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Filing Date - 2024-06-21 02:40:14 PM

Control Number - 56211

Item Number - 376

**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
KIT PEVOTO**

**ON BEHALF OF
THE HOUSTON COALITION OF CITIES**

June 21, 2024

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ATTACHMENTS

Attachment KP-1 Resume and Expert Experience of Kit Pevoto

Attachment KP-2 Alton J. Hall, Jr.’s Rate Case Expense Affidavit

WORKPAPER

**Workpaper KP-1 D56211 HCC FUNCTIONALIZATION COST ALLOCATION
MODEL**

Workpaper KP-2 D56211 HCC RATE CLASS COST ALLOCATION MODEL

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Kit Pevoto. I am the President of Kit Pevoto, LLC., a consulting firm
4 specializing in energy regulation and litigation. My business address is 13436
5 Athens Trail, Austin, Texas 78729.

6 **Q. ON WHOSE BEHALF ARE YOU APPEARING?**

7 A. I have been retained by the Houston Coalition of Cities (“HCC”) as an expert
8 witness in this proceeding.

9 **Q. WHAT ARE YOUR PRINCIPAL AREAS OF RESPONSIBILITY IN THIS**
10 **PROCEEDING?**

11 A. My principal areas of responsibility include reviewing the application for cost
12 allocation and rate design issues, providing expert recommendations to HCC, and
13 testifying at the hearing on the merits.

14 **Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND**
15 **PROFESSIONAL EXPERIENCE.**

16 A. I received a Master of Science degree in Electrical Engineering from the
17 University of Texas at Arlington. During my two years at UT Arlington, my
18 studies were concentrated on electrical power systems under the supervision of Dr.
19 Mo-Shen Chen. I focused my studies on issues related to the improvement of the
20 performance of a transmission system through the use of static reactive capacitors.
21 After completing my graduate study, I began working on a federally funded project
22 to study the benefits of the integration of the transmission systems in Texas for the
23 PUC. I started working on the development of transmission access and pricing

1 rules for the Texas wholesale electricity market in 1997. The rules provided for
2 equal and open access of the Texas Electric Reliability Council of Texas
3 (“ERCOT”) transmission system to all wholesale customers. The rules became the
4 foundation for the development of the deregulated electric wholesale market in
5 Texas, as directed by Texas Legislature in 1995.

6 In addition to the transmission access rulemaking project, I have also
7 worked on a number of rate cases for cooperatives and investor-owned utilities
8 (“IOUs”), as a cost allocation and rate design expert. My work in those rate cases
9 included developing complex cost allocation models and rate design analyses. As
10 a result of my work experience in these cases, I am very familiar with the cost
11 allocation models for all IOUs under PUC jurisdiction.

12 In 1997, after becoming the manager of the Costing and Pricing Section at
13 the PUC, I started a project to separate the costs of nine IOUs in Texas into
14 generation, transmission, distribution, metering & billing, and customer services
15 categories. In this project, my staff and I collected data, developed guidelines and
16 procedures for separating costs, and implemented the cost separation for the nine
17 IOUs. The project produced a report that contained all the data collected, the
18 procedure to separate the costs, and, most importantly, the results of the cost
19 separation for the nine IOUs. The unbundled cost information presented in the
20 report was used by the PUC in assisting the Texas Legislature in developing the
21 electric deregulation bill (Senate Bill 7) in the 1999 Legislation. During the 1999
22 Legislative Session, I was very involved in developing information and data for the
23 Legislature to review while it was

developing Senate Bill 7. I was also involved in the negotiations among parties regarding the issue of allocation of stranded costs among customers and assisted in drafting the language reflecting the settlement of this issue included in the Senate Bill 7. Senate Bill 7 provided for the use of the securitization financing to recover generation stranded costs from ratepayers.

In 1999, shortly after Senate Bill 7 was passed and published as Section 39.253 of the Texas Public Utility Regulatory Act (“PURA”), I led a team that developed rules governing the separation of competitive energy services from the integrated IOUs, the separation of the integrated IOUs into several business units, and the cost separation for the development of the non-bypassable charges, in order to implement the provisions related to business separation and the development of non-bypassable charges in Senate Bill 7. Specifically, the rules developed were eventually passed and published as PURA Sections 39.051, 39.201, and 39.251 through 39.265.

I have participated and made significant contributions to rule making projects implementing Senate Bill 7, including Docket No. 22344, which related to the eight Texas IOUs' cost unbundling cases. I testified before the PUC as an expert witness on the issues related to cost allocation and rate design for the non-bypassable charges to be applied in these unbundling cases. I recommended a simplified and uniform rate design for the transmission and distribution rates for all IOUs. The PUC eventually adopted my recommendations with very minor modifications.

1 I left the PUC in May 2001 to pursue a consulting career. As a consultant,
2 I perform information research, policy and economic analyses for clients and
3 participate on behalf of clients before the PUC and Texas Railroad Commission in
4 various rulemaking projects, tariff, and rate cases. I file and defend testimony as
5 an expert witness in contested tariff and rate cases before the PUC and the Texas
6 Railroad Commission. On behalf of various clients, including city governments,
7 state agencies, state universities, state hospitals, private electricity consumers, and
8 retail electric providers, I have participated in over 80 cases before the PUC and
9 the Texas Railroad Commission.

10 In 2008, I testified before the PUC in a case on the determination of
11 transmission expansion plan to accommodate more renewable power into the
12 ERCOT grid, on behalf of a renewable power supplier client. The PUC relied on
13 the cost-benefit analyses developed by me and eventually adopted the transmission
14 expansion plan-a \$4.9 billion transmission expansion in west Texas to allow more
15 wind power moving from the west to other parts of Texas as advocated by me.

16 Through my participation in all of the cases, I have helped my clients save
17 millions of dollars on their electricity spending. I have provided a further
18 summary of my educational background and professional experience in
19 Attachment-KP-1.

20 **II. SCOPE OF TESTIMONY AND SUMMARY OF**
21 **RECOMMENDATIONS**

22 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

1 A. The first purpose of my testimony is to determine the overall revenue requirement
2 impact and rate impact on HCC’s customers resulting from the cost adjustments
3 recommended by HCC’s witnesses Michael Ivey, Mark Garrett, Steven Hunt, and
4 Breandan Mathuna, in PUCT Docket No. 56211, *Application of CenterPoint*
5 *Energy Houston Electric, LLC For Authority To Change Rates*. Another purpose
6 of my testimony is to present HCC’s functionalized class cost-of-service allocation
7 studies that reflect HCC’s recommended cost adjustments. Second, I address cost
8 allocation and rate design issues associated with CenterPoint Energy Houston
9 Electric (“CEHE”)’s proposal in this docket. HCC’s functionalized and class cost
10 of service allocation studies are in Workpaper KP-1 and Workpaper KP-2, which
11 reflect my recommendations on the cost allocation. Third, I will address the rate
12 impact concerns for certain rate classes. Finally, I will present testimony on the
13 rate case expenses incurred by HCC in this proceeding.

14 **Q. PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.**

15 A. The following summarizes my findings and recommendations:

16 1. **HCC’s Recommended Revenue Requirements:**

17 I. ***For the total transmission and distribution (“T&D”) revenue***
18 ***requirement:***

19 HCC’s recommended cost adjustments result in ***a reduction of \$133.6***
20 ***million*** to CEHE’s proposed \$2.362 billion total T&D revenue
21 requirement. HCC’s recommended cost adjustments generate ***a \$76.67***
22 ***million rate reduction*** to CEHE’s current T&D revenue of \$2.305
23 billion.

24 II. ***For the total retail distribution, metering, billing and customer service***
25 ***revenue requirement (collectively “total retail distribution revenue***
26 ***requirement”):***

27 HCC’s recommended cost adjustments result in ***a reduction of \$91.2***
28 ***million*** to CEHE’s proposed

1 \$1.665 billion total retail distribution revenue requirement. These
2 recommended adjustments result in **a \$76.624 million rate reduction** to
3 CEHE's current retail distribution revenue of \$1.651 billion.

4 III. ***For the wholesale transmission revenue requirement:***

5 HCC's recommended cost adjustments result **in a reduction of \$41.91**
6 **million** to CEHE's proposed \$697 million total wholesale transmission
7 revenue requirement. HCC's recommended cost adjustments generate **a**
8 **\$0.05 million rate decrease** to CEHE's current retail wholesale
9 transmission revenue of \$654 million

10 2. **Allocation of Distribution Demand-Related Costs:**

11 To allocate the distribution demand-related costs among rate classes,
12 CEHE should be ordered to use the class peak demands non coincident
13 with CEHE's system peak ("NCP") for June, July, August, and September
14 in the test year, instead of a single class NCP peak demand as proposed by
15 CEHE.

16 3. **Distribution Base Rate Revenue Requirement Assignment among Rate**
17 **Classes:**

- 18 I. CEHE's proposal of assigning the distribution base rate revenue
19 requirement for each rate class to equal the cost allocated to the class
20 resulting from its proposed rate class cost, should be rejected.
- 21 II. While assigning distribution base rate revenue requirement among rate
22 classes, if an overall distribution base rate revenue increase such as
23 CEHE's proposal is permitted in this case, a rate moderation adjustment
24 mechanism should be allowed. The rate moderation adjustment should
25 include setting the maximum percentage rate increase for any rate class
26 at two times the average system percentage rate increase and
27 reallocating the unrecovered rate increases to rate classes not subject to
28 the rate increase cap.
- 29 III. While assigning distribution base rate revenue requirement among rate
30 classes, if an overall distribution base rate revenue decrease, such as
31 HCC's proposal, is allowed in this docket, no rate class should be
32 assigned an increase and every rate class should receive a rate decrease.

1 **III. OVERALL REVENUE REQUIREMENT IMPACT OF HCC’S**
2 **RECOMMENDED COST ADJUSTMENTS**

3 **Q. HOW DID YOU DETERMINE THE OVERALL REVENUE**
4 **REQUIREMENT IMPACT OF HCC’S RECOMMENDED COST**
5 **ADJUSTMENTS?**

6 A. I developed the functionalization and rate class cost allocation studies that
7 incorporated all of HCC’s recommended cost adjustments (as included in the
8 testimony of HCC witnesses Michael Ivey, Mark Garrett, Steven Hunt, and
9 Breandan Mathuna) and my recommendation on cost allocation. HCC’s cost
10 allocation studies also reflect the return of equity recommendation of Texas Coast
11 Utilities Coalition (“TCUC”) witness Randall Woolridge. The results from the
12 calculation embedded in the models will show the impact of all HCC’s
13 recommendations on CEHE’s proposed increases and the rate impact on
14 customers.

15 **Q. PLEASE SUMMARIZE HCC’S RECOMMENDED ADJUSTMENTS THAT**
16 **YOU REFLECTED IN YOUR COST ALLOCATION MODELS.**

17 A. The following table summarizes all of HCC’s recommended adjustments reflected
18 in my cost allocation models:

Table KP-1---Summary of HCC's Proposed Adjustments and Revenue Requirement Impacts				
	Adjustment Amounts	Total RR Impacts	Transmission RR Impact	Distribution RR Impact
<i>Rate Base Items</i>				
Adjustment due to Minimal Impact On Reliability for the Projects Coering SAIDI Improvement, Grid harding, and Resiliency distribution	\$13,924,014	\$3,252,929		\$3,252,929
<u>NOLADIT Adjustment</u>	\$64,790,368	\$5,332,674	\$1,909,147	\$3,423,527
<i>Subtotal Rate Base Items</i>		\$8,585,603	\$1,909,147	\$6,676,456
<i>Expenses items</i>				
Storm Reg Assets Amortization Adj.	\$19,226,899	\$19,226,899	\$271,068	\$18,955,831
Direct Payroll	\$5,982,672	\$5,982,672	\$873,135	\$5,109,537
Affiliate Payroll	\$1,124,225	\$1,124,225	\$184,725	\$939,500
Direct STI	\$2,922,835	\$2,922,835	\$803,471	\$2,119,364
Affiliate STI	\$3,711,616	\$3,711,616	\$643,170	\$3,068,446
Storm Insurance Accural	\$5,848,100	\$5,848,100	\$2,427,817	\$3,420,283
Board of Directors Compensation	\$1,030,895	\$1,030,895	\$181,319	\$849,576
Directors and Officers Insurance	\$720,680	\$720,680	\$126,757	\$593,923
Investor Relations Expense	\$514,094	\$514,094	\$90,422	\$423,672
Executive Severance Expense	\$1,531,113	\$1,531,113	\$269,535	\$1,261,578
<u>Edison Electric Institute Dues</u>	<u>\$877,853</u>	<u>\$877,853</u>	<u>\$159,993</u>	<u>\$717,860</u>
<i>Subtotal Expenses</i>	\$43,490,982	\$43,490,982	\$6,031,412	\$37,459,570
Capital Str. 42.5%/57.5%		\$22,485,078	\$9,434,112	\$13,050,966
ROE 9.5% (TCUC Recom.)		\$58,546,504	\$24,567,182	\$33,979,322
Subtotal		\$133,108,167	\$41,941,853	\$91,166,314
CEHE Retail ERCOT Transmission Payment Responsibility Reduction due to HCC recommended TCOS		<u>\$10,488,224</u>		<u>\$10,488,224</u>
Total-HCC Adjustments		\$143,596,391	\$41,941,853	\$101,654,538

Q. HOW DO HCC'S PROPOSED COST ADJUSTMENTS AFFECT CEHE'S PROPOSED TOTAL COST OF SERVICE IN THIS CASE?

A. The following table shows in detail how HCC's recommended adjustments reduce CEHE's proposed increases:

Table KP-2 Comparison of CEHE and HCC Proposed Revenue Requirements			
Cost of Service Items	CEHE Proposed	HCC	Difference
Operating and maintenance	\$1,946,240,618	\$1,911,883,640	(\$34,356,977)
Depreciation & Amortization	\$583,162,018	\$562,878,750	(\$20,283,268)
Taxes other than Income Taxes	\$329,581,422	\$329,186,093	(\$395,329)
Federal Income Taxes	\$132,311,989	\$113,714,217	(\$18,597,772)
<u>Return on Rate Base</u>	<u>\$850,260,761</u>	<u>\$780,297,715</u>	<u>(\$69,963,046)</u>
Total TD Cost of Service	\$3,841,556,807	\$3,697,960,416	(\$143,596,391)
Other Revenue	\$73,276,770	\$73,276,770	\$0
Total Adjusted TD COS	\$3,768,280,037	\$3,624,683,645	(\$143,596,391)
CEHE Retail ERCOT Transmission Payment Expenses	\$1,406,821,457	\$1,396,333,233	(\$10,488,224)
Retail Distribution Revenue Req.	\$1,665,364,569	\$1,574,163,287	(\$91,201,281)
Wholesale Transmission Rev. Req.	<u>\$696,094,011</u>	<u>\$654,187,124</u>	<u>(\$41,906,887)</u>
Total TD Revenue Requirement	\$2,361,458,580	\$2,228,350,411	(\$133,108,169)

REVENUE REQUIREMENT IMPACT

Q. WHAT IS THE TOTAL OVERALL REVENUE REQUIREMENT IMPACT OF HCC'S RECOMMENDED ADJUSTMENTS?

A. The following table shows a summary of impacts of HCC's recommended cost adjustments on CEHE's total T&D revenue requirement:

Table KP-3 Comparison of CEHE's and HCC Recommended Total TD Revenue Requirement			
Total Adjusted TD Revenue Requirement			
	CEHE Proposed	HCC Recommended	Total HCC Adjustment RR Impact
Total TD Rev Req.	\$2,361,458,580	\$2,228,350,411	(\$133,108,169)
Present Total TD Rev. Req.	\$2,305,017,380	\$2,305,017,380	
RR Change from current rates \$	\$56,441,200	(\$76,666,969)	
Increase/Decrease (%)	2.45%	-3.33%	

As seen from this table, for the total adjusted transmission and distribution ("T&D") revenue requirement, HCC's recommended cost adjustments result in an approximate *\$133.1 million reduction* to

1 CEHE's proposed \$2.362 billion total T&D revenue requirement. This table also
2 shows that the HCC's recommended adjustments generate a total ***\$76.7 million***
3 ***reduction*** to CEHE's current \$2.305 billion total T&D revenue (a 3.3% reduction).
4 In contrast, CEHE's proposed \$2.36 billion total revenue requirement results in an
5 approximate ***\$56.4 million increase*** to its current total T&D revenue (a 2.5%
6 increase).

7 The total T&D revenue requirement comprises of two types of revenues:
8 the retail distribution revenue requirement and the wholesale transmission revenue
9 requirement. I will discuss the impacts of HCC's cost adjustments on these two
10 revenue requirements next.

11 **Q. WHAT ARE THE IMPACTS OF HCC'S RECOMMENDED COST**
12 **ADJUSTMENTS ON CEHE'S RETAIL DISTRIBUTION AND**
13 **WHOLESALE TRANSMISSION REVENUE REQUIREMENTS?**

14 A. The following table shows a summary of impacts of HCC's recommended
15 adjustments on CEHE's retail distribution revenue requirement and wholesale
16 transmission revenue requirement:

Table KP-4 Comparison of CEHE's and HCC Recommended Retail Distribution and Wholesale Transmission Rev Req.			
Total Retail Distribution Revenue Requirement			
	CEHE Proposed	HCC Recommended	Total HCC Adjustment RR Impact
Total Retail Distribution RR	\$1,665,364,569	\$1,574,163,287	(\$91,201,281)
Present Retail Distribution RR	\$1,650,780,562	\$1,650,780,562	
RR Change from current rates \$	\$14,584,007	(\$76,617,275)	
Increase/Decrease (%)	0.88%	-4.64%	
Total Wholesale Transmission Revenue Requirement			
	CEHE Proposed	HCC Recommended	Total HCC Adjustment RR Impact
Total Retail Distribution RR	\$696,094,011	\$654,187,124	(\$41,906,887)
Present Retail Distribution RR	\$654,236,818	\$654,236,818	
RR Change from current rates \$	\$41,857,193	(\$49,694)	
Increase/Decrease (%)	6.40%	-0.01%	

Retail Distribution Revenue Requirement:

As seen from this table, for the retail distribution revenue requirement, HCC's recommended cost adjustments result in an approximate **\$91.2 million reduction** to CEHE's proposed \$1.665 billion retail distribution revenue requirement. This table also shows that the HCC's recommended adjustments generate a **\$76.6 million reduction** to CEHE's current \$1.651 billion retail distribution revenue (a 4.6% decrease). In contrast, CEHE's proposed \$1.665 billion retail distribution revenue requirement results in an approximated **\$14.5 million increase** to its current retail distribution revenue (an approximate 0.88% increase).

Wholesale Transmission Revenue Requirement:

As seen from this table, for the wholesale transmission revenue requirement, HCC's recommended cost adjustments result in an approximated

1 ***\$41.9 million reduction*** to CEHE's proposed \$696 million wholesale transmission
2 revenue requirement. This table also shows that the HCC's recommended
3 adjustments generate a ***\$0.05 million decrease*** to CEHE's current \$654 million
4 wholesale transmission revenue (a 0.01% decrease). In contrast, CEHE's proposed
5 \$697 million wholesale transmission revenue requirement results in an
6 approximate ***\$41.9 million increase*** to its current wholesale transmission revenue
7 (a 6.5% increase).

8 **Q. PLEASE DESCRIBE THE ASSUMPTIONS USED TO CALCULATE THE**
9 **REVENUE REQUIREMENT IMPACT AS SHOWN IN THE TABLE?**

10 A. The calculation of the revenue requirement impact shown in this table reflects
11 CEHE's proposed costs, other than those affected by HCC's recommended
12 adjustments and the TCUC adjustment endorsed by HCC. The purpose of this
13 calculation is to determine the impact of HCC's recommended adjustments on the
14 overall revenue requirement. The revenues shown in this table are for illustration
15 purposes and do not represent HCC's endorsement of CEHE's proposed costs,
16 other than those affected by HCC recommended adjustments as reflected included
17 in the testimony. HCC may also support other adjustments to CEHE proposed
18 costs, cost allocation, and rate design raised and addressed by other intervenors or
19 Staff.

20 **IV. ALLOCATION OF DEMAND RELATED DISTRIBUTION**
21 **COSTS**

22 **Q. PLEASE EXPLAIN HOW CEHE PROPOSES ALLOCATING THE**
23 **DEMAND REALTED DISTRIBUTION COSTS AMONG RATE CLASSES.**

1 A. CEHE proposes allocating the demand-related distribution costs based on each rate
2 class' highest peak demand that is non coincident with CEHE's system for the test
3 year. In other words, the allocation factor used to allocate the demand-related
4 distribution costs is developed based on one single peak demand for each rate
5 class.

6 **Q. DO YOU AGREE WITH CEHE'S PROPOSED ALLOCATION**
7 **METHODOLOGY TO ALLOCATE ITS DEMAND-RELATED**
8 **DISTRIBUTION COSTS?**

9 A. No, I do not, because the use of a single peak demand allocation methodology does
10 not accurately reflect that the buildup of CEHE's distribution facilities is to meet
11 the demand and need for all four summer months of June through September,
12 when the rate class' peak demands occur. CEHE is a summer peaking system
13 during the four months of June, July, August, and September when the highest
14 demands happen. Therefore, based on a cost-causation principle, it is reasonable
15 to base the allocation of the demand-related distribution costs on the four class
16 NCP peak demands for June, July, August, and September. In addition, using the
17 four class NCP peak demands to allocate demand-related distribution costs is
18 consistent with the allocation methodology for transmission costs which is based
19 on the four coincident peak demand for June, July, August, and September.

1 **V. DISTRIBUTION BASE RATE REVENUE REQUIREMENT**
2 **ASSIGNMENT**

3 **DISTRIBUTION BASE RATE REVENUE REQUIREMENT**
4 **ASSIGNMENT**

5 **Q. WHAT ARE CUSTOMER CLASS BASE RATE REVENUE REQUIREMENT**
6 **ASSIGNMENTS?**

7 A. Customer class base rate revenues are the revenue levels that base rates are
8 designed to recover from each rate class. The customer class base rate revenue
9 assignment is the process by which the class base rate revenues are determined for
10 each class.

11 **Q. HOW DID CEHE PROPOSE TO ASSIGN ITS TOTAL DISTRIBUTION**
12 **BASE RATE REVENUE INCREASE AMONG CLASSES IN THIS**
13 **DOCKET?**

14 A. CEHE assigned a distribution base rate revenue requirement for each class to be
15 equal to the cost allocated to the class resulting from its proposed rate class cost.
16 Ideally, the results of a cost-of-service rate class allocation study should be
17 adopted as targeted revenues to be collected from each class. However, accepting
18 the cost-of-service study “as is” could produce significant impacts on some
19 classes, which is evident for the distribution base rate revenue requirement in this
20 case. Therefore, an adjustment to the results of a cost-of-service rate class
21 allocation study should be considered when assigning distribution base rate
22 revenue requirements to different classes.

23 **Q. DO YOU AGREE WITH CEHE’S PROPOSED ASSIGNMENT**
24 **METHODOLOGY OF ITS TOTAL DISTRIBUTION BASE RATE**
25 **REVENUE AMONG RATE CLASSES IN THIS DOCKET?**

1 A. No I don't, because CEHE's proposed rate class revenue distribution methodology
 2 creates unreasonably disproportionate rate impacts among rate classes. The
 3 following table shows a summary of the class distribution base rate revenue
 4 increases, which result from CEHE's proposed class distribution base rate revenue
 5 assignment of its proposed \$1.655 billion distribution revenue requirement:

Table KP-5 CEHE's Proposed Rate Class Increases resulting from Distribution Base Rate Rev. Reg Assignment Based on CEHE COS Allocation		
	Distribution Rev. Req. Increase/Decrease	
	\$000	%
Res	\$73,156	8.1%
Sec<=10kVa	-\$2,388	-9.4%
Sec >10kVa	-\$57,247	-9.9%
Primary	\$9,452	22.8%
Trans. Voltage	-\$3,088	-11.4%
MLT	-\$2,687	-46.2%
SLT	<u>-\$2,614</u>	<u>-3.7%</u>
Total	\$14,584	0.9%

6
 7 As seen in this table, while the total system sees a 0.9% rate increase, the
 8 Residential rate class and Primary rate class are the only rate classes to receive an
 9 increase, yielding *an 8.1% increase for Residential and a 22.8% increase for*
 10 *Primary*. The remaining rate classes would receive a decrease, ranging from *-3.7%*
 11 *to -46.2%*. CEHE's proposed distribution base rate revenue requirement
 12 assignment methodology creates rate increases on the Residential and Primary rate
 13 classes, (which happen to serve 88% of its total customers), yet assigns substantial
 14 rate reductions to the remaining five rate classes (which comprise only 12% of its
 15 total customers). In other words, under CEHE's proposed distribution base rate

1 revenue requirement assignment among rate classes, 88% of CEHE's customers
2 would experience a rate increase and the remaining 12% customers would receive
3 a substantial rate reduction. Such a disproportionate rate impact among the rate
4 classes is not reasonable. Therefore, an adjustment to the rate class distribution
5 base rate revenue assignment that is developed based on the results of CEHE's
6 proposed cost-of-service rate class allocation study should be considered to
7 mitigate the rate impacts to the majority of CEHE's customers who take service in
8 the Residential and Primary rate classes.

9 **Q. HAS THE COMMISSION ADOPTED RATE MODERATION**
10 **ADJUSTMENTS IN THE PAST?**

11
12 A. Historically, in rate cases where a rate moderation adjustment is necessary to
13 mitigate rate impacts, the Commission has often allowed the use of a rate
14 moderation adjustment mechanism that employs a multiple of the system average
15 percentage increases to set the limit on the increase that a single class should
16 experience. For example, if the average system percentage increase is 10% and a
17 rate increase limit is supposed to be set at 2 times the average system percentage
18 rate increase, the maximum rate increase that can be imposed on a rate class is
19 20%. After assigning the capped rate increases for the rate classes that experience
20 rate shock, the rate increases unrecovered from these rate classes would be picked
21 up by other rate classes that are not subject to the rate increase cap.

22 Previously, the Commission has set the ceiling on rate increases to be
23 between 1.5 and 2.0 times the system average increase, for situations where a limit
24 on the maximum rate increase is necessary. When determining the appropriate rate

1 increase factor to be used, the magnitude of the average system rate increase is
2 often taken into consideration. In general, the larger the average system
3 percentage rate increase is, the smaller the rate increase factor will be.

4 **Q. WHAT RATE MODERATION ADJUSTMENT MECHANISM DO YOU**
5 **PROPOSE IN THIS RATE CASE IF AN INCREASE IN CEHE'S TOTAL**
6 **DISTRIBUTION REVENUE REQUIREMENT IS ALLOWED?**

7 A. If an overall distribution base rate revenue increase is permitted in this case and the
8 distribution base rate revenue requirement based on cost allocation study results
9 creates unreasonable and disparate rate impacts, I propose a rate moderation
10 adjustment mechanism that includes setting the maximum percentage rate increase
11 for any rate class at *two times the average system percentage rate increase* and
12 reallocating the unrecovered rate increases to rate classes not subject to the rate
13 increase cap. I believe that this proposal is reasonable because it mitigates
14 unreasonable and disproportionate rate impacts among rate classes, as well as
15 reducing the rate impact on the two rate classes that serve most of CEHE's
16 customers. Additionally, this rate moderation methodology has been often allowed
17 by the Commission and the application of a rate increase cap that is two times the
18 average system percentage rate increase has been accepted by the Commission to
19 be used in mitigating rate impacts.

20 **Q. SHOULD THE COMMISSION CONSIDER ADJUSTMENTS TO THE**
21 **DISTRIBUTION BASE RATE REVENUE REQUIREMENT ASSIGNMENT**
22 **THIS IS DEVELOPED BASED ON COST ALLOCATION STUDY**
23 **RESULTS, IF A DECREASE IN CEHE'S TOTAL DISTRIBUTION**
24 **REVENUE REQUIREMENT IS ALLOWED?**

25 A. Yes, the Commission should consider adjusting the distribution base rate revenue
26 requirement assignment when a decrease

1 in total distribution revenue requirement is permitted and the assignment allows for
2 some rate classes receiving significant rate increases. When the system experiences
3 a rate decrease, no rate class should receive a rate increase and every rate class
4 should be assigned a rate decrease. When the overall system is experiencing a
5 decrease, to avoid sending an incorrect price signal, no rate class should be
6 assigned an increase.

7 As discussed earlier in this testimony, HCC's recommended cost
8 adjustments result in a \$76.6 million rate reduction to CEHE's current retail
9 distribution base rate revenue of \$1.651 billion. As shown in the following section
10 of this testimony, assigning HCC's recommended distribution base rate revenue
11 requirement to each rate class based on the allocated costs would create
12 unreasonable and disparate rate impacts among rate classes (two rate classes would
13 receive increases while the remaining five rate classes would be assigned
14 significant decreases) Therefore, in the next section of my testimony, I will further
15 discuss why and how adjustments to the distribution base rate revenue requirement
16 assigned should be used to mitigate the unreasonable and disparate rate impacts
17 among rate class, when assigning HCC's proposed distribution base rate revenue
18 requirement to different rate classes.

19 **HCC'S PROPOSED RETAIL DISTRIBUTION REVENUE**
20 **REQUIREMENT ASSIGNMENT**

21 **Q. DID YOU DEVELOP AN ALLOCATION OF DISTRIBUTION BASE RATE**
22 **REVENUES THAT IS BASED ON THE COST ALLOCATION RESULTS**
23 **FROM HCC'S COST ALLOCATION STUDY AND REFLECTS ALL OF**
24 **HCC PROPOSED COST ADJUSTMENTS?**

1 A. Yes, I did. The following table shows a summary of the rate class base rate
 2 revenue changes based on the cost allocation results from HCC's cost allocation
 3 studies, which reflects all of HCC's proposed adjustments:

Table KP-6 Distribution Base Rate Rev. Req Assignment Based on HCC's Proposed COS and Cost Allocation		
	Distribution Rev. Req. Increase/Decrease	
	\$000	%
Res	\$6,779	0.8%
Sec<=10kVa	-\$3,141	-12.4%
Sec >10kVa	-\$74,671	-12.9%
Primary	\$6,955	16.8%
Trans. Voltage	-\$3,242	-12.0%
MLT	-\$2,902	-49.9%
SLT	-\$6,395	-9.1%
Total	-\$76,617	-4.6%

4
 5 As seen in this table, the assignment of HCC's distribution base rate
 6 revenue requirement among rate classes, based on each rate class' cost resulting
 7 from HCC's proposed cost allocation, results in rate impacts ranging from a 50%
 8 decrease to a 17% increase. Even when the system experiences *an overall 4.6%*
 9 *rate decrease*, the Primary rate class receives an approximated *17% rate increase*
 10 and the Residential class receives an approximated *1% rate increase*, while the
 11 remaining rate classes experience a *significant base rate revenue decrease*
 12 *ranging between -9.1% and -50%.*

13 **Q. PLEASE EXPLAIN WHY THE DISTRIBUTION BASE RATE REVENUE**
 14 **REQUIREMNT ASSIGNMENT SHOWN IN TABLE KP-7 IS NOT**
 15 **REASONABLE.**

1 A. It is not reasonable for the rate classes to experience such extremely
2 disproportionate rate impacts (from a 50% rate decrease to a 17% rate increase).
3 It is also unreasonable that while the overall system experiences a rate decrease,
4 any rate class should receive a rate increase. Allowing a rate increase to any rate
5 class while the overall system receives a rate decrease would send an incorrect
6 pricing signal to customers.

7 Lastly, it is not reasonable that out of the seven rate classes, one rate class
8 (the Secondary Larger than 10kVA rate class) receives a rate decrease almost as
9 much as the total system rate decrease. As seen in the table above, the Secondary
10 Larger than 10kVA is assigned *a \$74.7 million rate decrease*, while the total
11 system experiences *a \$76.7 million rate decrease*. Therefore, adjustments to the
12 distribution base rate revenue requirement assignment based on cost allocation
13 study results should be used to mitigate the unreasonable and disparate rate
14 impacts among rate classes.

15 **Q. DO YOU PROPOSE ADJUSTMENTS TO THE DISTRIBUTION BASE**
16 **RATE REVENUE REQUIREMENT ASSIGNMENTS RESULTING FROM**
17 **HCC'S COST ALLOCATION STUDY?**

18 A. Yes, I do. The following table shows a summary of the class distribution base rate
19 revenue changes that reflect my proposed adjustments to the distribution base rate
20 revenue requirement assignment based on cost results from HCC's cost allocation
21 study:

Table KP-7 Distribution Base Rate Rev. Reg Assignment reflecting HCC's Rate Moderation Adjustment		
	Distribution Rev. Req. Increase/Decrease	
	\$000	%
Res	-\$20,928	-2.3%
Sec<=10kVa	-\$1,903	-7.5%
Sec >10kVa	-\$45,229	-7.8%
Primary	-\$963	-2.3%
Trans. Voltage	-\$1,963	-7.2%
MLT	-\$1,758	-30.2%
SLT	-\$3,874	-5.5%
Total	-\$76,617	-4.6%

As I discussed earlier, if the system experiences a decrease, no rate class should receive an increase in its distribution base rates and each rate class should receive a rate decrease. As seen in this table, I assign no increase to the Residential and Primary rate classes. Instead, I assign a 2.3% decrease (2.3% equaling half of the 4.6% overall system decrease) to each of the Residential and Primary rate classes. Then I assign the remaining total overall system decrease to the remaining rate classes, based on the rate decreases assigned to these rate classes prior to my proposed revenue requirement adjustments.

Q. PLEASE EXPLAIN THE DISTRIBUTION BASE RATE REVENUE REQUIREMENT ASSIGNMENT RESULTING FROM YOUR PROPOSED ADJUSTMENTS.

A. As seen from the Table KP-7 above, my proposed adjustments to the distribution base rate revenue requirement assignment results in a more even assignment of the \$76.6 million rate increases among rate classes, compared to those resulting from the pre-adjusted assignment. No rate class receives a rate increase. After the application of my proposed adjustments,

1 the rate classes experiencing rate decreases before the re-assignment continues to
2 receive significant percentage rate decreases (ranging from -5.5% to -30%).

3 I believe that my proposed adjustments to the distribution base rate revenue
4 requirement assignment is reasonable, because it provides the correct pricing
5 signal to customers and results in a more reasonable distribution of the total overall
6 system rate decrease among rate classes.

7 **VI. RATE CASE EXPENSES**

8 **Q. WHAT IS THE AMOUNT OF RATE CASE EXPENSES ASSOCIATED**
9 **WITH KIT PEVOTO, LLC'S SERVICES IN THE PROCEEDING**
10 **THROUGH MAY 31, 2024?**

11 A. Kit Pevoto LLC's professional fees through May 31, 2024 was \$19,562.50. These
12 fees were for time spent reviewing application testimony, schedules and
13 workpapers, discovery responses, developing discovery, developing issues,
14 developing analyses and schedules, conferring with counsel, participating in
15 settlement discussions, and conferring with other experts working on the case. A
16 schedule of the hours billed is attached to Attachment KP-2, the Affidavit of Alton
17 J. Hall, Jr.

18 **Q. PLEASE IDENTIFY THE STAFF WHO CHARGED PROFESSIONAL**
19 **HOURS TO THIS CASE, THEIR HOURLY RATES, AND TOTAL HOURS**
20 **BILLED.**

21 A. I am the only staff who works on this case. As shown in Attachment KP-2, I billed
22 78.5 hours to this case through May 31, 2024, at a billing rate of \$250.00 per hour.

23 I anticipate I will incur additional fees in the amount of \$50,000 to
24 complete this case. The estimated amount reflects 135 actual hours for June, 50

1 estimated hours for July, and 15 estimated hours for August.

2 **Q. IS YOUR BILLING RATE AND TIME SPENT ON THE TASKS IN THIS**
3 **CASE REASONABLE?**

4 A. Yes. My billing rate is reasonable and is the billing rate for services provided to
5 similar clients. My rate is in the range of rates charged by other consultants with
6 similar experience and is reasonable for consultants providing these types of
7 regulatory and expert witness services in Texas.

8 My hourly billing rate is particularly reasonable given my qualifications
9 and experience. I have been working in the Texas energy regulatory industry for
10 more than thirty (30) years. I previously worked at the Public Utility Commission
11 of Texas for twelve (12) years and have been an independent consultant for the last
12 twenty (20) years. I am a recognized cost allocation and rate design expert in the
13 Texas energy industry. I have participated as an expert witness in over eighty (80)
14 cases before both the Public Utility Commission of Texas and Texas Railroad
15 Commission.

16 **Q. DO YOUR CHARGES INCLUDE ANY OF THE TYPES OF CHARGES**
17 **THAT MAY BE EXCLUDABLE?**

18 A. No. I have not included out of pocket expenses at this time. My charges are
19 entirely for professional fees.

20 **Q. WAS THERE ANY DUPLICATION OF SERVICES OR TESTIMONY?**

21 A. No. I coordinated with the other city groups participating in this proceeding for
22 purposes of not duplicating services or testimony.

23 **Q. DO THE ISSUES RAISED IN YOUR TESTIMONY HAVE A**
24 **REASONABLE BASIS IN LAW, POLICY, AND FACT?**

1 A. Yes. The issues raised in my testimony are reasonably based in law, policy, and
2 fact, being factually accurate and consistent with sound regulatory law and policy.

3 **Q. WHAT IS YOUR CONCLUSION REGARDING KIT PEVOTO, LLC'S**
4 **ACTUAL CHARGES?**

5 A. In my opinion, my fees of \$19,562.50 incurred through May 31, 2024, are
6 reasonable and necessary and are not disproportionate, excessive, or unwarranted
7 in relation to the nature and scope of the filing. Furthermore, to the best of my
8 knowledge, I have fully performed all the tasks as described earlier in this
9 testimony and as identified in my invoices for 2024.

10 **Q. WHAT IS YOUR CONCLUSION REGARDING KIT PEVOTO, LLC'S**
11 **ESTIMATED CHARGES?**

12 A. In my opinion, my estimated fee of \$50,000 to complete this case is reasonable and
13 necessary and is not disproportionate, excessive, or unwarranted in relation to the
14 nature and scope of the filing. These fees will include compiling information and
15 data, developing and performing cost and bill impact analyses, participating in and
16 preparing questions for the Utilities' witness deposition, preparing testimony,
17 schedules, attachments, and workpapers, filing direct testimony, responding to
18 discovery, reviewing the applicants' rebuttal testimonies when filed, developing
19 and reviewing discovery related to that testimony, participating in settlement
20 discussions and providing settlement impact analysis, preparing for trial and
21 testifying at trial, if necessary, and providing assistance with any post-hearing
22 briefs if needed.

23 **Q. IS THE REASONABLNESS OF HCC'S TOTAL FEES AND EXPENSES**
24 **PAID AND INCURRED ASSOCIATED WITH THIS DOCKET**
25 **ADDRESSED IN THE TESTIMONY?**

1 A. Yes. As shown in Attachment KP-2 to my testimony, Mr. Hall addresses the legal
2 fees and expenses for Adams and Reese, LLP and other experts and provides
3 expert testimony regarding the necessity and reasonableness of HCC's total fees
4 and expenses paid and incurred in this docket.

5 **Q. DOES YOUR TESTIMONY ADDRESS EVERY POTENTIAL ISSUE IN**
6 **THE CAS?**

7 A. No. My testimony addresses a very limited scope of issues. My silence on other
8 issues in the case should not be interpreted as my agreement on those issues.

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

10 A. Yes, it does.

Kit Pevoto
Kit Pevoto LLC
512-796-6707
Email: kpevoto@austin.rr.com

EDUCATION:

University of Texas at Arlington, Arlington, Texas

M.S. in Electrical Engineering, May 1991

Concentration: Power System Analysis

Thesis Title: The Dynamic Stability Analysis of a Power System
with Static Var System Using the Eigenvalue Method

National Taiwan University, Taiwan

B.S. in Electrical Engineering, June 1983

EXPERIENCE

Career Summary:

Ms. Pevoto has been working in Texas electric regulatory industry for more than 25 years. She previously worked at Public Utility Commission of Texas for twelve years and has been an independent consultant for the last 20 years. She is a recognized cost allocation and rate design expert in the industry. Ms. Pevoto has a strong knowledge of the cost of service, cost unbundling, cost allocation for electricity utilities and rate design/pricing issues for different aspects of the electricity prices. In addition to her expertise knowledge and experience, her creative and innovative approaches toward finding solutions for issues have allowed her numerous opportunities to get deeply involved and contributed greatly in developing the groundbreaking activities, projects, and rulemakings that led to deregulation at both wholesale and retail level in Texas. Most importantly, her work has helped Texas ratepayers and her clients save millions of dollars on their electricity bills. Ms. Pevoto also represented clients as an expert witness in natural gas utilities rate cases in Texas.

President, March 2019 to Present

Kit Pevoto LLC, Austin, Texas

Independent Consultant, June 2001-Feb 2019

Summary: Performs information research for clients. Performs policy and economic analyses for clients and participates on behalf of clients before the Texas Public Utility Commission (PUCT) in various rulemaking projects, tariff, and rate cases. Files and defends testimony in contested tariff and rate cases before PUCT.

Highlights:

- In the summer of 2008, Ms. Pevoto testified before the Commissioners in the Competitive Renewable Energy Zone docket on the determination of transmission expansion plan to accommodate more renewable power into the ERCOT grid, on behalf of a renewable power supplier client. The Commission relied on the cost-benefit analyses developed by Ms. Pevoto and eventually adopted the transmission expansion plan-a 4.9 billion transmission expansion in west Texas to allow more wind power moving from the west to

other parts of Texas as recommended by Ms. Pevoto. Today, this transmission expansion plan is complete and last year (2019), ERCOT just reached a milestone-the wind power production outpaces the coal generation in the first half of the year. The transmission expansion Ms. Pevoto recommended allowed this to happen.

- On behalf of various clients, including city governments, state agencies, state universities, state hospitals, private electricity consumers, and retail electric providers, Ms. Pevoto has participated in over forty cases before the Public Utility Commission of Texas and Texas Railroad Commission. The forty cases include the rate increase cases for the two largest ERCOT TD utilities (Oncor and CenterPoint), the Oncor buyout case, and the Oncor/Sharyland acquisition case. In her participation in all of these cases, Ms. Pevoto has helped her clients save millions of dollars on their electricity spending. In Docket No. 34800, Ms. Pevoto evaluated a Competitive Generation Service that allowed customers to purchase generation power from sources other than the incumbent utility (Entergy Texas).
- Ms. Pevoto participated in several significant rulemaking projects affecting utilities cost recoveries. These projects affect the cost recoveries for the distribution facilities investments and purchase power costs. One of the projects was to set up the rules and pricing for the Provider of Last Resort Services in ERCOT.
- Ms. Pevoto provides services to help clients to monitor and maintain a database for most updated retail transmission and distribution rates in ERCOT.

Chief Rate Analyst, November 1999 to May 2001

Assistant Director, April 1997-November 1999

Public Utility Commission of Texas (PUC), Austin, Texas

Summary: Participated in the development of rules to implement Texas Deregulation Bill (Senate Bill 7). Leader of a team to work on the development of rules governing the separation of the competitive energy services from the integrated IOUs, the separation of the integrated IOUs into several business units, and the cost separation for the development of the non-bypassable charges. Filed and defended testimony in contested cases (including cost unbundling cases) on: jurisdictional and Texas retail class cost allocation, cost and rate unbundling, rate design, pricing in an increasingly competitive electric industry, transmission cost of service. Supervised new and junior staff. Supervised new and junior staff. Provided training to staff on cost allocation and rate design.

Highlights:

- In the summer of 1999, shortly after the Texas Legislature passed Senate Bill 7, Ms. Pevoto led a team that developed rules governing the separation of competitive energy services from the integrated IOUs, the separation of the integrated IOUs into several business units, and the cost separation for the development of the non-bypassable charges. This project was part of the PUCT's implementation of the Senate Bill 7 provisions related to business separation and development of non-bypassable charges including the unbundled transmission and distribution service charges.
- Ms. Pevoto testified, in the spring of 2000, in Texas IOUs' first cost unbundling cases, before the Commission as an expert witness on cost allocation and rate design regarding the determination of transmission and distribution charges to be applied in these unbundling cases. The Commission adopted her recommendations a simplified and

uniform rate design for the transmission and distribution rates for all IOUs with very minor modifications. In particular, the retail transmission cost recovery rate design recommended by Ms. Pevoto has encouraged and allowed significant investments and improvement in ERCOT's transmission system.

- Ms. Pevoto also made significant contributions in other rulemaking projects involving the implementation of Senate Bill 7, such as the tariff Terms and Conditions for Transmission and Distribution Services and the Price to Beat.
- During the 1999 Legislative Session, Ms. Pevoto was actively involved in developing information and data for the Legislature to review while it was developing Senate Bill 7. She was also involved in the negotiations among parties regarding allocation of stranded costs among customers.
- Ms. Pevoto initiated a project to separate the costs of nine IOUs in Texas into generation, transmission, distribution, metering & billing, and customer services categories. Ms. Pevoto and her staff collected data, developed guidelines and procedures for separating costs, and implemented the cost separation for the nine IOUs. The project produced a report containing all of the data collected, the procedure to separate the costs, and most importantly the results of the cost separation for the nine IOUs. The Commission used the unbundled cost information resulting from this project in assisting the Texas Legislature to develop the electric deregulation bill (Senate Bill 7) in the 1999 legislation.

Senior Rate Analyst, January 1994-March 1997

Public Utility Commission of Texas (PUC), Austin, Texas

- Key staff in the development of the transmission open access rules for Texas, which established the policy for the open access of Texas's ERCOT transmission system, the rate for the usage of the transmission system. The post stamp transmission pricing scheme included in the rules allows generation developers to build anywhere in ERCOT and connect to the statewide transmission system but still pay the same wholesale transmission service rate. This pricing scheme provides the necessary foundation for the wind power potential in West Texas to be realized. Since then, the wind generation developed in west Texas has been exceedingly successful.
- Developed complex cost of service studies and analyzed rate design issues in major electric investor-owned utility rate proceedings. Testified as key expert witness on cost of service studies and rate design issues. Supervised new and junior staff.

Rate Analyst, September 1990-December 1993

Public Utility Commission of Texas, Austin, Texas

Analyzed cost of service study and rate design issues presented in electric utility rate proceedings. Testified as expert witness on above issues. Reviewed compliance and administrative tariff applications filed by regulated electric utilities. Supervised new and junior staff.

Utility Specialist, June 1989-August 1990

Public Utility Commission of Texas, Austin, Texas

Implemented load flow models and developed transmission line database for the project "Optimal State Electricity Supply in Texas," funded by the Oil Overcharge Settlement Funds. Evaluated

model results, wrote the project reports and assisted in presenting the results to other agencies and utilities.

Research Assistant, June 1988-May 1989

University of Texas at Arlington, Arlington, Texas

The Energy Systems Research Center (ESRC)

Assisted in the research of the installation of the Static Var System in a power system and in the demonstration of the effects of the Static Var System in the Power System Simulation Laboratory at the ESRC.

Software Engineer, November 1983-July 1987

Grace Baptist Church, Taipei, Taiwan

Set up and executed the office automation system, and developed the personnel information management and the financial management systems for the church office.

Software Engineer, September 1983-November 1983

5 Plus 2 Information Inc. Taipei, Taiwan

Developed commercialized management information systems for businesses and offices.

Kit Pevoto		
Rate Case Experience		
<u>Docket</u>	<u>Utility Name</u>	<u>Issues Addressed</u>
<u>Before the Public Utility Commission</u>		
9892	Denton County Electric Cooperative	Cost Allocation and Rate Design
10266	Sam Houston Electric Cooperative	Cost Allocation and Rate Design
10561	Jackson Electric Cooperative	Cost Allocation and Rate Design
10820	Magic Valley Electric Cooperative	Service Rules and Regulations
11011	Southwestern Public Service	Fuel Reconciliation
11347	Johnson County Electric Cooperative	Cost Allocation and Rate Design
11567	Kaufman County Electric Cooperative	Service Rules and Regulations
11571	Fayette Electric Cooperative	Cost Allocation and Rate Design
11650	Navasota Valley Electric Cooperative	Cost Allocation and Rate Design
11735	Texas Utilities Electric Company	Cost of Service Study
11999	Houston Lighting and Power Company	Economic Incentive Rate
12700	El Paso Electric Company	Cost of Service Study
12820	Central Power and Light Company	Cost Allocation and Rate Design
13109	Magic Valley Electric Cooperative	Time of Use Rate
14965	Central Power and Light Company	Rate Design
15296	Texas Municipal Power Agency	Transmission Rates
16705	Entergy Gulf States	Cost Allocation
22344	UCOS cases for all IOUs	Rate Design for Unbundled T&D rates
22351	Southwestern Public Service Company	T&D Rate Design
22352	Central Power and Light Company	T&D Rate Design
22353	Southwestern Electric Power Company	T&D Rate Design
22354	West Texas Utilities Company	T&D Rate Design
22355	Reliant Energy HL&P	T&D Rate Design
22356	Entergy Gulf States	T&D Rate Design
28556	Texas-New Mexico Power Company	Design of Competitive Metering Credits
28559	AEP Texas Central Company	Design of Competitive Metering Credits
28560	AEP Texas North Company	Design of Competitive Metering Credits
28562	CenterPoint Energy Houston	Design of Competitive Metering Credits

	Electric	
28563	Oncor Electric Delivery Company	Design of Competitive Metering Credits
28813	Cap Rock Energy Corporation	Cost Allocation and Rate Design
28840	AEP-Texas Central Company	Cost Allocation and Rate Design
30485	CenterPoint Energy Houston Electric	Cost Allocation and Rate Design for TC
30706	CenterPoint Energy Houston Electric	Cost Allocation and Rate Design For CTC
32766	Southwestern Public Service Company	Cost allocation and Rate Design
33734	Electric Transmission Texas, LLC	Certificate of Convenience and Necessity Application
34800	Entergy Gulf States	Cost Allocation and Rate Design
33672	Competitive Renewable Energy Zones Docket	Selection of transmission expansion plans
35717	Oncor Electric Delivery Company	Cost Allocation and Rate Design
35763	Southwestern Public Service Company	Cost Allocation and Rate Design
36025	Texas-New Mexico Power Co.	Cost Allocation and Rate Design
37364	Southwestern Electric Power Company	Cost Allocation and Rate Design
37482	Entergy Texas, Inc.	Purchased Power Capacity Cost Recovery
39690	El Paso Electric Company	Cost Allocation and Rate Design
37744	Entergy Texas, Inc.	Cost Allocation and Rate Design
38147	Southwestern Public Service Company	Cost Allocation and Rate Design
38480	Texas-New Mexico Power Co.	Cost Allocation and Rate Design
38929	Oncor Electric Delivery Company	Cost Allocation and Rate Design
39896	Entergy Texas, Inc.	Cost Allocation and Rate Design
40094	El Paso Electric Company	Cost Allocation and Rate Design
40824	Southwestern Public Service Company	Cost Allocation and Rate Design
41791	Entergy, Texas, Inc.	Cost Allocation and Rate Design
42004	Southwestern Public Service Company	Cost Allocation and, Rate Design
43111	Entergy Texas, Inc.	Distribution Cost Recovery Factor
43695	Southwestern Public Service Company	Cost Allocation and, Rate Design
44572	CenterPoint Energy	Distribution Cost Recovery Factor
45083	Entergy Texas, Inc.	Distribution Cost Recovery Factor
44491	El Paso Electric Company	Cost Allocation and Rate Design
45524	Southwestern Public Service Company	Cost Allocation and, Rate Design
45414	Sharyland Utilities	Cost Allocation and, Rate Design

46449	Southwestern Electric Power Company	Cost Allocation and, Rate Design
46831	El Paso Electric Company	Cost Allocation and Rate Design
46957	Oncor Electric Delivery Company	Cost Allocation and Rate Design
48233	Southwestern Electric Power Company	Cost Allocation and Rate Design
48325	Oncor Electric Delivery Company	Cost Allocation and Rate Design
49421	CenterPoint Energy Houston Electric	Cost Allocation and Rate Design
51415	Southwestern Electric Power Company	Cost Allocation and Rate Design
52040	El Paso Electric Company	Advanced Metering Service Charge
52195	El Paso Electric Company	Cost Allocation and Rate Design
53442	CenterPoint Energy Houston	Distribution Cost Recovery Factor, Temporary Emergency Electric Energy facilities factor
53601	Oncor Electric Delivery Company	Cost Allocation and Rate Design
53825	CenterPoint Energy Houston	Distribution Cost Recovery Factor
53840	CenterPoint Energy Houston	Temporary Emergency Electric Energy Facilities Factor
55993	CenterPoint Energy Houston	Distribution Cost Recovery Factor
<u>Before the Railroad Commission of Texas</u>		
9672	Atmos Energy Corp	Cost Allocation and Rate Design
10567	CenterPoint Energy Resource	Cost Allocation and Rate Design
7061	CenterPoint Energy Resource	Gas Securitization Rate Design
15133	CenterPoint Energy Rate Case	Cost Allocation and Rate Design
<u>Rulemaking</u>		
P14045	Transmission Open Access	
P21803	Cost Unbundling and Separation of Utility Business Activities, Including Separation of Competitive Energy Services and Distribution Generation	
P21409	Price to Beat	
P22187	Rulemaking to Establish Terms and Conditions of Transmission and Distribution Utilities' Retail Distribution Service	
P26418	Rulemaking to address Competitive Energy Services	
P31416	Rulemaking to address Price To Beat and Provider Of Last Resource rules	
P38298	Rulemaking to Address Recovery by Electric Utilities of Distribution Costs	
P39465	Rulemaking to Address Periodic Rate Adjustments	
P39246	Rulemaking to Address Recovery of Purchased Power Capacity Costs	

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

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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Affidavit of Alton J. Hall, Jr.
In Support of the Houston Coalition of Cities' Rate Case Expenses

STATE OF TEXAS §

COUNTY OF HARRIS §

Before me, the undersigned authority on this day personally appeared Alton J. Hall, Jr., who being by me first duly sworn, on oath deposed and said the following:

1. My name is Alton J. Hall, Jr. I am Special Counsel with the law firm of Adams and Reese LLP ("Adams and Reese") and lead counsel for the Houston Coalition of Cities ("HCC") in the Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates in Docket No. 56211.

2. I provide this affidavit with the actual legal, consulting, and professional expenses of HCC in Docket No. 56211.

3. I received my J.D. and my Texas State Bar license in 1984. I have represented numerous ratepayer interests before the Public Utility Commission ("PUC") since 1986. Moreover, I have represented HCC and other municipalities/municipality groups in proceedings before the PUC and SOAH since the Commission began referring cases to that agency.

4. I am personally familiar with the services performed by Adams and Reese on behalf of HCC in connection with Docket No. 56211. I am also personally familiar with the consulting services of Kit Pevoto, LLC ("Pevoto"), GDS Associates, Inc. ("GDS"), and Garrett Group, LLC

(“GG”) on behalf of HCC. I am over the age of 18 years and am qualified to make this Affidavit. The statements in this Affidavit are true and correct.

5. I have reviewed the billings of Adams and Reese, Pevoto, GG, and GDS for legal services and consulting services performed in Docket No. 56211. These billings accurately reflect the time spent and expenditures incurred by Adams and Reese, Pevoto, GG, and GDS on behalf of HCC. These billings were accurately calculated before they were tendered, and there was no double billing. None of these charges billed to HCC have been recovered through reimbursement for other expenses. The expenses charged were associated with the review of CenterPoint Energy Houston Electric, LLC’s proposed Rate Changes and its proposed recovery of costs in Docket No. 56211 and were reasonable and necessary to represent the interests of HCC in this matter.

6. For the period of March 1, 2024 through May 31, 2024, HCC has incurred \$159,550.00 from Adams and Reese for legal fees and expenses. In addition, HCC has incurred \$19,562.50 from Pevoto, \$47,987.50 from GG, and \$56,678.75 from GDS for consulting services.

7. Accordingly, the total fees and expenses incurred by HCC from the period of March 1, 2024 through May 31, 2024 is \$283,778.75. The fees and expenses incurred were necessary to accomplish the following: (1) review and analyze Applicant’s filings; (2) advise HCC on CenterPoint’s proposed rates; (3) prepare pleadings and motions; (4) identify issues in filings; (5) attend prehearing conferences and open meetings; (6) preparation for and attendance at settlement conferences; (7) numerous telephone conferences with other parties and consultants; (8) consultation with attorneys and consultants; (9) draft and submit discovery requests and review responses to same; (10) review and analyze pertinent legal authorities; and (11) confer and provide status updates to municipal clients.

8. The consulting services performed for HCC were conducted by Kit Pevoto with Pevoto, Market Garrett with GG, and Steven Hunt, Michael Ivey, and Breandan Mac Mathuna with GDS.

9. Testimony in this case is being submitted by Steven Hunt, Michael Ivey, Breandan Mac Mathuna, Mark Garrett, and Kit Pevoto (collectively "Witnesses"). The Witnesses, except for Michael Ivey, have testified in regulatory proceedings before various utility commissions on numerous occasions. Michael Ivey has been an engineering consultant for utilities since 1994 and has held managerial positions at the Crisp County Power Commission in Georgia. Mark Garrett, Kit Pevoto, Steven Hunt, Michael Ivey and Breandan Mathuna's hourly rate in Docket No. 56211 is \$250/hr. GDS's staff charges \$225/hr. GG's staff charges \$175/hr. These are the same or similar hourly rates charged for other clients for comparable services during the same time period.

10. The legal services performed by Adams and Reese on behalf of HCC were managed and supervised by me. The services rendered through the date of this affidavit included those items set forth in paragraph 7 above. The hours spent by Adams and Reese for work assigned to us in this proceeding were reasonable and necessary to complete those tasks in a professional manner and on a timely basis. I used my knowledge and experience in these matters before the PUC and SOAH to assure that the work being done and the expenses incurred were reasonable.

11. This case involved, and continues to involve, a substantial number of novel and complex legal and technical issues. This is the first electric base rate case by CenterPoint since 2019. Since that time, it has had three distribution cost recovery factor proceedings that are being addressed in this case. Additionally, there have been several amendments to the Regulatory Act that have impacted this proceeding.

12. The hourly rates charged HCC for attorneys by Adams and Reese range from \$250/hr to \$450/hr. These rates represent a significant discount from the standard rate charges for these same lawyers to other clients for similar work. My standard rate, for example, is \$450/hr. The rate charged to HCC is \$450/hr for my services. As stated above, I have been practicing for 38 years and appearing before Texas regulatory commissions for over 36 years.

13. I am personally familiar with the rates charged by attorneys in Harris County, Texas, for complex litigation and regulatory matters such as this case. The rate charged to HCC for my services of \$450/hr is on the low end of the market.

14. Similarly, the rates for other attorneys and paralegals in my firm representing HCC are on the low end for their experience levels and expertise on these types of matters. For example, the associate attorneys, Anam Fazli and Steven Mortiz, and paralegal Karen Poole working on this case charge a rate of \$250/hr and \$150/hr, respectively, both of which are on the low end of the market.

15. The actual invoices submitted to HCC by Adams and Reese, GDS, GG and Pevoto for services and expenses from March 1, 2024 through May 31, 2024 are attached hereto as part of Exhibit KP-2.1.

16. The actual invoices include a description of services performed and time expended on a daily basis. All expenses are supported by backup documentation. The documentation in this case is similar to that provided in many previous rate cases at the PUC and SOAH.

17. Pursuant to TEX. ADMIN. CODE § 7.5530, Adams and Reese, Pevoto, GG, and GDS recorded time spent on this matter by issue category to the extent possible. Time entries on the attached invoices indicate the issue subject matter of each entry, to the extent possible.

18. The issues addressed by HCC have a reasonable basis in law, policy, and/or fact. HCC's counsel reviewed the relevant law and PUC rules and applicable PUC and SOAH precedent to ensure that the issues raised by HCC in this case were reasonably grounded and relevant in this matter.

19. The expenses incurred by Adams and Reese, Pevoto, GG, and GDS, comply with TEX. ADMIN. CODE § 7.5530. Neither Adams and Reese nor our consultants charged for luxury items, including first-class airfare, limousine services, entertainment, or alcoholic beverages. No costs for meals sought to be recovered were charged in excess of \$25.00/person, and no individual billed for more than 12 hours in a single day.

20. The total amount requested for rate case expenses through May 31, 2024, in the amount of \$283,778.75 for Docket No. 56211 is reasonable and necessary, in light of all the factors discussed above and, therefore, in compliance with TEX. ADMIN. CODE § 7.5530. These fees and expenses are in proportion to the nature and scope of the case at issue.

21. We will supplement the rate case expenses for the month of June, and all future months, as soon as the information is available. I estimate that the fees, costs, and expenses that will be incurred by Adams and Reese from June 1, 2024 through the end of this proceeding (including any appeals of the Commission's final order) will be approximately \$185,000.00. The approximate fees incurred will be under the same rates as the rate case expenses incurred by Adams and Reese through May 31, 2024.

22. Pevoto, GG, and GDS estimate that their respective fees, costs, and expenses that will be incurred from June 1, 2024, through the end of this proceeding will be approximately \$50,000, \$47,512.00 and \$60,000.00 respectively. The approximate fees incurred will be under the same rates as the rate case expenses incurred by Pevoto, GG, and GDS through May 31, 2024.

23. The total approximate rate case expenses estimated from June 1, 2024, through the end of this proceeding for Adams and Reese, Pevoto, GG and GDS is \$342,512.00.

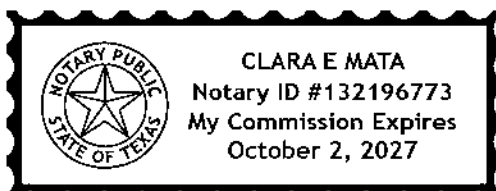
24. These approximate fees, costs, and expenses include the following services: (1) preparation, review, and revision of direct testimony; (2) preparation for and attendance at settlement conferences; (3) review Intervenor's and Staff's testimony; (4) review and respond to discovery requests; (5) review rebuttal testimony; (6) preparation for and participation in depositions; (7) preparation for and attendance at rehearing conferences; (8) prepare, review, and revise pre-trial brief; (9) prepare all exhibits for final hearing; (10) preparation for final hearing; (11) attendance at participation at final hearing; (12) review and revise settlement documents; (13) preparation and finalization of post-hearing briefs; (14) preparation and finalization of post-hearing reply briefs; (15) review and analysis of Proposal for Decision; (16) preparation of exceptions and replies to exceptions; (17) attendance at open meetings and conferences; (18) preparation of motion for rehearing and replies to motions for rehearing; (19) preparation of supplemental and amended affidavits on fees; and (20) confer and provide status updates to municipal client.

This concludes my affidavit. FURTHER, AFFIANT SAYETH NOT.

Alton Hall

Alton J. Hall, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority on this, the 21 day of June 2024.



Clara Mata

Notary Public State of Texas

Completed via Remote Online Notarization using 2 way Audio/Video technology.



April 11, 2024

Invoice Number: 1271365

City of Houston, TX
[REDACTED]File Number: 024680-000032
DN 56211-CEHE App for Authority to Change
Rates

Statement

For Professional Services Rendered in connection with the handling of the captioned matter, including the following:

03/06/24	A. Hall, Jr.	2.30	Review Application and supporting testimony.
03/06/24	M. Jahn	0.30	Receive and review Gulf Coast Coalition of Cities' Motion to Intervene.
03/06/24	M. Jahn	2.10	Receive and review 5,500 page Application for Authority to Change Rates filed by CenterPoint with direct testimony and workpapers of numerous experts; review and catalog CenterPoint's Rate Filing Package - Non-Confidential with Schedules and work papers.
03/07/24	A. Fazli	0.30	Conference call with team and consultants.
03/07/24	A. Hall, Jr.	2.80	Continue review of rate filing; analysis of rate impacts.
03/07/24	M. Jahn	0.90	Receive and review SOAH Order No. 1 regarding filing description, jurisdiction, sufficiency of application and notice, effective date, pending Motions to Intervene, Prehearing Conference, Protective Order and general procedures, with attention to deadlines.
03/07/24	M. Jahn	0.20	Receive and review International Brotherhood of Electrical Workers Local 66's Motion to Intervene.
03/07/24	M. Jahn	0.20	Receive and review the PUC's Order of Referral to the SOAH.

SEND PAYMENT:

By Check	By ACH	By Domestic Wire	By Foreign Wire
Adams and Reese LLP	Payee: Adams and Reese LLP	Payee: Adams and Reese LLP	Payee: Adams and Reese LLP

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03/07/24	M. Jahn	0.30	Receive and review Protective Order Certifications of Gulf Coast Coalition of Cities.
03/07/24	S. Moritz	1.00	Cursory review of CenterPoint's Application; Conference call regarding same.
03/08/24	A. Fazli	0.30	Review SOAH Order No. 1.
03/08/24	A. Hall, Jr.	2.60	Review potential procedural schedule; continue review of filing.
03/08/24	M. Jahn	1.20	Review PUC website to obtain the final orders and testimony of [REDACTED] email correspondence to consultant regarding same.
03/11/24	A. Fazli	0.30	Review order of referral.
03/11/24	A. Fazli	0.30	Review draft of motion to intervene.
03/11/24	A. Fazli	0.30	Review and sign protective order.
03/11/24	A. Hall, Jr.	3.70	Review rate filing and testimony; review final orders from previous DCRFs in connection with same
03/11/24	M. Jahn	0.90	Attend conference call with consultants and client to discuss list of issues, testimony, and strategy moving forward.
03/11/24	M. Jahn	0.40	Review and finalize HCC's Motion to Intervene for filing with the PUC; email correspondence to counsel regarding same.
03/11/24	M. Jahn	0.30	Prepare Protective Order Certifications for the group; email correspondence to consultants regarding same.
03/11/24	M. Jahn	0.30	Receive and review Texas Industrial Energy Consumers' Motion to Intervene.
03/11/24	S. Moritz	1.20	Draft Houston Coalition of Cities' Motion to Intervene.
03/12/24	A. Hall, Jr.	4.20	Continue review of Application; review [REDACTED] additional testimony.
03/12/24	M. Jahn	0.40	Receive and review Supplemental Protective Order Certifications of Gulf Coast Coalition of Cities.
03/13/24	A. Fazli	0.30	Review proposed scheduling order.
03/13/24	A. Hall, Jr.	3.70	Review [REDACTED] testimony; review [REDACTED] testimony.
03/13/24	M. Jahn	0.20	Receive and review OPUC's Motion to Intervene.

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03/13/24	S. Moritz	1.40	Review CEHE's proposed procedural schedule. Compare the proposed procedural schedule with adopted procedural schedule in last rate change case.
03/14/24	A. Fazli	0.30	Review Commission Staff's recommendation on sufficiency of the proposed notice of application.
03/14/24	A. Hall, Jr.	3.20	Continue review of filing; review procedural schedule; review [REDACTED] testimony.
03/14/24	M. Jahn	0.40	Receive and review Gulf Coast Coalition of Cities' First Request for Information to CenterPoint; email correspondence to consultants regarding same.
03/14/24	M. Jahn	0.30	Receive and review Commission Staff's Recommendation on Sufficiency of the Proposed Notice of the Application; email to consultants and client regarding same.
03/15/24	A. Fazli	0.40	Review Houston Coalition of Cities' First Requests for Information to CenterPoint Energy Houston Electric, LLC and Houston Coalition of Cities' Second Requests for Information and First Requests for Production to CenterPoint Energy Houston Electric, LLC.
03/15/24	A. Fazli	0.30	Review Staff's proposed changes to the scheduling order.
03/15/24	A. Hall, Jr.	3.00	Continue review of proposed procedural schedule; continue review of CEHE testimony.
03/15/24	M. Jahn	0.30	Review HCC's First Request for Information to CEHE and finalize for filing with the PUC.
03/15/24	M. Jahn	0.40	Review HCC's Second Request for Information and First Request for Production to CEHE and finalize for filing with the PUC. Email correspondence to counsel regarding First and Second Requests for Information and First Request for Production.
03/15/24	M. Jahn	1.50	Receive and review Protective Order Certifications from the City of Houston attorneys, staff, and consultants. Prepare Protective Order Certifications pleading to file with the PUC. Email correspondence to counsel regarding same.
03/15/24	S. Moritz	0.20	Review and analyze Staff's Recommendation on Sufficiency of the Proposed Notice of the Application.

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03/15/24	S. Moritz	0.70	Review and analyze Gulf Coast Coalition of Cities' 1st RFI to CenterPoint.
03/15/24	S. Moritz	2.50	Review correspondence and documents from consultants regarding discovery. Draft Houston Coalition of Cities' 1st RFI to CenterPoint. Draft Houston Coalition of Cities' 2nd RFI and 1st RFP to CenterPoint.
03/18/24	A. Hall, Jr.	2.90	Review HCC's first two sets of RFIs; continue review of CEHE testimony.
03/18/24	M. Jahn	0.30	Receive and review Environmental Defense Fund's Motion to Intervene.
03/18/24	M. Jahn	0.30	Receive and review Environmental Defense Fund's Protective Order Certifications.
03/18/24	M. Jahn	0.50	Receive and review CenterPoint's Rate Filing Package - USB Confidential; email correspondence to the consultants regarding same.
03/18/24	M. Jahn	0.20	Receive and review TCUC's Motion to Intervene.
03/18/24	M. Jahn	0.30	Receive and review TCUC's Protective Order Certifications.
03/18/24	M. Jahn	0.30	Receive and review Texas Consumer Association's Motion to Intervene.
03/18/24	M. Jahn	0.30	Receive and review Walmart, Inc.'s Motion to Intervene.
03/18/24	M. Jahn	0.30	Receive and review Texas Consumer Association's Motion to Intervene.
03/18/24	S. Moritz	0.50	Attend conference call with clients and consultants to discuss proposed schedule, discovery, and strategy moving forward.
03/19/24	A. Fazli	0.30	Review CEHE's proposed changes to procedural schedule.
03/19/24	A. Fazli	2.00	Review CenterPoint's application.
03/19/24	A. Fazli	1.50	Draft list of issues.
03/19/24	A. Hall, Jr.	3.80	Conference with clients regarding status and strategy; conference with consultants regarding status; continue review of CEHE testimony; prepare for and attend prehearing conference.

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03/19/24 M. Jahn	0.40	Receive and review OPUC's Protective Order Certifications.
03/19/24 M. Jahn	0.10	Email correspondence to client and consultants regarding Motions to Intervene filed by recent Intervenor.
03/19/24 M. Jahn	0.30	Receive and review Commission Staff's Protective Order Certifications.
03/19/24 S. Moritz	0.30	Attend prehearing conference.
03/20/24 A. Hall, Jr.	2.90	Continue review of CEHE testimony on [REDACTED]; review, revise list of issues; conference with consultants regarding same.
03/20/24 M. Jahn	0.40	Receive and review Environmental Defense Fund's Motion for Pro Hac Vice for attorneys, Casey Horan and Michael Zimmerman.
03/21/24 A. Fazli	0.50	Review GCCC's list of issues.
03/21/24 A. Fazli	0.50	Review CenterPoint's proposed list of issues.
03/21/24 A. Fazli	0.50	Review staff's proposed list of issues.
03/21/24 A. Fazli	0.30	Finalize list of issues and prepare for filing.
03/21/24 A. Hall, Jr.	3.30	Review list of issues filed by various parties; review of [REDACTED] additional testimony.
03/21/24 M. Jahn	0.20	Receive and review TCUC's First Request for Information to CenterPoint; email correspondence to consultants and client regarding same.
03/21/24 M. Jahn	1.30	Receive and review CEHE's Proposed List of Issues, Commission Staff's List of Issues, Environmental Defense Fund's List of Issues, Gulf Coast Coalition of Cities' List of Issues, and Texas Consumer Association's List of Issues. Review and finalize HCC's Proposed List of Issues for filing; email correspondence to consultants and client regarding same.
03/21/24 M. Jahn	0.30	Receive and review Texas Consumer Association's Protective Order Certifications.
03/21/24 S. Moritz	0.50	Review and analyze TCUC's 1st Set of RFI to CEHE.
03/22/24 A. Hall, Jr.	3.20	Review [REDACTED]; review revisions to proposed procedural schedule.

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03/22/24	M. Jahn	0.20	Receive and review Texas Consumer Association's List of Issues; email correspondence to consultants and client regarding same.
03/25/24	A. Fazli	0.30	Review final and filed procedural schedule.
03/25/24	A. Hall, Jr.	3.20	Work on discovery to CenterPoint; review testimony on [REDACTED] issues; review proposed procedural schedule
03/25/24	M. Jahn	0.50	Attend conference with consultants and client to discuss issues, procedural schedule and strategy.
03/25/24	M. Jahn	0.30	Email correspondence exchange with consultant regarding confidential testimony of [REDACTED]
03/25/24	M. Jahn	0.30	Receipt and review CEHE's Agreed Proposed Procedural Schedule.
03/26/24	A. Fazli	0.50	Review Houston Coalition of Cities' Third Requests for Information and Second Requests for Production to CenterPoint Energy Houston Electric, LLC.
03/26/24	A. Hall, Jr.	4.10	Review testimony; continue review of proposed procedural schedule
03/26/24	M. Jahn	0.40	Finalize HCC's Third Requests for Information and Second Requests for Production for filing with the PUC; email correspondence to counsel regarding same.
03/26/24	S. Moritz	0.70	Draft HCC's 3rd RFI and 2nd RFP to CEHE.
03/27/24	A. Fazli	0.70	Review SOAH Order No. 1.
03/27/24	A. Fazli	1.00	Review draft Preliminary Order with Memorandum.
03/27/24	A. Hall, Jr.	2.70	Continue review of testimony; review draft Preliminary Order; review discovery to CEHE.
03/27/24	M. Jahn	0.60	Receipt and review GCCC's Supplemental Motion to Intervene and the Commission's Draft Preliminary Order with Memorandum; email correspondence to the client and consultants regarding same.

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03/27/24	M. Jahn	0.60	Receipt and review of SOAH Order No. 2 Memorializing Prehearing Conference; Finding Notice Sufficient; Granting Interventions; Granting Motions for Pro Hac Vice; Adopting Agreed Procedural Schedule; and Setting Hearing on the Merits and Requiring Procedures with attention to deadlines; email correspondence to client and consultants regarding same.
03/27/24	S. Moritz	0.20	Receive and analyze SOAH Order No. 2.
03/28/24	A. Hall, Jr.	2.70	Review Staff's comments on sufficiency of Application; review additional discovery to CEHE; continue review of CEHE return testimony.
03/28/24	M. Jahn	0.40	Receive and review Commission Staff's Recommendation on the Sufficiency of the Application.
03/28/24	M. Jahn	0.40	Review and finalize HCC's Fourth Requests for Information and Third Requests for Production to CEHE; email correspondence to the client and consultants regarding same.
03/28/24	M. Jahn	0.30	Receipt and review Hunt Energy Network LLC's Motion to Intervene. Email correspondence to the client and consultants regarding documents recently filed.
03/28/24	S. Moritz	0.90	Correspondence with consultants regarding discovery requests. Draft HCC's 4th RFI and 3rd RFP to CEHE.
03/29/24	A. Hall, Jr.	3.10	Review ██████ testimony; review additional discovery to CEHE; continue review of ██████ testimony.
03/29/24	S. Moritz	0.40	Review and analyze GCCC's 2nd RFI to CEHE.

TOTAL HOURS	98.90
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Timekeeper Fee Summary

	Hours	Billed	
Timekeeper	Billed	Per Hour	Bill Amount
A. Hall, Jr.	57.40	\$450.00	\$25,830.00
A. Fazli	10.90	\$250.00	\$2,725.00
S. Moritz	10.50	\$250.00	\$2,625.00
M. Jahn	20.10	\$150.00	\$3,015.00
Totals	98.90		\$34,195.00

CURRENT FEES	\$34,195.00
TOTAL DUE THIS STATEMENT	<u>\$34,195.00</u>


 Attorneys at Law
 Federal ID No.

May 10, 2024

Invoice Number: 1278110

City of Houston, TX
 File Number: 024680-000032
 DN 56211-CEHE App for Authority to Change
 Rates

Statement

For Professional Services Rendered in connection with the handling of the captioned matter, including the following:

04/01/24 A. Hall, Jr.	3.10	Review additional discovery; continue review CEHE testimony on <div style="background-color: black; width: 100px; height: 15px; display: inline-block;"></div> issues; review Final Order in Docket No. 49421 regarding same
04/01/24 M. Jahn	0.40	Receive and review Gulf Coast Coalition of Cities' Second Request for Information to CenterPoint; email correspondence to consultants and client regarding same.
04/01/24 M. Jahn	0.40	Receive and review Walmart's Protective Order Certifications and determine additional persons allowed to receive confidential documents; receive and review of SOAH Order No. 3 finding CenterPoint's Application administratively complete.
04/01/24 M. Jahn	0.30	Review and finalize Houston Coalition of Cities' Fifth Requests for Information to Centerpoint for filing; Email correspondence to counsel regarding same.
04/01/24 M. Jahn	0.80	Attend meeting with the consultants and client to discuss issues, discovery and strategy.

SEND PAYMENT:

By Check

By ACH

By Domestic Wire

By Foreign Wire

Adams and Reese LLP

Payee: Adams and Reese LLP

Payee: Adams and Reese LLP

Payee: Adams and Reese LLP

04/01/24	S. Moritz	3.20	Attend conference call with consultants and client to discuss discovery and strategy moving forward; Prepare HCC's 5th RFI to CEHE; Review and analyze TCUC's 1st Set of RFPs to CEHE; Review and analyze GCCC's 2nd RFI to CEHE.
04/02/24	A. Hall, Jr.	2.60	Continue review of [REDACTED] testimony; review additional discovery
04/02/24	M. Jahn	0.40	Receive and review of notice of the transcript from the March 19, 2024 Prehearing Conference; receive and review Texas Coast Utilities Coalition's First Set of Requests for Production to CenterPoint Energy Houston Electric, LLC, and email correspondence to consultants and client regarding same.
04/02/24	S. Moritz	0.60	Review SOAH Order No. 3 - Application Administratively Complete; Review PUC Order No. 1 for key dates listed in the procedural schedule and analyze the protective order established.
04/03/24	A. Fazli	0.20	Review SOAH Order No. 2.
04/03/24	A. Fazli	0.30	Brief review of Houston Coalition of Cities' Fifth Requests for Information to the Company.
04/03/24	A. Hall, Jr.	2.90	Review [REDACTED] testimony; continue review of [REDACTED] testimony; review additional discovery
04/03/24	M. Jahn	0.90	Receive and review CenterPoint's Responses to Gulf Coast Coalition of Cities' First Requests for Information (non-confidential); email correspondence to the consultants and client regarding same; receive and review of CenterPoint's Responses to Gulf Coast Coalition of Cities' First Requests for Information (with confidential documents); email correspondence to the consultants and client regarding same.
04/03/24	M. Jahn	0.20	Receive and review TCUC's Protective Order Certifications and determine persons allowed to receive confidential documents.
04/03/24	S. Moritz	0.80	Review and consider CEHE's request for extension to respond to HCC's 2nd Set of discovery requests; Phone call with CEHE counsel regarding same; Analyze CEHE's Responses to GCCC's 1st Set of RFI.
04/04/24	A. Fazli	0.20	Review TIEC's list of participating members.

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04/04/24	A. Fazli	0.50	Review CenterPoint's responses to Houston Coalition of Cities first set of RFIs.
04/04/24	A. Fazli	1.00	Review CenterPoint's responses to Houston Coalition of Cities second set of RFIs and first set of RFPs.
04/04/24	A. Hall, Jr.	2.50	Review [REDACTED] testimony; review [REDACTED] testimony; review additional discovery
04/04/24	M. Jahn	1.40	Receive and review Texas Coast Utilities Coalition's Second Set of Requests for Information to CenterPoint; receive and review CenterPoint Energy Houston Electric, LLC's Response to Houston Coalition of Cities' First Requests for Information; receive and review Texas Industrial Energy Consumer's List of Participating Members; email correspondence to the consultants and client regarding same.
04/04/24	M. Jahn	1.10	Receive and review CenterPoint Energy Houston Electric, LLC's Responses to Houston Coalition of Cities' Second Requests for Information and First Requests for Production, (Excluding Questions HCC-RFI02-06, 02-08, 02-10, 02-11, 02-13, 02-15 and 02-16) (Confidential and non-confidential responses); email correspondence to the consultants and client regarding same.
04/04/24	S. Moritz	3.20	Correspondence with CEHE counsel regarding another extension for their discovery responses; Analyze CEHE's responses to HCC's 1st RFI and HCC's 2nd RFI and 1st RFP, excluding RFI 2-6, 2-8, 2-10, 2-11, 2-13, 2-15, and 2-16; Analyze CEHE's responses to GCCC's 1st RFI; and Analyze TCUC's 2nd Set of RFI to CEHE.
04/05/24	A. Fazli	3.60	Review and analyze CenterPoint's witness' testimonies: John Sousa, Carla A. Kneipp, and Stephanie Bundage Juvane.
04/05/24	A. Hall, Jr.	2.20	Continue review of [REDACTED] testimony; review testimony on [REDACTED]
04/05/24	M. Jahn	0.60	Receive and review CenterPoint's confidential and non-confidential sets of Responses to Gulf Coast Coalition of Cities' First Set of Requests for Information; email correspondence to the consultants and client regarding same.
04/08/24	A. Fazli	0.80	Conference call with consultants, team, and client.

04/08/24	A. Fazli	0.50	Review CenterPoint Energy Houston Electric, LLC's Houston Coalition of Cities' Second Requests for Information and First Requests for Production, Questions HCC-RFI02-06, 02-08, 02-10, 02-11, 02-13, and 02-15.
04/08/24	A. Hall, Jr.	2.40	Continue review of [REDACTED] testimony; continue review of [REDACTED] testimony
04/08/24	M. Jahn	0.30	Receive and review CenterPoint Energy Houston Electric, LLC's (non-confidential) Responses to Houston Coalition of Cities' Second Requests for Information and First Requests for Production, Questions HCC-RFI02-06, 02-08, 02-10, 02-11, 02-13, and 02-15.
04/08/24	M. Jahn	0.80	Attend meeting with the consultants and client to discuss issues, strategy, and discovery.
04/08/24	S. Moritz	0.80	Attend conference call with consultants and client to discuss discovery and strategy moving forward.
04/09/24	A. Hall, Jr.	1.90	Continue review of [REDACTED] testimony
04/09/24	S. Moritz	1.30	Continue reviewing CEHE's Statement of Intent and Application for Authority to Change Rates to determine key issues and CEHE's supporting facts.
04/10/24	A. Fazli	0.50	Review CenterPoint's responses to Houston Coalition of Cities' Third Requests for Information and Second Requests for Production.
04/10/24	A. Fazli	6.00	Review and analyze CenterPoint's witness' testimonies: Myles F. Reynolds, John R. Durland, and J. Stuart McMenamin, Gregory S. Wilson, and Jacqueline M. Richert.
04/10/24	A. Fazli	0.10	Review Hunt's Letter to Commission
04/10/24	A. Hall, Jr.	2.80	Review [REDACTED] testimony; review discovery responses
04/10/24	M. Jahn	0.20	Receive and review CenterPoint Energy Houston Electric, LLC's Responses to Houston Coalition of Cities' Second Requests for Information and First Requests for Production, Questions HCC-RFI02-06, 02-08, 02-10, 02-11, 02-13, and 02-15 with Confidential & Highly Sensitive Protected Material.

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04/10/24	M. Jahn	0.20	Receive and review CenterPoint Energy Houston Electric, LLC's Response to Houston Coalition of Cities' Second Requests for Information and First Requests for Production, Question HCC-RFI02-16 (Non-Confidential).
04/10/24	M. Jahn	0.30	Receive and review Hunt Energy Network Project Letter to Commissioners; email correspondence to consultants and client regarding same.
04/10/24	M. Jahn	0.60	Receive and review CenterPoint Energy Houston Electric, LLC's Responses to Texas Coast Utilities Coalition's First Requests for Information; receive and review CenterPoint Energy Houston Electric, LLC's Responses to Houston Coalition of Cities' Third Requests for Information and Second Requests for Production (confidential and non-confidential sets of responses).
04/10/24	S. Moritz	3.00	Receive and analyze CEHE's Responses to HCC's 2nd Set of RFI, Questions HCC-RFI 02-06, 08, 10, 11, 13, 15, and 16 with Attachments, Electronic Files and Confidential Files; CEHE's Responses to HCC's 3rd Set of RFI and 2nd Set of RFP with Confidential Files; and CEHE's Responses to TCUC's 1st RFI. Discussion with consultants regarding same.
04/11/24	A. Fazli	0.80	Attend open meeting.
04/11/24	A. Hall, Jr.	2.70	Continue review of [REDACTED] testimony; review additional discovery responses
04/11/24	M. Jahn	0.30	Receive and review OPUC's Protective Order Certifications and determine the persons allowed to receive confidential information.
04/11/24	M. Jahn	0.10	Email correspondence to City of Houston regarding [REDACTED]
04/11/24	S. Moritz	4.00	Review and assess Direct Testimony and workpapers of Jason M. Ryan.
04/11/24	S. Moritz	0.20	Review Hunt Energy Network's Letter to the Commission.
04/12/24	A. Fazli	0.50	Attend meeting regarding case.

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04/12/24	A. Fazli	0.50	Review CenterPoint's responses to Houston Coalition of Cities' Fourth Requests for Information and Third Requests for Production.
04/12/24	A. Fazli	0.50	Review signed preliminary order.
04/12/24	A. Hall, Jr.	2.80	Continue review of [REDACTED]; continue of [REDACTED] testimony; review additional discovery
04/12/24	M. Jahn	0.50	Receive and review of CenterPoint's Responses to Houston Coalition of Cities' Fourth Requests for Information and Third Requests for Production and documents produced; Email correspondence to consultants and clients regarding same.
04/12/24	S. Moritz	1.00	Attend meeting on status update, discovery, and strategy moving forward.
04/15/24	A. Fazli	0.50	Review CenterPoint's witnesses and the categories that they are testifying on.
04/15/24	A. Fazli	0.50	Conference call with client, consultants, and team.
04/15/24	A. Hall, Jr.	2.70	Continue review of testimony on [REDACTED]; review additional discovery; conference with consultants regarding issues
04/15/24	M. Jahn	0.50	Attend meeting with the consultants and client to discuss discovery and strategy.
04/15/24	M. Jahn	0.40	Receipt and review of Commission Staff's Protective Order Certificates and confirm those allowed to view confidential and protective information.
04/15/24	M. Jahn	0.60	Receipt and review of CenterPoint's Response to GCCC's Second Requests for Information and exhibits (confidential and non-confidential); Email correspondence to consultants and the client regarding same.
04/15/24	S. Moritz	7.00	Attend conference call with clients and consultants to discuss discovery and strategy moving forward. Review Direct Testimony of [REDACTED] on behalf of CEHE to determine key issues and supporting facts. Review and analyze CEHE's Responses to GCCC's 2nd Set of RFI. Review and analyze CEHE's Responses to HCC's 4th Set of RFI and 3rd Set of RFP. Review the Commission's Preliminary Order.

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04/16/24	A. Fazli	0.50	Review CenterPoint's responses to Houston Coalition of Cities' Fifth Requests for Information.
04/16/24	A. Hall, Jr.	3.10	Review [REDACTED] testimony; review additional discovery; continue review of [REDACTED]
04/16/24	M. Jahn	0.50	Receipt and review of CenterPoint's Response to Houston Coalition of Cities' Fifth Requests for Information and exhibits (non-confidential); Email correspondence to consultants and the client regarding same.
04/16/24	M. Jahn	0.20	Receipt and review of William J. Roper, Jr.'s Motion to Intervene.
04/16/24	M. Jahn	3.30	Review of CenterPoint's responses to GCCC's First RFI to determine [REDACTED]
04/16/24	S. Moritz	1.70	Review and analyze CEHE's Responses to HCC's 5th Set of RFI.
04/17/24	A. Hall, Jr.	1.90	Continue review of testimony; review additional filings; review additional discovery
04/17/24	M. Jahn	1.70	Continue review of CEHE's responses to GCCC's First RFI to determine [REDACTED]
04/17/24	M. Jahn	0.40	Receipt and review of Texas Energy Association of Marketers and Alliance for Retail Markets' Motion to Intervene.
04/17/24	M. Jahn	0.40	Receipt and review of CenterPoint's Response to Texas Coast Utilities Coalition's First Requests for Production (non-confidential); Email correspondence to the consultants and client regarding the same.
04/17/24	M. Jahn	0.40	Receipt and review of CenterPoint's Response to Texas Coast Utilities Coalition's First Requests for Production (confidential); Email correspondence to the consultants and client regarding same.
04/17/24	S. Moritz	0.70	Review and analyze CEHE's Responses to TCUC's 1st RFP.
04/18/24	A. Hall, Jr.	2.30	Review discovery responses; continue review of filing

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04/18/24	M. Jahn	0.20	Receipt and review of Affidavit of Alice Hart confirmation publication of notice to affected persons.
04/18/24	M. Jahn	0.30	Receipt and review of SMT Tx Management II LLC's Motion to Intervene.
04/18/24	M. Jahn	0.30	Receipt and review of Environmental Defense Fund's First Requests for Information and First Requests for Production to CenterPoint.
04/19/24	A. Fazli	0.50	Review Commission Staff's first request for information to CenterPoint.
04/19/24	A. Fazli	0.30	Review CenterPoint's affidavit.
04/19/24	A. Fazli	2.50	Review updated and errata filings by CenterPoint including schedules and workpapers.
04/19/24	A. Fazli	0.50	Review Commission Staff's first request for information to CenterPoint.
04/19/24	A. Fazli	0.50	Review CenterPoint's responses to Houston Coalition of Cities' Third Requests for Information and Second Requests for Production supplement.
04/19/24	A. Hall, Jr.	1.80	Continue review of testimony on [REDACTED]
04/19/24	M. Jahn	0.30	Receipt and review of Environmental Defense Fund's Protective Order Certifications and confirm persons allowed to view protected and confidential information.
04/19/24	M. Jahn	0.30	Receipt and review of Texas Industrial Energy Consumer's Protective Order Certifications and confirm persons allowed to view protected and confidential information.

04/19/24 M. Jahn	1.60	Receipt and review of: Environmental Defense Fund's First Requests for Information and First Requests for Production to CenterPoint Energy Houston Electric LLC; CenterPoint Energy Houston Electric LLC's Rate Filing Package 45-Day Update of Schedules and Workpapers (Confidential and Non-Confidential); Commission Staff's First Requests for Information to CenterPoint Energy Houston Electric LLC; Gulf Coast Coalition of Cities' Third Requests for Information to CenterPoint Energy Houston Electric LLC; CenterPoint Energy Houston Electric LLC's Responses to Houston Coalition of Cities' Third Requests for Information and Second Requests for Production (Supplement HCC-RFP02-01S); CenterPoint Energy Houston Electric LLC's Responses to Texas Coast Utilities Coalition's Second Requests for Information; Email correspondence to the consultants and client regarding the same.
04/19/24 M. Jahn	0.30	Receipt and review of CenterPoint Energy Houston Electric LLC's Errata 1 Filing to the Rate Filing Package; Email correspondence to the consultants and client regarding the same.
04/19/24 M. Jahn	0.60	Receipt and review of: CenterPoint Energy Houston Electric, LLC's Response to Texas Coast Utilities Coalition's Second Requests for Information [CONFIDENTIAL]; CenterPoint Energy Houston Electric LLC's Responses to Houston Coalition of Cities' Third Requests for Information and Second Requests for Production (Supplement HCC-RFP02-01S)[CONFIDENTIAL]; Email correspondence to the consultants and client regarding the same.
04/19/24 S. Moritz	7.20	Review and assess CEHE's updated filing and corresponding workpapers and schedules. Review and assess CEHE's Supplemental Responses to HCC's 3rd RFI and 2nd RFP. Review and assess CEHE's Response to TCUC's 2nd RFI. Review and assess EDF's 1st RFI and 1st RFP to CEHE. Review and Assess Staff's 1st RFI to CEHE. Review and assess GCCC's 3rd RFI to CEHE.
04/22/24 A. Fazli	0.40	Conference call with team, consultants, and client.
04/22/24 A. Fazli	4.20	Review and analyze CenterPoint's witness' testimonies: Ronald W. Bahr, Steven C. Greenley, Jennifer K. Storey, I. Darren Storey.

04/22/24	A. Hall, Jr.	3.80	Continue review of various testimony; conference with consultants; review additional discovery responses.
04/22/24	M. Jahn	0.40	Attend meeting with the consultants and client to discuss [REDACTED].
04/22/24	M. Jahn	0.20	Receipt and review of Motion to Intervene of South-Central Partnership for Energy Efficiency as a Resource (SPEER) with attention to authorized representatives.
04/22/24	M. Jahn	0.20	Receipt and review of Motion to Intervene of Lee Milam with attention to his representative.
04/22/24	M. Jahn	0.20	Receipt and review of Motion to Intervene of Timothy Large with attention to his representative.
04/22/24	M. Jahn	0.20	Receipt and review of Motion to Intervene of Rebecca Elliott with attention to her representative.
04/22/24	S. Moritz	0.50	Attend conference call with client and consultants to discuss discovery and strategy moving forward.
04/23/24	A. Hall, Jr.	4.20	Outline issues to address in testimony; review additions discovery responses; review cost allocation issues.
04/23/24	M. Jahn	0.20	Receipt and review of Gulf Coast Coalition of Cities' Fourth Request for Information to CenterPoint Energy Houston Electric, LLC.
04/23/24	M. Jahn	0.20	Receipt and review of CenterPoint Energy's Objection to William Roper's Motion to Intervene.
04/23/24	M. Jahn	0.40	Receipt and review of OPUC's First, Second and Third Sets of Request for Information to CenterPoint Energy Houston Electric, LLC.
04/23/24	M. Jahn	0.20	Receipt and review of Protective Order Certifications of Texas Energy Association for Marketers to determine persons allowed to view confidential documents.
04/23/24	S. Moritz	2.50	Review and analyze GCCC's 4th Set of RFI to CEHE. Review and analyze OPUC's 1st Set of RFI to CEHE. Review and analyze OPUC's 2nd Set of RFI to CEHE. Review and analyze OPUC's 3rd Set of RFI to CEHE. Review CEHE's Objection to William Roper's Motion to Intervene.

04/24/24	A. Hall, Jr.	3.30	Analysis of [REDACTED]; review [REDACTED] testimony related to same.
04/24/24	M. Jahn	0.30	Receipt and review of: (1) Texas Industrial Energy Consumers' First Request for Information to CEHE; and (2) Hunt Energy Network LLC's First Set of Requests for Information to Centerpoint Energy Houston Electric LLC.
04/24/24	S. Moritz	0.80	Review and analyze Hunt Energy Network's 1st Set of RFI to CEHE. Review and analyze TIEC's 1st Set of RFI to CEHE.
04/25/24	A. Fazli	0.30	Review Commission Staff's second requests for information to CenterPoint.
04/25/24	A. Fazli	0.30	Review Commission Staff's third requests for information to CenterPoint.
04/25/24	A. Hall, Jr.	5.10	Continue review of [REDACTED] testimony; review Commission precedent regarding [REDACTED].
04/25/24	M. Jahn	0.30	Receipt and review of: (1) Commission Staff's Second Request for Information to CenterPoint Energy Houston Electric LLC; and (2) Commission Staff's Third Request for Information to CenterPoint Energy Houston Electric LLC. Email correspondence to consultants and client regarding same.
04/25/24	S. Moritz	6.00	Correspondence with consultants regarding discovery. Prepare HCC's 6th RFI and 4th RFP to CEHE. Review and analyze Staff's 2nd Set of RFI to CEHE and 3rd Set of RFI to CEHE. Begin to review and assess Direct Testimony and workpapers of [REDACTED].
04/26/24	A. Fazli	0.40	Review Houston Coalition of Cities' Seventh Requests for Information to CenterPoint.
04/26/24	A. Fazli	0.40	Review Houston Coalition of Cities' Eight Requests for Information to CenterPoint.
04/26/24	A. Fazli	0.40	Review Houston Coalition of Cities' Fifth Requests for Production to CenterPoint.
04/26/24	A. Fazli	3.90	Review and analyze CenterPoint's witness' testimonies: Brad A. Tutunjian, M Shane Kimzey, and Shonda Royston- Johnson.

04/26/24	A. Hall, Jr.	4.30	Continue review of Commission precedent on [REDACTED]; continue review of CEHE testimony on same; review additions discovery responses.
04/26/24	M. Jahn	0.30	Finalize HCC's Sixth Requests for Information and Fourth Requests for Production to CenterPoint for filing with the PUC; email correspondence to opposing counsel regarding same.
04/26/24	M. Jahn	0.30	Receipt and review of CenterPoint Energy Houston Electric, LLC's Response to Texas Coast Utilities Coalition's First Requests for Production, TCUC-RFP01-07S Supplemental (Non-Confidential).
04/26/24	M. Jahn	0.20	Finalize HCC's Seventh Requests for Information to CenterPoint for filing with the PUC; Email correspondence to opposing counsel regarding same.
04/26/24	M. Jahn	0.20	Finalize HCC's Eighth Requests for Information and Fifth Requests for Production to CenterPoint for filing with the PUC; email correspondence to opposing counsel regarding same.
04/26/24	M. Jahn	0.20	Receipt and review of Texas Industrial Energy Consumers' Second Requests for Information to CenterPoint.
04/26/24	M. Jahn	0.20	Email correspondence with the client regarding [REDACTED].
04/26/24	S. Moritz	3.30	Review and analyze CEHE's Supplemental Responses to TCUC's 1st Set of RFP. Correspondence with consultants regarding discovery. Prepare HCC's 7th Set of RFI to CEHE. Prepare HCC's 8th Set of RFI and 5th Set of RFP to CEHE. Review and analyze TIEC's 2nd Set of RFI to CNP.
04/29/24	A. Fazli	4.00	Review and analyze CenterPoint's witness' testimonies: Ann E. Buckley, Dane A. Watson, Timothy S. Lyons, and Bertha Villatoro.
04/29/24	A. Fazli	0.30	Review/analyze Houston Coalition of Cities' Ninth Requests for Information to CenterPoint.
04/29/24	A. Fazli	0.90	Draft supplemental list of updated coalition members.
04/29/24	A. Fazli	0.40	Review CenterPoint's first Requests for Information to Houston Coalition of Cities.
04/29/24	A. Fazli	0.30	Review Houston Coalition of Cities' 10th Requests for Information to CenterPoint.

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04/29/24	A. Fazli	0.30	Review Houston Coalition of Cities' 6th Requests for Production to CenterPoint.
04/29/24	A. Fazli	0.40	Review Commission Staff's forth requests for information to CenterPoint.
04/29/24	A. Fazli	0.30	Review ordinances in order to draft supplemental list of updated coalition members.
04/29/24	A. Hall, Jr.	3.30	Review of preliminary issues considered; determine potential [REDACTED] impact; review Commission precedent on several issues.
04/29/24	M. Jahn	0.20	Receipt and review of Commission Staff's Fourth Requests for Information to CenterPoint.
04/29/24	M. Jahn	0.30	Finalize and serve HCC's Ninth Requests for Information to CenterPoint.
04/29/24	M. Jahn	0.30	Finalize and serve HCC's Supplemental List of Coalition Members.
04/29/24	M. Jahn	0.60	Receipt and review of: (1) CenterPoint's Notice of Additional Counsel; (2) CenterPoint's First Requests for Information to GCCC; (3) CenterPoint's First Requests for Information to HCC; and (4) CenterPoint's First Requests for Information to TCUC.
04/29/24	M. Jahn	0.30	Finalize and serve HCC's Tenth Requests for Information and Sixth Requests for Production to CenterPoint. Email correspondence to consultants and client regarding same.
04/29/24	S. Moritz	7.20	Correspondence with consultants regarding discovery. Prepare HCC's 9th Set of RFI to CEHE. Review and analyze Staff's 4th Set of RFI to CEHE. Review CEHE's 1st RFI to GCCC. Review CEHE's 1st RFI to HCC. Review CEHE's 1st RFI to TCUC. Prepare HCC's 10th Set of RFI and 6th Set of RFP to CEHE. Continue reviewing Direct Testimony and workpapers of [REDACTED].
04/30/24	A. Hall, Jr.	3.20	Continue analysis of Commission precedent on certain [REDACTED] issues; review additions discovery responses.

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04/30/24	M. Jahn	1.00	Receipt and review of: (1) IBEW Local 66's First Requests for Information to CenterPoint; (2) SMT TX Management II LLC'S Protective Order Certifications; (3) CenterPoint's Response to Gulf Coast Coalition of Cities Second Requests for Information, GCCC-RFI02-03S (Supplemental)(Non-Confidential); (4) CenterPoint's Response to Gulf Coast Coalition of Cities Second Requests for Information, GCCC-RFI02-03S (Supplemental) - CONFIDENTIAL; and (5) William A. Roper, Jr.'s Response to CenterPoint's CenterPoint's Objection to Motion to Intervene. Email correspondence to consultants and client regarding same.
04/30/24	S. Moritz	1.80	Review and analyze IBEW Local 66's 1st Set of RFI to CEHE. Review and analyze CEHE's Supplemental Response to GCCC-RFI01-03S.

TOTAL HOURS	189.70
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Timekeeper Fee Summary

	Hours Billed	Billed Per Hour	Bill Amount
Timekeeper			
A. Hall, Jr.	64.90	\$450.00	\$29,205.00
A. Fazli	39.00	\$250.00	\$9,750.00
S. Moritz	56.80	\$250.00	\$14,200.00
M. Jahn	29.00	\$150.00	\$4,350.00
Totals	189.70		\$57,505.00

CURRENT FEES	\$57,505.00
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Costs Advanced

04/01/24	Expert Consultant Fees - Kit Pevoto LLC Expert consultant services Invoice Number: 1 - COH-CEHE (DN 56211)	\$1,750.00
04/10/24	Expert Consultant Fees - GDS Associates, Inc. Expert consulting fees Invoice Number: 0227912	\$12,485.00
04/15/24	Expert Consultant Fees - Garrett Group Consulting, Inc. Expert consultant fees Invoice Number: CenterPoint Rate - DN 56211	\$9,512.50

COSTS ADVANCED	\$23,747.50
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TOTAL DUE THIS STATEMENT

\$81,252.50

Kit Pevoto LLC
Invoice

Date: April 1, 2024

Invoice No.: 1

To: Alton J. Hall, Jr
Adams and Reese LLP
LyondellBasell Tower
1221 McKinney, Suite 4400
Houston, TX 77010

From: **Kit Pevoto LLC**
13436 Athens Trail
Austin, TX 78729
(512) 796-6707 ph phone
(512) 257-1715 fax

For

Professional services for March 2024

For PUCT Docket No. 56211 CenterPoint 2024 Electric Rate Case

<u>Date</u>	<u>Hrs.</u>	<u>Rate</u>	<u>Description</u>	<u>Total</u>
3/12/2024	3.50 @	\$250.00	Reviewing the application/testimony	\$875.00
3/28/2024	1.50 @	\$250.00	Developing [REDACTED] models/reviewing testimony	\$375.00
3/29/2024	<u>2.00</u> @	\$250.00	Drafting RFIs	<u>\$500.00</u>
	7.00			\$1,750.00

Subtotal for hours	7.00 hrs	\$1,750.00
Total Due This Invoice		<u>\$1,750.00</u>

Make checks payable to Kit Pevoto LLC



1850 Parkway Place
Suite 800
Marietta, Georgia 30067

INVOICE

770.425.8100
Fax 866.611.3791

CITY OF HOUSTON
AMIN & REGULATORY AFFAIRS

ALTON HALL

INVOICE NO : 0227912
DATE : Apr 10, 2024
CLIENT CODE : 0044304
PROJECT NO : 0027

DKT 56211 ELECTRIC RATE CASE -
CENTERPOINT ENERGY HOUSTON ELE
PROFESSIONAL SERVICES RENDERED 02/24/24 - 03/29/24

Services rendered during March 2024 supported the review, analysis, discussion, team meetings, research, and preparation of discovery for CenterPoint electric rate case in Docket No. 56211. All work performed was conducted by or under the direction of GDS Project Managers.

		Hours	Rate	Amount
3/7/24	MariaElena Eick Review CEHE Docket 56211 filing.	0.50	225.00	112.50
3/11/24	Breandan Mac Mathuna Review of [REDACTED] CNP Electric Houston testimony. Feedback provided for Counsel.	2.00	250.00	500.00
3/11/24	Michael Ivey Meeting with client to discuss project	1.00	250.00	250.00
3/11/24	MariaElena Eick Participate in weekly conference call & discuss with Steven Hunt and Breandan Mac Mathuna. Review and download application, testimony, workpapers, and schedules, orders, and pleadings. Discuss with GDS team.	6.75	225.00	1,518.75
3/11/24	Steven Hunt Project team meeting. Analysis of rate filing.	0.75	250.00	187.50
3/13/24	Michael Ivey Tabulate possible areas of concern with [REDACTED]	0.25	250.00	62.50
3/15/24	Breandan Mac Mathuna GDS team meeting.	0.50	250.00	125.00
3/15/24	MariaElena Eick Prepare and protective orders and case availability for GDS team to Adams and Reese. Discuss with Steven Hunt and Breandan Mac Mathuna. Respond to question from Michael Ivey.	0.75	225.00	168.75
3/15/24	Steven Hunt Evaluation of CenterPoint Rate case	0.50	250.00	125.00
3/17/24	MariaElena Eick Review recent filings of discovery, pleadings and filings. Discuss with GDS team.	1.50	225.00	337.50
3/18/24	Breandan Mac Mathuna Meeting with counsel.	1.00	250.00	250.00





1850 Parkway Place
Suite 800
Marietta, Georgia 30067

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CITY OF HOUSTON



ALTON HALL

INVOICE NO : 0227912
DATE : Apr 10, 2024
CLIENT CODE : 0044304
PROJECT NO : 0027

		Hours	Rate	Amount
3/18/24	Breandan Mac Mathuna Communication with experts, made at the request of counsel.	0.25	250.00	62.50
3/18/24	Steven Hunt Team meeting and evaluation of CenterPoint rate case	1.00	250.00	250.00
3/21/24	Breandan Mac Mathuna Engagement with colleague Dan B regarding [REDACTED]	0.25	250.00	62.50
3/21/24	T. Daniel Burapavong Prepare CEHE [REDACTED] analysis for Breandan. Emails with Breandan.	2.25	225.00	506.25
3/22/24	MariaElena Eick Meeting preparation and attend GDS internal meeting to discuss case status. Update group calendar with project deadlines.	0.75	225.00	168.75
3/22/24	Steven Hunt Team meeting and evaluation of CenterPoint rate case	0.50	250.00	125.00
3/25/24	Breandan Mac Mathuna Review of [REDACTED] testimony and development of data requests.	2.00	250.00	500.00
3/25/24	Breandan Mac Mathuna Review of [REDACTED] supporting Excel files and CEHE [REDACTED] Excel files.	1.50	250.00	375.00
3/25/24	Michael Ivey Weekly coordination meeting	0.50	250.00	125.00
3/25/24	MariaElena Eick Review testimony and respond to questions from Breandan Mac Mathuna. Discuss confidential items and case documents with Mary Jahn. Participate in weekly conference call & discuss with Steven Hunt and Breandan Mac Mathuna.	3.50	225.00	787.50
3/26/24	Breandan Mac Mathuna Meeting with colleague Max M regarding needed analysis of [REDACTED]	0.50	250.00	125.00
3/26/24	Breandan Mac Mathuna Research and review of PUCT precedent.	0.50	250.00	125.00
3/26/24	Breandan Mac Mathuna Review of CEHE historical [REDACTED] data and filed for [REDACTED]	0.75	250.00	187.50
3/26/24	MariaElena Eick Respond to Breandan Mac Mathuna re: CEHE research.	2.50	225.00	562.50





1850 Parkway Place
Suite 800
Marietta, Georgia 30067

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CITY OF HOUSTON



ALTON HALL

INVOICE NO : 0227912
DATE : Apr 10, 2024
CLIENT CODE : 0044304
PROJECT NO : 0027

		Hours	Rate	Amount
3/26/24	Maxwell Murphy	1.50	165.00	247.50
	Making changes and updates to [REDACTED] analysis			
3/27/24	Breandan Mac Mathuna	1.25	250.00	312.50
	Review and analysis of [REDACTED] schedules re [REDACTED] and [REDACTED]			
	[REDACTED] Development of data requests. Review of present and hist. market [REDACTED]			
	vis a via [REDACTED] testimony.			
3/27/24	Michael Ivey	0.75	250.00	187.50
	Reviewing rate case filings			
3/27/24	MariaElena Eick	4.00	225.00	900.00
	Work on CEHE research and discuss with Breandan Mac Mathuna.			
3/27/24	Maxwell Murphy	3.00	165.00	495.00
	Making changes and updates to [REDACTED] analysis			
3/28/24	Breandan Mac Mathuna	2.00	250.00	500.00
	Review of [REDACTED] testimony. Review of company schedules.			
	Development of data requests. Discussion with MariaElena E regarding PUCT precedent research.			
3/28/24	MariaElena Eick	8.50	225.00	1,912.50
	Work on CEHE research and discuss with Breandan Mac Mathuna.			
3/28/24	Maxwell Murphy	2.00	165.00	330.00
	Making changes and updates to [REDACTED] analysis			

TOTAL FEES:

12,485.00

TOTAL AMOUNT DUE:

12,485.00

PAYMENT DUE WITHIN 30 DAYS OF RECEIPT
PLEASE MAKE CHECKS PAYABLE TO GDS ASSOCIATES, INC.



GARRETT GROUP CONSULTING, INC.
4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013

TELEPHONE (405) 203-5145

E-MAIL: MGARRETT@GARRETTGROUPLLC.COM

April 15, 2024

Mr. Alton Hall
Adams and Reese LLP
Lyondell Basell Tower
1221 McKinney, Suite 4400
Houston, TX 77010

RE: CenterPoint Electric 2024 Rate Case - DN 56211

Dear Alton:

Our invoice for professional services for March 2024 in connection with the above-referenced case follows:

I. Professional Services:			
A.	Mark Garrett, JD, CPA (Details in Attachment A)	30.0 hours at \$250.00 per hour	\$7,500.00
B.	Edwin Farrar (Details in Attachment B)	11.5 hours at \$175.00 per hour	\$2,012.50
II. Expenses:			
	Office Expenses		N/C
III. Total Invoice:			<u><u>\$9,512.50</u></u>

We appreciate the opportunity to work with you on this case. Please call me if you should have any questions.

Sincerely,



Mark E. Garrett
Attachments

Attachment A
Mark Garrett

Consulting Tasks for
CenterPoint Electric 2024 Rate Case - DN 56211
Billing Period: March 2024

Dates	Tasks	Hours
3/14/2024	Review exhibits and testimony, draft discovery;	4.0
3/21/2024	Review exhibits and testimony,	4.0
3/22/2024	Review exhibits and testimony, draft discovery;	4.0
3/25/2024	Review discovery;	2.0
3/27/2024	Review discovery; issue identification and development;	4.0
3/28/2024	Review testimony and discovery; issue identification and development;	4.0
3/29/2024	Review testimony and discovery; issue identification and development;	4.0
3/30/2024	Review testimony and discovery; issue identification and development;	4.0
	Total	30.0

Attachment B

Edwin Farrar

Consulting Tasks for
CenterPoint Electric 2024 Rate Case - DN 56211
Billing Period: March 2024

Dates	Tasks	Hours
3/11/2024	Review application files;	6.0
3/14/2024	Review exhibits and testimony, draft discovery;	1.5
3/18/2024	Review exhibits and testimony;	3.0
3/28/2024	Review discovery;	1.0
	Total	11.5



May 30, 2024

Invoice Number: 1279160

City of Houston, TX
[REDACTED]File Number: 024680-000032
DN 56211-CEHE App for Authority to Change
Rates

Statement

For Professional Services Rendered in connection with the handling of the captioned matter, including the following:

05/01/24	A. Fazli	0.30	Review preliminary list of issues.
05/01/24	A. Fazli	0.30	Review SOAH Order No.4 regarding revised pre-and post-hearing requirements.
05/01/24	A. Fazli	0.30	Review SOAH Order No.5 Granting Motions to Intervene.
05/01/24	A. Fazli	0.50	Review ordinances and resolutions for Bellaire, West U, LaPorte, Surfside, and Oak Ridge.
05/01/24	A. Fazli	3.00	Review CenterPoint's witnesses testimonies: Kristie L. Colvin, John R. Hudson, and Rina Harris.
05/01/24	A. Hall, Jr.	3.90	Continue analysis of [REDACTED] issues, including [REDACTED] and other [REDACTED] issues; review Commission precedent regarding same; review recent Commission precedent regarding [REDACTED]; review additional discovery and responses
05/01/24	S. Moritz	4.40	Review and assess new deadlines and procedures set forth in SOAH Order No. 4. Review and assess TIEC's 3rd RFI to CEHE. Analyze CEHE's Supplemental Response to GCCC's 2nd Set of RFI. Continue analyzing the Direct Testimony of Eric D. Eason.

SEND PAYMENT:

By Check

By ACH

By Domestic Wire

By Foreign Wire

Adams and Reese LLP

Payee: Adams and Reese LLP

Payee: Adams and Reese LLP

Payee: Adams and Reese LLP
[REDACTED]

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05/02/24	A. Fazli	0.30	Review Houston Coalition of Cities' eleventh request for information to CenterPoint.
05/02/24	A. Hall, Jr.	3.20	Continue review of various testimony on [REDACTED] issues; analysis of [REDACTED] issues; review additional discovery and responses
05/02/24	K. Poole	0.60	Assist attorney in draft of Houston Coalition of Cities' Eleventh Request for Information to CenterPoint Energy Houston Electric, LLC. in preparation of filing with the PUC.
05/02/24	S. Moritz	4.50	Review and assess TIEC's 4th Set of RFI to CEHE. Correspondence with consultants regarding discovery. Prepare HCC's 11th Set of RFI to CEHE. Begin analyzing the Direct Testimony of David Mercado.
05/03/24	A. Fazli	0.30	Review REP Coalition's first requests for information to CenterPoint.
05/03/24	A. Fazli	0.30	Review TEAM and ARM's first requests for information to CenterPoint.
05/03/24	A. Fazli	2.80	Review CenterPoint's witnesses' testimonies: Mandie W. Shook, Randal M. Pryor, and Deryl Tumlinson.
05/03/24	A. Hall, Jr.	2.70	Review data from CEHE's last rate case regarding [REDACTED] issues; review PFD regarding same; review additional discovery and responses
05/03/24	S. Moritz	4.20	Review and execute protective order certification. Analyze TEAM and ARM's 1st RFI to CEHE. Finalize HCC's 11th Set of RFI to CEHE. Continue analyzing the Direct Testimony of David Mercado.
05/06/24	A. Fazli	3.60	Review CenterPoint's witnesses' testimonies: David L. Mercado, Eric D. Easton, Jason M. Ryan, and Lynnae K. Wilson.
05/06/24	A. Fazli	0.40	Review Commission Staff's Fifth Request for Information to CenterPoint.
05/06/24	A. Fazli	0.80	Review CenterPoint's responses to the PUC's first set of requests for information.
05/06/24	A. Hall, Jr.	3.80	Continue review and analysis of [REDACTED] issues; review additional [REDACTED] issues; review additional discovery and responses; conference with consultants regarding status

05/06/24	S. Moritz	3.50	Analyze Staff's 5th Set of RFI to CEHE. Analyze CEHE's Response to PUC's 1st Set of RFI. Analyze CEHE's Response to GCCC's 3rd Set of RFI. Analyze CEHE's Response to EDF's 1st Set of RFI and 1st Set of RFP. Review CEHE's Reply to Roper's Response to CEHE's Objection to Intervention.
05/07/24	A. Fazli	0.90	Review CenterPoint's responses to Houston Coalition of Cities' second set of requests for information and first requests for production.
05/07/24	A. Hall, Jr.	4.20	Continue review and analysis of [REDACTED] and testimony; review additional discovery and responses; identify issues for testimony
05/07/24	S. Moritz	4.80	Analyze CEHE's Supplemental Responses to GCCC's 1st and 2nd Set of RFI. Analyze CEHE's Supplemental Response to HCC's Second RFI and First RFP. Review CEHE's 45 day update. Review Roper's Motion for Leave and Surreply on Motion to Intervene. Review CEHE's Response to Roper's Surreply. Begin analyzing the Direct Testimony of Deryl Tumlinson.
05/08/24	A. Fazli	0.20	Review Commission Staff's sixth request for information to CenterPoint.
05/08/24	A. Hall, Jr.	3.40	Continue analysis of issues for testimony, possible adjustments; review discovery and responses
05/08/24	S. Moritz	6.00	Analyze Staff's 6th Set of RFI to CEHE. Analyze CEHE's Response to GCCC's 4th Set of RFI. Analyze CEHE's Response to OPUC's 1st Set of RFI. Analyze CEHE's Response to OPUC's 2nd Set of RFI. Analyze CEHE's Response to OPUC's 3rd Set of RFI. Continue analyzing the Direct Testimony of Deryl Tumlinson.
05/09/24	A. Hall, Jr.	3.50	Review CEHE testimony and analysis on [REDACTED] issues; review [REDACTED]; review additional discovery and responses
05/09/24	K. Poole	1.40	Receipt and review PUC's filings received; review discovery and responses and catalog same.
05/09/24	S. Moritz	5.50	Analyze Hunt Energy and SMT TX Management's Joint Motion for Certified Issues. Analyze CEHE's Response to TIEC's 1st Set of RFI. Analyze CEHE's Response to Hunt Energy's 1st Set of RFI. Begin analyzing the Direct Testimony of Randal M. Pryor.

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05/10/24	A. Fazli	0.20	Review SOAH Order No.6 denying Mr. Roper's motion to intervene.
05/10/24	A. Fazli	0.60	Review CenterPoint's responses to the Public Utility Commission's second and third requests for information.
05/10/24	A. Fazli	1.00	Review CenterPoint's responses to Houston Coalition of Cities' first set of requests for information.
05/10/24	A. Hall, Jr.	2.70	Continue review of [REDACTED] precedent and [REDACTED]; review additional discovery and responses
05/10/24	K. Poole	1.00	Receipt and review PUC's filings and discovery received; catalog same.
05/10/24	S. Moritz	7.50	Analyze CEHE's Confidential Response to Hunt Energy's 1st Set of RFI. Analyze SOAH Order No. 6. Analyze GCCC's Response to CEHE's 1st RFI. Analyze EDF's 2nd Set of RFI and 2nd Set of RFP to CEHE. Analyze CEHE's Response to PUCT's 2nd Set of RFI. Analyze CEHE's Response to PUCT's 3rd Set of RFI. Analyze TIEC's 5th Set of RFI to CEHE. Analyze CEHE's Revised Response to HCC's 1st Set of RFI. Continue analyzing the Direct Testimony of Randal M. Pryor.
05/13/24	A. Fazli	0.50	Review Houston Coalition of Cities' responses to CenterPoint's first requests for information.
05/13/24	A. Fazli	1.00	Review CenterPoint's responses to Houston Coalition of Cities' sixth requests for information and fourth requests for production.
05/13/24	A. Fazli	1.20	Review CenterPoint's responses to Houston Coalition of Cities' eight requests for information and fifth requests for production.
05/13/24	A. Fazli	0.80	Review CenterPoint's responses to Houston Coalition of Cities' seventh requests for information.
05/13/24	A. Hall, Jr.	2.90	Analysis of [REDACTED]; continue review of [REDACTED] testimony on same; review additional discovery responses
05/13/24	K. Poole	1.80	Receipt and review PUC's filings received and catalog same.

05/13/24	S. Moritz	5.50	Prepare HCC's 1st Response to CEHE's 1st RFI. Correspondence with client regarding same. Analyze CEHE's Responses to HCC's 6th Set of RFI. Analyze CEHE's Responses to HCC's 7th Set of RFI. Analyze CEHE's Responses to HCC's 8th Set of RFI and 5th Set of RFP. Analyze CEHE's Responses to TIEC 2nd Set of RFI.
05/14/24	A. Fazli	0.90	Review CenterPoint's responses to Houston Coalition of Cities' ninth requests for information.
05/14/24	A. Fazli	1.10	Review CenterPoint's responses to Houston Coalition of Cities' tenth requests for information and sixth requests for production.
05/14/24	A. Fazli	0.60	Review CenterPoint's responses to Public Utility Commission's fourth requests for information.
05/14/24	A. Hall, Jr.	2.50	Continue review of [REDACTED] testimony and support; review additional discovery responses; conference with coalition members regarding status
05/14/24	K. Poole	1.60	Receipt and review PUC's filings received; prepare email and forward to Houston Coalition participants and catalog same.
05/14/24	S. Moritz	3.40	Finalize HCC's 1st Responses to CEHE's 1st Set of RFI. Analyze CEHE's Responses to HCC's 9th Set of RFI. Analyze CEHE's Responses to HCC's 10th Set of RFI and 6th Set of RFP. Analyze CEHE's Responses to PUCT's 4th Set of RFI.
05/15/24	A. Fazli	1.30	Review CenterPoint's responses to Houston Coalition of Cities' third requests for information and second requests for production supplement.
05/15/24	A. Fazli	0.60	Review CenterPoint's responses to the public utility commission's first set of requests for information.
05/15/24	A. Hall, Jr.	2.80	Continue analysis of [REDACTED] issues; determine possible need for testimony; review additional discovery responses
05/15/24	K. Poole	2.30	Receipt and review PUC's filings received; prepare email and forward to Houston Coalition participants and catalog same.

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05/15/24	S. Moritz	5.50	Analyze GCCC's 5th RFI to CEHE. Analyze CEHE's Supplemental Responses to HCC's 3rd Set of RFI. Analyze TCUC's Response to CEHE's 1st Set of RFI. Analyze CEHE's Response to IBEW Local 66's 1st Set of RFI. Review and analyze Direct Testimony of Mandie W. Shook.
05/16/24	A. Hall, Jr.	3.10	Review additional discovery; continue review of proposed procedural schedule; review comments from parties regarding same; continue review of testimony on [REDACTED]
05/16/24	A. Hall, Jr.	3.40	Continue work identifying issues for testimony; analysis of [REDACTED]; continue review of [REDACTED] testimony and Final Orders regarding [REDACTED]; review additional discovery responses
05/16/24	K. Poole	2.50	Receipt and review PUC's filings received and catalog same.
05/16/24	S. Moritz	4.40	Analyze CEHE's Response to TIEC's 3rd Set of RFI. Analyze CEHE's Response to Hunt Energy and SMT's Motion for Certified Issues. Analyze CEHE's Response to IBEW Local 66's 1st Set of RFI. Analyze Direct Testimony of Rina H. Harris.
05/17/24	A. Hall, Jr.	2.60	Continue [REDACTED] analysis; continue outlining issues for testimony; continue review of additional discovery and responses; review various pleadings filed
05/17/24	S. Moritz	5.00	Review CEHE's Confidentiality Statement. Analyze CEHE's Response to TIEC's 4th Set of RFI. Correspondence with experts regarding discovery. Analyze Direct Testimony of John R. Hudson.
05/20/24	A. Fazli	0.50	Conference call with consultants, clients, and Adams and Reese team.
05/20/24	A. Fazli	0.50	Review Houston Coalition of Cities' twelfth requests for information to CenterPoint.
05/20/24	A. Fazli	0.90	Review CenterPoint's response to Houston Coalition of Cities' eleventh set of requests for information.

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05/20/24	A. Hall, Jr.	3.90	Analysis of issues to determine [REDACTED]; review of [REDACTED]; conference with consultants regarding status and issues for testimony; review additional discovery and responses
05/20/24	K. Poole	2.20	Catalog filings.
05/20/24	K. Poole	0.50	Prepare draft of HCC's 12th RFI to CEHE for attorney's review.
05/20/24	S. Moritz	2.30	Prepare HCC's 12th Set of RFI to CEHE. Correspondence with consultants regarding same. Analyze CEHE's Response to HCC's 11th Set of RFI. Analyze CEHE's Supplemental Responses to TIEC's 1st Set of RFI. Analyze OPUC's 4th Set of RFI to CEHE. Review SOAH Order No. 7.
05/21/24	A. Fazli	0.30	Review CenterPoint's petition for review regarding motion to consolidate.
05/21/24	A. Fazli	0.50	Review CenterPoint's responses to Public Utility Commission's fifth requests for information.
05/21/24	A. Fazli	0.40	Review CenterPoint's responses to REP Coalition's first requests for information.
05/21/24	A. Hall, Jr.	4.10	Continue review and analysis of various [REDACTED] and [REDACTED] issues for possible [REDACTED] and to assess [REDACTED]; review additional discovery responses
05/21/24	K. Poole	0.50	Receipt and review PUC's filings received; prepare email and forward to Houston Coalition participants and catalog same.
05/21/24	S. Moritz	2.80	Analyze SPEER's List of Issues. Analyze CEHE's 1st Petition for Review and Motion to Consolidate. Analyze CEHE's partial responses to PUC's 5th Set of RFI. Analyze CEHE's partial responses to REP Coalition's 1st Set of RFI. Analyze HEN and SMT's Appeal of SOAH Order No. 7.
05/22/24	A. Fazli	0.30	Attend call with consultants.
05/22/24	A. Fazli	2.50	Review CenterPoint's errata 2 filing.
05/22/24	A. Hall, Jr.	3.60	Continue analysis of [REDACTED] issues; review Commission precedent regarding same; review recent legislation regarding same; review additional discovery and responses regarding same

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05/22/24 K. Poole	1.30	Receipt and review PUC's filing received; prepare email and forward to Houston Coalition participants and catalog same.
05/22/24 K. Poole	0.40	Prepare draft of HCC's 13th RFI to CenterPoint Energy Houston Electric.
05/22/24 S. Moritz	3.20	Prepare HCC's 13th Set of RFI to CEHE. Analyze CEHE's Errata 2 Filing.
05/23/24 A. Fazli	0.50	Review Houston Coalition of Cities' 13th requests for information to CenterPoint.
05/23/24 A. Fazli	0.40	Review Houston Coalition of Cities' fourteenth requests for information and seventh requests for production to CenterPoint.
05/23/24 A. Hall, Jr.	3.10	Review of Second Errata; review additional discovery.
05/23/24 K. Poole	1.80	Receipt and review PUC's filing received; prepare email and forward to Houston Coalition participants and catalog same.
05/23/24 S. Moritz	3.30	Further correspondence with consultants regarding HCC's 13th Set of RFI. Continue preparing same. Correspondence with consultants regarding HCC's 14th Set of RFI and 7th Set of RFP. Prepare same. Correspondence with Company regarding same. Analyze EDF's 3rd Set of RFI to CEHE.
05/24/24 A. Fazli	0.30	Review commission staff's seventh request for information to CenterPoint.
05/24/24 A. Fazli	0.60	Review CenterPoint's response to Public Utility Commission's fifth requests for information.
05/24/24 A. Hall, Jr.	3.50	Continue analysis of various [REDACTED] to assess [REDACTED] and to determine scope of testimony; review additional discovery responses
05/24/24 K. Poole	1.10	Receipt and review PUC's filing received; prepare email and forward to Houston Coalition participants and catalog same.
05/24/24 S. Moritz	4.80	Review Second Errata; Analyze Staff's 51 page 7th Set of RFI to CEHE. Analyze CEHE's partial Responses to PUC's 5th Set of RFI. Analyze CEHE's partial Responses to Rep Coalition's 1st Set of RFI. Analyze CEHE's Confidentiality Statement.

05/27/24 A. Hall, Jr.	4.30	Continue review and analysis of impact of Second Errata; continue examination of [REDACTED] adjustments and impact on [REDACTED].
05/28/24 A. Fazli	1.50	Review possible adjustments to [REDACTED].
05/28/24 A. Hall, Jr.	3.50	Continue review of additional discovery and responses; continue review of [REDACTED] issues.
05/28/24 K. Poole	0.60	Receipt and review of PUC's filing received and catalog same.
05/28/24 S. Moritz	5.20	Correspondence with Company regarding discovery. Consider HCC's strategy. Begin preparing HCC's 15th Set of RFI to CEHE. Correspondence with consultants regarding same. Analyze CEHE's Response to TIEC's 5th Set of RFI. Analyze OPUC's 5th Set of RFI to CEHE. Begin to analyze Direct Testimony of Kristie L. Colvin.
05/29/24 A. Fazli	0.40	Review CenterPoint's response to the Public Utility Commission's fourth requests for information.
05/29/24 A. Hall, Jr.	3.70	Continue review of recent precedent on [REDACTED], [REDACTED] and [REDACTED] and [REDACTED] issues and [REDACTED]; review additional discovery responses.
05/29/24 K. Poole	1.20	Receipt and review PUC's filing received and catalog same.
05/29/24 S. Moritz	5.80	Final preparation of HCC's 15th Set of RFI to CEHE. Correspondence with consultants regarding same. Review CEHE's Response to HEN and SMT's Appeal of SOAH Order No. 7. Analyze CEHE's Updated Response to PUC's 4th Set of RFI. Analyze CEHE's Response to EDF's 2nd Set of RFI and 2nd Set of RFP. continue analyzing the Direct Testimony of [REDACTED] Colvin.

TOTAL HOURS **220.20**

Timekeeper Fee Summary

	Hours	Billed	
Timekeeper	Billed	Per Hour	Bill Amount
A. Hall, Jr.	74.40	\$450.00	\$33,480.00
A. Fazli	33.40	\$250.00	\$8,350.00
S. Moritz	91.60	\$250.00	\$22,900.00
K. Poole	20.80	\$150.00	\$3,120.00

Timekeeper	Hours Billed	Billed Per Hour	Bill Amount
Totals	220.20		\$67,850.00

CURRENT FEES	\$67,850.00
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Costs Advanced

05/01/24	Expert Fees Expert Fees Kit Pevoto LLC Expert consultant services Invoice Number: 2 - CEHE RATE CHANGE DN 56211	\$5,187.50
05/04/24	Expert Fees Expert Fees Garrett Group Consulting, Inc. Expert consultant services Invoice Number: CEHE Electric DN 56211	\$9,925.00
05/06/24	Expert Fees Expert Fees GDS Associates, Inc. Expert consultant fees Invoice Number: 0228777	\$16,575.00

COSTS ADVANCED	\$31,687.50
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TOTAL DUE THIS STATEMENT	<u>\$99,537.50</u>
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Kit Pevoto LLC
Invoice

Date: May 1, 2024

Invoice No.: 2

To: Alton J. Hall, Jr
Adams and Reese LLP
LyondellBasell Tower
1221 McKinney, Suite 4400
Houston, TX 77010

From: **Kit Pevoto LLC**
13436 Athens Trail
Austin, TX 78729
(512) 796-6707 ph phone
(512) 257-1715 fax

For

Professional services for April 2024

For PUCT Docket No. 56211 CenterPoint 2024 Electric Rate Case

<u>Date</u>	<u>Hrs.</u>	<u>Rate</u>	<u>Description</u>	<u>Total</u>
4/24/2024	9.25 @	\$250.00	Developing [REDACTED] models	\$2,312.50
4/25/2024	4.00 @	\$250.00	Developing [REDACTED] models/[REDACTED] analysis	\$1,000.00
4/26/2024	1.75 @	\$250.00	Drafting RFIs	\$437.50
4/29/2024	4.75 @	\$250.00	Developing [REDACTED] models/RFIs	\$1,187.50
4/30/2024	<u>1.00</u> @	\$250.00	Developing [REDACTED] models	<u>\$250.00</u>
	20.75			\$5,187.50

Subtotal for hours 20.75 hrs **\$5,187.50**

Total Due This Invoice

\$5,187.50

Make checks payable to Kit Pevoto LLC

GARRETT GROUP CONSULTING, INC.
4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013

TELEPHONE (405) 203-5145

E-MAIL: MGARRETT@GARRETTGROUPLLC.COM

May 4, 2024

Mr. Alton Hall
Adams and Reese LLP
Lyondell Basell Tower
1221 McKinney, Suite 4400
Houston, TX 77010

RE: *CenterPoint Electric 2024 Rate Case - DN 56211*

Dear Alton:

Our invoice for professional services for April 2024 in connection with the above-referenced case follows:

I. Professional Services:			
A.	Mark Garrett, JD, CPA <i>(Details in Attachment A)</i>	39.0 hours at \$250.00 per hour	\$9,750.00
B.	Edwin Farrar <i>(Details in Attachment B)</i>	1.0 hours at \$175.00 per hour	\$175.00
II. Expenses:			
	Office Expenses		N/C
III. Total Invoice:			<u><u>\$9,925.00</u></u>

We appreciate the opportunity to work with you on this case. Please call me if you should have any questions.

Sincerely,

Mark E. Garrett

Mark E. Garrett
Attachments

Attachment A**Mark Garrett**

Consulting Tasks for
CenterPoint Electric 2024 Rate Case - DN 56211
Billing Period: April 2024

Dates	Tasks	Hours
4/2/2024	Review application, testimony and exhibits;	2.0
4/3/2024	Review application, testimony and exhibits;	0.5
4/8/2024	Review application, testimony and exhibits; perform analysis;	4.0
4/9/2024	Review application, testimony and exhibits; perform analysis;	4.5
4/11/2024	Issue development;	4.0
4/12/2024	Issue development;	2.0
4/17/2024	Review data responses; issue development;	4.0
4/18/2024	Issue development;	0.5
4/22/2024	Review data responses; perform analysis;	3.5
4/23/2024	Review data responses; perform analysis;	4.0
4/25/2024	Review data responses; perform analysis;	2.5
4/26/2024	Review data responses; perform analysis;	3.5
4/29/2024	Work on testimony outlines;	4.0
		39.0

Attachment B

Edwin Farrar

*Consulting Tasks for***CenterPoint Electric 2024 Rate Case - DN 56211***Billing Period: April 2024*

Dates	Tasks	Hours
4/27/2024	Review testimony and exhibits;	1.0
	Total	1.0



1850 Parkway Place
Suite 800
Marietta, Georgia 30067

INVOICE

770.425.8100
Fax 866.611.3791

CITY OF HOUSTON
AMIN & REGULATORY AFFAIRS

ALTON HALL

INVOICE NO : 0228777
DATE : May 06, 2024
CLIENT CODE : 0044304
PROJECT NO : 0027

DKT 56211 ELECTRIC RATE CASE -
CENTERPOINT ENERGY HOUSTON ELE
PROFESSIONAL SERVICES RENDERED 03/30/24 - 04/26/24

Services rendered during April 2024 supported the review, analysis, discussion, team meetings, research, and preparation of discovery for CenterPoint electric rate case in Docket No. 56211. All work performed was conducted by or under the direction of GDS Project Managers.

		Hours	Rate	Amount
3/31/24	MariaElena Eick	2.50	225.00	562.50
	Review recent filings of discovery, lists of issues, procedural schedule, orders, and pleadings. Discuss with GDS team.			
4/1/24	Michael Ivey	1.00	250.00	250.00
	Weekly update and coordination meeting			
4/1/24	MariaElena Eick	0.75	225.00	168.75
	Participate in weekly conference call & discuss with Steven Hunt and Breandan Mac Mathuna. Review recent filings of discovery, lists of issues, procedural schedule, orders, and pleadings. Discuss with GDS team.			
4/1/24	Steven Hunt	0.25	250.00	62.50
	Project team meeting			
4/2/24	Michael Ivey	0.50	250.00	125.00
	Review of case filings			
4/5/24	MariaElena Eick	1.50	225.00	337.50
	Review recent filings of discovery, lists of issues, procedural schedule, orders, and pleadings. Discuss with GDS team.			
4/7/24	Steven Hunt	2.50	250.00	625.00
	Review of rate case testimonies and drafting discovery			
4/8/24	Michael Ivey	0.75	250.00	187.50
	Weekly update and coordination meeting			
4/8/24	MariaElena Eick	0.50	225.00	112.50
	Participate in weekly conference call & discuss with Steven Hunt and Breandan Mac Mathuna.			
4/8/24	Steven Hunt	1.50	250.00	375.00
	Review of rate case testimonies and drafting discovery			
4/9/24	Breandan Mac Mathuna	1.00	250.00	250.00
	Review of PUCT precedent regarding [REDACTED]			





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ALTON HALL

INVOICE NO : 0228777
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CLIENT CODE : 0044304
PROJECT NO : 0027

		Hours	Rate	Amount
4/9/24	Breandan Mac Mathuna	0.75	250.00	187.50
	Review of DRs asked by others and current set of responses to them.			
4/9/24	MariaElena Eick	2.50	225.00	562.50
	Work on research and discuss with Breandan Mac Mathuna. Review recent filings of discovery responses. Discuss with GDS team.			
4/9/24	Steven Hunt	2.50	250.00	625.00
	Evaluation of [REDACTED] of electric rate filing			
4/10/24	MariaElena Eick	2.00	225.00	450.00
	Review recent filings of discovery responses and pleadings. Discuss with GDS team.			
4/10/24	Steven Hunt	0.50	250.00	125.00
	Research and analysis			
4/11/24	Michael Ivey	0.50	250.00	125.00
	Review of case filings			
4/11/24	Steven Hunt	1.50	250.00	375.00
	Review of rate case testimonies and drafting discovery			
4/15/24	Breandan Mac Mathuna	0.75	250.00	187.50
	Review of responses to data requests.			
4/15/24	Michael Ivey	0.50	250.00	125.00
	Weekly update and coordination meeting			
4/15/24	MariaElena Eick	1.50	225.00	337.50
	Participate in weekly conference call & discuss with Steven Hunt and Breandan Mac Mathuna. Review recent filings of discovery responses, orders, and pleadings. Discuss with GDS team.			
4/15/24	Steven Hunt	0.50	250.00	125.00
	Team meeting discussing CenterPoint's electric rate case.			
4/16/24	Michael Ivey	1.25	250.00	312.50
	Review of case filings			
4/21/24	Steven Hunt	1.00	250.00	250.00
	Analysis of amendments to the RFP			
4/22/24	Breandan Mac Mathuna	0.25	250.00	62.50
	Review of CEHE errata material. Engagement with MariaElena.			





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ALTON HALL

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DATE : May 06, 2024
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PROJECT NO : 0027

		Hours	Rate	Amount
4/22/24	MariaElena Eick	9.75	225.00	2,193.75
	Participate in weekly conference call & discuss with Steven Hunt and Breandan Mac Mathuna. Review of Errata and 45-Day Update and respond to questions from Breandan Mac Mathuna and Steven Hunt.			
4/23/24	Breandan Mac Mathuna	2.00	250.00	500.00
	Review and research of PUCT precedent on the [REDACTED]			
4/23/24	MariaElena Eick	3.50	225.00	787.50
	Review recent filings of discovery responses and pleadings. Discuss with GDS team.			
4/23/24	Steven Hunt	2.25	250.00	562.50
	Analysis of discovery and related responses.			
4/24/24	Breandan Mac Mathuna	1.50	250.00	375.00
	Review of PUCT precedent and also testimony filed in prior CEHE proceeding.			
4/24/24	Breandan Mac Mathuna	0.75	250.00	187.50
	Review of CEHE responses to discovery.			
4/24/24	Michael Ivey	2.00	250.00	500.00
	Review of case filings and analyzing data responses			
4/24/24	Steven Hunt	5.00	250.00	1,250.00
	Analysis of CEHE [REDACTED], discovery responses, and drafting discovery.			
4/25/24	Breandan Mac Mathuna	2.50	250.00	625.00
	Review of DR responses, CEHE [REDACTED], [REDACTED] etc.			
4/25/24	Breandan Mac Mathuna	1.00	250.00	250.00
	Review of CEHE [REDACTED]			
4/25/24	MariaElena Eick	1.50	225.00	337.50
	Respond to questions from Breandan Mac Mathuna.			
4/25/24	Steven Hunt	1.00	250.00	250.00
	CEHE [REDACTED] analysis and discovery development			
4/26/24	Breandan Mac Mathuna	2.75	250.00	687.50
	Review of [REDACTED] provided by CEHE in response to discovery.			
	Development of additional discovery requests.			
4/26/24	Breandan Mac Mathuna	1.00	250.00	250.00
	Development of additional discovery requests.			





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ALTON HALL

INVOICE NO : 0228777
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		Hours	Rate	Amount
4/26/24	Michael Ivey	1.50	250.00	375.00
	Review of case filings and analyzing data responses			
4/26/24	Steven Hunt	1.25	250.00	312.50
	CEHE analysis and discovery development			
4/26/24	T. Daniel Burapavong	1.00	225.00	225.00
	Prepare analysis for all for Breandan.			
	Email to Breandan.			
TOTAL FEES:				16,575.00

TOTAL AMOUNT DUE:

16,575.00

PAYMENT DUE WITHIN 30 DAYS OF RECEIPT
PLEASE MAKE CHECKS PAYABLE TO GDS ASSOCIATES, INC.



\$12,625.00



1850 Parkway Place
Suite 800
Marietta, Georgia 30067

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Fax 866.611.3791
Fed. EIN 58-1659843

CITY OF HOUSTON
AMIN & REGULATORY AFFAIRS
611 WALKER 13TH FLOOR
Houston, TX 77002

INVOICE NO : 0229696
DATE : Jun 06, 2024
CLIENT CODE : 0044304
PROJECT NO : 0027

ALTON HALL

DKT 56211 ELECTRIC RATE CASE -
CENTERPOINT ENERGY HOUSTON ELE
PROFESSIONAL SERVICES RENDERED 04/27/24 - 05/31/24

Services rendered during May 2024 supported the review, analysis, discussion, team meetings, research, and preparation of discovery for CenterPoint electric rate case in Docket No. 56211. Work also includes the identification of issues for testimony and drafting of testimony in the proceeding. All work performed was conducted by or under the direction of GDS Project Managers.

		Hours	Rate	Amount
4/29/24	Breandan Mac Mathuna	1.00	250.00	250.00
	Review of prior CEHE proceeding witness testimony			
4/29/24	Breandan Mac Mathuna	2.50	250.00	625.00
	Review of independent proxy group capital structure analysis. Engagement with GDS colleague on same.			
4/29/24	Breandan Mac Mathuna	1.25	250.00	312.50
	Review of CEHE rating agency financial analysis provided with application, testimony and discovery responses.			
4/29/24	Michael Ivey	3.00	250.00	750.00
	Review and analysis of filings			
4/29/24	T. Daniel Burapavong	0.75	225.00	168.75
	Teams call with Breandan. Add exhibits for Bulkley and Coyne proxy groups in capital structure analysis. Email to Breandan.			
4/30/24	Breandan Mac Mathuna	1.50	250.00	375.00
	Review of several Moody's credit rating reports.			
4/30/24	Michael Ivey	3.00	250.00	750.00
	Review and analysis of filings			
5/1/24	Breandan Mac Mathuna	0.50	250.00	125.00
	Meeting with Steven H. regarding accounting matters affecting the capital structure.			
5/1/24	Breandan Mac Mathuna	1.00	250.00	250.00
	Review of Bulkley testimony and supporting analysis/exhibits.			
5/1/24	Steven Hunt	0.75	250.00	187.50
	Rate case analysis and meeting with Breandan			
5/2/24	Breandan Mac Mathuna	2.50	250.00	625.00
	Analysis and modification to CEHE financial metrics.			





1850 Parkway Place
Suite 800
Marietta, Georgia 30067

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770.425.8100
Fax 866.611.3791
Fed. EIN 58-1659843

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		Hours	Rate	Amount
5/2/24	MariaElena Eick Review recent filings of discovery responses, orders, and pleadings. Review RFI to HCC. Discuss with GDS team.	5.25	225.00	1,181.25
5/6/24	MariaElena Eick Review recent filings of discovery responses and pleadings. Discuss with GDS team.	1.00	225.00	225.00
5/7/24	MariaElena Eick Review recent filings of discovery responses and pleadings. Discuss with GDS team.	0.50	225.00	112.50
5/9/24	Breandan Mac Mathuna Development of testimony outline and associated review of material.	1.75	250.00	437.50
5/9/24	MariaElena Eick Respond to research question from Breandan Mac Mathuna.	1.50	225.00	337.50
5/10/24	Michael Ivey Review and analyze rate plan filings	1.00	250.00	250.00
5/10/24	MariaElena Eick Review recent filings of discovery responses and pleadings. Discuss with GDS team.	1.25	225.00	281.25
5/13/24	MariaElena Eick Review recent filings of discovery responses and pleadings. Discuss with GDS team.	2.00	225.00	450.00
5/13/24	Steven Hunt Rate case analysis of testimonies and schedules.	1.50	250.00	375.00
5/14/24	MariaElena Eick Review recent filings of discovery responses and pleadings. Discuss with GDS team.	1.75	225.00	393.75
5/15/24	MariaElena Eick Review recent filings of discovery responses and pleadings. Discuss with GDS team. Follow up on missing discovery responses with Counsel.	2.25	225.00	506.25
5/16/24	MariaElena Eick Review recent filings of discovery responses and pleadings. Discuss with GDS team. Respond to discovery questions from Breandan Mac Mathuna.	2.50	225.00	562.50
5/17/24	Breandan Mac Mathuna Review and analysis of DR responses. Analysis of credit metrics.	4.25	250.00	1,062.50
5/17/24	T. Daniel Burapavong Teams call with Breandan to discuss next steps in CEHE capital structure work - new exhibits.	0.25	225.00	56.25





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		Hours	Rate	Amount
5/20/24	Breandan Mac Mathuna	3.25	250.00	812.50
	Additional analysis undertaken re cost and savings of CEHE request. Outline of testimony.			
5/20/24	Michael Ivey	4.00	250.00	1,000.00
	Rate case coordination meeting and adjustment analysis			
5/20/24	MariaElena Eick	0.25	225.00	56.25
	Participate in weekly conference call & discuss with Steven Hunt and Breandan Mac Mathuna.			
5/21/24	Breandan Mac Mathuna	0.50	250.00	125.00
	Review of State ROE and Equity Ratios report by SPCIQ. Get latest SPCIQ hist. rate case data for Texas.			
5/21/24	Breandan Mac Mathuna	0.50	250.00	125.00
	Work testimony build out.			
5/21/24	Steven Hunt	4.00	250.00	1,000.00
	Analysis and development of issues, discovery, and rate impact.			
5/22/24	Breandan Mac Mathuna	5.75	250.00	1,437.50
	Development of testimony.			
5/22/24	Breandan Mac Mathuna	1.00	250.00	250.00
	Detailed review of PUCT decisions re factors relied on for capital structure decision.			
5/22/24	Breandan Mac Mathuna	0.25	250.00	62.50
	Call with consultants.			
5/22/24	Michael Ivey	4.00	250.00	1,000.00
	Adjustment coordination meeting and adjustment analysis			
5/22/24	Steven Hunt	5.00	250.00	1,250.00
	Analysis and development of issues, discovery, and rate impact.			
5/22/24	T. Daniel Burapavong	2.50	225.00	562.50
	Prepare new CEHE capital structure analyses and figures using Bulkley and Woolridge (placeholder) proxy groups. Download new Value Line reports as necessary. Emails with Breandan.			
5/23/24	Breandan Mac Mathuna	1.00	250.00	250.00
	Financial integrity analysis.			





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		Hours	Rate	Amount
5/23/24	Breandan Mac Mathuna	7.75	250.00	1,937.50
	Additional build out of testimony. Work on financial integrity analysis to determine/support my positions. Research and review of credit rating reports and views.			
5/23/24	Steven Hunt	1.00	250.00	250.00
	Analysis and development of issues, discovery, and rate impact.			
5/23/24	T. Daniel Burapavong	1.50	225.00	337.50
	Prepare 2023-only Bulkley proxy group capital structure analysis and figure. Emails with Breandan, try to refine figure.			
5/24/24	Breandan Mac Mathuna	5.50	250.00	1,375.00
	Development of testimony. Call with other consultant. Call with counsel.			
5/24/24	T. Daniel Burapavong	1.00	225.00	225.00
	Prepare 2021-2023 capital structure analysis using Woolridge proxy group (data only). Download new Value Line reports as necessary and spot-check data. Emails with Breandan.			
5/25/24	Breandan Mac Mathuna	2.00	250.00	500.00
	Work on testimony.			
5/26/24	MariaElena Eick	2.50	225.00	562.50
	Review recent filings of discovery responses, pleadings, and errata. Discuss with GDS team.			
5/28/24	Michael Ivey	6.00	250.00	1,500.00
	Reviewing and analyzing submittals			
5/28/24	Steven Hunt	0.50	250.00	125.00
	Analysis and internal discussion of CEHE income tax issues.			
5/30/24	MariaElena Eick	3.50	225.00	787.50
	Work on testimony and exhibits and discuss with Steven Hunt.			
5/30/24	Steven Hunt	5.00	250.00	1,250.00
	Analysis of discovery and preparing for testimony			
5/31/24	Steven Hunt	0.75	250.00	187.50
	Analysis of discovery and preparing for testimony			

TOTAL FEES:

27,618.75





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Hours	Rate	Amount
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TOTAL AMOUNT DUE:

27,618.75

PAYMENT DUE WITHIN 30 DAYS OF RECEIPT
PLEASE MAKE CHECKS PAYABLE TO GDS ASSOCIATES, INC.



GARRETT GROUP CONSULTING, INC.
4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013

TELEPHONE (405) 203-5145

E-MAIL: MGARRETT@GARRETTGROUPLLC.COM

June 17, 2024

Mr. Alton Hall
Adams and Reese LLP
Lyondell Basell Tower
1221 McKinney, Suite 4400
Houston, TX 77010

RE: *CenterPoint Electric 2024 Rate Case - DN 56211*

Dear Alton:

Our invoice for professional services for May 2024 in connection with the above-referenced case follows:

I. Professional Services:			
A.	Mark Garrett, JD, CPA <i>(Details in Attachment A)</i>	89.0 hours at \$250.00 per hour	\$22,250.00
B.	Edwin Farrar <i>(Details in Attachment B)</i>	36.0 hours at \$175.00 per hour	\$6,300.00
II. Expenses:			
	Office Expenses		N/C
III. Total Invoice:			<u><u>\$28,550.00</u></u>

We appreciate the opportunity to work with you on this case. Please call me if you should have any questions.

Sincerely,

Mark E. Garrett

Mark E. Garrett
Attachments

Attachment A
Mark Garrett

Consulting Tasks for
CenterPoint Electric 2024 Rate Case - DN 56211
Billing Period: May 2024

Dates	Tasks	Hours
5/1/2024	Review testimony, exhibits, and workpapers perform analysis;	6.0
5/2/2024	Review testimony and exhibits; review discovery;	4.0
5/3/2024	Review discovery; review testimony and exhibits, perform analysis;	8.0
5/6/2024	Review discovery; conference with Counsel;	1.5
5/9/2024	Review testimony and exhibits, perform analysis;	4.0
5/10/2024	Review testimony and exhibits, perform analysis;	2.0
5/11/2024	Review testimony and exhibits, perform analysis;	2.0
5/13/2024	Conference with Counsel; review testimony and exhibits, perform analysis;	4.0
5/15/2024	Work on testimony;	8.0
5/16/2024	Work on issue development;	4.0
5/17/2024	Review testimony and exhibits, perform analysis;	3.5
5/20/2024	Conference with Counsel; review discovery;	4.0
5/21/2024	Review testimony and exhibits, perform analysis;	8.0
5/22/2024	Work on issue development; review discovery;	8.5
5/23/2024	Work on draft testimony;	2.5
5/24/2024	Review testimony and exhibits, perform analysis; work on draft testimony;	5.0
5/25/2024	Work on accounting schedules;	6.5
5/27/2024	Review testimony and exhibits, perform analysis;	2.5
5/29/2024	Work on accounting schedules;	4.0
5/30/2024	Review discovery;	1.0
	Total	89.0

Attachment B

Edwin Farrar

Consulting Tasks for
CenterPoint Electric 2024 Rate Case - DN 56211
Billing Period: May 2024

Dates	Tasks	Hours
5/3/2024	Review exhibits and discovery;	3.0
5/4/2024	Review exhibits and discovery;	1.0
5/17/2024	Review testimony and exhibits;	3.5
5/19/2024	Review testimony and exhibits;	1.0
5/20/2024	Review testimony and exhibits, perform analysis;	7.0
5/21/2024	Review testimony, exhibits and discovery, perform analysis;	8.0
5/22/2024	Review testimony, exhibits and discovery, perform analysis;	5.0
5/23/2024	Perform analysis;	0.5
5/24/2024	Review exhibits, perform analysis, draft testimony;	4.0
5/25/2024	Draft testimony;	3.0
	Total	36.0