



## **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 19, 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**  
**TEXAS CONSUMER ASSOCIATION**  
**REQUEST NO.: TCA-RFI01-01**

**QUESTION:**

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.

**ANSWER:**

Please see the following documents responsive to this request:

- Workpapers attached to the Direct Testimony of Myles F. Reynolds including WP-MFR-01, WP-MFR-02, WP-MFR-03, and WP-MFR-04.
- Attachments to CenterPoint Houston's Response to IBEW-RFI01-03(f):
  - IBEW RFI01-03 Billing Rate Ranges AG Directive and Case Law- M Reynolds.pdf (pages 160-756, 904-1008, 1076-1387)
  - IBEW RFI-1-03 2022 Survey of Law Firm Economics Results M Reynolds.xlsx (pages 1-455)
  - IBEW RFI01-03 Rate Survey- M Reynolds.pdf (pages 1-7)
  - IBEW RFI01-03 Peer Monitor Rates Report Jan-Dec 2022 - M Reynolds Confidential HSPM.xlsx (pages 1-52)
  - IBEW RFI01-03 Peer Monitor Rates Report Jan-Nov 2023 - M Reynolds Confidential HSPM.xlsx (pages 1-60)
  - IBEW RFI01-03 Email From Myles Reynolds Inbox Confidential.pdf (pages 1-8)
  - IBEW RFI01-03 PCR-CP Engagement Letter - My Reynolds Confidential.pdf (pages 1-4)
- Attachments to CenterPoint Houston's Supplement Response IBEW-RFI01-03S
  - IBEW RFI01-03S Entergy - 53719 - 2022 - Griffiths.pdf (pages 1-61)
  - IBEW RFI01-03S ONCOR - 53601 - 2021-2023 Rate Case.pdf (pages 1-7)
  - IBEW RFI01-03S ITRON - CEHE 2018 Rate Case Confidential.pdf (pages 1-3)

**SPONSOR:**

Myles Reynolds

**RESPONSIVE DOCUMENTS:**

None

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

**TEXAS CONSUMER ASSOCIATION  
REQUEST NO.: TCA-RFI01-02**

**QUESTION:**

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.

**ANSWER:**

Please see the following documents responsive to this request:

- Attachments to CenterPoint Houston's response to IBEW-RFI01-03:
  - IBEW RFI01-03 Billing Rate Ranges AG Directive and Case Law- M Reynolds.pdf (pages 160-756, 904-1008, and 1076-1387)
  - IBEW RFI-1-03 2022 Survey of Law Firm Economics Results M Reynolds.xlsx (pages 1-455)
  - IBEW RFI01-03 Rate Survey- M Reynolds.pdf (pages 1-7)
  - IBEW RFI01-03 Peer Monitor Rates Report Jan-Dec 2022 - M Reynolds Confidential HSPM.xlsx (pages 1-52)
  - IBEW RFI01-03 Peer Monitor Rates Report Jan-Nov 2023 - M Reynolds Confidential HSPM.xlsx (pages 1-60)
- Attachments to CenterPoint Houston's Supplement response IBEW-RFI01-03S
  - IBEW RFI01-03S Entergy - 53719 - 2022 - Griffiths.pdf (pages 1-61)
  - IBEW RFI01-03S ONCOR - 53601 - 2021-2023 Rate Case.pdf (pages 1-7)
  - IBEW RFI01-03S ITRON - CEHE 2018 Rate Case Confidential.pdf (pages 1-3)

**SPONSOR:**

Myles Reynolds

**RESPONSIVE DOCUMENTS:**

None

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

**TEXAS CONSUMER ASSOCIATION  
REQUEST NO.: TCA-RFI01-03**

**QUESTION:**

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..

**ANSWER:**

Please see CenterPoint Houston's response to TCA-RFI01-02.

**SPONSOR:**

Myles Reynolds

**RESPONSIVE DOCUMENTS:**

None

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

**TEXAS CONSUMER ASSOCIATION  
REQUEST NO.: TCA-RFI01-04**

**QUESTION:**

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 rate making 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.

**ANSWER:**

Please see Centerpoint Houston's response to IBEW RFI01-03; attachment:

- IBEW RFI01-03 Billing Rate Ranges AG Directive and Case Law- M Reynolds.pdf (pages 1076-1315)

**SPONSOR:**

Myles Reynolds

**RESPONSIVE DOCUMENTS:**

None

### **CERTIFICATE OF SERVICE**

I certify that on June 19, 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.

Valence Glenn Russell