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

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**Houston Coalition of Cities' Seventh Requests for Information
to CenterPoint Energy Houston Electric, LLC**

In connection with the Application of CenterPoint Energy Houston Electric, LLC ("the Company" or "CEHE") for Authority to Change Rates, Houston Coalition of Cities ("HCC") requests the following information within fifteen (15) days of receipt of these requests, unless shortened or extended by agreement of the parties.

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

Definitions and Explanatory Notes

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

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

Respectfully submitted,

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By: /s/ Steven T. Moritz
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Counsel for Houston Coalition of Cities

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of April 2024, a true and correct copy of the foregoing document was served upon on all parties of record by email, facsimile and/or First Class Mail.

/s/ Steven T. Moritz
Steven T. Moritz

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

- 7-1. In reference to Direct Testimony of Jennifer Story, page 48:20 - 49:3, and Schedule II-E-3.24, please:
- a. Confirm whether the net operating loss ("NOL") balance of \$64,790,368 is an NOL on CenterPoint Energy, Inc.'s ("CNP") books or CEHE's books.
 - b. Confirm whether the NOL balance has been used in the CNP consolidated tax returns of prior years to offset the taxable income of the CNP consolidated taxable income.
 - c. Provide the portion of the NOL balance that is a "protected" balance under the IRS Normalization requirements, an Excel spreadsheet computing the "protected" balance, and a narrative discussion justifying computation of the "protected" balance.
 - d. Provide the portion of the NOL balance that is not a "protected" balance under the IRS Normalization requirements.
- 7-2. In reference to Schedule II-E-3.24, for each tax year 2018 – 2023, please provide CEHE's NOL balance generated on a stand-alone basis, the NOL amount used in the CNP consolidated tax return to reduce consolidated taxable income, year-end NOL carryforward balance for IRS income tax return reporting purposes, and year-end NOL balance for retail ratemaking purposes. For purposes of this response, please provide a complete narrative discussion of the information provided to ensure a complete understanding of the information provided and assumptions utilized.
- 7-3. In reference to Direct Testimony of Jennifer Story, confirm that the NOL balance included in the revenue requirement for CEHE is created through the use of CEHE's tax deductions in excess of its taxable income, and such tax deductions are associated with temporary differences for expenses that are both recoverable and excluded from CEHE's base rate calculation in this proceeding. To the extent it cannot be confirmed, please provide a detailed clarification.
- 7-4. In reference to GCCC01-13 Attachment 1, please identify all permanent and temporary differences that are associated with costs fully and/or partially excluded from recovery in this base rate case.
- 7-5. In reference to GCCC01-13 Attachment 1, please confirm that the calculation of NOL balances includes all CEHE taxable income and deductions.
- 7-6. In reference to WP II-E-2 Adj 3, please provide in an Excel worksheet CEHE's monthly ad valorem tax expense accruals and adjustments for 2018 – 2023.
- 7-7. In reference to WP II-E-2 Adj 3, please provide in an Excel worksheet CEHE's beginning and ending plant in-service balances for 2017 - 2022.