



## **Filing Receipt**

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<b>APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § § §</b>	<b>BEFORE THE STATE OFFICE OF    ADMINISTRATIVE HEARINGS</b>
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**TEXAS ENERGY ASSOCIATION FOR MARKETERS' AND ALLIANCE FOR RETAIL  
MARKETS' FIRST REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Texas Energy Association for Marketers (TEAM) and Alliance for Retail Markets (ARM) (collectively, REP Coalition) request CenterPoint Energy Houston Electric, LLC (CenterPoint), as defined in this First Request for Information (RFI), to respond to the questions and sub-questions in this RFI under oath, and in accordance with the definitions, explanatory notes, and instructions provided in these Requests. Please answer the questions and sub-questions in the order in which they are submitted, and include sufficient detail to provide a complete and accurate response. Also, please state the name of the witness who will sponsor the response to each question and sub-question and who can vouch for the truth of the response.

**DEFINITIONS, EXPLANATORY NOTES, AND INSTRUCTIONS**

1. "CenterPoint" or "Company" refers to CenterPoint Energy Houston Electric, LLC.
2. "CenterPoint Energy" refers to CenterPoint Energy, Inc., CenterPoint Energy Houston Electric, LLC's ultimate parent company.
3. The term "identify," "identity," or "identification" when used in reference to an individual person, means to state that person's full name and business address, including zip code, telephone number, and present or last-known business position and duties.
4. The term "identify," "identity," or "identification" when used in reference to a business organization, means to state the corporate, partnership, or proprietorship name or names, and locations, full addresses and telephone numbers of its principal place of business, and

all other business locations that should be denoted for a full and complete response to an inquiry, interrogatory, or request for information.

5. The term “identify,” “identity” or “identification” when used in reference to a document or study, means to state the type of document or the study format (e.g., book, magazine article, circular, ledger, letter, memorandum, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author, volume and page number or other means of general identification, its approximate size and number of pages, and the date on which it was made, prepared, or taken. If any such document was, but is no longer, in your possession or subject to your control, describe the disposition.
6. The term “identify,” “identity,” or “identification” when used in reference to anything other than a person, business organization, document, or study means to state the nature and present location of the item, a description of its form, the name or title by which the item is commonly known, and the person or business organization that has custody of or responsibility to maintain the item.
7. The term “test year” means the 12-month period ending December 31, 2023.
8. The term “study” or “studies” means any analysis, investigation, summary of data, listing, or report, the results of which were made known, formally or informally, where the author thereof reached an objective or subjective conclusion or presented information upon which others could or did reach an objective or subjective conclusion.
9. The terms “document” and “documents” are used in their 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, e-mails, 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 (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however and by whomever produced, prepared, reproduced,

disseminated, or made. The terms “document” and “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.

10. When a request calls for the identification of a “document” or “documents,” 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 or “re:” line, and the subject 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.
11. If any requested information or document cannot be provided in its entirety, it shall be provided to the greatest extent possible, with an indication of the portion of the information or document that cannot be provided and the reason it cannot be provided.
12. The respondent to requests for information must provide not only the information or documents in its physical possession, custody, or control, but all information and documents in the physical possession, custody, or control of any other person acting or purporting to act on behalf of the respondent, including, but not limited to, contractors, attorneys, consultants, and witnesses.
13. The term “communication” shall mean any transmission of information by oral, graphic, written, pictorial, or other means, including, but not limited to, telephone, conversations, letters, telegrams, e-mails, text messages, and personal conversations.
14. “To each” means to identify separately information, facts, data, and documents for each of the individual items or things designated as the subject of the specific inquiry or request.
15. Terms expressed in the masculine gender shall be regarded as including the feminine or neuter; terms expressed in the singular shall be regarded as being expressed in the plural,

and vice versa; terms expressed in the past tense shall be regarded as being expressed in the present tense, and vice versa; and the term “and” shall be regarded as the term “or,” and vice versa, so as to not limit the scope of any request.

16. In answering each request, please restate the request prior to providing the response. Each request and its response should begin on a separate page. Where there are subparts to a request, the answer to each subpart should be separately labeled.
17. If any question appears confusing or the scope of the question is unclear, please request clarification from the undersigned counsel. Similarly, if you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions, please call the undersigned counsel as soon as possible.
18. If any of the information requested is claimed to be privileged or proprietary, then the response should identify such information, identify all persons who participated in the preparation of the information or who received a copy, read, or examined the information or knows of its substance, state the present location of the information and all copies of it, and identify each person having custody or control of the information or any of the copies.
19. If any requested information is not available in the form requested, provide the information in the form that it currently exists, explain why the data cannot be provided in the form requested, and describe the work or process needed to provide the information in the form requested.
20. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
21. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.

Respectfully submitted,

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**COUNSEL FOR ALLIANCE FOR RETAIL  
MARKETS**

**CERTIFICATE OF SERVICE**

I hereby certify that notice of the filing of this document was provided to all parties of record via electronic mail on May 3, 2024 in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Rashmin J. Asher

Rashmin J. Asher

**Code of Conduct/Competitive Affiliates**

- REP COALITION 1-1:** Does CenterPoint have any competitive affiliates, as defined by 16 TAC § 25.272(c)(2)? If so, please provide a complete list of all of CenterPoint's competitive affiliates including a description of the type of business conducted by the affiliate.
- REP COALITION 1-2:** Since 2019, has CenterPoint shared or disclosed any "proprietary customer information" under 16 TAC § 25.272(c)(5) (e.g., customer name, address, account number, historical electricity usage), either individually or in aggregate, with any of the competitive affiliates identified in response to RFI 1-1?
- a. If yes, please identify the competitive affiliate with which the information was shared, describe the information shared, and provide the date(s) when such sharing occurred.
- REP COALITION 1-3:** Since 2019, has CenterPoint received any "proprietary customer information" under 16 TAC § 25.272(c)(5) (e.g., customer name, address, account number, historical electricity usage), either individually or in aggregate, from any of the competitive affiliates identified in response to RFI 1-1?
- a. If yes, please identify the competitive affiliate with which the information was shared, describe the information shared, and provide the date(s) when such sharing occurred.
- REP COALITION 1-4:** Has CenterPoint shared ESI-ID information with any of its competitive affiliates identified in response to RFI 1-1?
- a. If yes, please identify the competitive affiliate with which the ESI-ID information was shared, describe the information shared, and provide the date(s) when such sharing occurred.
- REP COALITION 1-5:** Did any of CenterPoint's invested capital for which it seeks recovery in this case arise from payments made to a competitive affiliate? If so, please provide an itemized list of each item or class of items, the competitive affiliate to which the payment was made, the date of the payment, and the payment amount.



- REP COALITION 1-6:** Has CenterPoint made any payments during the Test Year for expenses to a competitive affiliate? If so, please provide an itemized list of each item or class of items, the competitive affiliate to which the payment was made, the date of the payment, and the payment amount.
- REP COALITION 1-7:** Did CenterPoint conduct any transactions with its competitive affiliates during the Test Year? If so, please provide a complete list of each transaction, documentation that demonstrates that each listed transaction was conducted at arm's length, and any and all amounts paid to or by CenterPoint in connection with each transaction.
- REP COALITION 1-8:** Please identify the corporate entity within the CenterPoint Energy family of companies that is responsible for the development, maintenance, evolution, and promotion of the CenterPoint Energy brand.
- a. Please provide the total costs incurred and expended by that entity in connection with the development, maintenance, evolution, and promotion of the CenterPoint Energy brand from 2019 to the present, as well as during the Test Year.
  - b. With respect to CenterPoint's response to subpart (a), please provide the total costs allocated to CenterPoint from 2019 to the present, as well as during the Test Year.
  - c. With respect to CenterPoint's response to subpart (a), please provide the total costs allocated to other CenterPoint Energy entities for each year from 2019 to the present, as well as during the Test Year. In answering this question, please list each entity separately.
  - d. Please quantify CenterPoint's total costs incurred during the Test Year associated with maintenance and promotion of the CenterPoint Energy brand.
- REP COALITION 1-9:** Does CenterPoint Energy still employ a "one brand" strategy for its subsidiary businesses?

**REP COALITION 1-10:** Please list the CenterPoint Energy subsidiary companies that utilize the “CenterPoint Energy” name and logo shown below in their media and marketing materials.



**REP COALITION 1-11:** Does CenterPoint receive any payments from the entities listed in response to RFI 1-10 for their use of the name and logo referenced above?

**REP COALITION 1-12:** Please list the CenterPoint Energy subsidiary companies that utilize the “Always There” tagline in their media and marketing materials.

**REP COALITION 1-13:** Does CenterPoint receive any payments from the entities listed in response to RFI 1-12 for their use of the “Always There.”

**FERC Account 363**

**REP COALITION 1-14:** Please admit or deny that the amounts requested for recovery in this proceeding do not include any amounts for investments booked to FERC Account 363. If the response is anything other than an unqualified admit, please answer the following questions for each investment booked to the account:

- a. Describe the investment and its distribution-related purpose;
- b. State the installation date and the date of service, if the two dates differ; and
- c. State the amount of plant in service and any accumulated depreciation amount relating to the asset.

**Rate Stability**

**REP COALITION 1-15:** Please provide the supporting data used to create the table, Average Monthly, CEHE Charges (per 1,000 kWh) on page 15 of the Application section. The table illustrates the Company’s claim that the Company’s average annual rate for the residential customer has remained flat over the past ten years (at ~\$49).

**Discretionary Charges**

**REP COALITION 1-16:** In the testimony of John Durland (Page 44), CenterPoint proposes to increase the charge for a new Standard Meter from \$0 to \$213, for the sole purpose of mitigating Competitive Retailer confusion as it relates to charges assessed to CRs for an AMS-M move-in transaction. Please confirm that this proposed change will not require any revisions to the way CR's currently send EDI transactions when requesting a new meter installation.

**Rates**

**REP COALITION 1-17:** Please refer to Exhibit JRD-07 concerning the addition of "IDR Capable AMS" and Exhibit JRD-08 concerning corresponding Tariff Sections including 6.1.1.1.3, 6.1.1.1.4, and 6.1.1.6.3 in the Direct Testimony of CenterPoint Witness John R. Durland's testimony.

- a. How many customers, by rate class, currently have IDR Capable AMS meters?
- b. For customers that currently have IDR Capable AMS meters, are they currently charged rates for IDR meters or Non-IDR meters?

**REP COALITION 1-18:** Please refer to charts A and B below from the Errata to CenterPoint Witness John R. Durland's testimony filed on April 19, 2024. Please confirm that these are accurate compilations of the proposed changes to represented charges. If the response is anything but an unqualified confirmation, please provide the accurate versions in final form in one responsive exhibit.

**Chart A**

CURRENT AND PROPOSED CHARGES (General Rate Schedules)					
CLASS	Type of Charge	Current Charge	Proposed Charge	Inc. or Dec.	Billing Unit
<b>RESIDENTIAL</b>	Customer	\$2.30	\$2.12	-\$0.18	per customer
	Metering	\$2.09	\$2.90	\$0.71	per meter
	Transmission	\$0.000000	\$0.000000	\$0.000000	per kWh
	Distribution	\$0.020314	\$0.025940	\$0.005626	per kWh
<b>SECONDARY =&lt;10 kVa (Small)</b>	Customer	\$2.26	\$2.01	-\$0.25	per customer
	Metering	\$2.32	\$2.97	\$0.65	per meter
	Transmission	\$0.000000	\$0.000000	\$0.000000	per kWh
	Distribution	\$0.015504	\$0.015470	-\$0.000034	per kWh
<b>SECONDARY &gt;10kVa (Large)</b>	Customer				
	NON-IDR	\$3.00	\$4.67	\$1.67	per customer
	IDR	\$44.95	\$45.80	\$0.85	per customer
	Metering				
	NON-IDR	\$7.41	\$9.35	\$1.94	per meter
	IDR	\$72.00	\$87.68	\$15.68	per meter
	Transmission				
	NON-IDR	\$0.0000	\$0.0000	\$0.00	per NCP kVa
<b>PRIMARY</b>	IDR	\$0.0000	\$0.0000	\$0.00	per 4 CP kVa
	Distribution	\$4.449410	\$4.544200	\$0.09479	per Billing kVa
	Customer				
	NON-IDR	\$4.51	\$24.08	\$19.57	per customer
	IDR	\$57.14	\$57.38	\$0.24	per customer
	Metering				
	NON-IDR	\$284.78	\$308.54	\$23.76	per meter
	IDR	\$175.97	\$87.05	-\$88.92	per meter
	Transmission				
	NON-IDR	\$0.0000	\$0.0000	\$0.00	per NCP kVa
	IDR	\$0.0000	\$0.0000	\$0.00	per 4 CP kVa
	Distribution	\$2.334540	\$3.376320	\$1.04	per Billing kVa
<b>TRANSMISSION</b>	Customer	\$209.26	\$190.52	-\$18.74	per customer
	Metering	\$799.36	\$670.99	(\$128.37)	per meter
	Transmission	\$0.0000	\$0.0000	\$0.00	per 4 CP kVa
	Distribution	\$0.594950	\$0.536270	-\$0.06	per 4 CP kVa

Chart B

CURRENT AND PROPOSED CHARGES (Rider Schedules) (Not Including TCs)					
CLASS	Type of Charge	Current Charge	Proposed Charge	Inc. or Dec.	Billing Unit
Residential	RCE	N.A	\$0.000050	\$0.000050	per kWh
Secondary <=10 kVa	RCE	N.A	\$0.000033	\$0.000033	per kWh
Secondary >10 kVa	RCE	N.A	\$0.008311	\$0.008311	per Billing kVa
Primary	RCE	N.A	\$0.006528	\$0.006528	per Billing kVa
Transmission	RCE	N.A	\$0.008712	\$0.008712	per 4 CP kVa
Street Lighting	RCE	N.A	\$0.000310	\$0.000310	per kWh
Miscellaneous Lighting	RCE	N.A	\$0.000056	\$0.000056	per kWh
Residential	TCRF	\$0.010833	\$0.018286	\$0.007453	per kWh
Secondary <=10 kVa	TCRF	\$0.010734	\$0.010088	(\$0.000646)	per kWh
Secondary > 10 kVa					
IDR	TCRF	\$5.739265	\$4.928306	(\$0.810959)	per 4 CP Kva
Non-IDR	TCRF	\$3.364432	\$3.541345	\$0.176913	per NCP Kva
Primary					
IDR	TCRF	\$4.804674	\$5.050229	\$0.245555	per 4 CP Kva
Non-IDR	TCRF	\$2.084892	\$3.907859	\$1.822967	per NCP Kva
Transmission	TCRF	\$4.735986	\$6.494414	\$1.758428	per 4 CP Kva
Street Lighting	TCRF	\$0.000000	\$0.000000	\$0.000000	per kWh
Miscellaneous Lighting	TCRF	\$0.000000	\$0.000000	\$0.000000	per kWh
Residential	EECRF	\$0.000826	\$0.000826	\$0.000000	per kWh
Secondary <=10 kVa	EECRF	\$0.003344	\$0.003344	\$0.000000	per kWh
Secondary > 10 kVa	EECRF	\$0.000538	\$0.000538	\$0.000000	per kWh
Primary	EECRF	\$0.001403	\$0.001403	\$0.000000	per kWh
Transmission (Non Profit)	EECRF	\$0.000340	\$0.000340	\$0.000000	per kWh
Transmission (Industrial)	EECRF	\$0.000000	\$0.000000	\$0.000000	per kWh
Lighting Service	EECRF	\$0.000000	\$0.000000	\$0.000000	per kWh
Secondary > 10 kVa	CMC	\$0.92	\$2.35	\$1.429924	per meter
Primary	CMC	\$0.87	\$2.32	\$1.445034	per meter
Transmission	CMC	\$1.25	\$3.25	\$1.998527	per meter
Residential	TEEEF	\$0.002392	\$0.002392	\$0.000000	per kWh
Secondary <=10 kVa	TEEEF	\$0.001403	\$0.001403	\$0.000000	per kWh
Secondary > 10 kVa	TEEEF	\$0.504912	\$0.504912	\$0.000000	per Billing kVa
Primary	TEEEF	\$0.449845	\$0.449845	\$0.000000	per Billing kVa
Transmission	TEEEF	\$0.000000	\$0.000000	\$0.000000	per 4 CP kVa
Lighting Service	TEEEF	\$0.002852	\$0.002852	\$0.000000	per kWh
Residential	DCRF	\$0.003963	\$0.000000	(\$0.003963)	per kWh
Secondary <=10 kVa	DCRF	\$0.003781	\$0.000000	(\$0.003781)	per kWh
Secondary > 10 kVa	DCRF	\$0.614230	\$0.000000	(\$0.614230)	per Billing kVa
Primary	DCRF	\$0.382788	\$0.000000	(\$0.382788)	per Billing kVa
Transmission	DCRF	\$0.014217	\$0.000000	(\$0.014217)	per 4 CP kVa
Lighting Service	DCRF	\$0.079087	\$0.000000	(\$0.079087)	per kWh
Residential	IRA	N.A	\$0.000000	\$0.000000	per kWh
Secondary <=10 kVa	IRA	N.A	\$0.000000	\$0.000000	per kWh
Secondary >10 kVa	IRA	N.A	\$0.000000	\$0.000000	per Billing kVa
Primary	IRA	N.A	\$0.000000	\$0.000000	per Billing kVa
Transmission	IRA	N.A	\$0.000000	\$0.000000	per 4 CP kVa
Street Lighting	IRA	N.A	\$0.000000	\$0.000000	per kWh
Miscellaneous Lighting	IRA	N.A	\$0.000000	\$0.000000	per kWh
Residential	NDC	\$0.000003	\$0.000013	\$0.000010	per kWh
Secondary <=10 kVa	NDC	\$0.000002	\$0.000006	\$0.000004	per kWh
Secondary >10 kVa	NDC	\$0.000606	\$0.001460	\$0.000853	per Billing kVa
Primary	NDC	\$0.000576	\$0.001622	\$0.001046	per Billing kVa
Transmission	NDC	\$0.000764	\$0.004181	\$0.003418	per 4 CP kVa
Lighting Service	NDC	\$0.000002	\$0.000005	\$0.000003	per kWh

**Meter Exchanges**

**REP COALITION 1-19:** Please refer to the Direct Testimony of John R. Hudson III at 726–727 and the Direct Testimony of Randall M. Pryor at 496–497. In relation to the work concerning meters and meter exchanges:

- a. How many meter exchanges were performed in the Test Year?
- b. Does CenterPoint expect that the number of meter exchanges in future years will be similar to the amount for the Test Year? If no, please explain any expected deviations.
- c. For meter exchanges during the Test Year:
  1. How many meter exchanges resulted in meter readings being delayed longer than 30 days?
  2. How many meter reads were sent to the REP following a meter exchange without the read from the actual exchange?
  3. Are there any planned process improvements to the meter exchange process? If yes, please describe.

**REP COALITION 1-20:** Please refer to the Direct Testimony of Carla A. Kneipp (p. 24) and provide a breakdown of the Long Lead Time Facilities (LLTF) assets that compose the Qualifying LLTF Balance of \$31,161,482.