

Chapter 6: Company Specific Items

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Applicable: Entire Service Area

CNP 8037

LED Street Lamp Lumen Levels. By choosing an LED street lighting option, Retail Customer (1) acknowledges that there will be variances in lumen levels and energy consumption between individual LED Lamps and between an LED Lamp and the applicable lumen and watt levels for the Lamp set forth in the table above, and (2) agrees to not hold Company liable for any variations in LED Lamp performance.

The Initial Lumen and Watt levels shown in the table above for LED street lights reflect a target average lumen output and a target average wattage range and may not be representative of any particular LED Lamp.

The Monthly KWH level shown in the table above for LED street Lamps reflects a target average KWH level and may not be representative of any particular LED luminaire.

MISCELLANEOUS LIGHTING SERVICE**AVAILABILITY**

Miscellaneous Lighting Service is available in areas designated by Company with suitable locations, where permission for installation has been granted by all affected parties, and where facilities of adequate capacity and suitable voltage are adjacent to the lighting fixture(s) to be served. All new fixtures installed by Company for the provision of Miscellaneous Lighting Service must be purchased from a third-party vendor and owned by the Retail Customer or the Retail Customer's REP ("Customer Owned Installation" or "Customer Owned Fixture"). All Customer Owned Fixtures must be approved by Company prior to installation and must conform to one of the lamp types described in the table below, except that metal halide and mercury vapor fixtures will no longer be approved by Company for installation as Customer Owned Fixtures. Existing Company owned fixtures will continue to be owned by the Company ("Company Owned Installation" or "Company Owned Fixture"). Miscellaneous Lighting Service consists of the delivery of electric power and energy to, and the installation and maintenance of lighting fixtures, as described herein. Retail Customer's electric power and energy must be provided by the Retail Customer's REP in accordance with Applicable Legal Authorities and the Company's Tariff.

TYPE OF SERVICE

Miscellaneous Lighting Service is provided as an Unmetered Service at Company's standard secondary distribution voltages to Customer Owned and Company Owned Fixtures which operate automatically every night from dusk to dawn. The Company will install, make electrical connection(s), and maintain the lighting fixture(s), whether Customer Owned or Company Owned.

Charges for services shall commence on the date that the electrical connection is made.

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MONTHLY RATE**I. Transmission and Distribution Charges**

In addition to the installation charges described below for Customer Owned Fixtures, the following monthly charges apply to Miscellaneous Lighting Service.

A. Only the T&D Charge below is applicable to Customer Owned Installations.

B. The T&D Charge and the Fixture Charge below are applicable to Company Owned Installations. In addition to the T&D Charge and the Fixture Charge for each lamp type in the table below, an additional charge of \$2.84 per month is charged for a span of secondary which was installed exclusively for Miscellaneous Lighting Service and Retail Customer did not reimburse Company for construction cost (applies only to installations existing as of 1-1-2002).

<u>TYPE OF LAMP</u>	<u>T&D CHARGE</u>	<u>LUMEN RATING</u>	<u>TOTAL WATTAGE</u>	<u>FIXTURE CHARGE¹</u>	<u>MONTHLY KWH</u>
<u>Floodlighting/Directional Lighting</u>					
<u>High Pressure Sodium</u>					
High Pressure Sodium (150 watts)	\$2.85	15,000	185	\$5.69	61
High Pressure Sodium (250 watts)	\$3.13	28,000	315	\$6.20	105
High Pressure Sodium (400 watts)	\$3.40	50,000	475	\$6.69	158
High Pressure Sodium (1,000 watts)	\$3.72	140,000	1,100	N.A.	367
<u>Light Emitting Diode (LED)</u>					
Light Emitting Diode (40 watts)	\$0.65	4,800	40	\$1.30	14
<u>LED Alternative For 150W High Pressure Sodium</u>					
Light Emitting Diode (70 watts)	\$2.84	7,900	70	\$2.59	24
<u>LED Alternative For 250W High Pressure Sodium</u>					
Light Emitting Diode (100 watts)	\$2.90	11,300	100	\$2.64	33
<u>LED Alternative For 400W High Pressure Sodium</u>					
Light Emitting Diode (175 watts)	\$2.89	15,100	175	N.A.	58
<u>LED Alternative For 1,000W High Pressure Sodium</u>					
<u>Metal Halide</u>					
Metal Halide (175w) (no new installations)	\$5.05	12,900	210	N/A	70
Metal Halide (250w) (no new installations)	\$9.51	19,475	294	N/A	98
Metal Halide (400 w) (no new installations)	\$3.83	32,200	476	N/A	159

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<u>TYPE OF LAMP</u>	<u>T&D CHARGE</u>	<u>LUMEN RATING</u>	<u>TOTAL WATTAGE</u>	<u>FIXTURE CHARGE¹</u>	<u>MONTHLY KWH</u>
Metal Halide (1,000w) (no new installations)	\$7.22	104,500	1,100	N/A	367
<u>Roadway/General Lighting</u>					
High Pressure Sodium (150 watts)	\$2.33	15,000	185	\$4.49	61
Light Emitting Diode (95 watts)	\$2.33	7,900	95	\$4.49	32
LED Alternative For 150W High Pressure Sodium					
<u>Guard Lighting</u>					
High Pressure Sodium (100 watts)	\$1.78	9,500	120	\$3.49	40
Mercury Vapor (no new installations)	\$1.24	7,800	215	\$2.51	72
Light Emitting Diode (40 watts)	\$1.78	4,800	40	\$3.49	14
LED Alternative For 100W High Pressure Sodium					

¹ Applies only to Company Owned Fixtures that are Company-owned and installed prior to September 1, 2000.

II. Transition Charge: See Schedule TC5

III. Nuclear Decommissioning Charge: See Rider NDC

IV. Transmission Cost Recovery Factor: See Rider TCRF

V. Other Charges or Credits:

A. Municipal Account Franchise Credit
(see application and explanation below) (\$0.002372) per kWh

B. Rate Case Expenses Surcharge See Rider RCE

C. Energy Efficiency Cost Recovery Factor See Rider EECRF

D. Distribution Cost Recovery Factor See Rider DCRF

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E. Temporary Emergency Electric Energy
Facilities

See Rider TEEEF

F. Inflation Reduction Act 2022

See Rider IRA

OTHER PROVISIONS

Municipal Account Franchise Credit. A credit equal to the amount of franchise fees included in the Transmission and Distribution Charges will be applied to municipal accounts receiving service within the incorporated limits of such municipality which imposes a municipal franchise fee upon the Company based on the kWh within that municipality and who have signed an appropriate Franchise Agreement.

Acceptable Lamp Types for Installation. For Miscellaneous Lighting Service, the Company no longer installs Customer Owned Fixtures that use mercury vapor or metal halide lighting. Only Customer Owned Fixtures using high pressure sodium or LED lighting are accepted by Company for installation. Existing mercury vapor and metal halide installations (whether Customer Owned Installations or Company Owned Installations) will be converted to the appropriate high pressure sodium or LED equivalent from time to time during the normal course of maintenance when individual lamps burn out. Mercury vapor Guard Lighting installations with 7,800 lumen lamps will be converted to 9,500 lumen high pressure sodium, at no up-front cost to the Retail Customer.

LED Lumen Levels. By choosing an LED miscellaneous lighting option, Retail Customer (1) acknowledges that there will be variances in lumen levels and energy consumption between individual LED lamps and between an LED Lamp and the applicable lumen and watt levels for the other lamp types set forth in the table above, and (2) agrees to not hold Company liable for any variations in LED Lamp performance.

INSTALLATION AND MAINTENANCE FOR CUSTOMER OWNED FIXTURES

Company will install and maintain the lighting fixture(s) served hereunder. For all Miscellaneous Lighting fixture installations except Guard Lighting fixtures, the Company will provide for each fixture the bulb and the photoelectric relay at the time of installation. Company will replace burned out lamps and make other maintenance repairs during Company's regular working hours at Company's expense, but with no adjustment of payments hereunder due to outage. Maintenance includes replacement of burned-out lamps (bulbs) and malfunctioning photoelectric relays.

Damages due to vandalism, storms, accidents or manufacturing defects are not included under maintenance. Generally, Company will make maintenance repairs under this tariff within 72 hours after notification by the Retail Customer or REP.

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The Retail Customer will be charged a one-time fee per lighting fixture to cover the Company's standard installation as detailed below. Standard installation consists of installing the lighting fixture on an existing wooden distribution pole and connecting service supplied from an existing or new overhead secondary conductor on the pole as detailed below. Standard installations are made during normal Company business hours. The charges below include both the labor to install and eventually remove fixtures. Any additional construction and/or cost required to provide service will be at the Retail Customer's expense, for an additional charge. Any additional facilities so required will be owned, installed and maintained by the Company.

Retail Customer or REP must purchase/provide all lighting fixtures. Only un-metered lighting fixtures meeting Company Service Standards and specifications will be allowed under this tariff. The Retail Customer or REP will own the lighting fixture.

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CUSTOMER OWNED FIXTURES STANDARD INSTALLATION FEES	One Light per Pole	Two Lights per Pole	Three Lights per Pole
Flood Light			
High Pressure Sodium			
Installations without secondary			
150w, 250w, 400w	\$325	\$350	\$405
1000w	\$370	\$450	\$550
Installations with 150 feet of secondary			
150w, 250w, 400w	\$425	\$450	\$505
1000w	\$470	\$550	\$655
Light Emitting Diode			
Installations without secondary			
40w, 100w, 180w	\$325	\$350	\$405
	\$370	\$450	\$550
Installations with 150 feet of secondary			
40w, 100w, 180w	\$425	\$450	\$505
	\$470	\$550	\$655
Guard Light			
Installations without secondary			
100w HPS	\$325	N/A	N/A
Installations with secondary			
100w HPS	\$365	N/A	N/A
Installations without secondary			
100w LED	\$325	N/A	N/A
Installations with secondary			
100w LED	\$365	N/A	N/A
Roadway Light			
Installations without secondary			
150w HPS	\$335	N/A	N/A
Installations with secondary			
150w HPS	\$375	N/A	N/A
Installations without secondary			
95w LED	\$335	N/A	N/A
Installations with secondary			
150w HPS 95w LED	\$375	N/A	N/A

INSTALLATION AND MAINTENANCE FOR COMPANY OWNED FIXTURES

Company Owned Fixtures were installed by the Company before September 1, 2000. Company will replace burned out lamps and make other maintenance repairs during Company's regular working hours at Company's expense, but with no adjustment of payments hereunder due to outage. Maintenance includes replacement of burned-out lamps (bulbs) and malfunctioning photoelectric relays, and damages due to vandalism, storms, accidents or manufacturing defects.

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Generally, Company will make maintenance repairs under this tariff within 72 hours after notification by the Retail Customer or REP.

EXTRAORDINARY MAINTENANCE ACTIVITIES

For Customer Owned Fixtures, Company will charge Retail Customer an additional fee as detailed below for each occurrence of the extraordinary maintenance activities listed hereunder.

CUSTOMER OWNED FIXTURES EXTRAORDINARY MAINTENANCE FEE	
ACTIVITY	FEE
(1) Replace a vandalized shield (parts and labor)	\$125.00
(2) Make adjustments to the fixture (labor only)	\$125.00
(3) Replace a fixture (labor only)	\$125.00
(4) Relocate a fixture (labor only)	As Calculated

NOTICE

This Rate Schedule is subject to the Company's Tariff and Applicable Legal Authorities

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6.1.1.6 OTHER CHARGES**6.1.1.6.3 RIDER TCRF - TRANSMISSION COST RECOVERY FACTOR****APPLICABILITY**

Each Retail Customer connected to the Company's transmission or distribution system will be assessed a nonbypassable transmission service charge adjustment pursuant to this rider. The charges derived herein, pursuant to Substantive Rule §25.193, are necessitated by a change in a transmission service provider's wholesale transmission rate subsequent to Commission approval of the Company's base rate charge for transmission service.

MONTHLY RATE

The REP, on behalf of the Retail Customer, will be assessed this transmission service charge adjustment based on the monthly per unit cost (TCRF) multiplied times the Retail Customer's appropriate monthly billing determinant (kWh, 4 CP kVA or NCP kVA).

The TCRF shall be calculated for each rate according to the following formula:

TCRF =

$$\frac{\left\{ \sum_{i=1}^N (NWTR_i * NL_i) - \sum_{i=1}^N (BWTR_i * NL_i) \right\} * 1/2 * ALLOC \} + ADJ}{BD}$$

Where:

- TCRF = Transmission Cost Recovery Factor in dollars per kWh, dollars per 4 CP kVA or dollars per NCP kVA to be used for billing for each listed rate schedule. The rate schedules are listed under "BD" below.
- NWTR_i = The new wholesale transmission rate of a TSP approved by the Commission by order or pursuant to Commission rules, since the DSP's last rate case;
- BWTR_i = The base wholesale transmission rate of the TSP represented in the NWTR_i, used to develop the retail transmission charges of the Company, in the Company's last rate case.
- NL_i = The Company's individual 4CP load component of the total ERCOT 4CP load information used to develop the NWTR_i;

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ALLOC = The class allocator approved by the Commission to allocate the transmission revenue requirement among classes in the Company's last rate case, unless otherwise ordered by the Commission;

The Allocation Factor for each listed rate schedule is as follows:

Residential Service	48.923847%
Secondary Service Less Than or Equal to 10 kVA	0.6486%
Secondary Service Greater Than 10 kVA	29.0275%
Primary Service	3.0846%
Transmission Service	18.3155%
Street Lighting Service	0.00%
Miscellaneous Lighting Service	0.00%

$$ADJ = \sum_{p=1}^6 \left\{ EXP_p - (REV_p - ADJP1_p - ADJP2_p) \right\}$$

Where:

ADJ = Adjustment of the rate class TCRF;

EXP_p = Transmission expenses not included in base rates for period p;

REV_p = TCRF revenue for period p;

ADJP1 = 1/6th of ADJ calculated in the previous TCRF update for the periods 5 and 6;

ADJP2 = 1/6th of ADJ calculated in the second previous TCRF update for the periods 1 through 4.

BD = Each class' billing determinant (kWh, 4 CP kVA, or NCP kVA) for the prior March to August six month period for the March update and prior September to February six month period for the September update.

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TCRF EFFECTIVE FOR SCHEDULED METER READ DATES ON AND AFTER
TBD

	<u>TCRF</u> <u>Rate</u>	<u>Billing</u> <u>Units</u>	
Residential Service	\$0.018282	per kWh	I
Secondary Service Less Than or Equal to 10 kVA	\$0.010086	per kWh	B
Secondary Service Greater Than 10 kVA IDR or IDR Capable AMS	\$4.927225	per 4 CP kVA	B
Non-IDR	\$3.540568	per NCP kVA	
Primary Service IDR or IDR Capable AMS	\$5.049122	per 4 CP kVA	I
Non-IDR	\$3.907002	per NCP kVA	
Transmission Service	\$6.492990	per 4 CP kVA	
Lighting Services			
Street Lighting Service	\$ -	per kWh	
Miscellaneous Lighting Service	\$ -	per kWh	

NOTICE

This rate schedule is subject to the Company's Tariff and Applicable Legal Authorities.

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6.1.1.6.6 RIDER RCE - RATE CASE EXPENSES SURCHARGE**APPLICABILITY**

This rider is applicable to all Retail Customers receiving Delivery Service under one of the Company's Rate Schedules in the Tariff for Retail Delivery Service for recovery of rate case expenses.

MONTHLY RATE

A Retail Customer's RCE for the billing month shall be determined by multiplying the appropriate rate case expenses factor shown below by the Retail Customer's applicable billing determinant for the current month.

Retail Customer Rate Classes	Rate Case Expenses Factor	Rate Class Billing Determinant
Residential Service	\$0.000050	Per kWh
Secondary Service Less than or Equal to 10 kVA	\$0.000033	Per kWh
Secondary Service Greater than 10 kVA	\$0.008260	Per Billing kVA
Primary Service	\$0.006579	Per Billing kVA
Transmission Service	\$0.008721	Per 4CP kVA
Street Lighting Service	\$0.000306	Per kWh
Miscellaneous Lighting Service	\$0.000058	Per kWh

TERM

Rider RCE will remain in effect for three years from the original effective date of xx/xx/xx or until the Commission approved amount is recovered.

NOTICE

This Rate Schedule is subject to the Company's Tariff and Applicable Legal Authorities.

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Chapter 4: Rate Schedules
Section 4.1. Wholesale Transmission Service - WTS

Sheet No. 4.1
Page 1 of 2

CenterPoint Energy Houston Electric, LLC
Applicable: ERCOT Region

CHAPTER 4 – RATE SCHEDULES

SECTION 4.1. WHOLESALE TRANSMISSION SERVICE - WTS

AVAILABILITY

Wholesale transmission service is provided to any Transmission Service Customer (“Customer”) as that term is defined in the Public Utility Commission of Texas (“PUC”) Substantive Rule 25.5 at all points where transmission facilities of adequate capacity and suitable voltage are made available to implement wholesale transmission service. Service shall be in accordance with applicable PUC Substantive Rules, Chapter 25, Subchapter I, Division 1. This rate schedule shall not apply to service that is subject to the jurisdiction of the Federal Energy Regulatory Commission (“FERC”), unless so ordered by FERC pursuant to lawful authority under the Federal Power Act. Any power delivered onto or received from the Company’s transmission grid under this rate schedule must be delivered onto or received from transmission lines that operate nominally at 60,000 volts or higher, three phase, 60 hertz alternating current, that have been made available for this service.

This rate schedule applies only to wholesale transmission service within the Electric Reliability Council of Texas (“ERCOT”) Region, including service scheduled across the DC ties, and does not govern transactions outside the jurisdiction of the PUC.

PRICING

In accordance with PUC Substantive Rule 25.192, each Distribution Service Provider (“DSP”) and exporting entity, including Qualified Scheduling Entities (“QSE”), within ERCOT shall be assessed a transmission service charge for transmission service based upon either the DSP’s coincident peak load as defined in PUC Substantive Rule 25.192(d) or the ERCOT export entity reported load scheduled across the DC ties.

A. For Service to Load Within ERCOT:

The monthly transmission service charge shall be calculated by multiplying (a) the monthly transmission service rate by (b) the DSP’s previous year’s average 4CP kW demand that is coincident with the ERCOT 4CP demand.

Transmission Service Monthly Rate:	\$0.69546148924232 per kW per Month	1
------------------------------------	-------------------------------------	---

Chapter 4: Rate Schedules
Section 4.1. Wholesale Transmission Service - WTSSheet No. 4.1
Page 2 of 2CenterPoint Energy Houston Electric, LLC
Applicable: ERCOT Region**B. For Service to Export Electric Power From ERCOT**

The monthly transmission service charge shall be calculated by multiplying (a) the monthly ERCOT export entity reported load across the DC ties by (b) the hourly rate.

Hourly Rate per kW

\$0.000953~~21~~

I

PAYMENT

All charges due to the Company under this rate schedule shall be billed in accordance with PUC Substantive Rule 25.202. The DSP or export entity shall make payment to Company in a manner consistent with the procedures and deadlines set forth in PUC Substantive Rule 25.202. Any late payments by DSP or export entity, or default by DSP or export entity shall be handled in accordance with PUC Substantive Rule 25.202.

NOTICE

Wholesale transmission service furnished under this rate schedule is subject to Company's Terms and Conditions for Wholesale Transmission Service, Sheet No. 3.1, the terms of PUC Substantive Rules, Chapter 25, Subchapter I, Division 1, and applicable ERCOT Protocols, as amended from time to time.

PUC DOCKET NO. 56211

APPLICATION OF CENTERPOINT	§	PUBLIC UTILITY COMMISSION
ENERGY HOUSTON ELECTRIC, LLC	§	
FOR AUTHORITY TO CHANGE RATES	§	OF TEXAS

DIRECT TESTIMONY ERRATA-3

OF

RANDAL M. PRYOR

ON BEHALF OF

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

JUNE
~~MARCH~~ 2024

identified by the inspectors.

Figure 10 - Damage Identified by Inspectors



Q. WHAT VOLUME OF REPAIRS HAS BEEN REQUIRED FOR DAMAGED OR BROKEN FACILITIES UNDER THE POLE LIFE EXTENSION PROGRAM?

A. From January 1, 2019, to December 31, 2023, the Company inspected 469,411 ~~463,718~~

**Direct Testimony of Randal M. Pryor
CenterPoint Energy Houston Electric, LLC**

376,756

poles. From those poles inspected, the Company treated ~~329,849~~ poles and replaced 11,469 poles. The Company also remediated 21,255 guy wires. As part of the Company's infrastructure hardening initiative, pole assessment and treatment have been accelerated, so approximately 10% of the Company's poles are assessed annually, on average, on a rolling 10-year cycle. As such, pole bracings, replacements, and facility repairs should increase accordingly. Additional third-party poles (for example AT&T poles) containing Company facilities that may merit replacement by third parties are also identified.

Q. HOW IS THE POLE LIFE EXTENSION PROGRAM ADMINISTERED?

A. The CenterPoint Houston administrator of the program is responsible for the management of the systematic inspection of all CenterPoint Houston distribution wood poles, the treatment of wood poles, and the bracing or replacement of wood poles with significant wood decay. The administrator ensures that work orders are issued, and construction completed in a timely manner for wood poles requiring bracing or replacement. The administrator manages the contracts with the contractors that perform the inspections, repairs, wood pole replacements and pole bracings. The administrator also coordinates any electrical construction on AT&T owned poles.

B. URD Cable Life Extension Program

Q. WHAT IS THE URD CABLE LIFE EXTENSION PROGRAM?

A. The program takes an innovative, proactive approach and technology to identify potential failures in aged underground cable and other URD components that do not meet specifications before failures actually occur. By identifying the risk of potential failures, CenterPoint Houston can make wise and prudent investments in

Figure 16 - MUG & Distribution Modernization Capital Reliability Improvements (Millions)

Capital Reliability Improvements	Amount in Millions					
	2019	2020	2021	2022	2023	TOTAL
Overhead Reliability	23	32	72	174	272	573
Pole Replacement/Bracing	20	29	30	61	52	193
URD Replacement	31	21	30	50	36	167
Capacitor	5	6	6	7	7	29
MUG Rehabilitation	10	8	8	7	5	38
Street Lighting	22	26	27	27	29	130
IGSD Installations	7	1	5	12	13	38
Total	118	123	177	338	413	1,168

Q. WHY WERE OVERHEAD RELIABILITY, INVESTMENTS IN POLES, URD REPLACEMENT, CAPACITOR, MUG REHABILITATION, STREET LIGHTING, AND IGSD'S NECESSARY?

A. Reliability-related capital costs are primarily caused by the aging of the Company's overhead distribution system and the programs needed to meet the reliability standards required by the Public Utility Regulatory Act and the Commission's Substantive Rules. For instance, the Company inspected approximately ^{108,836}~~96,242~~ poles in 2023. As a result of its pole life extension program, the Company replaced or treated approximately ^{89,845}~~72,487~~ wooden poles in 2023 alone. In addition, approximately 1,516 URD cable spans were replaced or treated to maintain service. MUG facilities (Transformers, vaults, cables and switches) required replacement to maintain service. Streetlights were replaced as necessary to maintain lighting requirements. IGSDs are installed to enhance the switching capability of the

1 distribution system and thus improve reliability. Since January 1, 2019, the
2 Company installed ⁴³⁶~~437~~ IGSDs.

3 **Q. DOES CENTERPOINT HOUSTON HAVE CAPITAL IMPROVEMENT**
4 **PROGRAMS THAT ARE DESIGNED TO MAINTAIN OR IMPROVE**
5 **RELIABILITY?**

6 A. Yes. Programs to improve reliability often result in capital improvement. These
7 programs include the Company's pole life extension program, its URD Cable Life
8 Extension Program, and in 2022, the Company initiated a program aimed to
9 enhance the Resiliency of the Distribution system. This resiliency program
10 includes rebuilding circuits to new distribution standards, automating switches in
11 commercial underground areas, hardening the feeder main system by converting
12 overhead freeway crossings to underground, and installing fiber and
13 communication equipment in dedicated underground areas to improve monitoring
14 and control of underground assets. The distribution automation program has two
15 parts: TripSaver® and IGSDs. Mr. Tumlinson will address the TripSaver®
16 program and IGSD installations fall under my purview. Other witnesses discuss
17 additional programs under their purview.

18 **Q. WHY IS INVESTMENT IN URD REPLACEMENT NECESSARY?**

19 A. Similar to overhead service rehabilitation, underground rehabilitation costs are
20 primarily caused by the aging of the underground distribution system. CenterPoint
21 Houston's facilities installed during the economic boom of the late 1970s and early
22 1980s are aging, especially in residential areas served by underground URD
23 facilities. As the underground cable approaches and exceeds 30 years of age, it is

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APPLICATION OF CENTERPOINT § PUBLIC UTILITY COMMISSION
ENERGY HOUSTON ELECTRIC, LLC §
FOR AUTHORITY TO CHANGE RATES § OF TEXAS

DIRECT TESTIMONY

- ERRATA 3
-ERRATA 2

OF

JENNIFER K. STORY

ON BEHALF OF

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

JUNE

MAY

 MARCH 2024

- 1 My testimony and supporting schedules demonstrate that CenterPoint Houston's
 2 requested tax-related cost of service items are as shown in the table below:

3 **Table 1. Tax Related Cost of Service Components¹**

EXPENSES		\$132.3 million
Federal Income Tax Expense	\$132.4 million	\$132.5 million
Texas Margin Tax Expense	\$27.5 million	
Property Tax Expense	\$126.8 million	
RATE BASE		
Accumulated Deferred Federal Income Taxes	(\$1.3) billion	
Regulatory Liability: Protected EDIT (TCJA)	(\$656.2) million	
Regulatory Liability: Protected EDIT (Pre TCJA)	(\$0.8) million	
Regulatory Asset: Unprotected EDIT (TCJA)	\$8.1 million	
Regulatory Asset: Medicare Part D Subsidy	\$11.0. million	

¹ "EDIT" refers to Excess Deferred Income Taxes. "TCJA" refers to the Tax Cuts and Jobs Act of 2017.

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**APPLICATION OF CENTERPOINT
ENERGY HOUSTON ELECTRIC, LLC
FOR AUTHORITY TO CHANGE RATES**

§
§
§

**PUBLIC UTILITY COMMISSION

OF TEXAS**

DIRECT TESTIMONY---ERRATA-2 - ERRATA 3

OF

GREGORY S. WILSON

ON BEHALF OF

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

JUNE ~~MAY-MARCH~~ 2024

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V. TARGET RESERVE	10
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VII. CONCLUSION	16

LIST OF EXHIBITS

Exhibit GSW-1	Gregory S. Wilson Educational Background and Professional Experience
Exhibit GSW-2 ERRATA 3	Calculation of Recommended Accrual
Exhibit GSW-3	Major Property Damage Adjusted to Current Cost Levels
Exhibit GSW-4	Example of Loss Trending Methodology

reasonably anticipated and included in operating and maintenance expenses, and are not paid or reimbursed by commercial insurance. The commission will approve a self-insurance plan to the extent it finds it to be in the public interest. In order to establish that the plan is in the public interest, the electric utility must present a cost benefit analysis performed by a qualified independent insurance consultant who demonstrates that, with consideration of all costs, self-insurance is a lower-cost alternative than commercial insurance and the ratepayers will receive the benefits of the self insurance plan. The cost benefit analysis shall present a detailed analysis of the appropriate limits of self insurance, an analysis of the appropriate annual accruals to build a reserve account for self insurance, and the level at which further accruals should be decreased or terminated.

Q. WHAT HAS THE COMMISSION PREVIOUSLY ESTABLISHED AS THE PROPERTY INSURANCE EXPENSE AND RESERVE TARGET FOR CENTERPOINT HOUSTON?

A. In Docket No. 49421, the Commission set (1) an annual accrual of \$3.575 million to provide for average annual expected losses from events where losses are greater than \$100,000 and (2) an accrual of \$4.11 million annual for three years to achieve a target reserve of \$6.55 million from a reserve deficit level of (\$5.79 million).

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.

A. As shown on Exhibit GSW-2 to my direct testimony, I propose an annual accrual of ~~\$22.34~~ **22.3** million and a new target property insurance reserve of \$16.7 million. The accrual is composed of two elements. The first is \$10.6 million to provide for average annual expected O&M losses from events where the O&M expense is greater than \$100,000 and the loss is expected to be charged to the self-insurance reserve. As I explain subsequently, the \$10.6 million annual accrual is calculated using a Monte Carlo simulation run on the loss history of the Company. The second

11.7
 1 is ~~\$11.74~~ million accrued annually for five years to achieve the target reserve of
 2 \$16.7 million from the current reserve deficit level of ~~(\$42.98)~~ ^{018 41.819} million).

3 **III. SELF-INSURANCE RESERVE BACKGROUND**

4 **Q. PLEASE STATE THE PURPOSE OF CENTERPOINT HOUSTON'S**
 5 **SELF-INSURANCE RESERVE AND EXPLAIN HOW IT WOULD**
 6 **OPERATE.**

7 A. The purpose of CenterPoint Houston's self-insurance reserve is to provide for
 8 accruals to be credited to a reserve account to cover occurrences resulting in T&D
 9 losses of more than \$100,000 in O&M expenses, as discussed in the testimony of
 10 Ms. Kristie L. Colvin.

11 Each year, an amount would be accrued in the self-insurance reserve to
 12 provide for losses expected to occur in the calendar year. In addition to this amount,
 13 an accrual would be made to raise the self-insurance reserve to a level that would
 14 serve as a financial buffer in the event that actual losses exceed the accrued amount
 15 of expected annual losses.

16 **Q. WHAT HAPPENS IF THE ANNUAL AGGREGATE LOSSES DO NOT**
 17 **EQUAL THE AMOUNT ACCRUED IN ANY GIVEN YEAR?**

18 A. If the annual aggregate losses exceed the amount accrued in any given year, the
 19 remaining reserve, if sufficient, would be drawn upon to provide the needed
 20 additional amounts. If the remaining reserve is insufficient, the losses will still be
 21 booked to the self-insurance reserve, resulting in the reserve having a negative
 22 value. If the annual aggregate losses are less than the amount accrued for that

1 **Q. WHAT IS THE BALANCE OF THE RESERVE?**

2 A. As shown on Rate Filing Package Schedule II-B-7, the adjusted balance of the
 3 reserve is a deficit balance of approximately ~~(\$42,081,000)~~ ^{---018 41,819,000} as of December 31,
 4 2023.

5 **Q. WHAT ARE THE INDIVIDUAL COMPONENTS OF THE ANNUAL**
 6 **ACCRUAL TO THE SELF-INSURANCE RESERVE INDICATED BY**
 7 **YOUR ANALYSIS?**

8 A. The annual amount to be accrued each year is ~~\$22.34~~ ^{22.3} million, which is composed
 9 of two elements. First, there is \$10.6 million each year to provide for the year's
 10 annual expected covered losses from property loss event damages. Second, there
 11 should be an accrual of ~~\$11.74~~ ^{11.7} million each year for five years to provide for the
 12 variation in annual losses from year to year by building the total self-insurance
 13 reserve from the test year balance of approximately ~~(\$42.081-million)~~ ^{---018 41.819} up to the
 14 \$16.7 million level. I have recommended a five-year period to be consistent with
 15 the Company's treatment of regulatory asset requests, as well as to balance the
 16 interests of future ratepayers versus past ratepayers.

17 **Q. ARE THESE CALCULATIONS PREPARED IN ACCORDANCE WITH**
 18 **GENERALLY ACCEPTED ACTUARIAL PROCEDURES?**

19 A. Yes. The process reflects generally accepted actuarial procedures. However, I have
 20 made certain adjustments to reflect the nature of ratemaking for public utilities. For
 21 example, it would be customary to project losses to the anticipated cost level of the
 22 future time period during which rates will be in effect. Because of the historical
 23 test year approach to utility ratemaking and the adjustment of expense items based

CenterPoint Houston
Calculation of Recommended Accrual

Expected Annual Storm Loss	10,600,000	
Incremental Amount to Build Storm Reserve	11,740,000	11,700,000
Total Annual Accrual	22,340,000	22,300,000

PUC DOCKET NO. 56211

APPLICATION OF CENTERPOINT	§	PUBLIC UTILITY COMMISSION
ENERGY HOUSTON ELECTRIC, LLC	§	
FOR AUTHORITY TO CHANGE RATES	§	OF TEXAS

DIRECT TESTIMONY ERRATA 2

OF

LYNNAE K. WILSON

ON BEHALF OF

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

JUNE

MAY

MARCH 2024

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List of Exhibits

Exhibit LKW-1	CenterPoint Energy Houston Service Area Map
Exhibit LKW-2	Rate Case Witness List
Exhibit LKW-3 ERRATA 3	Comparison per Rate Case General Instruction 2

1 the current and future needs of our customers.

2 In establishing new transmission and distribution rates for CenterPoint Houston,
3 the Company asks the Public Utility Commission of Texas (“Commission”) to provide it
4 with the opportunity to earn a reasonable rate of return on its investment and to recover its
5 necessary O&M expenses, so that it can continue to provide safe and reliable electric
6 service. As shown in the Company’s application, the total cost of service for CenterPoint
7 Houston using a test year based on the 12 months ending December 31, 2023 (“Test Year”),
8 as adjusted for known and measurable changes, is approximately \$2.4 billion, excluding
9 costs related to wholesale transmission from others. This includes a proposed return on
10 equity of 10.4%, a capital structure of 55.1% debt and 44.9% equity, and a proposed overall
11 weighted cost of capital of 7.03% on a rate base of approximately \$12.1 billion. The
12 Company has invested over \$6.5 billion in transmission and distribution infrastructure
13 since the Company’s last rate case. If approved and implemented through the rates for
14 Retail Delivery Service, the impact on a residential customer using 1,000 kilowatt-hours
15 per month would be an increase of approximately ~~\$1.17~~ **\$1.21** per month.

16 My testimony provides an overview of the Company’s filing, its operations, and its
17 rate request. I also introduce the Company witnesses that support the requested rates. In
18 addition, my testimony highlights the Company’s commitment to its customers—a
19 commitment to modernizing electric delivery to create a stronger, smarter, more resilient,
20 and adaptable grid enabling continuing evolution of our customers’ and communities’
21 energy future. As a result, the Company has established investment pillars of system
22 growth, reliability, modernization, and clean energy enablement to focus efforts, enhance
23 resiliency, and drive system performance results.

1 Company has prepared the filing using actual Test Year books and records, adjusted
2 for known and measurable changes, and using traditional and widely accepted
3 ratemaking principles.

4 **Q. WHY IS NECESSARY TO REMOVE COSTS RELATED TO**
5 **WHOLESALE TRANSMISSION FROM OTHERS FROM THE COST OF**
6 **SERVICE?**

7 A. As described by witness Mr. Durland, the Company is not proposing a transmission
8 function charge in this rate case since the retail transmission costs are recovered
9 through the Transmission Cost Recovery Factor ("TCRF") and not through base
10 rates. Additionally, as explained by Company witness Mr. Durland, consistent with
11 16 TAC § 25.193 and Rider TCRF, the Company will be required to update the
12 TCRF to reflect any changes in wholesale transmission rates separate from this rate
13 case.

14 **Q. WHAT EFFECT WOULD THE COMPANY'S PROPOSED RATE HAVE**
15 **ON RESIDENTIAL CUSTOMERS?**

16 A. As a result of IRA, the Company could be subject to the CAMT. Therefore, the
17 Company is requesting approval of a tax rider ("Rider IRA") to ensure that the
18 impacts of the IRA are captured on an annual basis. As set out in the direct
19 testimony of Company witness Mr. Durland, the Company's filing shows an
20 increase for residential customers over adjusted test year Retail Delivery Service
21 ~~\$74~~ **\$73** million, or approximately 8%, for the Customer,
22 Meter, and Distribution portion of the bill. The TCRF without the over-under is
23 expected to increase by approximately \$0.74. TC5 is expected to be retired during

1 this proceeding and results in a decrease of \$1.92 per 1000kWh. If approved and
2 implemented through the rates for Retail Delivery Service, the impact on a
3 residential customer using 1,000 kwh per month, including current and proposed
4 tariff riders would be an increase of approximately ~~\$1.17~~ **\$1.21** per month. A customer
5 with a retail plan that charges 17.67 cents a kWh would see their rate go to 17.79
6 cents per kWh, or a ~~0.66%~~ **0.69%** increase in their total bill. The extent to which these
7 additional charges would be passed on by Retail Electric Providers is a function of
8 the competitive market.

9 **Q. WHAT ARE THE PRIMARY DRIVERS OF THE REVENUE**
10 **REQUIREMENT IN THIS CASE?**

11 A. As also discussed by Company witness Mr. Ryan, the area served by CenterPoint
12 Energy Houston is growing rapidly and faces extreme weather. The combination of
13 rapid growth and extreme weather demands significant levels of investment in the
14 Company's transmission and distribution system. CenterPoint Houston's total
15 gross plant in service since the end of the test year presented in Docket No. 49421
16 has increased approximately \$6.3 billion. This investment includes 2,188
17 additional miles of distribution lines, 101 new miles of transmission lines, six new
18 distribution substations and six new transmission substations, and associated plant
19 in service necessary to meet the demands of a growing service territory. Since the
20 Company's last base rate case, there has been an approximate 11% increase in the
21 number of metered customers, yet during that same time, O&M (excluding
22 wholesale transmission costs that are recovered through the TCRF) have decreased,
23 even without considering the impact of inflation. This reduction from 2019 level

1 charge from the Tariff for Retail Delivery Service, removing the Accumulated
 2 Deferred Federal Income Tax Credit rider, and removing the Transmission Charge
 3 in the Tariff for Retail Delivery Service. In addition, the Company is proposing to
 4 update the charges for Discretionary Services consistent with the methodology
 5 approved in 49421. The Company also proposes to revise the Tariff for Retail
 6 Delivery Service to incorporate the applicable terms of service in the relevant rate
 7 schedules to which the terms apply, and to reorganize some provisions in a more
 8 logical structure. CenterPoint Houston proposes to update the Wholesale
 9 Transmission Service Tariff to reflect CenterPoint Houston's current cost of
 10 providing this service.

11 Regarding the cost-of-service portion of the request, the Company's filed
 12 cost of service data demonstrates that CenterPoint Houston's total annual cost of
 13 service (excluding wholesale transmission from others) totals approximately
 14 ~~\$2.36~~ **\$2.365** billion while current annual revenues are approximately \$2.305 billion
 15 (including the revenue from the interim DCRF rates set in docket 55993 that will
 16 soon be implemented). Consequently, there is a total annual net revenue deficiency
 17 ~~\$58~~ **\$57** million⁵, after adjustments for known
 18 and measurable changes. The Company proposes to eliminate this annual earnings
 19 deficiency and to have its rates set at a level to provide a reasonable opportunity to
 20 earn a reasonable ROE of 10.4%.

21 **Q. HAS THE COMPANY MANAGED O&M EXPENSES SINCE ITS LAST**
 22 **BASE RATE PROCEEDING?**

~~\$61.5~~ **\$60.3**

⁵ Note that Schedule I-A which shows a ~~\$62.8~~ million proposed adjustment to rates includes the impact of updated Nuclear Decommission charges and proposed Rider RCE.

1 A. Yes. As noted above, the Company has continued its efforts to manage its O&M
2 expenses while continuing to provide safe and reliable electric service. In fact and
3 as shown on page 3 of my Exhibit LKW-3, the Company has experienced a \$44
4 million net decrease in O&M since 2019. The CenterPoint Houston witnesses that
5 support the Company's request for recovery of its O&M expenses discuss the cost
6 control measures and budget management used to effectively manage overall
7 expenses.

8 **Q. HOW DOES THE COMPANY PROPOSE TO RECOVER REASONABLE**
9 **RATE CASE EXPENSES?**

10 A. As addressed in the testimony of Company witness Mr. Durland, the Company is
11 including a rate case expense recovery rider ("Rider RCE") to ensure that the
12 Company can recover the reasonable and reimbursable rate case expenses incurred
13 in this proceeding as well as other prior rate proceedings. Company witness Myles
14 Reynolds supports the reasonableness of CenterPoint Houston's rate case expenses
15 eligible for recovery.

16 **Q. IS THE COMPANY ALSO SEEKING RATE RELIEF IN THE**
17 **INCORPORATED AREAS OF CENTERPOINT HOUSTON'S SERVICE**
18 **TERRITORY?**

19 A. Yes. Concurrent with this filing, the Company is filing Statements of Intent and
20 underlying support with each of the cities in CenterPoint Houston's service territory
21 that have retained original jurisdiction. CenterPoint Houston has calculated its
22 proposed rates on a system-wide basis. Accordingly, the proposed rates and tariff
23 changes filed with the cities are identical to the proposed rates and tariff changes

CENTERPOINT HOUSTON ELECTRIC
2023 RATE CASE REVENUE REQUIREMENT
(Thousands)

	Prior Rate Case Docket No. 49421 /1/	Test Year Ending December 31, 2023 Proposed Rates	ERRATA 2	ERRATA 3
Total Rate Base	\$ 6,233,718	\$ 12,099,745	\$ 12,105,853	\$ 12,091,958
Rate of Return	6.51%	7.03%	7.03%	7.03%
Operating and Maintenance Expense	\$ 586,317	\$ 542,431	\$ 539,459	\$ 539,419
Wholesale Transmission from Others	\$ 929,975	\$ 1,407,130	\$ 1,406,987	\$ 1,406,821
Depreciation and Amortization Expense	\$ 352,141	\$ 583,418	\$ 583,162	\$ 583,162
Taxes Other Than Federal Income Tax	\$ 275,047	\$ 329,581	\$ 329,581	\$ 329,581
Federal Income Tax Expense	\$ 39,218	\$ 132,409	\$ 132,484	\$ 132,312
Return on Rate Base	\$ 394,594	\$ 850,808	\$ 851,238	\$ 850,261
Total Cost of Service	\$ 2,577,292	\$ 3,845,777	\$ 3,842,912	\$ 3,841,557
Other Revenues	\$ 67,903	\$ 73,277	\$ 73,277	\$ 73,277
Total Adjusted Revenue Requirement	\$ 2,509,389	\$ 3,772,500	\$ 3,769,635	\$ 3,768,280
Total Revenue Requirement not including Wholesale Transmission from others:	\$ 1,579,414	\$ 2,365,370	\$ 2,362,648	\$ 2,361,459

/1/ Prior Rate Case information from Rev 1.18.2020 Final Version-49421-Settlement Model of CEHE's CCROSS-Final Order.xlsx attached to Kristie L. Colvin Testimony In Support of Agreement filed 1-24-2020 Case 49421-786, approved by PUCT in its March 9, 2020 Order (49421-792); Rate of Return from Conclusion of Law 15 in PUCT March 9, 2020 Order (49421-792).

CENTERPOINT HOUSTON ELECTRIC
2023 RATE CASE REVENUE REQUIREMENT
(Thousands)

	Prior Rate Case Docket No. 49421 /1/	Test Year Ending December 31, 2023 Proposed Rates	ERRATA 2	ERRATA 3
Total Plant in Service	\$ 11,451,236	\$ 17,795,166	\$ 17,795,166	\$ 17,795,166
Accumulated Depreciation	(3,799,299)	(4,404,443)	(4,404,443)	(4,404,443)
Net Plant in Service	\$ 7,651,937	\$ 13,390,723	\$ 13,390,723	\$ 13,390,723
Plant Held for Future Use	929	6,260	6,260	6,260
Accumulated Provisions	(13,880)	24,434	24,235	24,235
Accumulated Deferred Federal Income Taxes	(962,480)	(1,278,618)	(1,270,979)	(1,270,979)
Materials and Supplies	109,729	399,097	399,097	385,206
Cash Working Capital Allowance	24,269	12,226	12,172	12,168
Prepayments	117,523	70,490	70,490	70,490
Other Rate Base Items	(694,309)	(524,868)	(526,146)	(526,146)
Total Rate Base	\$ 6,233,718	\$ 12,099,745	\$ 12,105,853	\$ 12,091,958

/1/ Prior Rate Case information from Rev 1.18.2020 Final Version-49421-Settlement Model of CEHE's CCOS-Final Order.xlsx attached to Kristie L. Colvin Testimony In Support of Agreement filed 1-24-2020 Case 49421-786, approved by PUCT in its March 9, 2020 Order (49421-792); Rate of Return from Conclusion of Law 15 in PUCT March 9, 2020 Order (49421-792).

CENTERPOINT HOUSTON ELECTRIC
2023 RATE CASE REVENUE REQUIREMENT
(Thousands)

	Prior Rate Case Docket No. 49421 /1/	Test Year Ending December 31, 2023 Proposed Rates	ERRATA 2	ERRATA 3
Transmission O&M (exclude FERC 565)	\$ 51,964	\$ 52,412	\$ 51,947	\$ 51,947
Distribution O&M Expense	272,092	227,904	225,504	225,504
Customer Accounting Expense	32,495	18,718	18,662	18,662
Customer Service & Information Expense	6,905	2,047	2,047	2,047
Sales Expense	-	-	-	-
Admin & General Expenses	222,860	241,350	241,298	241,258
Subtotal	\$ 586,316	\$ 542,431	\$ 539,459	\$ 539,419
Wholesale Transmission from Others	929,975	1,407,130	1,406,987	1,406,821
Depreciation and Amortization Expense	352,141	583,418	583,162	583,162
Taxes Other Than Federal Income Tax	275,047	329,581	329,581	329,581
Federal Income Tax Expense	39,218	132,409	132,484	132,312
Return on Rate Base	394,594	850,808	851,238	850,261
Total Cost of Service	\$ 2,577,291	\$ 3,845,777	\$ 3,842,912	\$ 3,841,557
Other Revenues	67,903	73,277	73,277	73,277
Total Adjusted Revenue Requirement	\$ 2,509,388	\$ 3,772,500	\$ 3,769,635	\$ 3,768,280
Total Revenue Requirement not including Wholesale Transmission from others:	\$ 1,579,413	\$ 2,365,370	\$ 2,362,648	\$ 2,361,459

/1/ Prior Rate Case information from Rev 1.18.2020 Final Version-49421-Settlement Model of CEHE's CCOS-Final Order.xlsx attached to Kristie L. Colvin Testimony In Support of Agreement filed 1-24-2020 Case 49421-786, approved by PUCT in its March 9, 2020 Order (49421-792); Rate of Return from Conclusion of Law 15 in PUCT March 9, 2020 Order (49421-792).

**LYNNAE K. WILSON
LIST OF WORKPAPERS**

	Workpaper LKW-01	Change in customers since 2018
	Workpaper LKW-02	Change in mileage since 2018
ERRATA 3	Workpaper LKW-03	Residential bill impact – no change to TC5
ERRATA 3	Workpaper LKW-04	Residential bill impact – TC5 to \$0 in 2024
	Workpaper LKW-05	TMC, Port of Houston
	Workpaper LKW-06	Change in gross plant since 2018
ERRATA 3	Workpaper LKW-07	Revenue Requirement
	Workpaper LKW-08	Growth in the Nations Largest Counties Rebounds in 2022
	Workpaper LKW-09	Population Growth Surges
	Workpaper LKW-10	Customer count by year
	Workpaper LKW-11	Weather activity – KHOU (voluminous)
	Workpaper LKW-12	Weather activity – Galveston Scholes (voluminous)
	Workpaper LKW-13	Weather activity – KIAH (voluminous)
	Workpaper LKW-14	Weather activity – tableau workbook (electronic)

Residential Bill impact - no change to TC5

CEHE Charges	Current	Proposed	ERRATA 2	ERRATA 3
Customer Charge	\$ 2.30	\$ 2.16	\$ 2.12	\$ 2.11
Metering Charge	\$ 2.09	\$ 2.77	\$ 2.79	\$ 2.79
Distribution System Charge	\$ 0.020314	\$ 0.026100	\$ 0.026040	\$ 0.026100
Transition Charge 5	\$ 0.001916	\$ 0.001916	\$ 0.001916	\$ 0.001916
Nuclear Decommissioning Charge	\$ 0.000003	\$ 0.000013	\$ 0.000013	\$ 0.000013
Energy Efficiency Cost Recovery Factor (EECRF)	\$ 0.000826	\$ 0.000826	\$ 0.000826	\$ 0.000826
Rate Case Expense Rider	\$ -	\$ 0.000050	\$ 0.000050	\$ 0.000050
Temp Emergency Electric Energy Facilities	\$ 0.002392	\$ 0.002392	\$ 0.002392	\$ 0.002392
Distribution Cost Recovery Factor (9/1/2024)	\$ 0.003963	\$ -	\$ -	\$ -
Transmission Cost Recovery Factor (Annualized)	\$ 0.020894	\$ 0.021635	\$ 0.021633	\$ 0.021631
***REP Charges	\$ 121.99	\$ 121.99	\$ 121.99	\$ 121.99
kWh	\$ 0.050308	\$ 0.052932	\$ 0.052871	\$ 0.052928
CEHE@1000kWh Month	\$ 54.70	\$ 57.86	\$ 57.78	\$ 57.83
Total Bill	\$ 176.69	\$ 179.85	\$ 179.77	\$ 179.82

*<https://ftp.puc.texas.gov/public/puct-info/industry/electric/rates/RESrate/rate23/Dec23Rates.pdf>

**Added 1.29 for DCRF 9/1 increase to REP Charges

Current

TDU as a % of total bill

31% 32%

Proposed	\$	%
TDU Increase	\$ 3.16	6%
Total Bill Increase	\$ 2.36	1.8%
	Current	Proposed
TDU Base and TC5	\$ 30.58	\$ 32.95
	% Change	
Base & TC5 / Total TDU	4.3%	
Proposed - ERRATA 3	\$	%
TDU Increase	\$ 3.13	6%
Total Bill Increase	\$ 2.33	1.8%
	Current	Proposed
TDU Base and TC5	\$ 30.58	\$ 32.92
	% Change	
Base & TC5 / Total TDU	4.3%	

see Item 240 in Docket No. 56211 for ERRATA 2 filed 5/22/2024

Residential Bill impact - TC5 to \$0 during 2024

CEHE Charges	Current	Proposed	ERRATA 2	ERRATA 3
Customer Charge	\$ 2.30	\$ 2.16	\$ 2.12	\$ 2.11
Metering Charge	\$ 2.09	\$ 2.77	\$ 2.79	\$ 2.79
Distribution System Charge	\$ 0.020314	\$ 0.026100	\$ 0.026040	\$ 0.026100
Transition Charge 5	\$ 0.001916	\$ -	\$ -	\$ -
Nuclear Decommissioning Charge	\$ 0.000003	\$ 0.000013	\$ 0.000013	\$ 0.000013
Energy Efficiency Cost Recovery Factor (EECRF)	\$ 0.000826	\$ 0.000826	\$ 0.000826	\$ 0.000826
Rate Case Expense Rider	\$ -	\$ 0.000050	\$ 0.000050	\$ 0.000050
Temp Emergency Electric Energy Facilities	\$ 0.002392	\$ 0.002392	\$ 0.002392	\$ 0.002392
Distribution Cost Recovery Factor (9/1/2024)	\$ 0.003963	\$ -	\$ -	\$ -
Transmission Cost Recovery Factor (Annualized)	\$ 0.020894	\$ 0.021635	\$ 0.021633	\$ 0.021631
*, **REP Charges	\$ 121.99	\$ 121.99	\$ 121.99	\$ 121.99
kWh	\$ 0.050308	\$ 0.051016	\$ 0.050955	\$ 0.051012
CEHE@1000kWh Month	\$ 54.70	\$ 55.95	\$ 55.86	\$ 55.91
Total Bill	\$ 176.69	\$ 177.94	\$ 177.86	\$ 177.90

*<https://ftp.puc.texas.gov/public/puct-info/industry/electric/rates/RESrate/rate23/Dec23Rates.pdf>

**Added 1.29 for DCRF 9/1 increase to REP Charges

Current		
TDU as a % of total bill	31%	
Proposed	\$	%
TDU Increase	\$ 1.25	2%
Total Bill Increase	\$ 0.45	0.7%
	Current	Proposed
TDU Base and TC5	\$ 30.58	\$ 31.03
	% Change	
Base & TC5 / Total TDU	0.8%	
Proposed - ERRATA 3		
	\$	%
TDU Increase	\$ 1.21	2%
Total Bill Increase	\$ 0.42	0.69%
	Current	Proposed
TDU Base and TC5	\$ 30.58	\$ 31.00
	% Change	
Base & TC5 / Total TDU	0.76%	
see Item 240 in Docket No. 56211 for ERRATA 2 filed 5/22/2024		

Revenue Requirement Summary (\$000s)

	Revenue Requirement		Revenue Under Existing Rates		ERRATA 2	ERRATA 3
1 Total	3,772,500	1			3,769,635	3,768,280
2 less TCRF related	1,407,130	2			1,406,987	1,406,821
3 net	2,365,370	3			2,362,648	2,361,459
4						
5 Base Revenues			2,085,188	4	2,084,871	2,084,871
6 current TCRF						
7 proposed TCRF						
8 DCRF from Docket 55993			220,146	5	220,146	220,146
9 Total			2,305,334	6	2,305,017	2,305,017
10						
11 Increase before impact of TC5			60,036	7	57,631	56,441

Notes

- 1 Schedule I-A-1, line 17
- 2 Schedule II-D-1, line 14
- 3 line 1 less line 2, also Schedule 1-A line 2
- 4 WP 1-A line 2
- 5 WP 1-A line 10
- 6 Line 4 plus line 5
- 7 Line 3 less line 7

The following files are not convertible:

	Exhibit JRD-03 - ERRATA 3 (clean).xlsx
	Exhibit KLC-03 - ERRATA 3 (clean).xlsx
	Exhibit KLC-04a - ERRATA 3 (clean).xlsx
	Exhibit KLC-06a - ERRATA 3 (clean).xlsx
	Exhibit KLC-07 - ERRATA 3 (clean).xlsx
	Exhibit LKW-03 ERRATA 3 (clean).xlsx
	Exhibits JRD 2,4,4.1,5,6 - ERRATA 3
(clean).xlsx	
	Workpaper LKW 03 and WP LKW 04 ERRATA
3.xlsx	
	Workpaper LKW 07 ERRATA 3.xlsx
	CEHE RFP Workpapers E-Errata 3
(redacted).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.