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PUC DOCKET NO. 56211

APPLICATION OF CENTERPOINT	§	BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC	§	
FOR AUTHORITY TO CHANGE	§	OF
RATES	§	
	§	ADMINISTRATIVE HEARINGS

**Houston Coalition of Cities’ Second Requests for Information and
First Requests for Production to CenterPoint Energy Houston Electric, LLC**

In connection with the Application of CenterPoint Energy Houston Electric, LLC (“the Company”) for Authority to Change Rates, Houston Coalition of Cities (“HCC”) requests the following information within ten (10) days of receipt of these requests, unless shortened or extended by agreement of the parties.

It is further requested that the answers to the requests for information be made under oath and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by the Company, such changed answer should be submitted immediately as supplement to the Company’s original answer.

Definitions and Explanatory Notes

1. When a request calls for identification of a "Person" or "Witness," the identification shall include a name, employer name, job title, business address, and business telephone number.
2. The term "Document" is used in its broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms "non-privileged document" and "non-privileged documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification of a "Document," as defined herein, the identification should include the following:
 - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
 - b. the date of the document;
 - c. the title and/or 're' of the document;
 - d. the subject matter of the document;
 - e. the full name and address of the recipient and every person who received copies of the document;
 - f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and

- g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
5. The term “Studies” includes any Document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information with the subjects referred to in this proceeding.
6. The term “the Company” includes CenterPoint Energy Houston Electric, LLC and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

Respectfully submitted,

Arturo G. Michel
City Attorney
YuShan Chang
State Bar No. 24040670
Senior Assistant City Attorney
900 Bagby, 4th Floor
Houston, Texas 77002
(832) 393-6442
(832) 393-6259 Facsimile
yushan.chang@houstontx.gov

Counsel for City of Houston

-and-

Alton J. Hall, Jr.
State Bar No.: 08743740
Anam Fazli
State Bar No.: 24108599
Steven T. Moritz
State Bar No.: 24138686
ADAMS AND REESE LLP
LyondellBasell Tower
1221 McKinney St., Suite 4400
Houston, Texas 77010
(713) 308-0106
(713) 308-4032 (Fax)
Alton.Hall@arlaw.com
Anam.Fazli@arlaw.com
Steven.Moritz@arlaw.com

By: /s/ Steven T. Moritz
Steven T. Moritz

Counsel for Houston Coalition of Cities

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of March 2024, a true and correct copy of the foregoing document was served upon on all parties of record by email, facsimile and/or First Class Mail.

/s/ Steven T. Moritz
Steven T. Moritz

Houston Coalition of Cities'
Second Requests for Information to CenterPoint Energy Houston Electric, LLC

- 2-1. Please provide an analysis of accumulated deferred income taxes, identifying each accumulated deferred income tax item, providing the temporary book/tax difference related to each item, identifying the item as protected or unprotected, the related balance sheet account related to each item (accumulated depreciation, regulatory assets or liabilities, etc.), whether the item is or has been included in the revenue requirement, the accumulated deferred income tax balance based on the current federal income tax rate, and the amount included in the revenue requirement for each item. Please provide the response to this discovery request in Excel compatible format with all formulas intact and with all amounts obtained from external spreadsheets or other sources fully referenced and included in the response.
- 2-2. Please identify each item in the adjusted revenue requirement that was measured on December 31, 2023 and was not updated or measured beyond that date. Please provide a reference to each related work paper.
- 2-3. Please identify each item in the adjusted revenue requirement that was estimated past December 31, 2023 and provide a reference to the related work paper.
- 2-4. For each incentive plan whose expenses are included in the revenue requirement, please identify the number of employees and amounts covered by the plan for CenterPoint Houston Electric and for each affiliate or operating unit with payroll costs allocated or assigned to Texas jurisdictional operations.
- 2-5. Please provide the dollar value of each incentive plan award included in the revenue requirement, separately identifying amounts for CenterPoint Houston Electric and for each affiliate or operating group with incentive costs allocated to Texas.
- 2-6. Please provide the target levels for each incentive award for 2022 and for 2023, and the related jurisdictional amounts, separately identifying amounts for each affiliate or operating group with incentive costs allocated to Texas.
- 2-7. Please provide the budgeted amount of each incentive award for 2022 and 2023, and the related jurisdictional amount, separately identifying amounts for CenterPoint Houston Electric and for each affiliate or operating group with incentive costs allocated to Texas.
- 2-8. Please provide the jurisdictional amount of each incentive award for 2023 included in O&M expenses, separately identifying amounts for CenterPoint Houston Electric and for each affiliate or operating group with incentive costs allocated to Texas, identifying amounts awarded and allocated based on company earnings, control of capital or expense costs, customer satisfaction, safety, and/or other identified goals.
- 2-9. Please provide the payroll expense percentages for the test year and each of the three years prior to the test year for CenterPoint Houston Electric and for each affiliated company with payroll included in the revenue requirement.

- 2-10.** Please provide the payroll by pay period for the test year for each employee group with a separate payroll annualization calculation in the Company's exhibits, and showing for each pay period the number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for CenterPoint Houston Electric and for each affiliate or working group with costs allocated to CenterPoint Houston Electric. Please provide this response in Excel compatible format with all formulas fully functional and intact.
- 2-11.** Please provide the payroll by pay period for each pay period subsequent to the test year through the latest available date for each employee group with a separate payroll annualization calculation in the Company's exhibits, and showing for each pay period the number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for CenterPoint Houston Electric and for each affiliate of CenterPoint Houston Electric. Please provide this response in Excel compatible format with all formulas fully functional and intact.
- 2-12.** Please provide the pro forma payroll for each employee group with a separate payroll annualization calculation in the Company's exhibits, and showing for each payroll group the number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for CenterPoint Houston Electric and for each affiliate or work group with costs allocated to CenterPoint Houston Electric. Please provide this response in Excel compatible format with all formulas fully functional and intact.
- 2-13.** Please provide the payroll for the test year and each of the three years preceding the test year, showing for average number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for CenterPoint Houston Electric and for each affiliate or work group with costs allocated to CenterPoint Houston Electric. Please provide this response in Excel compatible format with all formulas fully functional and intact.
- 2-14.** Please provide the Company's policy regarding pay increases, and explain if the Company grants general pay increases, if the general pay increases are granted on the same date for all qualifying employees, an explanation of the alternative dates if that is used instead of a uniform increase date, if the individual increases are based on merit, and the different methods are used to determine the amount pay increases for each payroll group (contract, management's decision, etc.).
- 2-15.** If pay increases are granted on a uniform date for groups of employees, please provide the dates each general pay increase was granted during the test year, identify the applicable payroll groups for each pay increase, and for each identified payroll group provide the number of employees and base pay by payroll period in the test year and for each pay period following the test year through the latest available date.

- 2-16.** If pay increases are granted on a uniform date for groups of employees, please provide the dates each general pay increase was granted in each of the three years preceding the test year, and for each applicable payroll group provide the base pay in the twelve months preceding and following each pay increase.
- 2-17.** Please provide a narrative description of any and all programs that the Company and/or its parent company has instituted which resulted in a decrease to the Company's number of employees since the beginning of the test year.
- 2-18.** Please provide a narrative description of any and all programs that the Company and/or its parent company plans to institute which could result in a decrease to the Company's number of employees after the end of the test year.
- 2-19.** Please quantify the savings which have been achieved or that are expected to be achieved from programs to reduce the number of employees of the Company and/or its parent company.
- 2-20.** Please provide a narrative describing any changes the Company plans to make to any of its retirement plans or post-retirement benefits within the two years after the end of the test year.
- 2-21.** Please quantify the savings which have been achieved or that are expected to be achieved from changes to Company's retirement plans or post-retirement benefits.
- 2-22.** Please provide the amounts included in test year operating expenses for each retirement plan and post-retirement benefits.
- 2-23.** Please provide the amounts included in pro forma operating expenses for each retirement plan and post-retirement benefits.
- 2-24.** Please identify each non-qualified retirement plan and provide the amount of each included in the revenue requirement separately for CenterPoint Houston Electric and for each affiliate or work group with costs allocated to CenterPoint Houston Electric.
- 2-25.** For each regulatory asset and liability, provide an explanation of the item, the reason for including it in rate base, and any related statutes, orders, legal precedent or other available documentary support for including the item in rate base.
- 2-26.** For each regulatory asset and liability, provide an analysis of the item showing by month the related revenue or expense, increases and decreases to the account balance with basic descriptive information (i.e. "Storm Damage," Insurance Reimbursements," "Amortization"), and the account balances. This analysis should begin with the later of the origination of the item or the last jurisdictional filing which included the item, and the analysis should continue through latest available date. Please provide the response in Excel compatible format with fully functional formulas.
- 2-27.** Please provide the balances of each regulatory asset and liability for each month beginning one month prior to the test year and continuing through the latest available date.

- 2-28. Please provide an analysis identifying each vendor with costs exceeding \$500,000 in the outside services expense account in the test year. For each vendor, provide the service provided by the vendor, the amount included in test year expenses, and any adjustments related to the test year level of expenses related to the vendor, and the amounts paid to the vendor in each of the two years prior to the test year.
- 2-29. Please provide an analysis of reserve account for Injuries and Damages Expense for each of the three years prior to the test year and for the test year showing the beginning balance, the accruals increasing the reserve account, claims charged to the reserve account, adjusting entries, and the year ending balance for the reserve account.
- 2-30. Please provide an analysis of reserve account for Property Insurance Expense for each of the three years prior to the test year and for the test year showing the beginning balance, the accruals increasing the reserve account, claims charged to the reserve account, adjusting entries, and the year ending balance for the reserve account.
- 2-31. Please provide the total and jurisdictional balances of plant in service, accumulated depreciation, and accumulated deferred income taxes for January 1 of each year 2020, 2021, 2022, and 2023, and the property taxes for each of those years.

Houston Coalition of Cities'

First Requests for Production to CenterPoint Energy Houston Electric, LLC

- 1-1. Please provide copies of all incentive compensation plan documents whose expenses are included in the revenue requirement.
- 1-2. Please provide copies of the actuarial reports supporting the test year level of pension costs for each retirement plan or post-retirement benefits.
- 1-3. Please provide a copy of the full document(s) provided by the Company's actuary supporting the level of pension costs and post-retirement benefits included in the revenue requirement.