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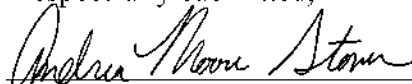
APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S
SECOND REQUEST FOR INFORMATION TO THE
HOUSTON COALITION OF CITIES**

Pursuant to 16 Texas Administrative Code § 22.144 and SOAH Order No. 2, CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston" or "the Company") requests that the Houston Coalition of Cities ("HCC") by and through its representatives of record, provide, within 8 business days, the information requested in the attached Exhibit A.

Respectfully submitted,

By:



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**COUNSEL FOR CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2024, notice of the filing of this document was provided to all parties of record via electronic mail in accordance with the Second Order Suspending Rules, issued in Project No. 50664.


Andrea Stover

EXHIBIT A

I. DEFINITION OF TERMS

The singular herein includes the plural and vice versa; the words “and” and “or” shall be construed as “and/or” in order to bring all information within the scope of the Request. The words, “each,” “all,” and “any,” mean “any and all” or “each and every.”

“HCC” means Houston Coalition of Cities.

“CenterPoint Houston” or “Company” means CenterPoint Energy Houston Electric, LLC.

“Communication” shall include all meetings, telephone calls, conversations, discussions, letters, memoranda, notes, and other forms of communication.

“Document” or “Documents” is used in the broadest sense possible and shall mean every writing or record of every type and description, such as drafts, corrections, memoranda, letters, tapes, stenographic or handwritten notes, studies, publications, work papers, books, pamphlets, diaries, desk calendars, interoffice communications, records, reports, analyses, bills, receipts, checks, check stubs, checkbooks, invoices, requisitions, papers and forms filed with a court or governmental body, notes, transportation and expense logs, work papers, contracts, statistical and financial statements, corporate records of any kind, charts, graphs, pictures, photographs, photocopies, films, voice recordings, and any other written, recorded or graphic material, however denominated, by whomever prepared, and to whomever addressed, which are in your possession, custody or control. The term “document” also includes all electronic and magnetic data, including e-mail. The term “document” includes all copies of every such writing or record that are not identical copies of the original or that contain any commentary, notes, or markings that do not appear on the original.

“Including” means “including but not limited to” and “including without limitation.”

“Identify” means to state as much information as you now have or that is now subject to your control, or that you may hereafter come to have or that hereafter becomes subject to your control, including the following:

- a. when used in reference to a natural person, state the person’s full name, title, present (or last known) address, telephone number, occupation, present business affiliation or employer, business address, and exact duties and responsibilities of such individual;
- b. when used in reference to an entity, state the full name of the company, organization, association, partnership, or other business enterprise; and
- c. when used in reference to a document, state the date and title of the document and, if already produced in this case, the Bates-number of such document.

“Relate” or “relating to” includes referring to, mentioning, reflecting, containing, pertaining to, evidencing, involving, describing, discussing, responding to, supporting, opposing, constituting or being a draft, copy or summary of, in whole or in part.

“You” and “Your” refers to the Houston Coalition of Cities or HCC and any of the attorneys or law firms that purport to represent you in this case.

II. INSTRUCTIONS

1. Each request herein extends to any documents or information in your possession and the possession of any of the attorneys or law firms that purport to represent you in this case.
2. Each and every non-identical copy of a document, whether different from the original because of indications of the recipient(s), handwritten notes, marks, attachments, marginalia, or any other reason, is a separate document that must be produced.
3. If you object to any portion of a request on the ground of privilege, answer the nonprivileged portion of the Request by providing such non-privileged information as is responsive.
4. If you object to any portion of a request on any ground other than privilege, you should still provide documents responsive to the remaining non-objectionable portion.
5. Separately for each request to which you object in whole or in part, describe in detail and itemize each basis of your objection.
6. If the basis of an objection to any request, or any portion thereof, is a statute, contract or other agreement, or any other obstacle to production that you claim is based in the law, please identify the basis of that purported obstacle with specificity.
7. Each request herein shall be construed independently, and no request shall be viewed as limiting the scope of any other request. Please indicate where any portion of your document production in response to a request has been covered in your production in response to another request, and please specify the request numbers at issue.
8. If you claim that any document responsive to any request is lost or destroyed, (a) identify and describe such document, (b) describe how the document was lost or destroyed, and (c) identify when the document was lost or destroyed.
9. If you claim that any documents responsive to any request are already in the possession of CenterPoint Houston, please identify the document with sufficient specificity to allow CenterPoint Houston to locate the document.
10. The requests shall be deemed continuing so as to require additional answers if, after answering such requests, you obtain information upon the basis of which you determine that the answer was incorrect when made, or you become aware that the answer, though correct when made, is no longer true, and the circumstances are such that failure to amend the answer is in substance a knowing concealment.
11. Any document that is withheld from production pursuant to a claim of attorney/client, work product, party communication or investigative privilege shall be identified and shall be segregated and maintained for in camera submission, and a list identifying such withheld documents shall be furnished at the time and place of production. Such list shall state with

respect to each document: (a) the privilege under which the document is being withheld; (b) a description of the type of document; (c) a description of the subject matter and purpose of the document; (d) the date the document was prepared; (e) the author and/or signatory of the document; (f) the identity of the persons to whom the document was sent; and (g) the present custodian of the document.

12. As part of the response to each request for information, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparation of the response. Please also state the name of the witness in this docket who will sponsor the answer to the request and may verify the truth of the response.

III. REQUEST FOR INFORMATION

- 2-1 If not provided with your direct testimony in this case, please provide, in native format, all workpapers and documents supporting the testimony of each witness filing testimony on your behalf in this proceeding.
- 2-2 For each testifying expert that has provided testimony for you in this case, please provide (to the extent not provided earlier):
- a. A list of all cases in which the testifying expert has submitted testimony from 2019 to the present;
 - b. Copies of all prior testimony, articles, speeches, published materials, and peer-review materials written by the testifying expert from 2019 to the present;
 - c. The testifying expert's billing rate for this proceeding; and
 - d. All documents provided to, reviewed by, or prepared by or for the testifying expert in anticipation of the testifying expert filing testimony in this proceeding.
- 2-3 For each consulting expert whose mental impressions or opinions have been reviewed by one or more of your testifying experts in this case, please provide (to the extent not provided earlier):
- a. A list of all cases in which the consulting expert has submitted testimony from 2019 to the present;
 - b. Copies of all prior testimony, articles, speeches, published materials, and peer-review materials written by the consulting expert, from 2019 to the present;
 - c. The consulting expert's billing rate for this proceeding; and
 - d. All documents provided to, reviewed by, or prepared by or for the consulting expert in anticipation of the testifying expert filing testimony in this proceeding.
- 2-4 Please separately state whether each witness is testifying as an expert witness.
- 2-5 Regarding page 27, lines 14–15 of the Direct Testimony of Mark E. Garrett, please provide a listing of “the numerous electric utilities nationwide owned by cities, counties, and tribal nations that do not maintain an investor relations function.”
- a. Please provide all details on expenses such as member relations services that utilities owned by cities, counties, and tribal nations may have that a public utility may not have.
 - b. Please provide any details that witness Mr. Mark E. Garrett and/or HCC may have on non-utility services (e.g., parks, swimming pools, libraries, police, and firefighters) that may be paid for by municipal utility rates.
- 2-6 Referring to the Direct Testimony of Mark E. Garrett, please provide all support for the following statements:
- a. On page 29, lines 8–9: “industry associations act primarily in the interests of the utility industry and its owners rather than its captive customers;” and

- b. On page 29, lines 9–11: “EEI provides an array of services to its members, with significant overlap between those services which advocate for members’ private interests and other services that serve the public interest.”
- 2-7 Regarding page 16, line 23 through page 18, line 8 of the Direct Testimony of Kit Pevoto—which concludes that establishing rates that are based on the costs to serve customer classes creates “unreasonably disproportionate rate impacts” in this case because “88% of CEHE’s customers would experience a rate increase and the remaining 12% customers would receive a substantial rate reduction”—please explain at what point does the distribution of rate increases to rate decreases become unreasonable (e.g., if 60% of customers would experience a rate increase and 40% a reduction, would that be unreasonable?).
- 2-8 Does HCC and/or witness Ms. Kit Pevoto recommend that if the Commission approves a revenue allocation that is not designed to recover costs by customer class in this case, should the resulting subsidization between classes continue in perpetuity? If not, when or under what conditions would HCC and/or Ms. Pevoto view a return to cost-based rates as appropriate?
- 2-9 Regarding page 18, lines 9–16 of the Direct Testimony of Kit Pevoto, please provide specific docket numbers supporting the statement that “[h]istorically, in rate cases where a rate moderation adjustment is necessary to mitigate rate impacts, the Commission has often allowed the use of a rate moderation adjustment mechanism.”
- 2-10 Regarding page 18, lines 16–21 of the Direct Testimony of Kit Pevoto, please confirm or deny whether the example discussed is based on a specific docket or dockets. If the example discussed is based on a specific docket or dockets, please provide the docket number(s).
- 2-11 Please explain how HCC and/or witness Ms. Kit Pevoto propose to establish DCRF and TCOS baselines under Ms. Pevoto’s proposed rate-moderation adjustment.
- 2-12 Please reconcile the differences in the amounts for the following recommendations between the Direct Testimony of Lane Kollen and the Direct Testimony of Kit Pevoto:

Recommendation:	Kollen:	Pevoto:
Remove NOL ADIT from Base Revenue Requirement	\$5,360,000	\$5,332,674
Reduce Amortization Expense to Reflect 10-year Amortization Period for All Named Storms	\$10,938,000	\$19,226,899
Reflect Capital Structure of 42.5% equity/57.5% debt	\$24,923,000	\$22,485,078
Reflect Return on Equity of 9.5%	\$56,565,000	\$24,567,182