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

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

May 21, 2024

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- **Please note that the discovery responses were prepared under the direction of the sponsors.**

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**REP Coalition
REQUEST NO.: REP-RFI01-01**

QUESTION:

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.

ANSWER:

CenterPoint does not currently have any competitive affiliates. During a portion of the test year, CenterPoint had a competitive affiliate: Energy Systems Group, LLC ("ESG"). ESG was sold by CenterPoint Energy around June of 2023 and is no longer an affiliate of CenterPoint. Prior to ESG's divestiture by CenterPoint Energy, ESG was a leading energy services provider that specialized in energy efficiency, sustainability, and infrastructure modernization solutions in the government, education, healthcare, commercial, and industrial sectors. It's customers in Texas included NASA's Johnson Space Center. In 2015, ESG was competitively selected by NASA to develop the first combined heat and power project in NASA history, which was completed in 2018.

SPONSOR:

Darren Storey

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**REP Coalition
REQUEST NO.: REP-RFI01-02**

QUESTION:

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.

ANSWER:

Since 2019, CenterPoint Energy Houston Electric, LLC (CEHE) disclosed proprietary customer information, as defined in 16 TAC § 25.272(c)(5), one time to a competitive affiliate. In 2021, the City of Houston engaged Energy Systems Group (ESG), which was then a competitive affiliate of CEHE, to help with designing a City of Houston resiliency project. The City of Houston authorized CEHE to share the City of Houston's proprietary customer information with ESG. The City of Houston's letter of authorization consenting to the sharing of proprietary customer information for purposes of the project is attached.

SPONSOR:
Darren Storey

RESPONSIVE DOCUMENTS:
REP-RFI01-02 Attachment 1



Mar. 18, 2021

To Whom it May Concern

Re: Letter of Authorization

Please be advised that Tina Paetz (Customer) hereby authorizes and appoints CenterPoint Energy, Inc. and its subsidiaries and affiliates (Agent), other than CenterPoint Energy Houston Electric, LLC., as its limited agent with authority to act on its behalf in regards to the following functions effective Mar. 18, 2021.

1. Agent is hereby authorized to obtain utility records of electricity, natural gas, and water service accounts for City of Houston facilities located at in Houston, TX. (Listing of additional facilities attached.) The authority includes and not limited to: the right to transmit and receive any information regarding the utility accounts for the said facility such as historical data, past, present and future tariff structure, demand interval data, information in the possession of the Retail Electric provider, Transmission and Distribution System provider, Independent System Operator, and the Federal Energy Regulatory Commission.
2. Agent may have access to the most timely information possible with respect to customer's daily and monthly usage and/or delivered volumes via electronic format or otherwise.

The authorization vested to Agent to request and obtain the above-mentioned information is valid until June 30, 2021.

This authorization shall become effective from the date above and shall remain in full force and effective until terminated by Customer or Agent upon ten (10) days prior written notice.

Sincerely,

Tina Paetz
(Print Name)

Director, ARE
(Title)

City of Houston
(Company)

ALB
(Signature)

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**REP Coalition
REQUEST NO.: REP-RFI01-03**

QUESTION:

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.

ANSWER:

No.

SPONSOR:
Darren Storey

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**REP Coalition
REQUEST NO.: REP-RFI01-04**

QUESTION:

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.

ANSWER:

Other than ESI-ID information (for historical usage data) that may have been shared with ESG in 2021 pertaining to the City of Houston's resiliency project (see response to REP-RFI01-02), the answer is no.

SPONSOR:
Darren Storey

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**REP Coalition
REQUEST NO.: REP-RFI01-05**

QUESTION:

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.

ANSWER:

No

SPONSOR:
Darren Storey

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**REP Coalition
REQUEST NO.: REP-RFI01-06**

QUESTION:

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.

ANSWER:

No

SPONSOR:

Darren Storey

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**REP Coalition
REQUEST NO.: REP-RFI01-07**

QUESTION:

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.

ANSWER:

No. CenterPoint did not conduct any transactions with a competitive affiliate during the Test Year.

SPONSOR:

Darren Storey

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**TEXAS ENERGY ASSOCIATION FOR MARKETERS' AND ALLIANCE FOR RETAIL MARKETS
(REP COALITION)
REQUEST NO.: REP-RFI01-14**

QUESTION:

FERC Account 363

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.

ANSWER:

The amounts requested for recovery in this proceeding do not include any amounts for investments booked to FERC Account 363.

SPONSOR:

Kristie Colvin

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**TEXAS ENERGY ASSOCIATION FOR MARKETERS' AND ALLIANCE FOR RETAIL MARKETS
(REP COALITION)
REQUEST NO.: REP-RFI01-15**

QUESTION:

Rate Stability

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).

ANSWER:

Please see attachment REP-RFI01-15 Attachment 1 and the following link, <https://www.puc.texas.gov/industry/electric/rates/tdarchive.aspx>, for the Company's historical rates used to calculate the annual average rate.

SPONSOR:

John R. Durland

RESPONSIVE DOCUMENTS:

REP-RFI01-15 Attachment 1

Year CEHE per 1000kWh

2014	\$	49.50
2015	\$	42.88
2016	\$	45.55
2017	\$	43.47
2018	\$	47.29
2019	\$	44.17
2020	\$	42.45
2021	\$	44.18
2022	\$	48.38
2023	\$	49.55

Year		2014		Mar-23		Sep-23		2023
BASE Customer	\$	1.62	\$	2.30	\$	2.30		2.30
BASE METER	\$	3.85	\$	2.09	\$	2.09		2.09
AMS	\$	3.05	\$	-	\$	-		-
Base DIST	\$	0.016489	\$	0.020314	\$	0.020314		0.0203140
BASE TRAN	\$	0.008439	\$	-	\$	-		-
NDC	\$	0.000010	\$	0.000003	\$	0.000003		0.0000030
TC5	\$	0.003211	\$	0.001991	\$	0.001991		0.0019914
TEEEF	\$	-	\$	-	\$	0.003241		0.0016203
TCRF	\$	0.006720	\$	0.010878	\$	0.025514		0.0181960
EECRF	\$	0.000862	\$	0.000958	\$	0.000958		0.0009578
DCRF	\$	-	\$	0.001476	\$	0.002673		0.0020748
TC2	\$	0.003030	\$	-	\$	-		-
TC3	\$	0.000406	\$	-	\$	-		-
SRC	\$	0.002234	\$	-	\$	-		-
ADFIT	\$	(0.000420)	\$	-	\$	-		-
Customer Bill	\$	49.50	\$	40.01	\$	59.08	\$	49.55

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
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**TEXAS ENERGY ASSOCIATION FOR MARKETERS' AND ALLIANCE FOR RETAIL MARKETS
(REP COALITION)
REQUEST NO.: REP-RFI01-16**

QUESTION:

Discretionary Charges

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.

ANSWER:

Confirm.

SPONSOR:

John R. Durland

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**TEXAS ENERGY ASSOCIATION FOR MARKETERS' AND ALLIANCE FOR RETAIL MARKETS
(REP COALITION)
REQUEST NO.: REP-RFI01-17**

QUESTION:

Rates

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?

ANSWER:

- a. The Company currently has 5,944 deployed and active IDR meters. 114 of those meters are assigned to generators. Of those, 110 are IDR Capable AMS meters and 4 are not AMS capable.

SVS has 49 IDR meters and 47 are IDR Capable AMS meters.

SVL has 4,725 IDR meters and 4,697 are IDR Capable AMS meters.

PVS has 712 IDR meters and 699 are IDR Capable AMS meters.

TVS has 344 IDR meters and 12 are IDR Capable AMS meters.

- b. The IDR Meter charges are applicable to Retail Customers who have established an NCP demand greater than 700 kVA in any previous billing month, and to Retail Customers who were billed on a 4CP kVA basis prior to the effective date of the Rate Schedule established in Docket No. 49421.

SPONSOR:

John R. Durland

RESPONSIVE DOCUMENTS:

None

CERTIFICATE OF SERVICE

I certify that on May 21, 2024, this document was filed with the Public Utility Commission of Texas in Docket No. 56211, and a true and correct copy of it was served by electronic mail on all parties of record in this proceeding in accordance with the Second Order Suspending Rules issued in Project No. 50664.

A handwritten signature in cursive script, reading "Alice A. Hart", is positioned above a horizontal line.

The following files are not convertible:

REP- RFI01-15 Attachment 1.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.