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**SOAH DOCKET NO. 473-21-13232
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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**OFFICE OF PUBLIC UTILITY COUNSEL’S
FIFTH REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Fifth Request for Information to CenterPoint Energy Houston Electric, LLC (“CEHE”). OPUC requests that CEHE provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that CEHE provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. “CEHE,” the “Company,” “Applicant,” “You,” and “Your” refer to CenterPoint Energy Houston Electric, LLC and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
2. “Document” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, summaries of interviews, reports of consultants, appraisals,

forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information 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 to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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- 5-1.** Please confirm that CEHE was included in the Vectren Corporation consolidated federal tax return during the years 2014 – 2019 and in the CenterPoint Energy Consolidated federal tax return for years 2019 through the present. If this is incorrect, please state specifically which consolidated tax returns the Company was included in for each of the tax years 2014 – 2023.
- 5-2.** Please confirm that CenterPoint Energy Inc. would be the entity subject to the Corporate Alternative Minimum Tax (“CAMT”) and not CenterPoint Energy Houston Electric, LLC. If this is not correct, please explain in detail what entity will be subject to the CAMT and how the CAMT would be calculated.
- 5-3.** Please refer to the direct testimony of Mr. Durland, page 31, Lines 11 through 15. Please identify other dockets in Texas or elsewhere where a similar rider to the Rider Inflation Reduction Act (“IRA”) has been approved by a state commission or other regulatory body. Identify the state commission or other regulatory body and the docket and order number.
- 5-4.** Please refer to the direct testimony of Mr. Durland, page 32, Lines 4 and 5, stating that updates to the Rider IRA revenue requirement will be filed annually. Please explain CEHE’s proposed submission, review, comment, and approval process and timelines for updating the Rider IRA revenue requirement.
- 5-5.** Please refer to the direct testimony of Ms. Jennifer K. Story, page 18, Lines 21 and 22, and page 19, Line 1, stating that “additional guidance is expected to clarify provisions of the IRA.” Per Footnote 16, “Comments have been requested on various tax credits and the CAMT. Additional IRS Notices will likely be issued before Proposed Regulations come out.” Given that the provisions of the IRA are yet to be finalized, please explain why it is appropriate to implement the Rider IRA and commence tracking at this time.
- 5-6.** Please refer to the direct testimony of Ms. Story, page 19, Lines 15 through 21, and page 20, Lines 1 through 2, please explain why recovery through a new Rider IRA is preferable to recovery through the existing Distribution Cost Recovery Factor and Transmission Cost of Service interim rate mechanisms.
- 5-7.** Please refer to the rate filing package file ‘II-I Class Allocation.xls’, sheet ‘WP-Mwh’, row 13, please explain why the losses for the lighting SLS and MLS are the same as the losses for the Secondary voltage > 10 kVa.

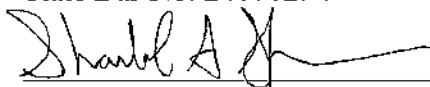
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- 5-8.** Please refer to the rate filing package file 'II-I Class Allocation.xls', sheet 'WP-Accts. 907-10', row 39, please describe the justification behind the allocation of Business Development to the Residential class.

Date: May 28, 2024

Respectfully submitted,

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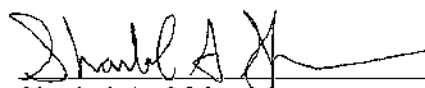
**ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL**

CERTIFICATE OF SERVICE

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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 28th day of May 2024 by facsimile, electronic mail, and/or first class, U.S. mail.



Sharbel A. Sfeir