Capital) divided by the total distribution revenue requirement (less any identifiable amounts

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

explicitly unrelated to Distribution Invested Capital) for all classes as approved by the commission in the electric utility's last comprehensive base-rate case.

The Allocation Factor for each listed rate schedule is as follows:

Residential Service	57.4920%
Secondary Service Less Than or Equal to 10 kVA	1.5016%
Secondary Service Greater Than 10 kVA	30.4483%
Primary Service	2.3617%
Transmission Service	0.2494%
Street Lighting Service	7.9471%

BD_{C-CLASS} = Rate Class Billing Determinants (weather-normalized and adjusted to reflect the number of customers at the end of the period) for the 12 months ending on the date used for purposes of determining the Current Net Distribution Invested Capital. For customer classes billed primarily on the basis of kilowatt-hour billing determinants, the DCRF shall be calculated using kilowatt-hour billing determinants. For customer classes billed primarily on the basis of demand billing determinants, the DCRF shall be calculated using demand billing determinants.

BD_{RC-CLASS} = Rate Class Billing Determinants used to set rates in the last comprehensive base-rate proceeding.

**DCRF EFFECTIVE FOR SCHEDULED METER READ DATES ON AND AFTER
SEPTEMBER 1, 2022**

Rate Class	DCRF Charge	Billing Units
Residential Service	\$ 0.002758	per kWh
Secondary Service Less Than or Equal to 10 kVA	\$ 0.002499	per kWh
Secondary Service Greater Than 10 kVA	\$ 0.422682	per Billing kVA
Primary Service	\$ 0.273246	per Billing kVA
Transmission Service	\$ 0.009995	per 4CP kVA
Lighting Services	\$ 0.050782	per kWh

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

DETERMINATION OF BILLING DEMAND FOR DISTRIBUTION SYSTEM CHARGES

Secondary Service Greater Than 10 kVA - Determination of Billing kVA. The Billing kVA applicable to the Distribution System Charge shall be the NCP kVA for the current billing month.

Determination of Billing kVA For loads whose maximum NCP kVA established in the 11 months preceding the current billing month is less than or equal to 20 kVA, the Billing kVA applicable to the Distribution System Charge shall be the NCP kVA for the current billing month. For all other loads, the Billing kVA applicable to the Distribution System Charge shall be the higher of the NCP kVA for the current billing month or 80% of the highest monthly NCP kVA established in the 11 months preceding the current billing month (80% ratchet). The 80% ratchet shall not apply to seasonal agricultural Retail Customers.

This rate schedule is subject to the Company's Tariff and Applicable Legal Authorities.

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

6.1.1.6.13 RIDER DCRF - DISTRIBUTION COST RECOVERY FACTOR

APPLICABILITY

Each Retail Customer connected to the Company's distribution system will be assessed a nonbypassable distribution service charge adjustment pursuant to this rider. The charges derived herein, pursuant to Substantive Rule §25.243, are necessitated by incremental distribution costs not included in the Company's last general rate case proceeding before the Commission.

MONTHLY RATE

The REP, on behalf of the Retail Customer, will be assessed this distribution service charge adjustment based on the monthly per unit cost (DCRF) multiplied times the Retail Customer's appropriate monthly billing determinant (kWh, Billing kVA, or 4 CP kVA).

The DCRF shall be calculated for each rate according to the following formula:

DCRF =

$$\begin{aligned} & [((DIC_C - DIC_{RC}) * ROR_{AT}) + (DEPR_C - DEPR_{RC}) + (FIT_C - FIT_{RC}) + (OT_C - \\ & OT_{RC}) - \sum(DISTREV_{RC-CLASS} * \%GROWTH_{CLASS})] * ALLOC_{CLASS} / BD_{C-CLASS} \end{aligned}$$

Where:

DIC_C = Current Net Distribution Invested Capital.

DIC_{RC} = Net Distribution Invested Capital from the last comprehensive base-rate proceeding.

ROR_{AT} = After-Tax Rate of Return as defined in Substantive Rule §25.243(d)(2).

$DEPR_C$ = Current Depreciation Expense, as related to Current Gross Distribution Invested Capital, calculated using the currently approved depreciation rates.

$DEPR_{RC}$ = Depreciation Expense, as related to Gross Distribution Invested Capital, from the last comprehensive base-rate proceeding.

FIT_C = Current Federal Income Tax, as related to Current Net Distribution Invested Capital, including the change in federal income taxes related to the change in return on rate

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

base and synchronization of interest associated with the change in rate base resulting from additions to and retirements of distribution plant as used to compute Net Distribution Invested Capital.

FIT_{RC} = Federal Income Tax, as related to Net Distribution Invested Capital from the last comprehensive base-rate proceeding.

OT_C = Current Other Taxes (taxes other than income taxes and taxes associated with the return on rate base), as related to Current Net Distribution Invested Capital, calculated using current tax rates and the methodology from the last comprehensive base-rate proceeding, and not including municipal franchise fees.

OT_{RC} = Other Taxes, as related to Net Distribution Invested Capital from the last comprehensive base-rate proceeding, and not including municipal franchise fees.

$DISTREV_{RC-CLASS}$ (Distribution Revenues by rate class based on Net Distribution Invested Capital from the last comprehensive base-rate proceeding) = $(DIC_{RC-CLASS} * RORAT) + DEPR_{RC-CLASS} + FIT_{RC-CLASS} + OT_{RC-CLASS}$.

$\%GROWTH_{CLASS}$ (Growth in Billing Determinants by Class) = $(BD_{C-CLASS} - BD_{RC-CLASS}) / BD_{RC-CLASS}$

$DIC_{RC-CLASS}$ = Net Distribution Invested Capital allocated to the rate class from the last comprehensive base-rate proceeding.

$DEPR_{RC-CLASS}$ = Depreciation Expense, as related to Gross Distribution Invested Capital, allocated to the rate class in the last comprehensive base-rate proceeding.

$FIT_{RC-CLASS}$ = Federal Income Tax, as related to Net Distribution Invested Capital, allocated to the rate class in the last comprehensive base-rate proceeding.

$OT_{RC-CLASS}$ = Other Taxes, as related to Net Distribution Invested Capital, allocated to the rate class in the last comprehensive base-rate proceeding, and not including municipal franchise fees.

$ALLOC_{CLASS}$ = Rate Class Allocation Factor approved in the last comprehensive base-rate proceeding, calculated as: total net distribution plant allocated to rate class, divided by total net distribution plant. For situations in which data from the last comprehensive base-rate proceeding are not available to perform the described calculation, the Rate Class Allocation Factor shall be calculated as the total distribution revenue requirement allocated to the rate class (less any identifiable amounts explicitly unrelated to Distribution Invested Capital)

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

divided by the total distribution revenue requirement (less any identifiable amounts explicitly unrelated to Distribution Invested Capital) for all classes as approved by the commission in the electric utility's last comprehensive base-rate case.

The Allocation Factor for each listed rate schedule is as follows:

Residential Service	57.4920%
Secondary Service Less Than or Equal to 10 kVA	1.5016%
Secondary Service Greater Than 10 kVA	30.4483%
Primary Service	2.3617%
Transmission Service	0.2494%
Street Lighting Service	7.9471%

$BD_{C-CLASS}$ = Rate Class Billing Determinants (weather-normalized and adjusted to reflect the number of customers at the end of the period) for the 12 months ending on the date used for purposes of determining the Current Net Distribution Invested Capital. For customer classes billed primarily on the basis of kilowatt-hour billing determinants, the DCRF shall be calculated using kilowatt-hour billing determinants. For customer classes billed primarily on the basis of demand billing determinants, the DCRF shall be calculated using demand billing determinants.

$BD_{RC-CLASS}$ = Rate Class Billing Determinants used to set rates in the last comprehensive base-rate proceeding.

**DCRF EFFECTIVE FOR SCHEDULED METER READ DATES ON AND AFTER
SEPTEMBER 1, 2022**

Rate Class	DCRF Charge	Billing Units
Residential Service	\$ 0.002758	per kWh
Secondary Service Less Than or Equal to 10 kVA	\$ 0.002499	per kWh
Secondary Service Greater Than 10 kVA	\$ 0.422682	per Billing kVA
Primary Service	\$ 0.273246	per Billing kVA
Transmission Service	\$ 0.009995	per 4CP kVA
Lighting Services	\$ 0.050782	per kWh

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

DETERMINATION OF BILLING DEMAND FOR DISTRIBUTION SYSTEM CHARGES

Secondary Service Greater Than 10 kVA - Determination of Billing kVA. The Billing kVA applicable to the Distribution System Charge shall be the NCP kVA for the current billing month.

Determination of Billing kVA For loads whose maximum NCP kVA established in the 11 months preceding the current billing month is less than or equal to 20 kVA, the Billing kVA applicable to the Distribution System Charge shall be the NCP kVA for the current billing month. For all other loads, the Billing kVA applicable to the Distribution System Charge shall be the higher of the NCP kVA for the current billing month or 80% of the highest monthly NCP kVA established in the 11 months preceding the current billing month (80% ratchet). The 80% ratchet shall not apply to seasonal agricultural Retail Customers.

This rate schedule is subject to the Company's Tariff and Applicable Legal Authorities.

Schedule J: Summary of Distribution Cost Recovery Factor

Exhibit JRD-7
Page 1 of 8

Distribution Cost Recovery Factor CenterPoint Energy Houston Electric, LLC Update Period 1/1/2010 - 12/31/2014 Sponsor: Matthew A. Troxle Docket No. 44572 Summary of Revenue Requirement by Class								
Class	(1) Cumulative DCRF Revenue by Class	(2) (Plus/Minus) Distrev * Growth Adjustment	(3) = (1) + (2) Adjusted Cumulative DCRF Revenues	(4) Alloc _{Class}	(5) = Total (3) * (4) DCRF Revenues	(6) Billing Units	(7) = (5)/(6) Rate (\$)	(8) Units
Residential	\$ -	\$ -	-	53.07%	\$ 6,899,295	28,666,923,745	0.000241	per kWh
Secondary <= 10	\$ -	\$ -	-	2.11%	\$ 274,345	859,006,747	0.000319	per kWh
Secondary > 10	\$ -	\$ -	-	35.12%	\$ 4,565,055	113,878,584	0.040087	per Billing kVa
Primary	\$ -	\$ -	-	1.64%	\$ 213,809	12,111,597	0.017653	per Billing kVa
Transmission	\$ -	\$ -	-	0.14%	\$ 17,983	22,837,179	0.000787	per 4CP kVa
Lighting	\$ -	\$ -	-	7.92%	\$ 1,029,512	305,056,891	0.003375	per kWh
Total	\$ -	\$ -	\$ 13,000,000	100.00%	\$ 13,000,000			

Reference:

(1) Cumulative DCRF Revenue by Class: WP/Schedule J/1
(2) Distrev * Growth Adjustment: WP/Schedule J/2
(4) Alloc_{Class}: WP/Schedule J/1
(6) Billing Units : Schedule H

Schedule J: Summary of Distribution Cost Recovery Factor

Exhibit JRD-7

Page 2 of 8

Distribution Cost Recovery Factor CenterPoint Energy Houston Electric, LLC Update Period 1/1/2010 - 12/31/2015 Sponsor: Laurie A. Burridgde-Kowalik Docket No. 45747 Summary of Revenue Requirement by Class								
Class	(1) Cumulative DCRF Revenue by Class	(2) (Plus/Minus) Distrev * Growth Adjustment	Adjusted Cumulative DCRF Revenues	(4) Alloc _{class}	(5) = Total (3) * (4) DCRF Revenues	(6) Billing Units	(7) = (5)/(6) Rate (\$)	(8) Units
Residential	\$ -	\$ -		53.07%	\$ 23,882,175	30,027,970,677	0.000795	per kWh
Secondary <= 10	\$ -	\$ -		2.11%	\$ 949,657	895,206,495	0.001061	per kWh
Secondary > 10	\$ -	\$ -		35.12%	\$ 15,802,112	115,703,873	0.136574	per Billing kVa
Primary	\$ -	\$ -		1.64%	\$ 740,108	12,273,911	0.060299	per Billing kVa
Transmission	\$ -	\$ -		0.14%	\$ 62,250	23,427,710	0.002657	per 4CP kVa
Lighting	\$ -	\$ -		7.92%	\$ 3,563,697	305,688,732	0.011658	per kWh
Total	\$ -	\$ -	\$ 45,000,000	100.00%	\$ 45,000,000			

Reference:

(1) Cumulative DCRF Revenue by Class: WP/Schedule J/1

(2) Distrev * Growth Adjustment: WP/Schedule J/2

(4) Alloc_{class}: WP/Schedule J/1

(6) Billing Units : Schedule H

Schedule J: Summary of Distribution Cost Recovery Factor
Final Settlement Docket 47032/Docket 47364

Exhibit JRD-7

Distribution Cost Recovery Factor
CenterPoint Energy Houston Electric, LLC
Update Period 1/1/2010 - 12/31/2016
Sponsor: Laurie A. Burrige-Kowalik
Docket No. 47032
Summary of Revenue Requirement by Class

Page 3 of 8

Class	(1) Cumulative DCRF Revenue by Class	(2) {Plus/Minus} Distrev * Growth Adjustment	(3) = (1) + (2) Adjusted Cumulative DCRF Revenues	(4) Alloc _{class}	(5) = Total (3) * (4) DCRF Revenues	AMS Reconciliation	Revenue Requirement	(6) Billing Units	(7) = (5)/(6) Rate (\$)	(8) Units
Residential				53.07%	\$ 46,045,287	\$ (26,701,739)	\$ 19,343,548	29,652,012,330	0.000652	per kWh
Secondary <= 10				2.11%	\$ 1,830,957	\$ (164,049)	\$ 1,666,908	907,683,695	0.001836	per kWh
Secondary > 10 - Total				35.12%	\$ 30,466,772			115,203,905		
Non-IDR - 97.3% (7)					\$ 29,650,117	\$ (1,858,809)	\$ 27,791,308	112,115,889	0.247880	per Billing kVa
IDR - 2.7% (7)					\$ 816,655	\$ -	\$ 816,655	3,088,016	0.264460	per Billing kVa
Primary - Total				1.64%	\$ 1,426,942			12,584,831		
Non-IDR - 37.0% (7)					\$ 528,097	\$ (3,154)	\$ 524,943	4,657,520	0.112709	per Billing kVa
IDR - 63.0% (7)					\$ 898,845	\$ -	\$ 898,845	7,927,311	0.113386	per Billing kVa
Transmission				0.14%	\$ 120,020	\$ -	\$ 120,020	24,113,440	0.004977	per 4CP kVa
Lighting				7.92%	\$ 6,870,875	\$ -	\$ 6,870,875	286,605,204	0.023973	per kWh
Total			\$ 86,760,854	100.00%	\$ 86,760,854	\$ (28,727,751)	\$ 58,033,103			

Schedule J: Summary of Distribution Cost Recovery Factor
Final Settlement Docket 47032/Docket 47364

Exhibit JRD-7

September 2017 - Feb 2018				Page 4 of 8	
	DCRF Revenues	AMS Reconciliation	Revenue Requirement		
Residential	\$ 20,900,421	\$ (12,120,189)	\$ 8,780,232		
Secondary <= 10	\$ 903,185	\$ (80,923)	\$ 822,262		
Secondary > 10 - Total					
Non-IDR - 0.0% (7)	\$ 14,544,050	\$ (911,788)	\$ 13,632,262		
IDR - 0.0% (7)	\$ 400,588	\$ -	\$ 400,588		
Primary - Total					
Non-IDR - 0.0% (7)	\$ 257,339	\$ (1,537)	\$ 255,803		
IDR - 0.0% (7)	\$ 438,003	\$ -	\$ 438,003		
Transmission	\$ 59,838	\$ -	\$ 59,838		
Lighting	\$ 3,400,450	\$ -	\$ 3,400,450		
Total Sept 2017-Feb 2018	\$ 40,903,875	\$ (13,114,437)	\$ 27,789,438		

Schedule J: Summary of Distribution Cost Recovery Factor
Final Settlement Docket 47032/Docket 47364

Exhibit JRD-7

Page 5 of 8

March 2018 - August 2018	DCRF Revenues	AMS Reconciliation	Revenue Requirement	AMS Recon Settlement	Adjusted Rev Require	Billing Units	Rate	Units
Residential	\$25,144,866	\$ (14,581,550)	\$ 10,563,316	\$ (466,959)	\$ 10,096,357	16,192,664,593	0.000624	per kWh
Secondary <= 10	\$927,772	\$ (83,126)	\$ 844,646	\$ (2,662)	\$ 841,984	459,936,176	0.001831	per kWh
Secondary > 10 - Total								
Non-IDR - 0.0% (7)	\$15,106,067	\$ (947,021)	\$ 14,159,046	\$ (30,327)	\$ 14,128,718	57,120,522	0.247349	per Billing kVa
IDR - 0.0% (7)	\$416,068	\$ -	\$ 416,068	\$ -	\$ 416,068	1,573,275	0.264460	per Billing kVa
Primary - Total								
Non-IDR - 0.0% (7)	\$270,758	\$ (1,617)	\$ 269,141	\$ (52)	\$ 269,089	2,387,931	0.112687	per Billing kVa
IDR - 0.0% (7)	\$460,842	\$ -	\$ 460,842	\$ -	\$ 460,842	4,064,366	0.113386	per Billing kVa
Transmission	\$60,182	\$ -	\$ 60,182	\$ -	\$ 60,182	12,091,222	0.004977	per 4CP kVa
Lighting	\$3,470,425	\$ -	\$ 3,470,425	\$ -	\$ 3,470,425	144,762,034	0.023973	per kWh
Total Mar 2018 - Aug 2018	\$45,856,979	\$ (15,613,314)	\$ 30,243,664	\$ (500,000)	\$ 29,743,664			
Total	\$86,760,854	\$ (28,727,751)	\$ 58,033,103	\$ (500,000)	\$ 57,533,103			
Total AMS Refund				\$ (29,227,751)				

Reference:

- (1) Cumulative DCRF Revenue by Class: WP/Schedule J/1
(2) Distrev * Growth Adjustment: WP/Schedule J/2
(4) Alloc_{Class}: WP/Schedule J/1
(6) Billing Units: Schedule H
(7) IDR/Non-IDR: WP/Settlement Schedule J/3

DCRF Revenues Settlement (3)

DCRF	\$ 92,508,153
Prior DCRF Refund	\$ 2,947,299
DCRF Settlement Reduction	\$ 2,800,000
DCRF Revenue Requirement	\$ 86,760,854

AMS Reconciliation

Residential	\$ (26,701,739)
Secondary <= 10	\$ (164,049)
Secondary > 10 - Total Non-IDR	\$ (1,858,809)
Primary - Total Non-IDR	\$ (3,154)
Total	\$ (28,727,751)
Settlement adjustment Dk 47364	\$ (500,000)
Total AMS Recon Refund	\$ (29,227,751)

Schedule J: Summary of Distribution Cost Recovery Factor
Docket No. 48226 - Settlement and Reconciliation (Effective 9/1/2018 and 3/1/2019)

Exhibit JRD-7
Page 6 of 8

Distribution Cost Recovery Factor CenterPoint Energy Houston Electric, LLC Update Period 1/1/2010 - 12/31/2017 Sponsor: Laurie A. Burridge-Kowalik												
Summary of Revenue Requirement by Class (Effective Sept 2018 - Feb 2019) - Settlement												
	(1) Cumulative DCRF Revenue by Class	(2) (Plus/Minus) Distrev * Growth Adjustment	(3) = (1) + (2) Adjusted Cumulative DCRF Revenues	(4) Alloc <small>class</small>	(5) = Total (3) * (4) Net DCRF Revenues	Settlement TCJA Deferral	Unprotected EDIT	DCRF	(6) Billing Units	(7) = (5)/(6) Rate (\$)	(8) Units	
Residential	\$ -	\$ -		53.07%	\$ 22,502,342	\$ (10,614,300)	\$ (10,200,369)	\$ 43,317,011	29,513,574,664	0.000762	per kWh	
Secondary <= 10	\$ -	\$ -		2.11%	\$ 894,789	\$ (422,070)	\$ (405,610)	\$ 1,722,469	928,256,194	0.000964	per kWh	
Secondary > 10	\$ -	\$ -		35.12%	\$ 14,889,119	\$ (7,023,161)	\$ (6,749,275)	\$ 28,661,555	116,423,346	0.127888	per Billing kVa	
Primary	\$ -	\$ -		1.64%	\$ 697,347	\$ (328,937)	\$ (316,109)	\$ 1,342,393	12,059,474	0.057826	per Billing kVa	
Transmission	\$ -	\$ -		0.14%	\$ 58,654	\$ (27,667)	\$ (26,588)	\$ 112,909	26,426,924	0.002219	per 4CP kVa	
Lighting	\$ -	\$ -		7.92%	\$ 3,357,798	\$ (1,583,865)	\$ (1,522,098)	\$ 6,463,762	267,155,948	0.012569	per kWh	
Total	\$ -	\$ -	\$ 42,400,049	100.00%	\$ 42,400,049	\$ (20,000,000)	\$ (19,220,050)	\$ 81,620,099				
September 2018 - Feb 2019 Revenue Requirement												
			<u>Net DCRF Revenue</u>			Settlement TCJA Deferral	Unprotected EDIT	DCRF				
Residential			\$ 9,741,905			\$ (4,595,233)	\$ (4,416,030)	\$ 18,753,168				
Secondary <= 10			\$ 441,223			\$ (208,124)	\$ (200,008)	\$ 849,354				
Secondary > 10			\$ 7,397,289			\$ (3,489,283)	\$ (3,353,210)	\$ 14,239,783				
Primary			\$ 348,296			\$ (164,290)	\$ (157,883)	\$ 670,469				
Transmission			\$ 29,332			\$ (13,836)	\$ (13,296)	\$ 56,465				
Lighting			\$ 1,721,551			\$ (812,051)	\$ (780,383)	\$ 3,313,986				
Total			\$ 19,679,596			\$ (9,282,816)	\$ (8,920,811)	\$ 37,883,224				

October 2018 TCJA Deferral True-up (Effective March 2019 - August 2019)									
	Net DCRF Revenue	True-Up TCJA Deferral	Settlement TCJA Deferral	Total TCJA Deferral	Unprotected EDIT	DCRF	Billing Units	Rate (\$)	
Residential	\$ 10,965,735	\$ (1,794,703)	\$ (6,019,067)	\$ (7,813,770)	\$ (5,784,339)	\$ 24,563,843	16,736,307,554	0.000655	
Secondary <= 10	\$ 382,201	\$ (71,365)	\$ (213,946)	\$ (285,311)	\$ (205,603)	\$ 873,115	470,530,512	0.000812	
Secondary > 10	\$ 6,304,329	\$ (1,187,500)	\$ (3,533,878)	\$ (4,721,378)	\$ (3,396,065)	\$ 14,421,772	58,581,295	0.107617	
Primary	\$ 293,434	\$ (55,618)	\$ (164,647)	\$ (220,265)	\$ (158,226)	\$ 671,924	6,036,274	0.048612	
Transmission	\$ 24,643	\$ (4,678)	\$ (13,631)	\$ (18,509)	\$ (13,291)	\$ 56,444	13,211,007	0.001865	
Lighting	\$ 1,368,442	\$ (267,805)	\$ (771,614)	\$ (1,039,619)	\$ (741,715)	\$ 3,149,776	130,184,466	0.010512	
Total	\$ 19,338,784	\$ (3,381,669)	\$ (10,717,182)	\$ (14,098,852)	\$ (10,299,239)	\$ 43,736,875			
Annual Totals	\$ 39,018,380	\$ (3,381,669)	\$ (20,000,000)	\$ (23,381,669)	\$ (19,220,050)	\$ 81,620,099			
Check Totals	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			

Reference:

- (1) Cumulative DCRF Revenue by Class: WP/Schedule J/1
(2) Distrev * Growth Adjustment: WP/Schedule J/2
(4) Alloc_{class}: WP/Schedule J/1
(6) Billing Units: Schedule H, WP/ Schedule H/3, WP/Schedule H/4

Settlement

Revenue Required Filed	\$ 145,832,850
Less Load Adjustment	\$ (63,212,749)
Adjusted Revenue Requirement Filed	\$ 82,620,101
Less TCJA Deferral	\$ (20,000,000)
Less Unprotected EDIT	\$ (19,220,050)
Less DCRF Adjustments	\$ (1,000,002)
Settlement	\$ 42,400,049

TCJA Deferral True-up

Amount Programmed	\$ (20,000,000)	Reference Settlement Docket 48226
Final Amount	\$ (23,381,669)	WP/Schedule J/3
Reconciling Amount	\$ (3,381,669)	True-up Amount

Schedule J: Summary of Distribution Cost Recovery Factor
Docket No. 48226 - Settlement [Effective 9/1/2019]

Exhibit JRD-7
Page 8 of 8

Distribution Cost Recovery Factor CenterPoint Energy Houston Electric, LLC Update Period 1/1/2010 - 12/31/2017 Sponsor: Laurie A. Burriddge-Kowalik									
Summary of Revenue Requirement by Class									
Class	(1) Cumulative DCRF Revenue by Class	(2) (Plus/Minus) Distrev * Growth Adjustment	(3) = (1) + (2) Adjusted Cumulative DCRF Revenues	(4) Alloc _{class}	(5) = Total (3) * (4) DCRF Revenues	(6) Billing Units	(7) = (5)/(6) Rate (\$)	(8) Units	
Residential	\$ -	\$ -	-	53.07%	\$ 33,795,772	29,513,574,664	0.001145	per kWh	
Secondary <= 10	\$ -	\$ -	-	2.11%	\$ 1,343,864	928,256,194	0.001448	per kWh	
Secondary > 10	\$ -	\$ -	-	35.12%	\$ 22,361,639	116,423,346	0.192072	per Billing kVa	
Primary	\$ -	\$ -	-	1.64%	\$ 1,047,330	12,059,474	0.086847	per Billing kVa	
Transmission	\$ -	\$ -	-	0.14%	\$ 88,091	26,426,924	0.003333	per 4CP kVa	
Lighting	\$ -	\$ -	-	7.92%	\$ 5,043,003	267,155,948	0.018877	per kWh	
Total	\$ -	\$ -	\$ -	63,679,700	100.00%	\$ 63,679,700			

Reference:
 (1) Cumulative DCRF Revenue by Class: WP/Schedule J/1
 (2) Distrev * Growth Adjustment: WP/Schedule J/2
 (4) Alloc_{class}: WP/Schedule J/1
 (6) Billing Units : Schedule H

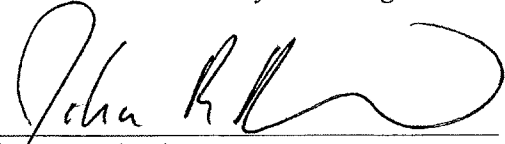
STATE OF TEXAS §
 §
COUNTY OF HARRIS §

AFFIDAVIT OF JOHN R. DURLAND

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

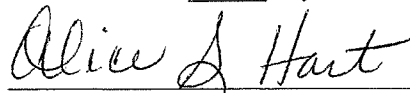
1. "My name is John R. Durland. I am of sound mind and capable of making this affidavit. The facts stated herein are true and correct based on my personal knowledge. My current position is Director of Rates for CenterPoint Energy Service Company, LLC.
2. The foregoing direct testimony and the attached exhibits have been prepared by me or under my direct supervision and are true and correct to the best of my knowledge."

Further affiant sayeth not.

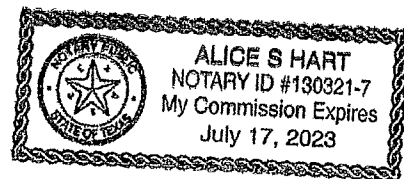


John R. Durland

SUBSCRIBED AND SWORN TO BEFORE ME on this 17th day of March, 2022.



Notary Public in and for the State of Texas



DCRF APPLICATION FORM SCHEDULES

Schedule A: Summary of Distribution Cost of Service (DCOS)

Distribution Cost Recovery Factor
CenterPoint Energy Houston Electric
Update Period January 1, 2019 - December 31, 2021
Sponsor: Mary A. Kirk

		(1)	(2)	(3)
Line No.	Description	Total Approved Docket No. 49421 Final Order	Annual Change	Revenue Requirement (3) = (1) + (2)
1	Operation & Maintenance Expense, Including A&G ⁽¹⁾	\$ 492,537,191	\$ -	\$ 492,537,191
2	Depreciation & Amortization ⁽¹⁾⁽²⁾	274,135,753	44,935,100	319,070,853
3	Taxes Other Than Income Taxes ⁽¹⁾⁽³⁾	237,363,464	15,184,025	252,547,489
4	Federal Income Tax ⁽¹⁾⁽⁴⁾	19,507,338	10,983,574	30,490,913
5	Return on Rate Base ⁽¹⁾⁽⁵⁾	243,667,091	67,415,473	311,082,564
6				
7	Total Revenue Requirement	\$ 1,267,210,838	\$ 138,518,172	\$ 1,405,729,009
8				
9	Other Revenues ⁽¹⁾	(30,591,898)	-	(30,591,898)
10				
11	Total DCRF	<u>\$ 1,236,618,940</u>	<u>\$ 138,518,172</u>	<u>\$ 1,375,137,111</u>
12				
13	Mobile Generation ⁽⁶⁾	-	59,903,845	59,903,845
14				
15	Total DCRF and Mobile Generation	<u>\$ 1,236,618,940</u>	<u>\$ 198,422,017</u>	<u>\$ 1,435,040,956</u>
16				
17	^(Note 1) Schedules and workpapers may have slight variances due to rounding.			
18	⁽¹⁾ From: Docket No. 49421 Settlement, Exhibit I			
19	⁽²⁾ From: Schedule E-1			
20	⁽³⁾ From: Schedule E-2			
21	⁽⁴⁾ From: Schedule E-3			
22	⁽⁵⁾ From: Schedule B			
23	⁽⁶⁾ From: Schedule Mobile Generation			

Schedule B: Summary of Distribution Rate Base

Distribution Cost Recovery Factor
CenterPoint Energy Houston Electric
Update Period January 1, 2019 - December 31, 2021
Sponsor: Mary A. Kirk

		(1)	(2)	(3)
Line No.	Description	Balance Approved Docket No. 49421 Final Order	Balance as of End of Update Period	Increase in Rate Base and Return (3) = (2) - (1)
1	Direct Assigned:			
2	Plant in Service ⁽¹⁾	\$ 7,437,681,280	\$ 8,912,063,643	\$ 1,474,382,362
3	Accumulated Depreciation ⁽²⁾	(2,780,269,081)	(3,156,677,602)	(376,408,521)
4	Net Plant in Service	\$ 4,657,412,199	\$ 5,755,386,041	\$ 1,097,973,841
5				
6	Allocated Plant Accounts - Net ^(*) (3)	282,137,279	282,137,279	-
7				
8	CWIP ^(*) (3)	-	-	-
9				
10	Working Capital:			
11	Plant Held for Future Use ^(*) (3)	772,653	772,653	-
12	Accumulated Provisions ^(*) (3)	(6,226,129)	(6,226,129)	-
13	Accumulated Deferred Federal Income Tax (ADFIT) ⁽⁴⁾	(697,011,107)	(776,918,887)	(79,907,779)
14	Protected Excess Deferred Income Tax (EDIT Reg Liability) ⁽⁵⁾	(594,045,905)	(576,544,024)	17,501,881
15	Materials and Supplies ^(*) (3)	64,133,551	64,133,551	-
16	Cash Working Capital ^(*) (3)	20,386,609	20,386,609	-
17	Prepayments ^(*) (3)	91,994,090	91,994,090	-
18	Other			
19	Customer Deposits & Advances ^(*) (3)	-	-	-
20	Reg Assets ^(*) (3)	83,536,310	83,536,310	-
21	Reg Liabilities ^(*) (3)	(53,688,435)	(53,688,435)	-
22	Subtotal	\$ (1,090,148,364)	\$ (1,152,554,262)	\$ (62,405,898)
23				
24	Total Rate Base	\$ 3,849,401,115	\$ 4,884,969,057	\$ 1,035,567,943 ⁽⁶⁾
25				
26	Rate of Return ^(*) (3)(6)			^(Note 1) 6.51%
27				
28	Return on Rate Base ^{(NOTE 2)(1)}	\$ 243,667,091		\$ 67,415,473

^(*) Per the provisions of Substantive Rule 25.243(d)(2).

^(Note 1) Weighted rate of return calculated based upon P.U.C. Subst. R. 25.243(d)(2)

^(Note 2) Will not foot properly due to the different rates between the baseline and approved Docket No. 49421 rate of return. The return on rate base was only calculated for the incremental Rate Base.

⁽¹⁾ From: Schedule B-1

⁽²⁾ From: Schedule B-5

⁽³⁾ From: Docket No. 49421 Settlement, Exhibit I

⁽⁴⁾ From: Schedule E-3.10, Line 11

⁽⁵⁾ From: Schedule E-3.11, Line 4, Column 2

⁽⁶⁾ From: WP Rate of Return

⁽⁷⁾ To: Schedule A

⁽⁸⁾ To: WP E-3.1

Schedule B-1: Distribution Plant-Gross

Distribution Cost Recovery Factor						
CenterPoint Energy Houston Electric						
Update Period January 1, 2019 - December 31, 2021						
Sponsor: Mary A. Kirk						
			(1)	(2)	(3)	(4)
Line No.	Category	Account No. & Description	Balance approved in Docket No. 49421 ⁽¹⁾	Additions since Docket No. 49421 ⁽²⁾	Retirements & Adjustments since Docket No. 49421 ⁽³⁾	Balance at End of Period (4) = (1) + (2) + (3)
1	Intangible Plant ^(Note 1)	30302-5: Intangible EFM Equipment (5 Yrs)	\$ 131,541,440	\$ 25,533,069	\$ (107,039,299)	\$ 50,035,210
2	^(Note 1)	30302-7: Intangible EFM Equipment (7 Yrs)	37,557,788	1,047,673	22,261,838	60,867,299
3	^(Note 1)	30302-10: Intangible EFM Equipment (10 Yrs)	82,128,295	126,717,712	(71,202,424)	137,643,583
4	^(Note 1)	30302-15: Intangible EFM Equipment (15 Yrs)	-	18,972,775	114,171,023	133,143,798
5	^(Note 1)	Subtotal	\$ 251,227,523	\$ 172,271,228	\$ (41,808,862)	\$ 381,689,890
6						
7	Transmission Plant	35201: Structures and improvements	7,015,209	6,998,091	(320)	14,012,980
8		35301: Station Equipment	77,609,094	28,100,699	3,196,825	108,906,618
9		Subtotal	\$ 84,624,302	\$ 35,098,790	\$ 3,196,505	\$ 122,919,597
10						
11	Distribution Plant	36001: Land Owned in Fee	10,234,974	14,652,969	-	24,887,943
12		36002: Land and Land Rights	1,114,928	-	-	1,114,928
13		36101: Structures and Improvements	68,857,255	27,950,457	(522,844)	96,284,868
14		36201: Station Equipment	758,043,955	109,686,073	(15,848,791)	851,881,237
15		36401: Poles, Towers & Fixtures	833,783,000	237,330,042	(38,201,154)	1,032,911,888
16		36501: O.H. Conductors & Devices	1,006,923,000	205,436,516	(38,360,784)	1,173,998,732
17		36601: Underground Conduits	588,107,000	119,206,752	(3,748,893)	703,564,859
18		36701: U.G. Conductors & Devices	1,066,097,000	225,231,070	(24,526,986)	1,266,801,084
19		36801: Line Transformers	1,376,114,000	311,158,407	(101,234,578)	1,586,037,829
20		36901: Services	200,437,000	31,001,247	(1,863,261)	229,574,986
21		37001: Meters	78,336,000	5,755,268	(6,158,478)	77,932,790
22		37003: Automated Meters	111,787,000	73,204,712	(2,207,262)	182,784,449
23		37301: Street Lights	604,289,000	117,880,577	(12,778,974)	709,390,603
24		37302: Security Lighting	13,210,000	1,408,502	(838,574)	13,779,929
25		37401: Security Lighting	-	(1,427)	1,449	22
26		Subtotal	\$ 6,717,334,112	\$ 1,479,901,163	\$ (246,289,130)	\$ 7,950,946,145
27						
28	General Plant	39101: Office furniture and equipment	10,256,950	2,981,532	(1,367,301)	11,871,181
29		39701: Microwave Equipment	271,100,699	88,950,119	(2,672,446)	357,378,371
30		39702: Computer Equipment	119,646,634	16,810,145	(32,689,380)	103,767,399
31		Subtotal	\$ 401,004,283	\$ 108,741,795	\$ (36,729,128)	\$ 473,016,951
32						
33		Docket No. 49421 Adjustments: Docket No. 49421 Adjustmer	(16,508,941)	-	-	(16,508,941)
34			\$ (16,508,941)	\$ -	\$ -	\$ (16,508,941)

Schedule B-1: Distribution Plant-Gross

Distribution Cost Recovery Factor						
CenterPoint Energy Houston Electric						
Update Period January 1, 2019 - December 31, 2021						
Sponsor: Mary A. Kirk						
			(1)	(2)	(3)	(4)
Line No.	Category	Account No. & Description	Balance approved in Docket No. 49421 ⁽¹⁾	Additions since Docket No. 49421 ⁽²⁾	Retirements & Adjustments since Docket No. 49421 ⁽³⁾	Balance at End of Period (4) = (1) + (2) + (3)
35						
36		Total	\$ 7,437,681,280 ⁽⁴⁾	\$ 1,796,012,977	\$ (321,630,615)	\$ 8,912,063,643 ⁽⁴⁾
37						
38	^(Note 1) Asset class 303.02 from Exhibit I has been expanded according to the approved depreciation rate on Docket No. 49421 Exhibit F.					
39	⁽¹⁾ From: Docket No. 49421 Settlement, Exhibit I					
40	⁽²⁾ From: WP B-1.1 Additions					
41	⁽³⁾ From: WP B-1.1 Summary, Column 3 and 4					
42	⁽⁴⁾ To: Schedule B					

Schedule B-5: Distribution Accumulated Depreciation

Distribution Cost Recovery Factor						
CenterPoint Energy Houston Electric						
Update Period January 1, 2019 - December 31, 2021						
Sponsor: Mary A. Kirk						
			(1)	(2)	(3)	(4)
Line No.	Category	Account No. & Description	Balance approved in Docket No. 49421 ⁽¹⁾⁽²⁾	Depreciation Expense since Docket No. 49421 ⁽²⁾	Retirement/Adjustments since Docket No. 49421 ⁽²⁾	Balance @ End of Period ^{(4) = (1) + (2) + (3)}
1	Distribution Accumulated Depreciation					
2	Intangible Plant ^(Note 1)	30302-5: Intangible EFM Equipment (5 Yrs)	\$ (73,764,746)	\$ (52,754,601)	\$ 98,619,867	\$ (27,899,480)
3	^(Note 1)	30302-7: Intangible EFM Equipment (7 Yrs)	(32,994,959)	(5,225,368)	(16,072,489)	(54,292,815)
4	^(Note 1)	30302-10: Intangible EFM Equipment (10 Yrs)	(23,516,352)	(37,207,060)	1,545,651	(59,177,761)
5	^(Note 1)	30302-15: Intangible EFM Equipment (15 Yrs)	-	(9,886,243)	(8,052,516)	(17,938,759)
6	^(Note 1)	Subtotal	\$ (130,276,057)	\$ (105,073,272)	\$ 76,040,513	\$ (159,308,816)
7						
8	Transmission Plant	35201: Structures and improvements	(651,906)	(318,093)	525	(969,474)
9		35301: Station Equipment	(12,853,112)	(5,358,423)	1,496,556	(16,714,979)
10		Subtotal	\$ (13,505,018)	\$ (5,676,516)	\$ 1,497,082	\$ (17,684,453)
11						
12	Distribution Plant	36002: Land and Land Rights	(614,348)	(59,649)	-	(673,997)
13		36101: Structures and Improvements	(23,190,176)	(4,068,781)	1,057,315	(26,201,641)
14		36201: Station Equipment	(216,941,065)	(48,165,104)	16,107,564	(248,998,605)
15		36401: Poles,Towers & Fixtures	(352,800,000)	(94,205,205)	72,907,453	(374,097,752)
16		36501: O.H. Conductors & Devices	(370,600,000)	(98,360,582)	65,565,824	(403,394,759)
17		36601: Underground Conduits	(214,109,000)	(42,673,611)	6,727,072	(250,055,539)
18		36701: U.G. Conductors & Devices	(367,555,000)	(115,342,419)	35,833,539	(447,063,880)
19		36801: Line Transformers	(558,460,000)	(151,965,619)	142,987,898	(567,437,721)
20		36901: Services	(82,547,000)	(24,013,139)	3,991,732	(102,568,407)
21		37001: Meters	(57,760,000)	(9,264,983)	6,158,478	(60,866,505)
22		37003: Automated Meters	(26,717,000)	(21,228,378)	2,207,262	(45,738,116)
23		37301: Street Lights	(233,182,000)	(63,135,409)	22,275,620	(274,041,789)
24		37302: Security Lighting	(3,657,000)	(1,311,046)	1,064,650	(3,903,395)
25		37401: Security Lighting	-	(41)	(1)	(43)
26		Subtotal	\$ (2,508,132,589)	\$ (673,793,966)	\$ 376,884,407	\$ (2,805,042,148)
27						
28	General Plant	39101: Office furniture and equipment	(2,915,424)	(1,327,001)	1,367,257	(2,875,167)
29		39701: Microwave Equipment	(71,078,136)	(37,348,769)	2,392,322	(106,034,583)
30		39702: Computer Equipment	(54,968,046)	(45,795,237)	32,798,609	(67,964,674)
31		Subtotal	\$ (128,961,606)	\$ (84,471,006)	\$ 36,558,189	\$ (176,874,424)
32						
33		Docket No. 49421 Adjustments: Docket No. 49421 Adjustments	606,190	1,626,048	-	2,232,238
34			\$ 606,190	\$ 1,626,048	\$ -	\$ 2,232,238
35						
36		Total	\$ (2,780,269,081) ⁽³⁾	\$ (867,388,712)	\$ 490,980,191	\$ (3,156,677,602) ⁽³⁾
37						

Schedule B-5: Distribution Accumulated Depreciation

Distribution Cost Recovery Factor						
CenterPoint Energy Houston Electric						
Update Period January 1, 2019 - December 31, 2021						
Sponsor: Mary A. Kirk						
			(1)	(2)	(3)	(4)
Line No.	Category	Account No. & Description	Balance approved in Docket No. 49421 ⁽¹⁾ (2)	Depreciation Expense since Docket No. 49421 ⁽²⁾	Retirement/Adjustments since Docket No. 49421 ⁽²⁾	Balance @ End of Period (4) = (1) + (2) + (3)
38	^(Note 1) Asset class 303.02 from Exhibit I has been expanded according to the approved depreciation rate on Docket No. 49421 Settlement, Exhibit F.					
39	⁽¹⁾ From: Docket No. 49421 Settlement, Exhibit I					
40	⁽²⁾ From: WP B-5.1 Summary					
41	⁽³⁾ To: Schedule B					

Schedule B-7: Distribution Accumulated Deferred Federal Income Taxes (ADFIT)

Distribution Cost Recovery Factor							
CenterPoint Energy Houston Electric							
Update Period January 1, 2019 - December 31, 2021							
Sponsor: Mary A. Kirk							
			(1)	(2)	(3)	(4)	(5)
Line No.	Category	Account No. & Description	Gross Incremental Distribution Investment since Docket No. 49421 (Note 2)(2)	Accumulated Depreciation since Docket No. 49421 (Note 3)(2)	Net Plant Additions since Docket No. 49421 (3) = (1) - (2) (Note 4)	Plant Additions by FERC Account	Change in ADFIT since Docket No. 49421
1	Incremental Distribution Plant in Service (Note 1)		\$ 1,474,382,362	\$ 376,408,521	\$ 1,097,973,841		(1) \$ (79,907,779)
2							
3	Intangible Plant	30302-5: Intangible EFM Equipment (5 Yrs)	(81,506,230)	(45,865,266)	(35,640,964)	(3.25%)	2,593,860
4		30302-7: Intangible EFM Equipment (7 Yrs)	23,309,511	21,297,856	2,011,654	0.18%	(146,403)
5		30302-10: Intangible EFM Equipment (10 Yrs)	55,515,288	35,661,409	19,853,879	1.81%	(1,444,915)
6		30302-15: Intangible EFM Equipment (15 Yrs)	133,143,798	17,938,759	115,205,039	10.49%	(8,384,333)
7		Subtotal	\$ 130,462,367	\$ 29,032,759	\$ 101,429,608	9.24%	\$ (7,381,792)
8							
9	Transmission Plant	35201: Structures and improvements	6,997,771	317,567	6,680,204	0.61%	(486,168)
10		35301: Station Equipment	31,297,524	3,861,867	27,435,657	2.50%	(1,996,698)
11		Subtotal	\$ 38,295,295	\$ 4,179,434	\$ 34,115,861	3.11%	\$ (2,482,867)
12							
13	Distribution Plant	36001: Land Owned in Fee	14,652,969	-	14,652,969	1.33%	(1,066,406)
14		36002: Land and Land Rights	-	59,649	(59,649)	(0.01%)	4,341
15		36101: Structures and Improvements	27,427,613	3,011,466	24,416,147	2.22%	(1,776,946)
16		36201: Station Equipment	93,837,281	32,057,540	61,779,742	5.63%	(4,496,174)
17		36401: Poles, Towers & Fixtures	199,128,888	21,297,752	177,831,136	16.20%	(12,942,104)
18		36501: O.H. Conductors & Devices	167,075,732	32,794,759	134,280,973	12.23%	(9,772,632)
19		36601: Underground Conduits	115,457,859	35,946,539	79,511,320	7.24%	(5,786,634)
20		36701: U.G. Conductors & Devices	200,704,084	79,508,880	121,195,204	11.04%	(8,820,283)
21		36801: Line Transformers	209,923,829	8,977,721	200,946,108	18.30%	(14,624,353)
22		36901: Services	29,137,986	20,021,407	9,116,578	0.83%	(863,482)
23		37001: Meters	(403,210)	3,106,505	(3,509,715)	(0.32%)	255,428
24		37003: Automated Meters	70,997,449	19,021,116	51,976,333	4.73%	(3,782,707)
25		37301: Street Lights	105,101,603	40,859,789	64,241,814	5.85%	(4,675,358)
26		37302: Security Lighting	569,929	246,395	323,533	0.03%	(23,546)
27		37401: Security Lighting	22	43	(20)	(0.00%)	1
28		Subtotal	\$ 1,233,612,033	\$ 296,909,559	\$ 936,702,474	85.31%	\$ (68,170,854)
29							
30	General Plant	39101: Office furniture and equipment	1,614,231	(40,257)	1,654,488	0.15%	(120,409)
31		39701: Microwave Equipment	86,277,672	34,956,447	51,321,225	4.67%	(3,735,030)
32		39702: Computer Equipment	(15,879,235)	12,996,627	(28,875,863)	(2.63%)	2,101,513
33		Subtotal	\$ 72,012,668	\$ 47,912,818	\$ 24,099,850	2.19%	\$ (1,753,927)
34							
35		Docket No. 49421 Adjustments: Docket No. 49421 Adjustments	-	(1,626,048)	1,626,048	0.15%	(118,340)
36			\$ -	\$ (1,626,048)	\$ 1,626,048	0.15%	\$ (118,340)

Schedule B-7: Distribution Accumulated Deferred Federal Income Taxes (ADFIT)

Distribution Cost Recovery Factor							
CenterPoint Energy Houston Electric							
Update Period January 1, 2019 - December 31, 2021							
Sponsor: Mary A. Kirk							
			(1)	(2)	(3)	(4)	(5)
Line No.	Category	Account No. & Description	Gross Incremental Distribution Investment since Docket No. 49421 (Note 2)(2)	Accumulated Depreciation since Docket No. 49421 (Note 3)(2)	Net Plant Additions since Docket No. 49421 (3) = (1) - (2) (Note 4)	Plant Additions by FERC Account	Change in ADFIT since Docket No. 49421
37							
38		Total	\$ 1,474,382,362	\$ 376,408,521	\$ 1,097,973,841	100.00%	\$ (79,907,779)
39							
40	(Note 1) This line is intended to represent the increase in total distribution plant, not just the DIC (see related worksheet).						
41	(Note 2) Additions, retirements, and adjustments since Docket No. 49421.						
42	(Note 3) Depreciation expense, retirements, and adjustments since Docket No. 49421.						
43	(Note 4) Net change since Docket No. 49421.						
44	(1) From: Schedule E-3.10						
45	(2) From: Schedule B-5 Column 2 & 3						

Schedule E-1: Distribution Depreciation Expense

Distribution Cost Recovery Factor							
CenterPoint Energy Houston Electric							
Update Period January 1, 2019 - December 31, 2021							
Sponsor: Mary A. Kirk							
			(1)	(2)	(3)	(4)	(5)
Line No.	Category	Account No. & Description	Depreciation Expense approved in Docket No. 49421	Gross Plant Balance approved in Docket No. 49421	Gross Plant Balance at 12/31/21 Including Requested Additions ⁽¹⁾	Increase in Gross Plant Balance (Requested Additions) (4) = (3) - (2)	Depreciation Rate approved in Docket No. 49421
1	Intangible Plant ^(Note 1)	30302-5: Intangible EFM Equipment (5 Yrs)	\$ 12,464,277	\$ 131,541,440	\$ 50,035,210	\$ (81,506,230)	20.00%
2	^(Note 1)	30302-7: Intangible EFM Equipment (7 Yrs)	6,223,223	37,557,788	60,867,299	23,309,511	14.29%
3	^(Note 1)	30302-10: Intangible EFM Equipment (10 Yrs)	9,492,908	82,128,295	137,643,583	55,515,288	10.00%
4	^(Note 1)	30302-15: Intangible EFM Equipment (15 Yrs)	1,307,737	-	133,143,798	133,143,798	6.67%
5	^(Note 1)	Subtotal	\$ 29,488,145	\$ 251,227,523	\$ 381,689,890	\$ 130,462,367	
6							
7	Transmission Plant	35201: Structures and improvements	112,480	7,015,209	14,012,980	6,997,771	1.74%
8		35301: Station Equipment	1,498,280	77,609,094	108,906,618	31,297,524	2.05%
9		Subtotal	\$ 1,610,759	\$ 84,624,302	\$ 122,919,597	\$ 38,295,295	
10							
11	Distribution Plant	36001: Land Owned in Fee	-	10,234,974	24,887,943	14,652,969	1.55%
12		36002: Land and Land Rights	18,235	1,114,928	1,114,928	-	1.55%
13		36101: Structures and Improvements	1,096,625	68,857,255	96,284,868	27,427,613	1.68%
14		36201: Station Equipment	15,972,429	758,043,955	851,881,237	93,837,281	2.14%
15		36401: Poles, Towers & Fixtures	25,156,419	833,783,000	1,032,911,888	199,128,888	3.84%
16		36501: O.H. Conductors & Devices	32,382,145	1,006,923,000	1,173,998,732	167,075,732	3.24%
17		36601: Underground Conduits	11,474,307	588,107,000	703,564,859	115,457,859	1.96%
18		36701: U.G. Conductors & Devices	34,746,854	1,066,097,000	1,266,801,084	200,704,084	3.34%
19		36801: Line Transformers	50,800,761	1,376,114,000	1,586,037,829	209,923,829	3.71%
20		36901: Services	8,995,209	200,437,000	229,574,986	29,137,986	3.76%
21		37001: Meters	2,576,278	78,336,000	77,932,790	(403,210)	3.32%
22		37002: Advanced Meters	-	-	-	-	3.32%
23		37003: Automated Meters	2,491,246	111,787,000	182,784,449	70,997,449	4.77%
24		37301: Street Lights	18,212,109	604,289,000	709,390,603	105,101,603	3.09%
25		37302: Security Lighting	461,604	13,210,000	13,779,929	569,929	3.09%
26		37401: Security Lighting	-	-	22	22	3.09%
27		Subtotal	\$ 204,384,221	\$ 6,717,334,112	\$ 7,950,946,145	\$ 1,233,612,033	
28							
29	General Plant	39101: Office furniture and equipment	361,797	10,256,950	11,871,181	1,614,231	4.17%
30		39701: Microwave Equipment	11,852,304	271,100,699	357,378,371	86,277,672	5.08%
31		39702: Computer Equipment	14,937,698	119,646,634	103,767,399	(15,879,235)	12.50%
32		Subtotal	\$ 27,151,798	\$ 401,004,283	\$ 473,016,951	\$ 72,012,668	
33							
34		Amortization Other: Amortization Other	5,872,595	-	-	-	0.00%
35		Docket No. 49421 Adjustments: Docket No. 49421 Adjustments ^(a)	(542,016)	(16,508,941)	(16,508,941)	-	0.00%
36		Misc. Other: Misc. Other	380,110	-	-	-	0.00%

Schedule E-1: Distribution Depreciation Expense

Distribution Cost Recovery Factor							
CenterPoint Energy Houston Electric							
Update Period January 1, 2019 - December 31, 2021							
Sponsor: Mary A. Kirk							
			(1)	(2)	(3)	(4)	(5)
Line No.	Category	Account No. & Description	Depreciation Expense approved in Docket No. 49421	Gross Plant Balance approved in Docket No. 49421	Gross Plant Balance at 12/31/21 Including Requested Additions ⁽¹⁾	Increase in Gross Plant Balance (Requested Additions) (4) = (3) - (2)	Depreciation Rate approved in Docket No. 49421
37		Allocated Expense Accounts: Allocated Expense Accounts	5,790,140 ⁽²⁾	398,545,543	398,545,543	-	0.00%
38		Subtotal	\$ 11,500,829	\$ 382,036,602	\$ 382,036,602	\$ -	
39							
40		Total	\$ 274,135,753 ⁽⁴⁾	\$ 7,836,226,823	\$ 9,310,609,186	\$ 1,474,382,362	
41							
42	^(Note 1) Asset class 303.02 from Exhibit I has been expanded according to the approved						
43	depreciation rate on Docket No. 49421 Settlement, Exhibit F.						
44	⁽¹⁾ From: Schedule B-1						
45	⁽²⁾ From: Docket No. 49421 Settlement, Exhibit I						
46	⁽³⁾ From: WP B-5.2						
47	⁽⁴⁾ To: Schedule A						

Schedule E-1: Distribution Depreciation Expense

Distribution Cost Recovery Factor				
CenterPoint Energy Houston Electric				
Update Period January 1, 2019 - December 31, 2021				
Sponsor: Mary A. Kirk				
			(6)	(7)
Line No.	Category	Account No. & Description	Additional Depreciation Expense on Gross Plant Additions (6) =(4) * (5)	Total Depreciation Expense (7) = (1) + (6)
1	Intangible Plant (Note 1)	30302-5: Intangible EFM Equipment (5 Yrs)	\$ (16,301,246)	\$ (3,836,969)
2	(Note 1)	30302-7: Intangible EFM Equipment (7 Yrs)	3,330,929	9,554,152
3	(Note 1)	30302-10: Intangible EFM Equipment (10 Yrs)	5,551,529	15,044,437
4	(Note 1)	30302-15: Intangible EFM Equipment (15 Yrs)	8,880,691	10,188,428
5	(Note 1)	Subtotal	\$ 1,461,903	\$ 30,950,048
6				
7	Transmission Plant	35201: Structures and improvements	121,761	234,241
8		35301: Station Equipment	641,599	2,139,879
9		Subtotal	\$ 763,360	\$ 2,374,120
10				
11	Distribution Plant	36001: Land Owned in Fee	227,121	227,121
12		36002: Land and Land Rights	-	18,235
13		36101: Structures and Improvements	460,784	1,557,409
14		36201: Station Equipment	2,008,118	17,980,547
15		36401: Poles, Towers & Fixtures	7,646,549	32,802,968
16		36501: O.H. Conductors & Devices	5,413,254	37,795,399
17		36601: Underground Conduits	2,262,974	13,737,281
18		36701: U.G. Conductors & Devices	6,703,516	41,450,371
19		36801: Line Transformers	7,788,174	58,588,935
20		36901: Services	1,095,588	10,090,797
21		37001: Meters	(13,387)	2,562,691
22		37002: Advanced Meters	-	-
23		37003: Automated Meters	3,386,578	5,877,824
24		37301: Street Lights	3,247,640	21,459,749
25		37302: Security Lighting	17,611	479,215
26		37401: Security Lighting	1	1
27		Subtotal	\$ 40,244,521	\$ 244,628,742
28				
29	General Plant	39101: Office furniture and equipment	67,313	429,110
30		39701: Microwave Equipment	4,382,906	16,235,210
31		39702: Computer Equipment	(1,984,904)	12,952,793
32		Subtotal	\$ 2,465,315	\$ 29,617,113
33				
34		Amortization Other: Amortization Other	-	5,872,595
35		Docket No. 49421 Adjustments: Docket No. 49421 Adjustments	-	(542,016)
36		Misc. Other: Misc. Other	-	380,110

Schedule E-1: Distribution Depreciation Expense

	Distribution Cost Recovery Factor			
	CenterPoint Energy Houston Electric			
	Update Period January 1, 2019 - December 31, 2021			
	Sponsor: Mary A. Kirk			
			(6)	(7)
Line No.	Category	Account No. & Description	Additional Depreciation Expense on Gross Plant Additions (6) =(4) * (5)	Total Depreciation Expense (7) = (1) + (6)
37		Allocated Expense Accounts: Allocated Expense Accounts	-	5,790,140
38		Subtotal	\$ -	\$ 11,500,829
39				
40		Total	\$ 44,935,100 ⁽⁴⁾	\$ 319,070,853 ⁽⁴⁾
41				
42	^(Note 1) Asset class 303.02 from Exhibit I has been expanded according to the approved			
43	depreciation rate on Docket No. 49421 Settlement, Exhibit F.			
44	⁽¹⁾ From: Schedule B-1			
45	⁽²⁾ From: Docket No. 49421 Settlement, Exhibit I			
46	⁽³⁾ From: WP B-5.2			
47	⁽⁴⁾ To: Schedule A			

Schedule E-2: Distribution Taxes Other than Income Taxes

Distribution Cost Recovery Factor
CenterPoint Energy Houston Electric
Update Period January 1, 2019 - December 31, 2021
Sponsor: Mary A. Kirk

		(1)	(2)	(3)
Line No.	FERC Account & Account Description	Total Approved per Docket No. 49421	Interim Annual Increase	Balance at 12/31/2021 (3) = (1) + (2)
1	Non-Revenue Related			
2	Ad Valorem Tax ⁽¹⁾	\$ 60,471,373	\$ 13,395,281	\$ 73,866,654
3	Payroll Taxes ⁽²⁾	7,641,775	-	7,641,775
4				
5	Revenue Related Taxes			
6	City Franchise Fee ⁽²⁾	153,245,000	-	153,245,000
7	Total Texas Margin Tax - Distribution ⁽³⁾	16,197,251	1,788,744	17,985,995
8	Deferred SIT/Local ⁽²⁾	(191,935)	-	(191,935)
9				
10	Total Taxes Other Than FIT Taxes ⁽⁴⁾	\$ 237,363,464	\$ 15,184,025	\$ 252,547,489
11				
12	⁽¹⁾ From: WP E-2.1			
13	⁽²⁾ From: Docket No. 49421 Settlement, Exhibit I			
14	⁽³⁾ From: WP E-2.2-1			
15	⁽⁴⁾ To: Schedule A			

Schedule E-3: Distribution Federal Income Taxes

	Distribution Cost Recovery Factor			
	CenterPoint Energy Houston Electric			
	Update Period January 1, 2019 - December 31, 2021			
	Sponsor: Mary A. Kirk			
		(1)	(2)	(3)
Line No.	Account Description	Amount Approved per Docket No. 49421 ⁽³⁾	Interim Annual Change	Balance at 12/31/2021 (3) = (1) + (2)
1	Federal Income Tax			
2				
3	Return on Rate Base ⁽¹⁾	\$ 243,667,091	\$ 67,415,473	\$ 311,082,564
4	Deductions:			
5	Synchronized Interest ⁽²⁾	100,716,496	26,096,312	126,812,809
6	ITC Amortization ⁽³⁾			
7	Amortization of Protected Excess DFIT ⁽³⁾	15,564,252	-	15,564,252
8	Amortization of Non-Protected Excess DFIT			
9	Research and Development Credit ⁽³⁾	1,058,003	-	1,058,003
10	Restricted Stock Excess Tax Benefit ⁽³⁾	44,735	-	44,735
11	Subtotal	\$ 117,383,486	\$ 26,096,312	\$ 143,479,799
12				
13	Additions:			
14				
15	Non-deductible Parking and Transit ⁽³⁾	91,385	-	91,385
16	Meals & Entertainment ⁽³⁾	464,184	-	464,184
17	Diesel Fuel Credit Disallowance ⁽³⁾	2,648	-	2,648
18	Permanent Depreciation Difference ⁽³⁾	3,640,151	-	3,640,151
19	Medicare Drug Subsidy ⁽³⁾	1,176,506	-	1,176,506
20	Subtotal	\$ 5,374,873	\$ -	\$ 5,374,873
21				
22	Taxable Component of Return	131,658,477	41,319,161	172,977,638
23	Tax Factor	26.58%	26.58%	
24		-	-	-
25	Federal Income Taxes Before Adjustments**	\$ 34,997,822	\$ 10,983,574	\$ 45,981,397
26				
27	Tax Credits-Deduct			
28	Amortization of protected excess DFIT ⁽³⁾	15,564,252	-	15,564,252
29	Amortization of Non-Protected EDIT ⁽³⁾	-	-	-
30	Research and Development Credit ⁽³⁾	1,058,003	-	1,058,003
31	Medicare Drug Subsidy ⁽³⁾	(1,176,506)	-	(1,176,506)
32	Restricted Stock Excess Tax Benefit ⁽³⁾	44,735	-	44,735
33	Total Tax Credits	\$ 15,490,484	\$ -	\$ 15,490,484
34				
35	TOTAL FEDERAL INCOME TAXES ⁽⁴⁾	\$ 19,507,338	\$ 10,983,574	\$ 30,490,913
36				
37				
38	⁽¹⁾ From: Schedule B			
39	⁽²⁾ From: WP E-3.1			
40	⁽³⁾ From: Docket No. 49421 Settlement, Exhibit I			
41	⁽⁴⁾ To: Schedule A			

Schedule E-3.7: Plant-Related Accumulated Deferred Federal Income Tax (ADFIT) Balances

Distribution Cost Recovery Factor
CenterPoint Energy Houston Electric
Update Period January 1, 2019 - December 31, 2021
Sponsor: Mary A. Kirk

		(1)	(2)	(3)	(4)	
Line No.	Account Number	Description	Company Total at Period End ⁽¹⁾	Function Factor Name	Distribution Function Factor ⁽¹⁾	Distribution Total at Period End ⁽⁴⁾ = (1) * (3)
1	2820	Self Developed Software	\$ (17,980,852)	DIT Account 282	71.40%	\$ (12,837,526)
2		AFUDC Debt	9,663,969	DIT Account 282	71.40%	6,899,643
3		Casualty Loss	(115,087,019)	DIT Account 282	71.40%	(82,166,996)
4		Remove Allocated PP&E ADIT - Update Period	-	Direct - ADFIT	0.00%	⁽¹⁾ 17,271,727
5		Include Allocated PP&E ADIT - Docket No. 49421	-	Direct - ADFIT	0.00%	⁽¹⁾ (15,303,273)
6		Uniform Capitalization	(112,320,039)	DIT Account 282	71.40%	(80,191,496)
7		Book/Tax Depreciation	(943,387,208)	DIT Account 282	71.40%	(673,536,368)
8		PP&E Permanent Difference	-	DIT Account 282	71.40%	-
9		ARO	-	DIT Account 282	71.40%	-
10		Deductible Repairs & Maintenance	(161,353,442)	DIT Account 282	71.40%	(115,199,157)
11		Include CIAC In Income	118,541,269	DIT Account 282	71.40%	84,633,176
12		Pre TCJA Excess DFIT	317,819	DIT Account 282	71.40%	226,909
13		Commission Number Run, Docket No. 49421	-	DIT Account 282	71.40%	⁽¹⁾ (64,297,994)
14		Cost of Removal	32,752,848	DIT Account 282	71.40%	23,384,072
15		Manual Transmission Plant In Service	(300,944)	Transmission	0.00%	-
16						
17		Total	<u>\$ (1,189,153,599)</u>			<u>\$ (911,117,284)</u>

18
19 ⁽¹⁾ From: WP E-3.10.1

Schedule E-3.10: Distribution Plant Accumulated Deferred Federal Income Taxes (ADFIT) Change

Distribution Cost Recovery Factor

CenterPoint Energy Houston Electric

Update Period January 1, 2019 - December 31, 2021

Sponsor: Mary A. Kirk

		(1)	(2)	(3)
Line No.	Description	Distribution Total Approved in Docket No. 49421 ⁽¹⁾	Distribution Total at Period End	Change in ADFIT (3) = (2) - (1)
1	<u>Plant-Related ADFIT</u>			
2	Direct	\$ (819,515,269)	\$ (895,814,010)	\$ (76,298,741)
3	Allocated	(15,303,273)	(15,303,273)	-
4	Total Plant-Related ADFIT	\$ (834,818,543)	\$ (911,117,284) ⁽²⁾	\$ (76,298,741)
5				
6	<u>Non-Plant ADFIT</u>			
7	FERC 190	128,463,615 ⁽¹⁾	124,854,576	(3,609,038)
8	FERC 283	9,343,820 ⁽¹⁾	9,343,820	-
9	Total Non-Plant ADFIT	\$ 137,807,435	\$ 134,198,397	\$ (3,609,038)
10				
11	Total Distribution Plant ADFIT ⁽³⁾	\$ (697,011,107)	\$ (776,918,887)	\$ (79,907,779)

12 ⁽¹⁾ From: WP E-3.10-1

13 ⁽²⁾ From: Schedule E-3.7, Column 4

14 ⁽³⁾ To: Schedule B

Schedule E-3.11: Distribution Plant Excess Deferred Federal Income Taxes (EDIT)-Reg Asset/Liability Change

Distribution Cost Recovery Factor

CenterPoint Energy Houston Electric

Update Period January 1, 2019 - December 31, 2021

Sponsor: Mary A. Kirk

		(1)	(2)	(3)
Line No.	Description	Distribution Total approved in Docket No. 49421	Distribution Total at Period End	Change in EDIT-Reg A/L (3) = (2) - (1)
1	<u>Protected EDIT-Reg Asset/Liability:</u>			
2	Direct ⁽¹⁾	\$ (578,727,954)	\$ (561,226,073)	\$ 17,501,881
3	Allocated ⁽¹⁾	(15,317,951)	(15,317,951)	-
4	Total Protected EDIT-Reg Asset/Liability ⁽²⁾	\$ (594,045,905)	\$ (576,544,024)	\$ 17,501,881
5				
6	⁽¹⁾ From: WP E-3.11.1			
7	⁽²⁾ To: Schedule B			

Schedule Mobile Generation

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
 Update of Distribution Cost Recovery Factor
 Mobile Generation
 Update Period January 1, 2019 - December 31, 2021
 Sponsor: Mary A. Kirk

As of December 31, 2021									
Line No.	Account Description	FERC	(1) Balance at End of December 31, 2021 [1]	(2) ADIT [2]	(3) Total Rate Base	(4) Amortization Period (yrs) [3]	(5) Annual Amortization Expense	(6) Taxes	(7) Net Impact
1	Rate Base Balances at End of Period								
2	144010 Prepayments - Other	1650 Prepayments	\$ 3,830,395	\$ -	\$ 3,830,395	1.00	\$ 3,830,395	\$ -	\$ 3,830,395
3	179052 Regulatory Assets-Emergency Generation	1823 Oth Regulatory Asset	20,269,958	(4,224,766)	16,045,193	1.00	20,269,958		20,269,958
4	179054 Emergency Gen LT	1823 Oth Regulatory Asset	150,568,510	(31,453,638)	119,114,874	7.50	20,075,801		20,075,801
5	188010 Misc Def Debits - Other	1860 Misc Deferred Debits	24,897,566	-	24,897,566	7.50	3,319,676		3,319,676
6		Subtotal	\$ 199,566,430	\$ (35,678,402)	\$ 163,888,028		\$ 47,495,830	\$ -	\$ 47,495,830
7									
8	Rate of Return				6.51%				
9	Return on Rate Base (Ln 6 Rate Base Subtotal x Ln 8 Rate of Return)				\$ 10,669,111				10,669,111
10									
11	Impact on Expense								
12	Weighted Cost of Debt							2.52%	
13	Synchronized Interest (Ln 6 Rate Base Subtotal x Ln 12 Weighted Cost of Debt)							4,127,520	
14									
15	Taxable Component of Return (Ln 9 Return on Rate Base - Ln 13 Synchronized Interest)							6,541,591	
16	Tax Factor							26.582278%	
17									
18	Federal Income Taxes (Ln 15 Taxable Component of Return x Ln 16 Tax Factor)							1,738,904	1,738,904
19									
20	Texas Margin Tax							-	
21									
22	Total Taxes (Ln 18 Federal Income Taxes + Ln 20 Texas Margin Tax)							\$ 1,738,904	
23									
24	Net Impact								\$ 59,903,845 [4]

Note

- [1] Source SAP, balance includes carrying costs.
 [2] Source : Tax Department
 [3] Amortization period dependent on life of the contract.
 [4] To: Schedule A

Schedule H: Distribution Revenues, Sales and Customer Data

Distribution Cost Recovery Factor
CenterPoint Energy Houston Electric, LLC
Update Period 1/1/2019 - 12/31/2021
Sponsor: John Durland

LINE	DESCRIPTION	VOLT	Billing Unit Type (1)	Billing units approved in Docket No. 49421 (2)	Twelve Months Ended December 31, 2021					Change in Billing Units (8) = (7) - (2)	Percent Change (9) = (8) / (2)
					(Update period) Unadjusted Billing Units at Meter (3)	(Update period) Billing Unit Weather Adjustment (4)	(Update period) Adjusted Billing Units at Meter (5) = (3) + (4)	(Update period) YE Customer Adjustment (6)	(Update period) Adjusted Billing Units (7) = (5) + (6)		
1	Residential	Secondary	kWh	29,428,636,118	30,564,353,064	(496,946,990)	30,067,406,074	299,481,386	30,366,887,460	938,251,342	3.19%
2	Secondary <= 10	Secondary	kWh	917,454,734	876,355,805	(3,403,080)	872,952,725	2,487,127	875,439,852	(42,014,882)	-4.58%
3	Secondary > 10	Secondary	Billing kVA	82,033,303	104,325,917	(449,710)	103,876,207	1,066,290	104,942,497	22,909,194	27.93%
4	Primary	Primary	Billing kVA	13,460,975	12,580,003	(24,570)	12,555,433	35,801	12,591,234	(869,741)	-6.46%
5	Transmission	Transmission	4CP kVa	29,796,612	35,799,944	-	35,799,944	545,270	36,345,214	6,548,602	21.98%
6	Lighting	Secondary	kWh	253,265,770	229,820,615	-	229,820,615	(1,839,492)	227,981,123	(25,284,647)	-9.98%
7											
Total				30,724,647,512	31,823,235,349	(500,824,350)	31,322,410,999	301,776,382	31,624,187,380	899,539,868	

Reference:

- (2) WP/Schedule H/1
- (3) WP/Schedule H/2
- (4) WP/Schedule H/2
- (6) WP/Schedule H/3

Schedule J: Summary of Distribution Cost Recovery Factor

Distribution Cost Recovery Factor CenterPoint Energy Houston Electric, LLC Update Period 1/1/2019 - 12/31/2021 Sponsor: John Durland								
Summary of Revenue Requirement by Class								
Class	(1) Cumulative DCRF Revenue by Class	(2) (Plus/Minus) Distrev * Growth Adjustment	(3) = (1) + (2) Adjusted Cumulative DCRF Revenues	(4) Alloc _{Class}	(5) = Total (3) * (4) DCRF Revenues	(6) Billing Units	(7) = (5)/(6) Rate (\$)	(8) Units
Residential	\$ 114,076,827	\$ (10,423,582)		57.49%	\$ 83,754,841	30,366,887,460	0.002758	per kWh
Secondary <= 10	\$ 2,979,487	\$ 430,903		1.50%	\$ 2,187,530	875,439,852	0.002499	per kWh
Secondary > 10	\$ 60,416,143	\$ (47,436,216)		30.45%	\$ 44,357,339	104,942,497	0.422682	per Billing kVa
Primary	\$ 4,686,073	\$ 854,946		2.36%	\$ 3,440,500	12,591,234	0.273246	per Billing kVa
Transmission	\$ 494,769	\$ (538,962)		0.25%	\$ 363,258	36,345,214	0.009995	per 4CP kVa
Lighting	\$ 15,768,718	\$ 4,371,705		7.95%	\$ 11,577,342	227,981,123	0.050782	per kWh
Total	\$ 198,422,017	\$ (52,741,207)	\$ 145,680,810	100.00%	\$ 145,680,810			

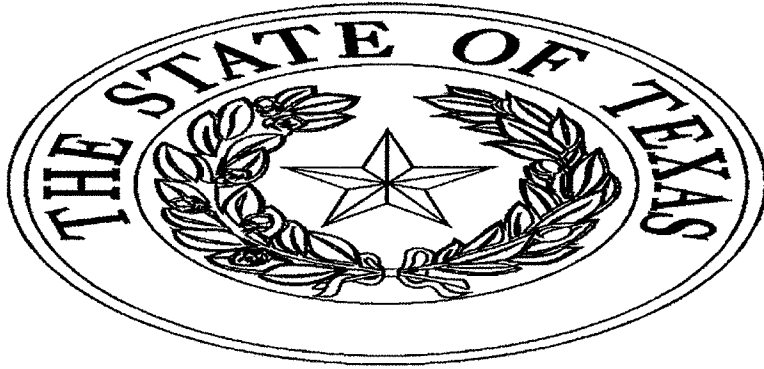
Reference:

(1) Cumulative DCRF Revenue by Class: WP/Schedule J/1
(2) Distrev * Growth Adjustment: WP/Schedule J/2
(4) Alloc_{Class}: WP/Schedule J/1
(6) Billing Units : Schedule H

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SCHEDULE K

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**ELECTRIC INVESTOR-OWNED UTILITIES
(Transmission & Distribution Service Providers in ERCOT)**

EARNINGS REPORT

OF

CenterPoint Energy Houston Electric, LLC

TO THE

PUBLIC UTILITY COMMISSION OF TEXAS

FOR THE

12 Months Ending December 31, 2021

Check one:

This is an original submission ☒

This is a revised submission ☐

Date of submission: April 5, 2022

GENERAL QUESTIONS

If additional space is required, please attach pages providing the requested information.

1. State the exact name of the utility.

CenterPoint Energy Houston Electric, LLC

2. State the date when the utility was originally organized.

January 9, 1906

3. Report any change in name during the most recent year and state the effective date.

N/A

4. State the name, title, phone number, email address, and office address of the officer of the utility to whom correspondence should be addressed concerning this report.

Stacey Peterson, Chief Accounting Officer
P.O. Box 4567, Houston TX 77210-4567
713-207-5350
Stacy.Peterson@CenterPointEnergy.com

- 4a. State the name, title, phone number, email address, and office address of any other individual designated by the utility to answer questions regarding this report (optional).

Mary A. Kirk, Director Accounting
P.O. Box 4567, Houston TX 77210-4567
713-207-5236
Mary.Kirk@CenterPointEnergy.com

5. State the location of the office where the Company's accounts and records are kept.

1111 Louisiana, Houston TX 77002

6. State the name, address, phone number, and email address of the individual or firm, if other than a utility employee, preparing this report.

N/A

CenterPoint Energy Houston Electric, LLC
12 Months Ending December 31, 2021

General Questions
Page 2 of 2

7. Please indicate the filing status of the Company regarding federal income taxes, e.g., S-Corps, Corporations, Partnerships, Individuals, etc.

Limited Liability Corporation

8. Please provide:

- a. The period-ending number of utility

employees (total company):

2,694 CEHE 10-K, page XX

- b. The period-ending number of Electric Points of Delivery:

Total Company:

2,651,537 Sch X.4

Texas Jurisdictional:

2,651,537 Sch X.4

9. Will the Company have a rate proceeding pending before this commission on the due date of this Earnings Monitoring Report?

Yes or No ==>

No

10. IF THIS IS A REVISED REPORT, provide the schedule number, line number, and column designation where each change input data appears.

N/A

SUMMARY OF REVENUES AND EXPENSES

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Line No.	Total Company	Non-Regulated or Non-Electric or Other Adjustment ^a	Total Electric (1)+(2)	Allocation Percentage (5)/(3)	Tx Jurisdictional: Wholesale and Retail	Wholesale Transmission Allocation Percentage ^{**}	Wholesale Transmission ^{***}	Retail T&D
1	TOTAL REVENUES:							
2	Energy Delivery Revenues ^(Note 1)	^(a) \$ 2,824,915,994	\$ 83,843,881	\$ 2,908,759,875	100.00%	\$ 2,908,759,875	N/A	^(a) \$ 400,494,548 ^(a) \$ 2,508,265,327
3	Miscellaneous Revenues	^(a) 69,170,923	-	69,170,923	100.00%	69,170,923	N/A	^(a) 33,874,442 ^(a) 35,296,481
4	Revenue Sub-total	\$ 2,894,086,916	\$ 83,843,881	\$ 2,977,930,797		\$ 2,977,930,797		\$ 434,368,990 \$ 2,543,561,808
5								
6	Total Revenues	\$ 2,894,086,916	\$ 83,843,881	\$ 2,977,930,797		\$ 2,977,930,797		\$ 434,368,990 \$ 2,543,561,808
7								
8								
9	EXPENSES:							
10								
11	Operations and Maintenance Expense ^(Note 2)	\$ 1,589,169,645	\$ 101,341,829	\$ 1,690,511,474	100.00%	\$ 1,690,511,474	6.54% ^(a) \$ 110,638,679	\$ 1,579,872,795
12	Amortization Expense ^(Note 3)	37,945,241	-	37,945,241	100.00%	37,945,241	-0.13% ^(a) (50,213)	37,995,454
13	Depreciation Expense	^(a) 379,135,422	^(a) -	379,135,422	100.00%	379,135,422	25.87% ^(a) 98,084,329	281,051,093
14	Interest on REP/CR Deposits	-	-	-	0.00%	-	0.00%	-
15	Taxes Other Than Income Taxes	^(a) 113,211,855	^(a) -	113,211,855	100.00%	113,211,855	33.68% ^(a) 38,127,328	75,084,530
16	State Taxes	^(a) 20,600,510	^(a) -	20,600,510	100.00%	20,600,510	13.73% ^(a) 2,828,450	17,772,060
17	Federal Income Tax ^(Note 4)	^(a) 55,139,531	22,896,787	78,036,317	100.00%	78,036,317	25.61% ^(a) 19,983,574	58,052,743
18	Deferred Expenses	-	-	-	0.00%	-	0.00%	-
19	Nonbypassable charges ^(Note 5)	151,604,939	-	151,604,939	100.00%	151,604,939	0.00%	151,604,939
20	Other Expenses ^(Note 6)	-	- ^(a)	-	0.00%	-	0.00%	-
21	TOTAL EXPENSES (lines 11 thru 20)	\$ 2,346,807,144	\$ 124,238,616	\$ 2,471,045,759		\$ 2,471,045,759	10.91% \$ 269,612,146	\$ 2,201,433,614
22	Return (line 6 minus line 21)	\$ 547,279,773	\$ (40,394,735)	\$ 506,885,038		\$ 506,885,038	32.50% \$ 164,756,844	\$ 342,128,194
23								
24	Non-Operating Income	^(a) \$ 6,795,332	-	\$ 6,795,332	100.00%	\$ 6,795,332		
25	AFUDC (Debt and Equity)	^(a) \$ 33,201,484	-	\$ 33,201,484	100.00%	\$ 33,201,484		

⁽¹⁾ Include supporting documentation for "other adjustments."

^(**) No inputs are made into the revenue (top) portion of this column; revenues for wholesale transmission are directly input into the top part of column 7. See Schedule I instructions for additional details on calculating the percentage inputs in the bottom portion of this column.

^(***) The revenues in this column should reflect the payments received from others for wholesale transmission service per the commission's wholesale transmission matrix. See instructions for additional details.

^(Note 1) See instructions for details regarding the reporting of revenues. Additionally, note that column 8 of this line should correspond to Schedule X.1a,b,c, line 13, column 10.

^(Note 2) This amount will be carried automatically from Schedule II, line 12.

^(Note 3) Columns 1, 3, and 5 for this line will be carried automatically from Supplemental Schedule I-1: Amortization Expense, line 22.

^(Note 4) Columns 3, 5, 7, and 8 of this line will be carried automatically from Schedule IV, line 45.

^(Note 5) This amount will be carried automatically from Schedule Ia, line 19, and includes only the NBP expenses included in the utility's T&D revenue requirement (i.e., not collected through a separate rider).

^(Note 6) This amount will be carried automatically from Supplemental Schedule I-2: Other Expenses, line 22.

[X] Indicate here if footnote or comment relating to this schedule is included on Supplemental Schedule IV.

⁽¹⁾ From: WP I-1

⁽²⁾ From: WP I-3

⁽³⁾ From: WP I-4 TOTI

⁽⁴⁾ From: WP I-5

⁽⁵⁾ From: WP I-6

⁽⁶⁾ From: Table

⁽⁷⁾ From: St-2

⁽⁸⁾ From: WP I-2

⁽⁹⁾ From: Schedule II

⁽¹⁰⁾ From: Schedule IV

SUMMARY OF OTHER NONBYPASSABLE CHARGES

Line No.	Item	Texas Jurisdictional	Notes
1	REVENUES RELATED TO NONBYPASSABLE CHARGES		
2	Nuclear Decommissioning Expense	⁽¹⁾ \$ 150,866	Tariff: 6.1.1.5, 6.1.1.5.1
3	Competition Transition Charge (CTC)	-	On PUC Form
4	Municipal Franchise Fees	⁽⁴⁾ 151,604,939	On PUC Form
5	System Benefit Fund (SBF)	-	Tariff: 6.1.1.4, 6.1.1.4.1
6	Rate Case Expense (RCE)	⁽³⁾ (96)	Tariff: 6.1.1.6.6
7	Transmission Cost Recovery Factor (TCRF)	⁽³⁾ 1,016,471,475	Tariff: 6.1.1.6.3
8	Energy Efficiency Cost Recovery Factor (EECRF)	⁽³⁾ 45,229,691	Tariff: 6.1.1.6.9
9	Distribution Cost Recovery Factor (DCRF)	⁽³⁾ (1,020)	Tariff: 6.1.1.6.13
10	Subtotal	\$ 1,213,455,855	
11			
12	Transition Charges (related to securitized costs)	⁽²⁾ \$ 239,896,493	Tariff: 6.1.1.2.2, 6.1.1.2.3, 6.1.1.2.4, 6.1.1.2.5
13	TOTAL NONBYPASSABLE CHARGES	\$ 1,453,352,348	
14			
15			
16	Amts related to above NBP charges to be reflected in Sch I revenue requirement		
17	(actual amounts of expenses incurred during monitoring period):		
18	Municipal Franchise Fees	\$ 151,604,939	
19	Total (Note 1)	\$ 151,604,939	
20			
21	^(Note 1) The amount on line 19 is carried automatically to Schedule I, line 19.		
22			
23	[X] Indicate here if footnote or comment relating to this schedule is included on Supplemental Schedule IV.		
24	⁽¹⁾ From: WPIa-1		
25	⁽²⁾ From: WPIa-2		
26	⁽³⁾ From: WPIa-3		
27	⁽⁴⁾ From: WPI-4a		
28	^(Note) ADFITC (Tariff 6.1.1.6.10) are not part of Texas Jurisdictional nonbypassable charges and are therefore excluded from the schedule.		

OPERATIONS AND MAINTENANCE EXPENSE

		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Line No.	Item	Total Company	Non-Regulated or Non-Electric or Other Adjustments*	Total Electric (1)+(2)	Allocation Percentage (5)/(3)	Tx Jurisdictional: Wholesale and Retail	Wholesale Transmission Allocation Percentage**	Wholesale Transmission	Retail T&D
1	Transmission Operations Expenses	⁽¹⁾ \$ 22,652,961	⁽¹⁾ \$ -	\$ 22,652,961	100.00%	\$ 22,652,961	100.00%	⁽¹⁾ \$ 22,652,961	⁽¹⁾ \$ -
2	Transmission Maintenance Expenses	⁽¹⁾ 33,020,571	⁽¹⁾ -	33,020,571	100.00%	33,020,571	97.12%	⁽¹⁾ 32,069,874	⁽¹⁾ 950,697
3	Distribution Operations Expenses	⁽¹⁾ 114,651,703	⁽¹⁾ -	114,651,703	100.00%	114,651,703	0.00%	⁽¹⁾ -	⁽¹⁾ 114,651,703
4	Distribution Maintenance Expenses	⁽¹⁾ 115,142,296	⁽¹⁾ -	115,142,296	100.00%	115,142,296	4.18%	⁽¹⁾ 4,810,027	⁽¹⁾ 110,332,269
5	Customer Accounts Expense	⁽²⁾ 20,187,863	⁽²⁾ -	20,187,863	100.00%	20,187,863	0.00%	-	20,187,863
6	Customer Service and Informational Expense	⁽²⁾ 37,666,097	-	37,666,097	100.00%	37,666,097	0.00%	-	37,666,097
7	Sales Expense	-	-	-	0.00%	-	0.00%	-	-
8	Wholesale transmission matrix payments to others	⁽²⁾ 999,786,927	⁽²⁾ 101,469,489	1,101,256,416	100.00%	1,101,256,416	0.00%	-	1,101,256,416
9	Administrative & General Operations Expenses	⁽¹⁾ 244,920,324	⁽¹⁾ (127,660)	244,792,664	100.00%	244,792,664	20.78%	⁽²⁾ 50,861,208	⁽¹⁾ 193,931,456
10	Administrative & General Maintenance Expenses	⁽¹⁾ 1,140,903	⁽¹⁾ -	1,140,903	100.00%	1,140,903	21.44%	⁽¹⁾ 244,610	⁽¹⁾ 896,293
11									
12	TOTAL OPERATIONS AND MAINTENANCE EXP	⁽⁴⁾ \$ 1,589,169,645	⁽⁴⁾ \$ 101,341,829	⁽⁴⁾ \$1,690,511,474		⁽⁴⁾ \$ 1,690,511,474	6.54%	⁽⁴⁾ \$ 110,638,679	⁽⁴⁾ \$ 1,579,872,795

⁽¹⁾ Include supporting documentation for "other adjustments."

⁽²⁾ See instructions for Schedule II to calculate this column.

[X] Indicate here if footnote or comment relating to this schedule is included on Supplemental Schedule IV.

⁽¹⁾ From: WP11-1

⁽²⁾ From: Table

⁽³⁾ From: WP1-5

*Column 2 Adjustments:

23 Amount reflected in column 2 for Wholesale transmission matrix payments to others reflects the amount of CEHE Transmission / Distribution Service Provider interdivisional expense

⁽⁴⁾ To: Schedule I

INVESTED CAPITAL AT END OF REPORTING PERIOD

		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Line No.	Item	Total Company	Non-Regulated or Non-Electric or Other Adjustments*	Total Electric (1)+(2)	Allocation Percentage (5)/(3)	Tx Jurisdictional: Wholesale and Retail	Wholesale Transmission Allocation Percentage**	Wholesale Transmission	Retail T&D (5)-(7)
1	Plant in Service	⁽¹⁾ \$ 14,416,245,159	⁽¹⁾ \$ (29,365,067)	\$ 14,386,880,092	100.00%	\$ 14,386,880,092	35.21%	⁽¹⁾ \$ 5,065,532,981	\$ 9,321,347,111
2	Accumulated Depreciation ^(Note 2)	⁽²⁾ (4,299,680,845)	⁽²⁾ 14,713,664	(4,284,967,181)	100.00%	(4,284,967,181)	22.92%	⁽²⁾ (982,026,494)	(3,302,940,687)
3									
4	Net Plant In Service (lines 1 thru 2)	\$ 10,116,564,314	\$ (14,651,403)	10,101,912,911		\$ 10,101,912,911	40.42%	\$ 4,083,508,488	\$ 6,018,406,424
5	Construction Work in Progress	⁽³⁾ 685,810,110	⁽³⁾ -	685,810,110	100.00%	685,810,110	60.54%	⁽³⁾ 415,216,022	270,594,088
6	Plant Held for Future Use	⁽³⁾ 10,501,381	-	10,501,381	100.00%	10,501,381	97.03%	⁽³⁾ 10,189,176	312,204
7	Working Cash Allowance	⁽³⁾ 24,269,000	-	24,269,000	100.00%	24,269,000	16.00%	⁽³⁾ 3,882,000	20,387,000
8	Materials and Supplies	⁽⁴⁾ 259,312,436	⁽⁴⁾ -	259,312,436	100.00%	259,312,436	41.55%	⁽⁴⁾ 107,744,604	151,567,833
9	Prepayments	⁽⁴⁾ 42,986,891	⁽⁴⁾ 95,065,395	138,052,286	100.00%	138,052,286	18.94%	⁽⁴⁾ 26,153,686	111,898,620
10	Other Invested Capital Additions ^(Note 1)	475,629,955	(85,673,220)	389,956,735	100.00%	389,956,735	2.60%	⁽⁴⁾ 10,122,770	379,833,965
11	Deferred Federal Income Taxes ^(Note 2)	⁽⁵⁾ (1,154,659,452)	⁽⁵⁾ 32,015,422	(1,122,644,030)	100.00%	(1,122,644,030)	34.75%	⁽⁵⁾ (390,126,851)	(732,517,179)
12	Advances For Construction ^(Note 2)	⁽⁶⁾ (22,006,386)	-	(22,006,386)	100.00%	(22,006,386)	30.59%	⁽⁶⁾ (6,731,753)	(15,274,632)
13	Property Insurance Reserve ^(Note 2)	⁽⁶⁾ 17,341,896	-	17,341,896	100.00%	17,341,896	0.00%	⁽⁶⁾ -	17,341,896
14	Injuries and Damages Reserve ^(Note 2)	⁽⁶⁾ (31,168,155)	⁽⁶⁾ -	(31,168,155)	100.00%	(31,168,155)	36.56%	⁽⁶⁾ (11,393,685)	(19,774,470)
15	Customer Deposits ^(Note 2)	⁽⁶⁾ (1,002,242)	⁽⁶⁾ -	(1,002,242)	100.00%	(1,002,242)	0.00%	⁽⁶⁾ -	(1,002,242)
16	Unclaimed Dividends (Note 2)	-	-	-	0.00%	-	0.00%	-	-
17	Other Invested Capital Deductions ^{(Note 2)(Note 3)}	(844,221,470)	40,765,658	(803,435,812)	100.00%	(803,435,812)	32.76%	(263,242,580)	(540,193,153)
18									
19									
20	TOTAL INVESTED CAPITAL (lines 4 thru 17)	\$ 9,579,358,277	\$ 67,541,853	\$ 9,646,900,129		\$ 9,646,900,129	41.31%	\$ 3,985,319,777	\$ 5,661,580,352
21									
22	Less: CWIP and PHFU ^(Note 4)			\$ 696,311,490		\$ 696,311,490	61.09%	\$ 425,405,198	\$ 270,906,292
23	Ending CWIP In Rate Base			⁽³⁾ 49,303		49,303	0.00%	⁽³⁾ -	49,303
24									
25	TOTAL INVESTED CAPITAL--ADJUSTED			\$ 8,950,637,942		\$ 8,950,637,942		\$ 3,559,914,579	\$ 5,390,723,363
26									
27	Return ^(Note 5)			⁽³⁾ \$ 508,885,038		\$ 506,885,038		\$ 164,756,844	\$ 342,128,194
28	Rate of Return (line 27 / line 25)			5.66%		5.66%		4.63%	6.35%
29	Earned Return on Ending Equity (based on reported capital structure in Sch. V)			7.86%		7.86%		5.42%	9.46%
30	(line 28 will automatically calculate correctly only after Schedule I, II,								
31	III, IV, and V are ALL completed.)								
32									
33	<u>Weather-Adjusted Data</u>								
34	Return (Schedule I, line 22 adjusted)			\$ 495,008,583		\$ 495,008,583		\$ 164,756,844	\$ 330,251,739
35	Rate of Return (line 34 / line 25)			5.53%		5.53%		4.63%	6.13%
36	Earned Return on Ending Equity (based on reported capital structure in Sch V)			7.54%		7.54%		5.42%	8.94%
37	(Line 40 will automatically calculate correctly only after Schedules I, II								
38	III, IV, and V are ALL completed.)								
39									
40									
41									
42									
43									
44	⁽¹⁾ Include supporting documentation for "other adjustments."								
45	⁽²⁾ See instructions for Schedule III to calculate this column.								
46	^(Note 1) This amount will be carried automatically from Supplemental Schedule III-1: Other Invested Capital Additions, line 29.								
47	^(Note 2) These items are typically DEDUCTIONS from invested capital and thus should normally be entered as NEGATIVE amounts.								
48	^(Note 3) This amount will be carried automatically from Supplemental Schedule III-2: Other Invested Capital Deductions, line 24.								
49	^(Note 4) Include the appropriate amounts from lines 5 and 6 (only PHFU balances falling outside the 10-year construction window are excluded).								
50									
51	[X] Indicate here if footnote or comment relating to this schedule is included on Supplemental Schedule IV.								
52	^(Note 5) Schedule I, line 22								