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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	§	ADMINISTRATIVE HEARINGS
RATES	§	

DIRECT TESTIMONY

OF

LAURIE TOMCZYK

ON BEHALF OF THE

OFFICE OF PUBLIC UTILITY COUNSEL

June 19, 2024

**SOAH DOCKET NO. 473-24-13232
PUC DOCKET NO. 56211**

DIRECT TESTIMONY OF LAURIE TOMCZYK

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LIST OF ACRONYMS

Acronym	Description
CCOSS	Class Cost of Service Study
CEHE or Company	CenterPoint Energy Houston Electric, LLC
Commission	Public Utility Commission of Texas
ERCOT	Electric Reliability Council of Texas
FERC	Federal Energy Regulatory Commission
kVA	Kilovolt Amperes
NCP	Non-Coincident Peak
NewGen	NewGen Strategies and Solutions, LLC
OPUC	Office of Public Utility Counsel
SDP	Society of Depreciation Professionals
4CP	4 Coincident Peak

1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.**

3 A. My name is Laurie A. Tomczyk. I am a Senior Manager in the Energy Practice of NewGen
4 Strategies and Solutions, LLC (“NewGen”). My business address is 4528 Trails End,
5 Lapeer, Michigan 48446. NewGen is a consulting firm that specializes in utility rates,
6 engineering economics, financial accounting, asset valuation, appraisals, and business
7 strategy for electric, natural gas, water, and wastewater utilities.

8 **Q. ON WHOSE BEHALF ARE YOU PRESENTING TESTIMONY IN THIS**
9 **PROCEEDING?**

10 A. I am presenting testimony on behalf of the Office of Public Utility Counsel (“OPUC”).

11 **Q. PLEASE OUTLINE YOUR EDUCATIONAL AND PROFESSIONAL**
12 **BACKGROUND.**

13 A. I have a Bachelor of Science in Mechanical Engineering from the University of Nebraska-
14 Lincoln. I am also a registered Professional Engineer in the state of Colorado and have
15 over 35 years of experience providing management consulting services to clients in the
16 electric power, water, and solid waste management industries. I am also a member of the
17 Society of Depreciation Professionals (“SDP”) and have completed multiple training
18 courses offered by SDP. I am working toward becoming a Certified Depreciation
19 Professional through SDP. I have been employed by NewGen since January 2014. I
20 specialize in electric utility revenue requirement, cost of service, and rate design studies as
21 well as depreciation studies, financial projections, expert witness services, other
22 engineering and economic analyses, and revenue projections. I have been an instructor on

behalf of Electric Utility Consultants, Inc. for courses on cost of service concepts and techniques and rate design for electric utilities. For additional details regarding my witness qualifications, please reference my resume, provided with this testimony as Attachment LAT-1.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes, I have. Attachment LAT-2 includes a list of dockets in which I have provided expert witness testimony before the Public Utility Commission of Texas (“Commission”) and other regulatory bodies.

II. PURPOSE AND SCOPE

Q. WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. I reviewed CenterPoint Energy Houston Electric, LLC's ("CEHE" or "the Company") proposed class cost of service study ("CCOSS") and rate design and CEHE's 2022 Depreciation Study prepared by Mr. Dane Watson. As a result, I have recommended changes to both the Company's proposed CCOSS and rate design. My recommended changes to the CCOSS concern the demand allocators. CEHE used unadjusted data to develop their demand allocators, and I recommend using adjusted data for the reasons discussed later in my testimony. The changes I recommend to the CCOSS model filed by CEHE also flow through to my recommended rate design. I also updated CEHE's CCOSS and rate design models with the revenue requirement proposed by Ms. Kyra Coyle in her direct testimony. I will present the results of these changes to the CCOSS and rate design later in my testimony.

1 **III. DEMAND DATA USED IN THE CEHE CCROSS**

2 **Q. WHAT TYPES OF ADJUSTMENTS WERE MADE TO THE TEST YEAR**
3 **CUSTOMER, ENERGY, AND DEMAND DATA IN THIS PROCEEDING?**

4 A. Two types of adjustments were made by CEHE: (1) customer adjustments to reflect the
5 number of customers at the end of the test year; and (2) weather adjustments to the test year
6 load data.¹

7 **Q. WHAT TYPES OF DEMAND DATA ARE USED IN DEVELOPING THE CLASS**
8 **ALLOCATORS IN THE CCROSS?**

9 A. The demand data used in the CCROSS for allocating costs to customer classes includes the
10 Electric Reliability Council of Texas (“ERCOT”) 4 Coincident Peak (“4CP”)²
11 Transmission Demands³ and Non-Coincident Peak (“NCP”)⁴ Distribution Demands.
12 CEHE uses the ERCOT 4CP data to develop allocators for capacity-related transmission
13 costs and the NCP data to develop allocators for demand-related distribution costs.⁵

14 **Q. FOR THE PURPOSES OF DEVELOPING DEMAND ALLOCATORS FOR THE**
15 **CCROSS, DID CEHE USE ADJUSTED OR UNADJUSTED DEMAND DATA? WHY**
16 **DID CEHE USE ADJUSTED OR UNADJUSTED DEMAND DATA?**

¹ Direct Testimony of John R. Durland at 6:21-23.

² 4CP is calculated using a rate class’s proportionate share of demand during the highest 15-minute demand interval in ERCOT for each month during the 4-month period from June through September.

³ Consistent with 16 Tex. Admin. Code § 25.192(d) for capacity-related transmission costs.

⁴ NCP is calculated using the highest non-coincident 15-minute aggregated peak demand for each rate class during the test year.

⁵ Direct Testimony of John R. Durland at 14:9-20.

1 A. CEHE used unadjusted demand data for determining the ERCOT 4CP and NCP allocators
2 used in the CCOSS.⁶ CEHE explains that they used the unadjusted ERCOT 4CP demand
3 data for the purposes of allocating capacity-related transmission costs because this
4 “matches the use of the 4CP allocator the Commission uses for pricing wholesale
5 transmission charges pursuant to the Public Utility Regulatory Act § 35.004(d) and is
6 consistent with Commission rules and the Company’s approved approach in
7 Docket No. 49421.”⁷ The Company did not explain why they used unadjusted NCP
8 demand data for the purposes of allocating demand-related distribution costs in the
9 CCOSS.

10 **Q. FOR WHAT PURPOSE DID CEHE USE THE ADJUSTED CUSTOMER,**
11 **ENERGY, AND DEMAND DATA?**

12 A. CEHE used the adjusted customer, energy, and demand data for the purposes of rate design.

13 **Q. DO YOU BELIEVE THAT THE COMPANY SHOULD HAVE USED ADJUSTED**
14 **NCP DATA FOR COST ALLOCATION PURPOSES?**

15 A. Yes, CEHE should have used adjusted NCP data rather than unadjusted data for
16 consistency with the data used for rate design purposes. Allocating costs to a customer
17 class based on unadjusted demand data, which is greater than the adjusted demand data,
18 and then using a lower adjusted demand data for rate design imposes a higher cost on
19 ratepayers, leading, inevitably, to unfair results. . As filed, the demand rate for that

⁶ *Id.* at 13:3-13.

⁷ *Id.* at 14:11-14.

customer class will be higher, compared to using adjusted demand data for both cost allocation and rate design.

Q. HOW DO THE COMPANY'S ADJUSTED NCP DEMANDS COMPARE TO ITS UNADJUSTED NCP DEMANDS?

A. A comparison of the Company's adjusted and unadjusted NCP demands is shown on Table LAT-1 below.

**Table LAT-1
Comparison of CEHE Adjusted and Unadjusted NCPs**

	Residential	Secondary <= 10 kVA¹	Secondary > 10 kVA¹	Primary	Transmission	Total
NCP Adjusted kW ²	9,143	144	6,122	762	4,389	20,560
%	44%	1%	30%	4%	21%	100%
NCP Unadjusted kW ³	10,651	148	6,530	789	4,389	22,507
%	47%	1%	29%	4%	19%	100%

¹ kVA means Kilovolt Amperes.

² Source: Schedule II 2023, II-II-1.4 at Sub Level.

³ Source: Schedule II 2023, II-II-1.3 at Sub Level.

Q. WHAT ARE OPUC'S PROPOSED CCROSS-BASED RATE CHANGES BY CLASS USING OPUC'S PROPOSED REVENUE REQUIREMENT AND ADJUSTED NCPS TO ALLOCATE DEMAND-RELATED DISTRIBUTION COSTS? HOW DO THEY COMPARE WITH CEHE'S PROPOSED RATE CHANGES BY RATE CLASS?

A. OPUC's proposed CCROSS-based rate changes by class using OPUC's proposed revenue requirement and adjusted NCPs to allocate demand-related distribution costs are shown in Table LAT-2 below.

**Table LAT-2
Comparison of OPUC and CEHE Proposed Rate Changes by Class**

OPUC Proposed					
Rate Class Description	Number of Customers	Present Revenues¹	Proposed Revenues¹	Change	Change Pct
Residential	2,455,309	\$901,815,248	\$927,546,950	\$25,731,702	2.9%
Secondary <= 10 kVA	155,776	\$25,410,421	\$23,295,560	(\$2,114,861)	(8.3%)
Secondary > 10 kVA	151,170	\$578,913,742	\$527,916,998	(\$50,996,744)	(8.8%)
Primary	1,047	\$41,515,394	\$55,036,158	\$13,520,765	32.6%
Transmission	233	\$27,090,086	\$23,922,240	(\$3,167,846)	(11.7%)
Miscellaneous Lighting	10,660	\$5,812,803	\$3,040,963	(\$2,771,839)	(47.7%)
Lighting	5,654	\$70,222,868	\$68,591,816	(\$1,631,053)	(2.3%)
Retail Electric Delivery Revenues	2,779,849	\$1,650,780,562	\$1,629,350,685	(\$21,429,876)	(1.3%)
Wholesale Transmission Revenue		\$654,236,818	\$669,969,930	\$15,733,112	2.4%
Total Cost of Service		\$2,305,017,380	\$2,299,320,615	(\$5,696,764)	(0.2%)
CEHE Proposed²					
Rate Class Description	Number of Customers	Present Revenues¹	Proposed Revenues¹	Change	Change Pct
Residential	2,455,309	\$901,815,248	\$973,130,757	\$71,315,509	7.9%
Secondary <= 10 kVA	155,776	\$25,410,421	\$23,000,757	(\$2,409,664)	(9.5%)
Secondary > 10 kVA	151,170	\$578,913,742	\$520,998,933	(\$57,914,809)	(10.0%)
Primary	1,047	\$41,515,394	\$53,126,721	\$11,611,328	28.0%
Transmission	233	\$27,090,086	\$24,002,755	(\$3,087,331)	(11.4%)
Miscellaneous Lighting	10,660	\$5,812,803	\$3,040,963	(\$2,771,839)	(47.7%)
Lighting	5,654	\$70,222,868	\$68,591,816	(\$1,631,053)	(2.3%)
Retail Electric Delivery Revenues	2,779,849	\$1,650,780,562	\$1,665,892,702	\$15,112,141	0.9%
Wholesale Transmission Revenue		\$654,236,818	\$696,755,404	\$42,518,586	6.5%
Total Cost of Service		\$2,305,017,380	\$2,362,648,106	\$57,630,726	2.5%

¹ Present Revenues include revenues from base rates and DCRF while Proposed Revenues include revenues from base rates.

² Source: Schedule I and J 2023-Errata 2, WP Summary of Revenues.

1

2 **Q. WHAT ARE OPUC'S PROPOSED RATES BY RATE CLASS?**

3 A. OPUC's proposed CCROSS-based rates and changes from present rates are shown in

4 Attachment LAT-3.

1 **IV. SUMMARY OF FINDINGS AND RECOMMENDATIONS**

2 **Q. PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS IN THIS**
3 **PROCEEDING.**

4 A. I recommend that the Commission approve the revenue requirement as proposed by
5 Ms. Kyra Coyle in her direct testimony and require CEHE to use adjusted NCP data rather
6 than unadjusted NCP data in their CCOSS for allocating demand-related distribution costs.
7 The impact of these recommendations to the CCOSS results are shown in Table LAT-2
8 above. I also recommend that the Commission approve the proposed rates by rate class
9 shown in Attachment LAT-3.

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 A. No. Given that CEHE updated their proposed revenue requirement, CCOSS, and rate
12 design with its Errata 3 filing made three business days before intervenor testimony was
13 due, and the resulting time constraints of incorporating their changes in my testimony, I
14 reserve the right to modify my testimony to reflect the changes in their Errata 3 filing.⁸

⁸ CenterPoint Energy Houston Electric, LLC's Errata 3 Filing (Jun. 14, 2024).

ATTACHMENTS



LAURIE TOMCZYK

Senior Manager

CONTACT

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EDUCATION

Bachelor of Science in Mechanical
Engineering, University of Nebraska

PROFESSIONAL REGISTRATIONS/ CERTIFICATIONS/COMMITTEES

Registered Professional Engineer (PE)
Mechanical, Colorado

KEY EXPERTISE

Cost of Service and Rate Design
Depreciation Studies
Expert Witness and Litigation Support
Engineering/Economic Analyses
Financial Projections
Revenue Requirements

Ms. Laurie Tomczyk has over 35 years of experience providing management consulting services to clients in the electric power, water, and solid waste management industries. She specializes in electric utility revenue requirement analyses, cost of service and rate design studies, financial projections, transmission and ancillary services rates, expert witness services, and other engineering and economic analyses. Her rate-related projects have included studies to develop retail electric, retail water, transmission, ancillary service, standby, and special contract rates. She also has experience in net energy metering, decoupling, and opt-out programs.

Ms. Tomczyk has provided expert witness testimony on revenue requirement, cost of service, and rate design issues, as well as depreciation studies before public utility commissions and the Federal Energy Regulatory Commission. She has been an instructor on behalf of Electric Utility Consultants, Inc. for courses on cost-of-service concepts and techniques and rate design for electric utilities.

Ms. Tomczyk joined NewGen as an Executive Consultant in 2014. Before joining the firm, she provided utility consulting services while employed at R. W. Beck, Inc. and its successor firm, SAIC, for 25 years.

RELEVANT EXPERIENCE

Revenue Requirement, Cost of Service, and Rate Design

Ms. Tomczyk leads and participates in retail revenue requirements, cost of service, and rate design studies for electric utilities. Services include the development of historical and projected revenue requirements and the development of detailed cost of service and rate design models. Ms. Tomczyk has utilized numerous cost allocation methods and compared the revenue requirements under the various cost of service methods to evaluate the most appropriate cost of service methodologies for specific clients.

Additionally, Ms. Tomczyk has worked on diverse ratemaking issues such as standby service rates, net energy metering rates, wheeling rates, feed-in tariffs, and cost of service levels. Efforts include:

- Utilizing projected test year analyses to assess revenue requirements;
- Evaluation of cost of service changes for multiple customer classes;
- Development of new rates for customer classes based on pre-defined overall percentage rate increases; and
- Determining whether a return on rate base or Times Interest Earned Ratio should be used for ratemaking purposes.

LAURIE TOMCZYK
Senior Manager

Below is a sample listing of Ms. Tomczyk's cost of service and rate design clients by service offering.

Electric Revenue Requirement, Unbundled Cost of Service Analysis, and Rate Design Studies

- Austin Energy, TX
- BC Hydro, British Colombia, Canada
- Brownsville Public Utilities Board, TX
- Bryan Texas Utilities, TX
- Cleveland Public Power, OH
- CPS Energy, TX
- Crawfordsville Electric Power & Light, IN
- Denton Municipal Electric, TX
- Farmington Electric Utility System, NM
- Fayetteville Public Works Commission, NC
- Garland Power & Light, TX
- Golden Valley Electric Cooperative, AK
- Guam Power Authority, Guam
- Homer Electric Association, AK
- Kaua'i Island Utility Cooperative, HI
- Lafayette Utilities System, LA
- Richmond Power & Light, IN
- San Francisco Public Utilities Commission, CA
- Springfield City Utilities, MO
- Tri-State Generation & Transmission Association, Inc., CO
- United Power Electric Cooperative, Colorado
- U.S. Army, California, Georgia, New York, and Virginia
- Vernon Public Utilities, CA
- Water and Electric Board, OR

Competitive Retail Rate Assessments

- Brownsville Public Utilities Board, TX
- Garland Power and Light, TX

Electric Transmission and Ancillary Service Rates

- Brownsville Public Utilities Board, TX
- Golden Valley Electric Cooperative, AK
- Greenville Electric Utility System, TX
- Homer Electric Association, AK
- Independence Power & Light, MO
- Lubbock Power & Light, TX
- Tri-State Generation & Transmission Association, Inc., CO

Net Energy Metering and Standby Rates

- Golden Valley Electric Cooperative, AK
- Homer Electric Association, AK
- Kaua'i Island Utility Cooperative, HI
- Madisonville Municipal Utilities, KY

LAURIE TOMCZYK
Senior Manager

Electric Special Contract Rates

- Alaska Golden Valley Electric Cooperative, AK
- Homer Electric Association, AK

Electric Decoupling Programs

- Guam Power Authority, Guam
- Kaua'i Island Utility Cooperative, HI

Opt-Out Program Associated with Advanced Electric Metering Infrastructure Project

- Kaua'i Island Utility Cooperative, HI

Expert Witness and Litigation Support

Ms. Tomczyk offers expert testimony regarding cost of service, rate design, and ratemaking issues before local and state regulatory bodies and courts. She has developed revenue requirements, rate base, cost of service analysis, rate design, and associated testimony filed with state commissions, including the design of retail, transmission, and ancillary services rates. Ms. Tomczyk has developed a standby rate report filed with the state commission as part of the standby rate service tariff filing. She has provided written testimony and other client litigation support regarding their revenue requirements, cost of service studies, and equity management plans.

Additionally, Ms. Tomczyk has developed comments on behalf of customer associations related to a state commission's investigation to analyze the strengths and weaknesses of marginal cost of service studies, embedded cost of service studies, the reconciliation process, and how this impacts rate classes. She has also reviewed wholesale energy providers' unbundled financial statements, calculation of equipment, projected wholesale customer patronage capital accruals, and estimated rate impacts associated with the wholesale utility's proposed construction of a new generation plant. Ms. Tomczyk has provided testimony and other types of litigation support for the following clients:

- City of Auburn, MI
- City of Fort Wayne, City of Mario, and Marion Municipal Utilities, IN
- Crawfordsville Electric Light & Power, IN
- Denton Municipal Electric, TX
- Fayetteville Public Works Commission, NC
- Golden Valley Electric Cooperative, AK
- Guam Power Authority, Guam
- Homer Electric Association, AK
- Independence Power & Light, MO
- Kaua'i Island Utility Cooperative, HI
- Lubbock Power & Light, TX
- Nevada Resorts Association, NV
- New England States Committee on Electricity, MA
- Office of Public Utility Counsel, TX
- Richmond Power & Light, IN
- SABIC Innovative Plastics Mount Vernon, IN
- Texas Office of Public Utility Counsel
- Tri-State Generation & Transmission Association, Inc., CO
- University of Texas System
- U.S. Department of Defense and all other Federal Executive Agencies, TX, NM, NY

LAURIE TOMCZYK

Senior Manager

Financial Projections

Ms. Tomczyk is responsible for developing financial and economic analyses for utility clients. She has presented many of these analyses before regulatory commissions in support of general rate case applications, particularly in support of the revenue requirements in the applications. She has also developed equity management plans for electric cooperatives, pro forma, and other financial analyses. Her financial project clients include:

- Brownsville Public Utilities Board, TX
- City of Indianapolis, IN
- CPS Energy, TX
- Fayetteville Public Works Commission, NC
- Georgetown Municipal Water and Sewer Service, KY
- Golden Valley Electric Cooperative, AK
- Guam Power Authority, Guam
- Homer Electric Association, AK
- Kaua'i Island Utility Cooperative, HI
- Lafayette Utilities System, LA
- St. Joseph Power & Light, MO

Depreciation

Ms. Tomczyk performs analyses on depreciation studies for municipal and cooperative utility clients. She developed a replacement planning model using the survivor curve methodology to estimate future replacement costs for electric utility systems at nine military bases operated and maintained under contract by City Light & Power, Inc. She also developed depreciation studies for the Kauai Island Utility Cooperative, HI, Lubbock Power & Light, TX, Denton Municipal Electric, TX, and New Braunfels Utilities, TX. Ms. Tomczyk is a Society of Depreciation Professionals (SDP) member and has completed training courses offered by SDP. Training course topics included data requirements and collection, unit versus group accounting, depreciation models, actuarial and simulation life analyses, salvage and cost of removal analyses, and technology forecasting. She is working towards becoming a Certified Depreciation Professional through SDP.

WORKSHOPS

Ms. Tomczyk has served as an instructor for the following courses:

Electric Utility Consultants, Inc. (EUCI)

- *Introduction to Cost of Service Concepts and Techniques for Electric Utilities*
- *Introduction to Rate Design for Electric Utilities*

PRESENTATIONS

Ms. Tomczyk has also made the following industry presentations:

Michigan Municipal Electric Association Annual Conference

- *Standby Rates for Distributed Generation*
- *Using AMI Data for Cost-of-Service and Rate Design Analyses, Resource Planning, and Financial Planning*
- *Balancing Aging Infrastructure, Rates, and Residential Demand*

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
1. New Braunfels Utilities	Docket No. 56440	Depreciation Study included in Transmission Cost of Service Filing	Public Utility Commission of Texas	New Braunfels Utilities	2024
2. Chugach Electric Association	Docket No. U-23-047 / U-23-048	Transmission and Ancillary Services Rates	Regulatory Commission of Alaska	Homer Electric Association, Matanuska Electric Association, and Golden Valley Electric Association	2024
3. Alaska Power Company	Docket No. U-23-054	Cost of Service and Rate Design	Regulatory Commission of Alaska	Alaska Power Company	2024
4. Indiana Michigan Power Company	Case No. U-21461	Nuclear Decommissioning Funding	Michigan Public Service Commission	City of Auburn	2024
5. Indiana Michigan Power Company	Cause No. 45993	Revenue Requirement	Indiana Utility Regulatory Commission	City of Fort Wayne, the City of Marion, and Marion Municipal Utilities	2023
6. CenterPoint Energy Houston Electric	Docket No. 54830	Temporary Emergency Electric Energy Facilities Rider	Public Utility Commission of Texas	Texas Office of Public Utility Counsel	2023
7. Lubbock Power & Light	Docket No. 54657	Depreciation Study Included in Transmission Cost of Service Filing	Public Utility Commission of Texas	Lubbock Power & Light	2023
8. Duke Energy Progress	Docket No. E-2, SUB 1300	Review of Duke Energy Progress Depreciation Study	North Carolina Utilities Commission	Fayetteville Public Works Commission	2023
9. Denton Municipal Electric	Docket No. 52715	Depreciation Study Included in Transmission Cost of Service Filing	Public Utility Commission of Texas	Denton Municipal Electric	2022
10. Oncor Electric Delivery Company	Docket No. 53601	Mitigation of Large Rate Increases	Public Utility Commission of Texas	University of Texas System	2022
11. Southwestern Public Service Company	Docket No. 53040	Fuel and Purchased Power Cost Reconciliation	Public Utility Commission of Texas	Texas Office of Public Utility Counsel	2022
12. El Paso Electric Company	Docket No. 52040	Advanced Metering System (AMS) Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fees	Public Utility Commission of Texas	Texas Office of Public Utility Counsel	2021

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
13. Independence Power & Light	Docket ER21-2581-000	Filing to Change the Annual Transmission Revenue Requirement	Federal Energy Regulatory Commission	Independence Power & Light	2021
14. El Paso Electric Company	Case No. 20-00104-UT	Cost of Service and Rate Design	New Mexico Public Regulatory Commission	U.S. Department of Defense and all other Federal Executive Agencies	2020, 2021
15. Lubbock Power & Light	Cause No. 51100	Transmission Cost of Service	Public Utility Commission of Texas	Lubbock Power & Light	2020
16. Crawfordsville Electric Light & Power	Cause No. 45420	Energy Cost Adjustment Tracker, Non-Recurring Charges, and LED Lighting Rates	Indiana Utility Regulatory Commission	Crawfordsville Electric Light & Power	2020, 2021
17. Richmond Power & Light	Cause No. 45361	Revenue Requirement	Indiana Utility Regulatory Commission	Richmond Power & Light	2020
18. Vectren Energy of Indiana	Docket No. 43354 – MCRA 21	MISO Cost and Revenue Adjustment Tracker	Indiana Utility Regulatory Commission	SABIC Innovative Plastics Mount Vernon, LLC	2017
19. El Paso Electric Company	Docket No. 46831	Cost of Service and Rate Design Studies	Public Utility Commission of Texas	U.S. Department of Defense and all other Federal Executive Agencies	2017
20. Golden Valley Electric Association	Docket No. U-17-007	Revenue Requirement and Cost of Service Study and Transmission and Ancillary Service Rates Development	Regulatory Commission of Alaska	Golden Valley Electric Association	2016, 2017
21. Homer Electric Association	Docket No. U-15-141	Revenue Requirement and Cost of Service Study and Transmission and Ancillary Service Rates Development	Regulatory Commission of Alaska	Homer Electric Association	2015, 2016
22. Homer Electric Association	Docket No. U-13-203	Revenue Requirement and Cost of Service Study and Transmission and Ancillary Service Rates Development	Regulatory Commission of Alaska	Homer Electric Association	2014, 2015
23. Homer Electric Association	Docket No. U-10-97	Revenue Requirement and Cost of Service Study	Regulatory Commission of Alaska	Homer Electric Association	2010

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
24. Chugach Electric Association	Docket No. U-09-80	Revenue Requirement and Cost of Service Study	Regulatory Commission of Alaska	Homer Electric Association	2010
25. Kaua'i Island Utility Cooperative	Docket No. 2009-0050	Cost of Service Study and Standby Rate Development	Hawai'i Public Utilities Commission	Kaua'i Island Utility Cooperative	2009
26. Golden Valley Electric Association	Docket No. U-08-139	Cost of Service Study and Transmission and Ancillary Service Rates Development	Regulatory Commission of Alaska	Golden Valley Electric Association	2008
27. Chugach Electric Association	Docket No. U-06-134	Unbundled Financial Statements, Calculation of Equity, Patronage Capital Accruals, and Rate Impacts Due to New Generation	Regulatory Commission of Alaska	Homer Electric Association	2007

Attachment C-LAT-3-Proposed Rates

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ATTACHMENT C-LAT-3-PROOF OF REVENUE - CURRENT, CRRF PROPOSED, AND OPTIC PROPOSED RATES
PUBLIC UTILITY COMMISSION OF TEXAS
CENTROPOINT ENERGY HOUSTON ELECTRIC, LLC
2023 YEAR-END RATE CASE
DOCKET NO. 2023

Line No	Class	Charge	Unit	Current	Proposed	Change	Current	Proposed	Change
1	Residential	Customer	per Customer per Month	80,480.725	80,480.725	0	80,480.725	80,480.725	0
2		Vending	per Meter per Month	24,107.476	24,107.476	0	24,107.476	24,107.476	0
3		Transmission	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
4		Distribution	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
5		Subtotal Base Rates		875,131.757	875,131.757	0	875,131.757	875,131.757	0
6		Distribution Cost Recovery Factor (DCRF)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
7		Subtotal Base Rates with DCRF		875,131.757	875,131.757	0	875,131.757	875,131.757	0
8		Energy Efficiency Cost Recovery Factor (EECRF)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
9		Subtotal Base Rates with EECRF		875,131.757	875,131.757	0	875,131.757	875,131.757	0
10		Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
11		Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
12		Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
13		Subtotal Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
14		Subtotal Base Rates		875,131.757	875,131.757	0	875,131.757	875,131.757	0
15	Secondary <= 10 Kva	Customer	per Customer per Month	80,480.725	80,480.725	0	80,480.725	80,480.725	0
16		Vending	per Meter per Month	24,107.476	24,107.476	0	24,107.476	24,107.476	0
17		Transmission	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
18		Distribution	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
19		Subtotal Base Rates		875,131.757	875,131.757	0	875,131.757	875,131.757	0
20		Distribution Cost Recovery Factor (DCRF)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
21		Subtotal Base Rates with DCRF		875,131.757	875,131.757	0	875,131.757	875,131.757	0
22		Energy Efficiency Cost Recovery Factor (EECRF)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
23		Subtotal Base Rates with EECRF		875,131.757	875,131.757	0	875,131.757	875,131.757	0
24		Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
25		Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
26		Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
27		Subtotal Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
28		Subtotal Base Rates		875,131.757	875,131.757	0	875,131.757	875,131.757	0
29	Secondary > 10 Kva	Customer	per Customer per Month	80,480.725	80,480.725	0	80,480.725	80,480.725	0
30		Vending	per Meter per Month	24,107.476	24,107.476	0	24,107.476	24,107.476	0
31		Transmission	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
32		Distribution	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
33		Subtotal Base Rates		875,131.757	875,131.757	0	875,131.757	875,131.757	0
34		Distribution Cost Recovery Factor (DCRF)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
35		Subtotal Base Rates with DCRF		875,131.757	875,131.757	0	875,131.757	875,131.757	0
36		Energy Efficiency Cost Recovery Factor (EECRF)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
37		Subtotal Base Rates with EECRF		875,131.757	875,131.757	0	875,131.757	875,131.757	0
38		Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
39		Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
40		Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
41		Subtotal Transmission Charge (TCHG)	per kW	31,810,000.554	31,810,000.554	0	31,810,000.554	31,810,000.554	0
42		Subtotal Base Rates		875,131.757	875,131.757	0	875,131.757	875,131.757	0

Attachment C-LAT-3-Proposed Rates

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ATTACHMENT C-LAT-3-PROOF OF REVENUE - CURRENT, CERP PROPOSED, AND OPTIC PROPOSED RATES
PUBLIC UTILITY COMMISSION OF TEXAS
CENTROPOINT ENERGY HOUSTON ELECTRIC, LLC
2023 YEAR-END RATE CASE
DOCKET NO. 202311

Line No	Class	Charge	Unit		\$	Unit Change	\$	Unit Change	\$	Unit Change
1	Primary	Customer	per Customer per Month							
2		Variable	per kWh	1.72	127,859	\$	37.72	121,812	\$	47.47
3		Variable	per kWh	7.741	440,265	\$	59.55	440,265	\$	47.95
4		Variable	per kWh	4.892	1,375,004	\$	785.58	1,345,555	\$	778.95
5		Variable	per kWh	0.582	797,864	\$	81.13	754,595	\$	82.12
6		Transmission	per MVA	1,151,347	0	\$	-	0	\$	-
7		Transmission	per MVA	7,031,307	0	\$	-	0	\$	-
8		Distribution	per Billing Kva	15,760,407	50,475,634	\$	3,594,070	52,436,295	\$	3,735,911
9		Subtotal Rates			79,747,730	\$		97,770,767	\$	
10		Subtotal Rates with LUMP		15,760,407	65,147,730	\$		83,034,555	\$	
11		Energy Efficiency Cost Recovery Factor (EECRF)	per kWh	7,709,287,939	9,127,724	\$	0.70770	9,728,143	\$	0.70117
12		Rate Case Expense Surcharge (RCS)	per Billing Kva	14,942,427	34	\$	0.00000	34	\$	0.00000
13		Transmission Cost Recovery Factor (TCRF)	per Billing Kva	11,017,922	0,575,771	\$	0.71255	9,710,104	\$	0.71985
14		Transmission Cost Recovery Factor (TCRF)	per Billing Kva	4,437,345	21,895,711	\$	4,690,967	21,536,501	\$	4,389,967
15		Transmission Charge (TCG)		0	10,197,129	\$	0.70622	10,735,625	\$	0.70622
16		Transmission Charge	per Billing Kva	401,470	252,600	\$	0.63101	279,958	\$	0.63101
17		Subtotal Transmission Charge (TCG)	per Billing Kva	11,017,922	22,758	\$	0.701022	22,762	\$	0.701022
18		Subtotal Rates			45,667,347	\$		43,555,952	\$	
19		Total Revenue			90,797,152	\$		87,570,112	\$	
20	Transmission	Customer	per Customer per Month							
21		Variable	per kWh	4.795	642,899	\$	127.78	730,761	\$	185.47
22		Transmission	per MVA	4,795	3,477,950	\$	732.48	3,477,950	\$	718.07
23		Distribution	per Billing Kva	97,471,773	0	\$	-	0	\$	-
24		Subtotal Rates		97,471,773	19,285,470	\$	0.586270	19,909,395	\$	0.676270
25		Subtotal Rates with LUMP		57,774,575	21,702,735	\$		29,902,317	\$	
26		Subtotal Rates with LUMP			21,002,735	\$		27,724,417	\$	
27		Energy Efficiency Cost Recovery Factor (EECRF)		27,779,428,721	257,789	\$	0.70031	280,872	\$	0.70031
28		Rate Case Expense Surcharge (RCS)		37,974,575	34	\$	0.00000	34	\$	0.00000
29		Transmission Charge (TCG)		97,471,773	0	\$	-	0	\$	-
30		Transmission Charge (TCG)		19,541,858	10,048,351	\$	8.20375	128,254,401	\$	5.48701
31		Transmission Charge	per Billing Kva	66,085,219	16,192,710	\$	0.75155	17,722,873	\$	0.75567
32		Transmission Charge	per Billing Kva	45,981,541	33,134	\$	0.00000	95,164	\$	0.00000
33		Subtotal Transmission Charge (TCG)		57,974,575	155,860	\$	0.70410	155,862	\$	0.70410
34		Subtotal Rates			247,652,359	\$		167,120,752	\$	
35		Total Revenue			111,027,771	\$		117,702,997	\$	
36	Street Lighting/Miscellaneous Lighting	Customer	per Customer per Month							
37		Variable	per Meter per Month	557,580	0	\$	-	0	\$	-
38		Transmission	per 400 Kva	0	0	\$	-	0	\$	-
39		Distribution	per Billing Kva	71,592,629	0	\$	-	0	\$	-
40		Subtotal Rates		71,592,629	0	\$		0	\$	
41		Subtotal Rates with LUMP			71,652,779	\$		71,652,779	\$	
42		Energy Efficiency Cost Recovery Factor (EECRF)	per kWh	401	401	\$	-	0	\$	-
43		Rate Case Expense Surcharge (RCS)	per kWh	401	401	\$	-	0	\$	-
44		Transmission Charge (TCG)	per kWh	617,564	617,564	\$	-	617,564	\$	-
45		Transmission Charge (TCG)	per kWh	0	0	\$	-	0	\$	-
46		Transmission Charge (TCG)	per kWh	0	0	\$	-	0	\$	-
47		Transmission Charge	per kWh	617,564	617,564	\$	-	617,564	\$	-
48		Transmission Charge	per kWh	617,564	617,564	\$	-	617,564	\$	-
49		Subtotal Transmission Charge (TCG)		617,564	617,564	\$	-	617,564	\$	-
50		Subtotal Rates			1,122,730	\$		1,122,730	\$	
51		Total Revenue			72,857,779	\$		72,857,779	\$	
52	Total	Customer	per Meter per Month		78,240,898			76,542,944		
53		Metering	per Meter per Month		114,656,438			112,502,417		
54		Transmission	per 400 Kva/NCP Kva		0			0		
55		Distribution	per Billing Kva		1,472,995,574			1,439,742,753		
56					1,666,992,700			1,629,887,393		