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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
SIXTH 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 Sixth 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.

SOAH Docket No. 473-24-13232
PUC Docket No. 56211
OPUC's Sixth Request for Information to
CenterPoint Energy Houston Electric, LLC

6-1. Referring to CEHE's Errata 2 Filing:

- a. Please provide the workpaper used to develop the Summary of Revenues table shown on [8] that includes each individual rate and the associated billing determinants and the resulting revenues. Please provide the workpapers in Excel format with all formulas and links intact. Please do not provide Excel workbooks that have numbers input in cells rather than formulas and links;
- b. Please refer to [8] where the statement is made that "[t]he Company proposes updates, deletions, and additions to several of the riders currently associated with the base rate schedules. It proposes to update: Rider RCE – Rate Case Expenses." Please identify any other riders that the Company proposes to update, delete, or add and the reasons for making such updates, deletions, or additions;
- c. Please provide the workpaper(s) used to develop Exhibit JRD-03 -ERRATA 2 shown on [76] that includes each individual rate and the associated billing determinants and the resulting revenues. Also, please identify what is included in Other Revenues. Please provide the workpaper(s) in Excel format with all formulas and links intact. Please do not provide Excel workbooks that have numbers input in cells rather than formulas and links;
- d. Please provide the workpaper(s) used to develop Exhibit JRD-04 - ERRATA-2 and JRD-04.1 -ERRATA 2 shown on [77] and [78] that includes each individual rate, the associated billing determinants applied to that rate, and the resulting revenues. Also, please identify what is included in Other Revenues. Please provide the workpaper(s) in Excel format with all formulas intact. Please provide the workpaper(s) in Excel format with all formulas and links intact. Please do not provide Excel workbooks that have numbers input in cells rather than formulas and links; and
- e. Please refer to Exhibit JRD-04 - ERRATA-2 and JRD-04.1 – ERRATA 2 shown on [77] and [78]. Please provide an analysis that determines the total Current Adjusted Revenue and Target Proposed Revenue by rate class that includes both base rate revenues by rate class and rider revenues by rate class based on the base rates and rider charges in the Errata 2 filing. Include each individual base rate and rider charge, the associated billing determinants applied to the rate or rider charge, and the resulting revenues. Also, show the total resulting Current Adjusted and Target Proposed Revenues by Rate Class including revenues from all base rate and rider charges. Also, please identify what is included in Other Revenues. Please provide the analysis in Excel format with all formulas and links intact. Please do not provide Excel workbooks that have numbers input in cells rather than formulas and links.

6-2. Referring to CEHE's Exhibit JRD-04 – ERRATA 2 shown on [77] in which the percentage changes by rate class including the Distribution Cost Recovery Factor ("DCRF") range

SOAH Docket No. 473-24-13232
PUC Docket No. 56211
OPUC's Sixth Request for Information to
CenterPoint Energy Houston Electric, LLC

from a 27.97% increase for the Primary class to a 47.69% decrease for the Miscellaneous Lighting class:

- a. Please explain why CEHE did not propose to mitigate the rate increases for the Residential class given the decreases proposed for the Secondary ≤ 10 kVa, Secondary > 10 kVa, and Transmission classes that range from a 9.48% decrease to an 11.40% decrease; and
 - b. Please explain why CEHE did not propose to mitigate the rate increases for the Primary class given the decreases proposed for the Secondary ≤ 10 kVa, Secondary > 10 kVa, and Transmission classes that range from a 9.48% decrease to an 11.40% decrease.
- 6-3.** Please refer to the three Figure 1s in CEHE's Errata 2 Filing on [67] and [68]. Please explain the differences between these figures.
- 6-4.** Please refer to Mr. John R. Durland's direct testimony on [13]. In the first Q&A, Mr. Durland states that special studies were performed to acquire specific data for the allocation factors and gives the example of how monthly energy usage and billing determinants were adjusted to reflect normal weather. In the second Q&A on [13], Mr. Durland states that there were no adjustments made to the demand and energy data for allocation purposes. The information in these two Q&As seem to conflict. Please answer the following:
 - a. Were weather adjustments made to the demand and energy data used for allocation purposes;
 - b. If the answer to subpart a. is no, please explain why it is appropriate to use weather-adjusted demand and energy billing data for billing determinant purposes but unadjusted data for cost allocation purposes;
 - c. If the answer to subpart a. is no, please explain why it is fair to allocate demand and energy costs to the residential class using unadjusted data and perform the demand and energy rate design using weather adjusted data that are lower than the adjusted data? Does this not result in higher residential cost-of-service based energy rates as compared to using either unadjusted or adjusted data for both cost allocation and rate design;
 - d. Were the customer count data used for allocation purposes adjusted to reflect the numbers of customers as of December 31, 2023, per Mr. Durland's testimony on [7]; and
 - e. If the answer to subpart d. is no, please explain why it is appropriate to use adjusted customer count data for billing determinant purposes but unadjusted data for cost allocation purposes?

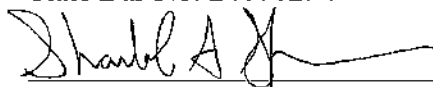
SOAH Docket No. 473-24-13232
PUC Docket No. 56211
OPUC's Sixth Request for Information to
CenterPoint Energy Houston Electric, LLC

- 6-5.** Please refer to Mr. Dane A. Watson's direct testimony on Net Salvage, [17] through [22]. Please provide all relevant workpapers, in Excel format with formulas intact where applicable, that support Mr. Watson's testimony on the projected cost to remove assets at the end of their lives to establish the net salvage rates.
- 6-6.** Please provide all relevant workpapers, in Excel format with formulas intact where applicable, that utilize the Handy Whitman Index, or any other inflationary index, as discussed on [83] of [105] of Exhibit DAW-1, to calculate a projected cost of removal to establish the net salvage rates.
- 6-7.** Have inflation adjusted net salvage rates, as discussed on [83] of [105] of Exhibit DAW-1, been approved by the Commission in previous cases? If so, please provide the relevant docket numbers and orders.
- 6-8.** Please provide a complete copy, including all supporting workpapers and exhibits, of the 2018 Removal Cost Study, as discussed on [18] of [22] of Mr. Watson's direct testimony.

Date: May 29, 2024

Respectfully submitted,

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

CERTIFICATE OF SERVICE

PUC DOCKET NO. 473-24-13232

PUC DOCKET NO. 56211

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 29th day of May 2024 by facsimile, electronic mail, and/or first class, U.S. mail.



Sharbel A. Sfeir