



## **Filing Receipt**

**Filing Date - 2024-04-25 01:41:52 PM**

**Control Number - 56211**

**Item Number - 129**

**SOAH DOCKET NO. 473-24-13232  
PUC DOCKET NO. 56211**

<b>APPLICATION OF CENTERPOINT</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>ENERGY HOUSTON ELECTRIC, LLC</b>	<b>§</b>	<b>OF</b>
<b>FOR AUTHORITY TO CHANGE</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>RATES</b>	<b>§</b>	

**COMMISSION STAFF’S THIRD REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
QUESTION NOS. STAFF 3-1 THROUGH 3-7**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission’s Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that CenterPoint Energy Houston Electric, LLC by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer, within 15 calendar days per SOAH Order No. 2 filed on March 27, 2024. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission’s website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: April 25, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Marisa Lopez Wagley  
Division Director

Andy Aus  
Managing Attorney

/s/ David Berlin  
David Berlin  
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**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on April 25, 2024, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ David Berlin  
David Berlin

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO  
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**DEFINITIONS**

- 1) "CEHE" or "you" refers to CenterPoint Energy Houston Electric, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 3-1** Please provide all calculations of the Monte Carlo Simulation showing how you arrived at your conclusions. Please include statistical distribution used in the simulation. Also, please provide all native Microsoft Excel spreadsheets used in the Monte Carlo Simulation.
- Staff 3-2** Please provide all native Microsoft Excel spreadsheets with formulas intact for the trended losses in Exhibit GSW-3 filed with the testimony of Gregory S. Wilson.
- Staff 3-3** Please provide simple descriptions (thunderstorms, lightning, wind & rain, etc.) for the storms listed in WP GSW-1 filed with the testimony of Gregory S. Wilson.
- Staff 3-4** What is the maximum cap amount that CEHE can use from the self-insurance reserve fund for a single storm event?
- Staff 3-5** What is the minimum cap amount above which CEHE can use the self-insurance reserve fund for a single storm event?
- Staff 3-6** Does CEHE have any commercial insurance for storm events? If so, please explain how it works.
- Staff 3-7** Please provide the amount of damages that was debited to the catastrophe reserve fund for the test year, and for the four calendar years before the test year.