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Filing Date - 2024-06-04 12:54:54 PM

Control Number - 56211

Item Number - 274

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

TEXAS CONSUMER ASSOCIATION’S FIRST REQUESTS FOR INFORMATION
TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Pursuant to 16 Texas Administrative Code § 22.144, Texas Consumer Association (TCA) submits this First Request for Information to CenterPoint Energy Houston Electric, LLC (CenterPoint). TCA requests that CenterPoint provide answers to the request for information as required by 16 TAC § 22.144(c)(2)(F) under oath and within the timeframe specified in the procedural schedule in this proceeding. These requests shall be deemed continuing as to require further and supplemental responses if CenterPoint receives additional information regarding these requests.

DEFINITIONS & INSTRUCTIONS

- A. The term “CenterPoint” or “Company” refers to CenterPoint Energy Houston Electric, LLC, and 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.
- B. The term "document" shall have the broadest meaning possible and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, calendars, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or video, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, engraved, taped, filmed,

recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper document is a separate document within the meaning of this term.

- C. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
- D. The terms "and" and "or" shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.
- E. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."
- F. "Any" shall be construed to include "all", and "all" shall be construed to include "any."
- G. The term "concerning," or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.
- H. The term "including," or one of its inflections, means and refers to "including but not limited to."
- I. The term "studies" includes any document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information with the subjects referred to in this proceeding.
- J. "Communications" refers to correspondence of any kind, including emails.
- K. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- L. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- M. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- N. Pursuant to 16 Tex. Admin. Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- O. If the information requested is included in previously furnished exhibits, workpapers, 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.

Respectfully submitted,

/s/ Sandra Haverlah

Sandra Haverlah

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**PRESIDENT - TEXAS CONSUMER
ASSOCIATION**

/s/ Blanca Laborde
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**ATTORNEY FOR TEXAS CONSUMER
ASSOCIATION**

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June 2024, a true and correct copy of this document was served to all parties of record by email.

/s/ Blanca Laborde
Blanca Laborde

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- 1-1. Refer to the Direct Testimony of Myles F. Reynolds on page 11 of 44, lines 6 to 10, where Mr. Reynolds states "I studied the basic case management documents associated with internal expense reimbursement, attorney assignments, the engagement documentation of the law firms, and the engagement documentation of outside consultants. I then researched the billing rates for the attorneys and consultants to satisfy myself that the billing rates were reasonable." Please provide the research collected as a comparison for the billing rates.
- 1-2. Refer to the Direct Testimony of Myles F. Reynolds on page 29 of 44, lines 1 to 3, where Mr. Reynolds states "I have studied the billing rates lawyers charge as reported in Commission rate cases and as reported in local and national billing rate surveys." Please provide the documentation for the billing rates reported in Commission rate cases and the surveys referenced.
- 1-3. Refer to the Direct Testimony of Myles F. Reynolds on page 29 of 44, lines 10 to 12, where Mr. Reynolds states "The rates reflect the market rates for national law firms that practice in Texas, including the representation of utilities in rate cases." Please provide documentation or research collected that the rates reflect market rates for representation of utilities in rate cases..
- 1-4. Refer to the Direct Testimony of Myles F. Reynolds on page 30 of 44, footnote 1: "In 2021, the RRC approved settlements that found hourly attorney rates of \$877.50 to be reasonable in two separate gas utility rate proceedings. Gas utility rate proceedings at the RRC and electric utility rate proceedings at the Commission are very similar in nature and share very similar ratemaking principles." Provide the case information for the two separate gas utility rate proceedings referred to in this footnote. Also provide the documents that indicate attorneys billed for \$877.50 per hour and the decision by the RRC that the rate was found to be reasonable. Provide the documents for the equivalent work being performed in this case.