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APRIL 30, 2024

SOAH DOCKET NO. 473-24-13232

PUC DOCKET NO. 56211

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

**IBEW LOCAL 66'S
FIRST REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

COMES NOW, IBEW Local 66 ("IBEW") to submit the following Requests for Information ("RFIs") under 16 TEXAS ADMINISTRATIVE CODE (TAC) §§ 22.141 and 22.144 to CenterPoint Energy Houston Electric, LLC ("CenterPoint") through its counsel of record:

James H. Barkley
Baker Botts L.L.P.
910 Louisiana Street
Houston, Texas 77062

Andrea Stover
Baker Botts L.L.P.
401 S. First Street, Suite 1300
Austin, Texas 78704

Patrick H. Peters III
Sam Chang
CenterPoint Energy Service Company,
LLC
1005 Congress Avenue, Suite 650
Austin, Texas 78701

Under SOAH Order No. 2, you must respond to these Requests within fifteen (15) calendar days of receipt of the Requests. If any RFI seems ambiguous, please contact counsel for IBEW to obtain clarification.

I. Instructions

1. Under 16 TAC §22.144(i), the respondent to these Requests must supplement within five days of the discovery of new information any response that newly-discovered information changes or makes incomplete a response already supplied.

2. Under 16 TAC § 22.144(c)(2), IBEW Local 66 requests you answer these Requests under oath or stipulate in writing its responses can be treated exactly

as if the responses were filed under oath. Each answer should identify the person or people responsible for preparing such response and the name of the witness in this proceeding who will sponsor the answer and be responsible for the accuracy of the response.

3. To the extent any response contains proprietary, trade secret, or commercially sensitive information, you may submit that information under the protective order in this proceeding. The requesting party does not agree to withholding of any information in any way other than redaction under the protective order.

4. In producing documents under these RFIs, number each document and indicate the question(s) or request(s) in response to which the document is being produced. If any document falls within multiple requests, multiple productions are not contemplated; one production referencing the multiple requests will be sufficient.

5. When a request asks for the production of a study, report, or supporting inputs for assumptions, such data should be in a Microsoft Office, Adobe Acrobat, or other useable PC-based electronic format, when available, on CD-ROM and be produced with your response to these requests.

6. For any information you claim is unavailable, state why it is unavailable. If you cannot respond to the request precisely as it is stated, provide any information that is available that would respond to the request at a level of detail different from that specified.

7. A request for "documents," "all documents," or "any documents" contemplates a complete production of materials relating to the referenced subject but is not intended to seek a duplicative or cumulative production of documents. If the production of one set of documents responds to the information requested, IBEW does not seek (and you need not produce) duplicate sets of hard-copy documents that also address the same matters. This instruction does not excuse you of your obligation to produce documents in both written and electronic format where available, under Instruction # 4.

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8. If the information requested is in previously-furnished exhibits, work papers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please provide references thereto, including Bates Stamp page citations and detailed cross-references.

9. When the RFI requests a study, report, schedule, or analysis, the response should also provide the work papers, underlying facts, inferences, suppositions, estimates, and conclusions to support each study, report, schedule, or analysis.

10. Please produce the requested documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business, and organize and label them to correspond to the categories in this request. If any part of a document responds to any request, the whole document is to be produced. If there has been any alteration, modification or addition to a document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists, drafts or revisions, each such alteration, modification or addition is to be considered as a separate document and it must be produced.

11. These requests are directed to all documents and information in your custody or control. A document is considered in your custody or control if you have the document or may secure such document from another person having possession. If you cannot produce a document or information based on a claim the document is not in your custody or control, state the location of such document or information when it was last in your possession, custody or control, and describe the reason the document is no longer in your possession, custody or control, and the way it was removed from your possession, custody or control.

12. In responding to each Request, provide information available from all of your corporate and individual files, and from past and present employees, officers, directors, and board members.

13. The singular form of a word shall be interpreted to mean and include the plural. Words used in the plural form of a word shall be interpreted mean and include the singular.

14. The past tense of a word shall be interpreted to include the present tense and the present tense shall be construed to include the past tense.
15. If any document is withheld under any claim of privilege, provide a list identifying each document for which a privilege is claimed, with the following information: date, sender, recipients of copies, subject matter of the document, and the basis on which this privilege is claimed.
16. Under 16 TAC § 22.144(h)(4), if the response to any request is voluminous, provide a detailed index of the voluminous material.
17. Please serve your Responses electronically or in person to:
Bradford W. Bayliff
Bayliff Law Firm PLLC
420 Crosswind Drive
Blanco, Texas 78606
brad@bayliff.law

II. Definitions

For these discovery requests, the terms set forth below have these meanings:

1. The terms “**CenterPoint Electric Houston, LLC**,” “**CenterPoint**,” “**CEHE**,” “**Applicant**,” or “**you**” means the Applicant in this proceeding and its parent, subsidiaries, affiliates, past or present; all employees, officers, directors, agents, consultants, investigators, attorneys, and all people acting under contractual obligations with or acting on your behalf for purposes of this proceeding; any merged or consolidated predecessors in interest or predecessor in interest; and any merged or consolidated successors in interest.
2. The terms “**and**” and “**or**” as used shall be construed as either conjunctive or disjunctive to make the request inclusive rather than exclusive.
3. The term “**any**” shall be construed to include “**all**” and “**all**” shall be construed to include “**any**.”
5. The term “**each**” shall be construed to include the word “**every**” and “**every**” shall be construed to include the word “**each**.”
6. The term “**concerning**” includes these meanings: relating to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing;

describing; showing; identifying; providing; disproving; comprising; supporting; contradicting; legally, logically, or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

7. The term “**including**” means and refers to “including but not limited to.”

4. The term “**communication**” includes, but is not limited to, all forms of communication, whether written, printed, oral, pictorial, or otherwise, including, but not limited to, testimony or sworn statements, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, and symposia. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio or computer.

5. The terms “**document**” or “**documents**” are used in their broadest sense in Tex. R. CIV. P. 192.3(b) and, as described in Rule 196.4 include electronic or magnetic data (included in the definition of “document”). These words mean and include any written, printed, typed, recorded or graphic matter of every kind or description, both original and copies, and all attachments and appendices. Without limiting the foregoing, the terms “**document**” and “**documents**” shall include all analyses, agreements, contracts, communications, correspondence, drawings, letters, opinion letters, telegrams, faxes, messages, e-mails, memoranda, records, reports, books, studies, summaries or other records of telephone conversations or interviews, summaries or other records of personal conversations or interviews, minutes, summaries or other records of meetings or conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, press releases, forecasts, progress reports, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, charts, tables, accounts, analytical records, consultants’ and expert reports, appraisals, bulletins, notes, meeting notes, telephone conversation notes, notices, marginal

notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disc recordings, sound recordings, video recordings, film, tape, photographs, programs, data, and data compilations from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, magnetically stored, optically-stored, or electronically stored matter, however produced, prepared, reproduced, disseminated, or made, on any medium of any description in your actual or constructive possession, custody or control, or of which you have knowledge, upon which intelligence or information is recorded from or from which intelligence or information can be retrieved; and every copy of such writing or record where the original is not in your possession, custody, or control. The words “**document**” and “**documents**” also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that have no markings, additions, or deletions different from the original need not be separately produced.

6. “**Identify**,” when used in connection with an act, shall mean to state a description of the act, including the place, date, and time of its occurrence, and the identity of the person, people, or entities that engaged in or witnessed the act.

7. “**Identify**,” when used regarding a “document,” shall mean to state the type of document (e.g., book, magazine, article, circular, ledger, letter, memoranda, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author/addresser (including all people who participated in the writing of the document), addressee, indicated or blind copies, subject matter, volume and page number or other means of general identification, approximate size and number of pages, any attachments or appendices, and the date on which it was made or prepared. Identification of the document includes identifying all documents known or believed to exist, whether or not in the custody of its attorneys or other representatives. The final version and each draft of each document should be identified and produced separately. If a document is no longer in your

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possession or control, state what disposition was made of it. A document need not be identified if it is produced.

8. “**Identify**,” when used regarding a natural person shall mean to state the person’s first and last names, title, employer and business address.

9. “**Person**” means any natural person, firm, corporation, association, partnership, or other organization or form of legal entity.

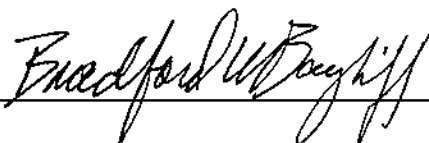
10. “**PUC**” and “**Commission**” refer to the Public Utility Commission of Texas.

11. “**Relate, refer, mention or pertain**” means documents containing, showing, relating, mentioning, referring or pertaining , directly, or indirectly to, or in legal, logical or factual way or connection with, a document request, and includes documents underlying, supporting, now or previously attached or appended to, or used in preparing any document called for by such request.

12. “**Outsource**” or “**outsourcing**” means obtaining goods or services from an outside supplier (contractor or sub-contractor) that is not the Applicant.

Respectfully submitted,

BAYLIFF LAW FIRM PLLC
420 Crosswind Drive
Blanco, Texas 78606
(512) 480-9900
(512) 480-9200 (FAX)

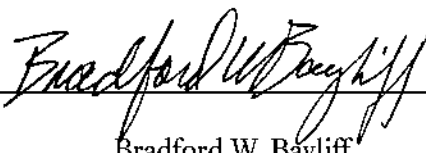
A handwritten signature in black ink, reading "Bradford W. Bayliff", is written over a horizontal line.

By: Bradford W. Bayliff
State Bar No. 24012260
brad@bayliff.law

ATTORNEY FOR IBEW LOCAL 66

CERTIFICATE OF SERVICE

I certify that on April 30, 2024, this document is being served on CenterPoint Energy Houston Electric, LLC and filed with the Central Records of the Public Utility Commission of Texas.



Bradford W. Bayliff

IBEW-CenterPoint 1-1

Identify the name, address, and title of each witness you intend to sponsor at the hearing on the merits and summarize the testimony s/he will present.

IBEW-CenterPoint 1-2

Identify and provide any documents that your witnesses will introduce, sponsor, or rely on.

IBEW-CenterPoint 1-3

Identify each expert you expect to call to testify at the hearing on the merits. For each testifying expert provide:

- a. the expert's name, address, and telephone number;
- b. the subject matter(s) on which the expert will testify;
- c. the facts known by the expert that relate to or form the basis of the expert's mental impressions and opinions formed or made in connection with this case;
- d. the expert's mental impressions and opinions formed or made in connection with the case, and any methods used to derive them;
- e. any bias of the witness;
- f. all documents, tangible things, reports, models, or data compilations provided to, reviewed by , or prepared by or for the expert in anticipation of the expert's testimony; and
- g. the expert's current resume and bibliography.

IBEW-CenterPoint 1-4

Identify each consulting expert whose mental impressions or opinions have been reviewed by an expert you expect to call to testify at the hearing on the merits. For any consulting expert provide:

- a. the expert's name, address, and telephone number;
- b. the facts known by the expert that relate to or establish the expert's mental impressions and opinions formed or made in connection with this case;
- c. the expert's mental impressions and opinions formed or made in connection with the case, and any methods used to derive them;
- d. any bias of the witness;
- e. all documents, tangible things, reports, models, or data compilations provided to, reviewed by , or prepared by or for the expert in anticipation of the expert's testimony; and
- f. the expert's current resume and bibliography.

IBEW-CenterPoint 1-5

Have you identified any errors in your public notice or your Application?

IBEW-CenterPoint 1-6

For any errors identified in your response to the previous Request, describe how you discovered or learned of the error and identify the source of the corrected information.

You have had growth of 257,084 residential customers, and 21,047 commercial accounts for a total of 278,131 total new customers. On page 8, lines 3 through 12 of Lynnae Wilson's direct testimony, she claims growth of 24% since 2010.

IBEW-CenterPoint 1-7

Distribution line construction:

- a. What is the total cost of distribution line construction you include in your requested rate base?
- b. What is the cost of the distribution line construction you outsource that you include in your Application as part of your requested rate base?
- c. If you are unable to respond to subpart b, please provide any data relating to your outsourcing of distribution line construction.
- d. Please provide your internal guidelines requirements to outsource distribution line construction instead of

IBEW-CenterPoint 1-8

Distribution line maintenance and repair:

- a. What is the total cost of distribution line maintenance and repair you include in your requested rate base?
- b. What is the cost of the distribution line maintenance and repair you outsource that you include in your Application as part of your requested rate base?
- c. If you are unable to respond to subpart b, please provide any data relating to your outsourcing of distribution line maintenance and repair.
- d. Describe your internal requirements for safety and
- e. What are your contractual arrangements with outsourcing contractors and sub-contractors for distribution line maintenance and repair to ensure compliance with 16 Texas Administrative Code (TAC) §25.52(b)(1) and (2) and PURA 38.005(c)?
- f. How does your use of outsourcing with outsourcing contractors and sub-contractors for distribution line maintenance and repair comply with

16 (TAC) §25.52(b)(4) and PURA 38.005(c), which require each utility to maintain adequately trained and experienced personnel throughout its service area so the utility is able to fully and adequately comply with service quality and reliability standards?

IBEW-CenterPoint 1-9

Installation of new customer 3-phase meters:

- a. What is the number of installed new customer 3-phase meters you include in your requested rate base? What is the amount you include in your requested rate base for the installation of new customer 3-phase meters?
- b. What is the number of new customer 3-phase meters you outsourced that you include in your Application as part of your requested rate base? What is the amount you include in your requested rate base for the outsourced installation of new customer 3-phase meters?
- c. If you are unable to respond to subpart b, please provide any data relating to your outsourcing of the installation of new customer 3-phase meters.

IBEW-CenterPoint 1-10

Installation of new customer single phase meters:

- a. What is the number of installed new customer single phase meters you include in your requested rate base? What is the amount you include in your requested rate base for the installation of new customer single phase meters?
- b. What is the number of new customer single phase meters you outsourced that you include in your Application as part of your requested rate base? What is the amount you include in your requested rate base for the outsourced installation of new customer single phase meters?
- c. If you are unable to respond to subpart b, please provide any data relating to your outsourcing of the installation of new customer single phase meters.

IBEW-CenterPoint 1-11

Vegetation management:

- a. What percentage of your total outages during the rate base period do you attribute to vegetation, including trees?
- b. Identify your internal and governmental compliance requirements with which you require your internal vegetation management employees to comply?
- c. Do you use a third-party safety administrator to help manage internal and governmental compliance requirements on internal vegetation management?

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- d. Do you require outsourcing contractors and sub-contractors to meet the same internal and governmental compliance requirements with which your internal vegetation management employees must comply?
- e. Do you require outsourcing contractors and sub-contractors for vegetation management to use a third-party safety administrator to help manage internal and governmental compliance requirements?
- f. What is the total cost of scheduled or ongoing vegetation management you include in your requested rate base?
- g. What is the cost of the scheduled or ongoing vegetation management you outsource that you include in your Application as part of your requested rate base?
- h. What is the total cost of emergency or outage-related vegetation management you include in your requested rate base?
- i. What is the cost of emergency or outage-based vegetation management you outsource that you include in your Application as part of your requested rate base?

IBEW-CenterPoint 1-12

Please refer to Randal M. Pryor's direct testimony at page 32, lines 11-14.

- a. Please identify, describe, and provide documents relating to your "processes in place to ensure adequate staffing while, at the same time, ensuring that its staffing is efficient and reasonable."
- b. Please identify, describe, and provide documents for the rate case base period relating to your regular and consistent evaluation of future staffing needs.
- c. Please explain how outsourcing factors into your "processes" and determination your staffing is "efficient and reasonable."

IBEW-CenterPoint 1-13

Please refer to Randal M. Pryor's direct testimony at page 34, lines 4-8.

Please describe what Mr. Pryor means by "supplement" including a description of the extent to which you "supplement" your workforce in Distribution Operations.

IBEW-CenterPoint 1-14

Please refer to Randal M. Pryor's direct testimony at page 35, lines 19-20.

Please identify and provide documents related to all instances in which a partnership took contingencies out of the cost equation during the rate base period.

IBEW-CenterPoint 1-15

Please refer to Randal M. Pryor's direct testimony at page 35, line 21 to page 36, line 2.

Because your growth has been steady and you project your steady growth to continue, why do you not hire and train your own workers to reduce reliance on contractors and sub-contractors?

IBEW-CenterPoint 1-16

Please refer to Figure 11 in Randal M. Pryor's direct testimony at page 42, lines 3 to 5.

- a. Please confirm the acronym "MUG" stands for Major Underground.
- b. Please identify what your customer count and growth was for each year in the table.
- c. The year-to-year increases in your MUG total spending ranges from about 21% in 2020, 19% in 2021, 50% in 2022, and 34% in 2023.
 1. Explain the variance in each year-to-year increase relative to your growth in customers.
 2. Explain the necessity of the increase in total annual spending in 2019 of \$355 million to \$1.019 billion in 2023.
- d. What are your practices and policies relating to capitalization of maintenance and repair work orders?

IBEW-CenterPoint 1-17

Outsourcing:

- a. As a general proposition, do you expect the contractors and sub-contractors with whom you contract for outsourcing to provide goods and services will include a profit margin on the outsourced goods and services they provide?
- b. Are you asking for a return on your spending for outsourced goods and services? If so, please identify the requested rate of return on outsourced goods and services.