



Filing Receipt

Filing Date - 2024-04-26 02:38:56 PM

Control Number - 56211

Item Number - 133

**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' Eighth Requests for Information and
Fifth Requests for Production 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'
Eighth Requests for Information to CenterPoint Energy Houston Electric, LLC

- 8-1.** Please refer to the file entitled "HCC-RFP02-02 2024 RA presentation (confidential).pdf" provided in response to HCC-RFP02-02 and slides 11-12. Confirm whether the base case credit metric results utilized the datapoints set out under the column header Recent Peer Outcome of slide 11 for each year of the analysis. If not, please provide the regulatory ROE and capital structure assumptions relied upon to generate the base case credit metric results.
- 8-2.** Please refer to the file entitled "HCC-RFP02-02 2024 RA presentation (confidential).pdf" provided in response to HCC-RFP02-02 and slides 11-12. Please provide a detailed explanation of how the base case and sensitivity analysis regulatory assumptions for the ROE and capital structure are reflected throughout the financial analysis used to calculate the credit metrics presented on slide 12. For example, please specify which line items in the Income Statement, Cash Flow Statement and Balance Sheet used in the financial analysis are directly impacted by those regulatory assumptions.
- 8-3.** Please refer to the file entitled "HCC-RFP02-02 2024 RA presentation (confidential).pdf" provided in response to HCC-RFP02-02 and slides 11-12. Please provide a detailed explanation as to whether the debt balance component used as the denominator in the credit metric calculation remains constant or is modified by the change in the regulatory assumptions as part of the scenario analysis? If the debt component remains constant, please explain the rationale adopted for doing so. If the debt component is modified, please explain the rationale for modifying the debt balance.
- 8-4.** Please refer to the Excel files referenced below which were provided in response to HCC-RFP02-02:
- a. HCC-RFP02-02 2024-2026 CNP Financial Plan_Moodys (confidential)
 - b. HCC-RFP02-02 2024-2026 CNP Financial Plan_SP (confidential)
 - c. HCC-RFP02-02 2024-2026 CNP Financial Plan_Fitch (confidential)

For each year of the analysis, please state the regulatory assumptions for the ROE and capital structure inputs used as part of the financial analysis for CenterPoint Energy Houston Electric and describe whether and how any of the estimated balance sheet line items are directly impacted by the selected ratemaking capital structure input used in the financial analysis.

- 8-5.** Please refer to the Excel file entitled "HCC-RFP02-02 2023 CNP financials (confidential)" provided in response to HCC-RFP02-02. For each year of the analysis, please state the regulatory assumptions for the ROE and capital structure inputs used as part of the financial analysis for CenterPoint Energy Houston Electric and describe whether and how any of the estimated balance sheet line items are directly impacted by the selected ratemaking capital structure input used in the financial analysis.

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

- 5-1.** Please refer to the responses to HCC's Request for Information 8-1 through 8-5 supra and provide documents supporting or reflecting the responses.
- 5-2.** Please refer to the file entitled "HCC-RFP02-02 2024 RA presentation (confidential).pdf" provided in response to HCC-RFP02-02 and slide 12. Please provide materials, analysis and calculations that demonstrate and document the computation of the base case and scenario analysis credit metrics shown on the presentation slide.
- 5-3.** Please refer to the file entitled "HCC-RFP02-02 2024 RA presentation (confidential).pdf" provided in response to HCC-RFP02-02 and slide 12. To the extent it is available, please provide equivalent credit metric results for CenterPoint Energy Houston Electric together with materials, analysis and calculations supporting the credit metrics.
- 5-4.** Please refer to the file entitled "HCC-RFP02-02 2024 RA presentation (confidential).pdf" provided in response to HCC-RFP02-02 and slide 31. For each year of the analysis, please provide materials, analysis and calculations used to support and determine the values shown at the line item "Other long-term debt, net".