



## **Filing Receipt**

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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**

**June 13, 2024**

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 <ul style="list-style-type: none"><li>• <b>Please note that the discovery responses were prepared under the direction of the sponsors.</b></li></ul>	

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**  
**PUC DOCKET NO. 56211**  
**SOAH DOCKET NO. 473-24-13232**  
**HOUSTON COALITION OF CITIES**  
**REQUEST NO.: HCC-RFI15-01**

**QUESTION:**

Please refer to page 21 of Mr. Durland's testimony and answer the following questions:

- a. Are the Non-Coincident Peak ("NCP") demands, used in determining CEHE's proposed allocator for allocating demand-related distribution costs among rate classes, the rate classes' highest peak demand?
- b. If the answer to Question (a) is no, please explain what the NCP demands represent and the rationale for using such NCP demands in allocating demand-related distribution costs among rate classes?
- c. Please confirm if the distribution demand allocators (D3, D4, and D5) used in CEHE's proposed cost allocation study (as included in Excel file "Schedule I and J 2023 Errata2") are developed based on the class demand coincident with CEHE's system peak demand.

**ANSWER:**

- a. Yes
- b. Please see a.
- c. No. The distribution demand allocators (D3, D4 and D5) in the Excel file "Schedule I and J 2023 Errata 2" are based on the class demand coincident with the Non-Coincident Peak (NCP) demands of the rate classes.

**SPONSOR:**

John R. Durland

**RESPONSIVE DOCUMENTS:**

None

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

**HOUSTON COALITION OF CITIES  
REQUEST NO.: HCC-RFI15-02**

**QUESTION:**

Please refer to WP JRD (Accts 586 & 597) as included in the Spreadsheet WP Accts-586\_597 of Excel file "Schedule I and J 2023 Errata 2" and explain in detail how the meter-related and the transformer-related operation and maintenance expenses, for both AMS and IDR meters as recorded in Accounts 586 and 597, are determined.

**ANSWER:**

The meter-related operation and maintenance expenses for both AMS and IDR are allocated based on meter count. The transformer-related operation and maintenance expenses for both AMS and IDR are allocated based on the average installation cost per rate class.

**SPONSOR:**

John R. Durland

**RESPONSIVE DOCUMENTS:**

None

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

**HOUSTON COALITION OF CITIES  
REQUEST NO.: HCC-RFI15-03**

**QUESTION:**

Please explain in detail how the bad debt expenses recorded in FERC Account 904 were allocated among rate classes.

**ANSWER:**

The bad debt expenses were allocated to the rate classes based on actual invoices. Those invoices were summarized to show the overall impact per rate class. Please see WP – Bad Debt by Rate Class (CONFIDENTIAL).

**SPONSOR:**

John R. Durland

**RESPONSIVE DOCUMENTS:**

None

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

**HOUSTON COALITION OF CITIES  
REQUEST NO.: HCC-RFI15-04**

**QUESTION:**

Please identify the date and time when the highest peak demand usage occurs for each of the following rate classes for the test year:

- a. Residential
- b. Secondary <= 10 kVa
- c. Secondary > 10 kVa
- d. Primary
- e. Transmission

**ANSWER:**

<b>Rate Class:</b>	<b>Class Peak Date:</b>	<b>Time of Peak (15 min interval):</b>
Residential	8/27/2023	17:45
SVS	8/15/2023	20:45
SVL (Non-IDR)	8/24/2023	15:00
SVL (IDR)	8/15/2023	14:00
PVS (Non-IDR)	6/28/2023	15:45
PVS (IDR)	9/21/2023	13:45
TVS	9/30/2023	4:30

**SPONSOR:**

John R. Durland

**RESPONSIVE DOCUMENTS:**

None

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

**HOUSTON COALITION OF CITIES  
REQUEST NO.: HCC-RFI15-05**

**QUESTION:**

Are the highest peak demand usages in your response to HCC RFI 15-4 the same as each rate class's maximum peak demand (the sum of each customer's maximum demand usage within the rate class)?

**ANSWER:**

No. Class Peak Demand (non-coincident) is the highest 15-minute aggregated demand regardless of when it happens for all customers in a rate class, which was provided in HCC-RFI15-04. Each individual customer's highest peak demand added together is the sum of maximum demand for a given period.

**SPONSOR:**

John R. Durland

**RESPONSIVE DOCUMENTS:**

None

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

**HOUSTON COALITION OF CITIES  
REQUEST NO.: HCC-RFI15-06**

**QUESTION:**

Please identify the date and time when the highest peak demand usage occurs for the entire CEHE system for June, July, August, and September for the test year.

**ANSWER:**

June	6/21/2023	Hr. 17:00
July	7/31/2023	Hr. 17:00
August	8/15/2023	Hr. 17:00
September	9/7/2023	Hr. 17:00

**SPONSOR:**

John R. Durland

**RESPONSIVE DOCUMENTS:**

None



**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
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**HOUSTON COALITION OF CITIES  
REQUEST NO.: HCC-RFI15-07**

**QUESTION:**

Please explain in detail the characteristic of the costs recorded in the following FERC accounts

30302	Misc Intangible Plant - NMF S/W
30302-5	Intangible EFM Equipment (5 Yrs)
30302-7	Intangible EFM Equipment (7 Yrs)
30302-10	Intangible EFM Equipment (10 Yrs)
30302-15	Intangible EFM Equipment (15 Yrs)

**ANSWER:**

The FERC accounts with useful lives of 5 through 15 years were created to mirror the useful lives of the Company's software assets. The FERC accounts along with their associated depreciation rates were approved in the last rate case and can be found on the Public Utility Commission of Texas Interchange under Docket Number 49421, Item Number 792, Findings of Fact 113 and 114; and Item Number 785 Bates page 396, Exhibit F of the settlement agreement. New software assets are being placed in the new FERC accounts based on the proposed useful life and FERC account 30302 will be phased out as assets in the account are fully amortized and retired.

**SPONSOR:**

Kristie Colvin

**RESPONSIVE DOCUMENTS:**

None

### **CERTIFICATE OF SERVICE**

I certify that on June 13, 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.

Jaunce Glenn Russell