



Filing Receipt

Filing Date - 2024-05-07 05:02:26 PM

Control Number - 56211

Item Number - 171

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

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

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC’S
RESPONSE TO MR. WILLIAM A. ROPER, JR.’S SURREPLY**

CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston”) acknowledges that it inadvertently filed its Reply to William A. Roper, Jr.’s Response to CenterPoint Houston’s Objection to My Motion to Intervene (“Reply”) 90 minutes after the 3:00 p.m. deadline. CenterPoint Houston apologizes for the inadvertently delayed filing, which was attributable in part to the attention required to be paid to eleven filings made on Sunday evening, May 5 and Monday, May 6 in Docket No. 55768, eight of which were made by Mr. Roper.¹ Despite the delay, CenterPoint Houston respectfully requests that the Administrative Law Judges (“ALJs”) consider CenterPoint Houston’s reply.²

Further, CenterPoint Houston does not oppose Mr. Roper’s Motion for Leave to Reply,³ and notes that his surreply (1) continues to focus on his alleged rights as a non-ratepaying

¹ *Application of CenterPoint Energy Houston Electric, LLC to Amend its Certificate of Convenience and Necessity for a Proposed 138-kV Transmission Line in Harris and Montgomery Counties*, Docket No. 55768, William A. Roper, Jr.’s Reply to CenterPoint’s Response and Motion to Remove (May 5, 2024); William A. Roper Jr.’s Motion for Leave to Amend His Reply to CenterPoint’s Response to Motion for Judicial Notice of Montgomery Thoroughfare Plan (May 5, 2024); William A. Roper, Jr.’s Amended Reply to CenterPoint’s Response to Motion for Judicial Notice of MTP (May 5, 2024); William A. Roper, Jr.’s First Set of Rebuttal Requests for Information to CenterPoint Energy Houston Electric, LLC (May 5, 2024); William A. Roper, Jr.’s Second Set of Rebuttal Requests for Information to CenterPoint Energy Houston Electric, LLC (May 6, 2024); William A. Roper, Jr.’s Third Set of Rebuttal Requests for Information to CenterPoint Energy Houston Electric, LLC (May 7, 2024); William A. Roper, Jr.’s Fourth Set of Rebuttal Requests for Information to CenterPoint Energy Houston Electric, LLC (May 7, 2024); William A. Roper, Jr.’s Amended Third Set of Rebuttal Requests for Information to CenterPoint Energy Houston Electric, LLC (May 7, 2024).

² CenterPoint Houston acknowledges that much of Mr. Roper’s frustration stems from its timeliness objection to his *Motion for Addition of Proposed Site G*, which was filed *months* after the route adequacy deadline in Docket No. 55768. CenterPoint Houston has not objected to any filings in this proceeding or in Docket No. 55768 that were filed shortly after the 3:00pm filing deadline. Nor has it objected to the timeliness of the above-cited filings made by Mr. Roper, all of eight of which he submitted slightly after the deadlines established in that docket.

³ William A. Roper, Jr.’s Motion to Reply (May 7, 2024).

landowner⁴ and (2) explicitly states that he is not seeking to intervene on behalf of the Estate of Patricia Roper.⁵ As explained in both CenterPoint Houston's initial objection and Reply, as Mr. Roper is not a CenterPoint Houston ratepayer, lacks standing to participate in this proceeding as he has not demonstrated how it will impact him now or in the future.⁶ CenterPoint Houston respectfully requests that the ALJs deny Mr. Roper's intervention request.

Respectfully submitted,

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⁴ William A. Roper Jr.'s Surreply on Motion to Intervene at 7 (May 7, 2024) ("While Movant does reside in Pennsylvania, Movant's landholdings within CenterPoint's service area exceed those of 99% of CenterPoint's ratepayers, either by total parcel size or value. Movant is not seeking any special treatment or consideration, but rather only the same right to intervene granted to the very smallest of landowners.")

⁵ *Id.* at 4 ("Movant has not sought to enforce legal rights of the Estate of Patricia Guarin Roper, but rather, from the outset has sought only to represent his own legally distinct personal interests which interests include an undivided one third interest in the parcel at 912 West Main Street, Tomball . . .").

⁶ *Application of Southwestern Bell Telephone Company to Approve Deletion of the Carrier Common Line and Interexchange Carrier Access Charge Credits*, Docket No. 10463, Examiner's Order No. 9; Rulings on Motions to Intervene at 2 (Dec. 3, 1991) ("[I]f a movant seeking to become a party cannot show that it will be affected by the outcome of the proceeding at the present time, it must show a sufficient degree of probability that it will be so affected in the future, either directly or indirectly.").

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CERTIFICATE OF SERVICE

I certify that on May 7, 2024, a true and correct copy of this document was served via electronic mail on all parties of record in this proceeding, in accordance with the *Second Order Suspending Rules* issued in Project No. 50664.


Andrea Moore Stover