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

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

DIRECT TESTIMONY- ERRATA 1

OF

LAURIE TOMCZYK

ON BEHALF OF THE
OFFICE OF PUBLIC UTILITY COUNSEL

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

DIRECT TESTIMONY OF LAURIE TOMCZYK

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LIST OF ACRONYMS

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

I. INTRODUCTION AND QUALIFICATIONS

- 2 Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.
- 3 A. My name is Laurie A. Tomczyk. I am a Senior Manager in the Energy Practice of NewGen
- 4 Strategies and Solutions, LLC ("NewGen"). My business address is 4528 Trails End,
- 5 Lapeer, Michigan 48446. NewGen is a consulting firm that specializes in utility rates,
- 6 engineering economics, financial accounting, asset valuation, appraisals, and business
- strategy for electric, natural gas, water, and wastewater utilities.
- 8 Q. ON WHOSE BEHALF ARE YOU PRESENTING TESTIMONY IN THIS
- 9 **PROCEEDING?**

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- 10 A. I am presenting testimony on behalf of the Office of Public Utility Counsel ("OPUC").
- 11 Q. PLEASE OUTLINE YOUR EDUCATIONAL AND PROFESSIONAL
- 12 BACKGROUND.
- 13 A. I have a Bachelor of Science in Mechanical Engineering from the University of Nebraska-
- Lincoln. I am also a registered Professional Engineer in the state of Colorado and have
- over 35 years of experience providing management consulting services to clients in the
- 16 electric power, water, and solid waste management industries. I am also a member of the
- Society of Depreciation Professionals ("SDP") and have completed multiple training
- 18 courses offered by SDP. I am working toward becoming a Certified Depreciation
- 19 Professional through SDP. I have been employed by NewGen since January 2014. I
- specialize in electric utility revenue requirement, cost of service, and rate design studies as
- 21 well as depreciation studies, financial projections, expert witness services, other
- 22 engineering and economic analyses, and revenue projections. I have been an instructor on

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

5 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

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

II. PURPOSE AND SCOPE

10 Q. WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY IN THIS 11 PROCEEDING?

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

III. DEMAND DATA USED IN THE CEHE CCOSS

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2	Q.	WHAT TYPES OF ADJUSTMENTS WERE MADE TO THE TEST YEAR
3		CUSTOMER, ENERGY, AND DEMAND DATA IN THIS PROCEEDING?
4	A.	Two types of adjustments were made by CEHE: (1) customer adjustments to reflect the
5		number of customers at the end of the test year; and (2) weather adjustments to the test year
6		load data.1
7	Q.	WHAT TYPES OF DEMAND DATA ARE USED IN DEVELOPING THE CLASS
8		ALLOCATORS IN THE CCOSS?
9	A.	The demand data used in the CCOSS for allocating costs to customer classes includes the
10		Electric Reliability Council of Texas ("ERCOT") 4 Coincident Peak ("4CP")2
11		Transmission Demands ³ and Non-Coincident Peak ("NCP") ⁴ Distribution Demands.
12		CEHE uses the ERCOT 4CP data to develop allocators for capacity-related transmission
13		costs and the NCP data to develop allocators for demand-related distribution costs. ⁵
14	Q.	FOR THE PURPOSES OF DEVELOPING DEMAND ALLOCATORS FOR THE
15		CCOSS, DID CEHE USE ADJUSTED OR UNADJUSTED DEMAND DATA? WHY

DID CEHE USE ADJUSTED OR UNADJUSTED DEMAND DATA?

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

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

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

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

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

- 1 Α. CEHE used unadjusted demand data for determining the ERCOT 4CP and NCP allocators used in the CCOSS.⁶ CEHE explains that they used the unadjusted ERCOT 4CP demand 2 data for the purposes of allocating capacity-related transmission costs because this 3 4 "matches the use of the 4CP allocator the Commission uses for pricing wholesale 5 transmission charges pursuant to the Public Utility Regulatory Act § 35.004(d) and is consistent with Commission rules and the Company's approved approach in 6 Docket No. 49421." The Company did not explain why they used unadjusted NCP 7 demand data for the purposes of allocating demand-related distribution costs in the 8 9 CCOSS.
- 10 Q. FOR WHAT PURPOSE DID CEHE USE THE ADJUSTED CUSTOMER,
 11 ENERGY, AND DEMAND DATA?
- 12 A. CEHE used the adjusted customer, energy, and demand data for the purposes of rate design.
- 13 Q. DO YOU BELIEVE THAT THE COMPANY SHOULD HAVE USED ADJUSTED

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

⁶ *Id.* at 13:3-13,

[?] *Id.* at 14:11-14.

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

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

4 UNADJUSTED NCP DEMANDS?

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

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

	Residential	Secondary <= 10 kVA ¹	Secondary > 10 kVA ¹	Primary	Transmission	Total
NCP Adjusted kW ²	9.143 9,727	144 153	6,122 6,518	762 793	4,389	20.560 17,191
%	44% 57%	1%	30% 38%	4% 5%	21%	100%
NCP Unadjusted kW ³	10,651	148	6,530	789	4,839	22,507 18,118
%	4 7% 59%	1%	29% 36%	4%	19%	100%

¹kVA means Kilovolt Amperes.

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- Q. WHAT ARE OPUC'S PROPOSED CCOSS-BASED RATE CHANGES BY CLASS
- 9 USING OPUC'S PROPOSED REVENUE REQUIREMENT AND ADJUSTED
- 10 NCPS TO ALLOCATE DEMAND-RELATED DISTRIBUTION COSTS? HOW
- 11 DO THEY COMPARE WITH CEHE'S PROPOSED RATE CHANGES BY RATE
- 12 CLASS?
- 13 A. OPUC's proposed CCOSS-based rate changes by class using OPUC's proposed revenue
- requirement and adjusted NCPs to allocate demand-related distribution costs are shown in
- Table LAT-2 Errata 1 below.

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

³ Source: Schedule H 2023, П-H-1.3 at Meter Sub Level.

Table LAT-2 Errata 1 Comparison of OPUC and CEHE Proposed Rate Changes by Class

			C Proposed		10000
m 20 to 81 2	Number of	Present			Change
Rate Class Description	Customers	Revenues ¹	Proposed Revenues ¹	Change	Pct
Residential	2,455,309	\$901,815,248	\$929,705,805	\$25,721,702 \$27,890,557	3.1%
Secondary <= 10 kVA	155,776	\$25,410,421	\$23,325,786 \$23,325,786	(\$2,084,635)	(8.2%)
Secondary > 10 kVA	151,170	\$578,913,742	\$529,432,724	(\$49,481,018)	(8.5%)
Primary	1,047	\$41,515,394	\$51,853,048	\$13,520,765 \$10,337,655	24.9%
Transmission	233	\$27,090,086	\$23,921,689	(\$3,168,397)	(11.7%)
Miscellaneous Lighting	10,660	\$5,812,803	\$3,040,963 \$3,125,641	(\$2,687,162)	(46.2%)
Lighting	5,654	\$70,222,868	\$67,609,051	(\$2,613,818)	(3.7%)
Retail Electric Delivery Revenues	2,779,849	\$1,650,780,562	\$1,628,973,744	(\$21,429,876) (\$21,806,818)	(1.3%)
Wholesale Transmission Revenue		\$654,236,818	\$669,932,750	\$15,695,932	2.4%
Total Cost of Service		\$2,305,017,380	\$2,298,906,494	(\$6,110,886)	(0.3%)
		CEHI	E Proposed ²		
	Number of	Present			Change
Rate Class Description	Customers	Revenues ¹	Proposed Revenues ¹	Change	Pct
Residential	2,455,309	\$901,815,248	\$974,971,423	\$73,156,175	8.1%
Secondary <= 10 kVA	155,776	\$25,410,421	\$23,000,757 \$23,022,245	(\$2,388,176)	(9.4%)
Secondary > 10 kVA	151,170	\$578,913,742	\$521,667,018	(\$57,246,724)	(9.9%)
Primary	1,047	\$41,515,394	\$50,967,061	\$9,451,668	22.8%
Transmission	233	\$27,090,086	\$24,002,785 \$24,002,130	(\$3,087,956)	(11.4%)
Miscellaneous Lighting	10,660	\$5,812,803	\$3,125,641	(\$2,687,162)	(46.2%)
Lighting	5,654	\$70,222,868	\$67,609,051	(\$2,613,818)	(3.7%)
Retail Electric Delivery Revenues	2,779,849	\$1,650,780,562	\$1,665,892,702 \$1,665,364,569	\$14,584,007	0.9%
Wholesale Transmission Revenue		\$654,236,818	\$696,094,011	\$42.518.586 \$41,857,193	6.4%
Total Cost of Service		\$2,305,017,380	\$2,362,648,106 \$2,361,458,580	\$56,441,200	2.4%

² Source: Schedule I and J 2023-Errata 23, WP Summary of Revenues.

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

- 2 A. OPUC's proposed CCOSS-based rates and changes from present rates are shown in
- 3 Attachment LAT-3 Errata 1.

IV. SUMMARY OF FINDINGS AND RECOMMENDATIONS

5 Q. PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS IN THIS

6 **PROCEEDING.**

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- 7 A. I recommend that the Commission approve the revenue requirement as proposed by
- 8 Ms. Kyra Coyle in her direct testimony and require CEHE to use adjusted NCP data rather
- 9 than unadjusted NCP data in their CCOSS for allocating demand-related distribution costs.
- The impact of these recommendations to the CCOSS results are shown in Table LAT-2
- Errata 1 above. I also recommend that the Commission approve the proposed rates by rate
- 12 class shown in Attachment LAT-3 Errata 1.

13 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

- 14 A. No. Given that CEHE updated their proposed revenue requirement, CCOS, and rate design
- 15 with its Errata 3 filing made three business days before the intervenor testimony was due,
- and the resulting time constraints of incorporating their changes in testimony, I reserve the
- 17 right to modify my testimony to reflect the changes in their Errata 3 filing. Yes it does.

^{*} CenterPoint Energy Houston Electric, LLC's Errata 3 Filing (Jun. 14, 2024).

ATTACHMENTS



CONTACT

4528 Trails End, Lapeer, Michigan 48446 Itomczyk@newgenstrategies.net www.newgenstrategies.net

EDUCATION

Bachelor of Science in Mechanical Engineering, University of Nebraska

PROFESSIONAL REGISTRATIONS/ CERTIFICATIONS/COMMITTEES

Registered Professional Engineer (PE) Mechanical, Colorado

KEY EXPERTISE

Cost of Service and Rate Design

Depreciation Studies

Expert Witness and Litigation Support

Engineering/Economic Analyses

Financial Projections

Revenue Requirements

LAURIE TOMCZYK

Senior Manager

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

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

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

RELEVANT EXPERIENCE

Revenue Requirement, Cost of Service, and Rate Design

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

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

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



LAURIE TOMCZYK

Senior Manager

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

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

- Austin Energy, TX
- BC Hydro, British Colombia, Canada
- Brownsville Public Utilities Board, TX
- Bryan Texas Utilities, TX
- Cleveland Public Power, OH
- CPS Energy, TX
- Crawfordsville ElectricPower & Light, IN
- Denton Municipal Electric, TX
- Farmington Electric Utility System, NM
- Fayetteville Public Works Commission, NC

- Garland Power & Light, TX
- Golden Valley Electric
 Cooperative, AK
- Guam Power Authority, Guam
- Homer Electric Association, AK
- Kaua'i Island Utility Cooperative, HI
- Lafayette Utilíties System, LA
- Richmond Power & Light, IN
- San Francisco Public Utilities
 Commission, CA
- Springfield City Utilities, MO

- Tri-State Generation & Transmission Association, Inc., CO
- United Power Electric Cooperative, Colorado
- U.S. Army, California, Georgia, New York, and Virginia
- Vernon Public Utilities, CA
- Water and Electric Board, OR

Competitive Retail Rate Assessments

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

Electric Transmission and Ancillary Service Rates

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

Net Energy Metering and Standby Rates

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

LAURIE TOMCZYK

Senior Manager

Electric Special Contract Rates

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

Electric Decoupling Programs

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

Opt-Out Program Associated with Advanced Electric Metering Infrastructure Project

 Kaua'i Island Utility Cooperative, HI

Expert Witness and Litigation Support

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

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

- City of Auburn, MI
- City of Fort Wayne, City of Mario, and Marion Municipal Utilities, IN
- Crawfordsville Electric Light & Power, IN
- Denton Municipal Electric, TX
- Fayetteville Public Works
 Commission, NC
- Golden Valley Electric
 Cooperative, AK
- Guam Power Authority, Guam
- Homer Electric Association, AK

- Independence Power & Light, MO
- Kaua'i Island Utility
 Cooperative, HI
- Lubbock Power & Light, TX
- Nevada Resorts
 Association, NV
- New England States
 Committee on Electricity, MA
- Office of Public Utility Counsel, TX
- Richmond Power & Light, IN
- SABIC Innovative Plastics Mount Vernon, IN

- Texas Office of Public Utility Counsel
- Tri-State Generation
 &Transmission Association,
 Inc., CO
- University of Texas System
- U.S. Department of Defense and all other Federal Executive Agencies, TX, NM, NY

LAURIE TOMCZYK

Senior Manager

Financial Projections

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

- Brownsville Public UtilitiesBoard, TX
- City of Indianapolis, IN
- CPS Energy, TX
- Fayetteville Public Works Commission, NC
- Georgetown Municipal Water and Server Service, KY

- Golden Valley Electric Cooperative, AK
- Guam Power Authority, Guam
- Homer Electric Association, AK
- Kaua'i Island UtilityCooperative, HI
- Lafayette Utilities System, LA
- St. Joseph Power & Light, MO

Depreciation

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

WORKSHOPS

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

Electric Utility Consultants, Inc. (EUCI)

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

PRESENTATIONS

Ms. Tomczyk has also made the following industry presentations:

Michigan Municipal Electric Association Annual Conference

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

Record of Testimony: Laurie A. Tomczyk

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

Record of Testimony: Laurie A. Tomczyk

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

Record of Testimony: Laurie A. Tomczyk

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

ATTACHMENT LATA DROOF OF REVENUE - CUBRENT, CEHE DROPOSED, AND ONL'C PROPOSED BATES PUBLIC LITTLY COMMISSION OF TEXAS.
CERTIFERON'T EREBICA MORETO'S ELECTRIC, LLC
TEXT TEXAS REPUBLIC ESTERIZES
DOCKET NO SIZE!

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4		Yubtotal Base, Pates			673,130,757		027 546 050		775 716 401 [0.003065
:		Distribution Carl Representation (FGRT)	per KWT	21 218,983 391	-	ε -		t -	129 798 767 1	0.0059%
÷ .		Yubnotal Base Pates with DIGPH			673,131,757		927 548 950		901 615 946	
:			per 1994	31 854,078,413	08,407 ∠ 30	s 0,000028	26,417,462	£ 0,000026	75,407,452, U	0.00000
i I	Residential	Energy Entidency Cost Recovery Hactor (EECkn)							75,407,437	
		Rate Carlo Expense Snicharge (RCT)	per KWT	71 718,983 731	1 (99	5 0.00000	1,679	† 0.0000000	1	-
- 1		Temptrary Emergency Electric Energy Hacilities (HEEE+)	pm loss	31.610,902.564	78,105,530		76,128,538	£ 0,000362	75,128,536 1	0.000%
14		Transmission Gost Recovery Factors (C.2-1)	per KWT	17,735,751,979	311,170,771		5/ 3 756 0 1?	† 0.018197	207,817 702 1	0.01083
٠ ا		Transilion Charge 5 (TC5)	per less	32,435,882,020	80,074,560		52,274,586	\$ 0,001016	82,074,586 []	0.00101
24		- ranchise - eks	per KWT	1,077,928	-2 976		-2,979	† (0.001767)	(5.097) 1	(0.00183
1		Nuclear Decement aliening Charge (NDC)	per 1995	31,810,902,564	426,245	\$ 0,000013	400,045	\$ 0,000013	68 443 1	0.0000
::		Sido dal Rida Reversiona			009,111,278		607.771.899		560 FT 719 086	
7		Lotal Revenues			1409 542 005		1,435,310,546		1,070,634,035	
10										
· F		C. dones	par Claraner per March	1,056,010	3.752,030	S 2.1	3,677,485	1 197	8 4,024,645,10 1	
57		Metenni;	pertitet der Vorth	1,899 72	6.514,606	5 3.96	9,121,910	1 2.90	\$ 1,579,771.68	2?
<i>a</i>		Trainin ais:	por IAM	073,864,605	0 . 1 ,0.0	8	.,,		1,0,	
;;		2 stricution	DELIKA-	877,651,920	la,/a/ 71a	5 0.016720	12 197,065	f 0.010250	S 18,549 201,00 F	0.01660
		Sidodal Dalo Bales	per r.co	01.,031 925	23,000,757	3	23 265,580	0 02	22.108.778	100.
14		Distriction Great Recovery Factor (ECRF)	per KWT	77 8,697,926	,		23.28 (, 110.	.		0.00678
3		Side of the Cartest o	per Kee	:, 8,007, 330	23,000,757		23 265,580	' ' 	?,505 91? - 1 25 4 10 49 1	057:
37				1	.,		V V V V V V V V V V V V V V V V V V V		*** - ***	
27	Secondary <= 10 Kva	Theogy Tifetoney Cool Receivery Factor (TECRT)	per KWT	909,779,756	a 042,457	5 0.0055/1	2,0/2/67	f 0.00aa27	2,0/2/67	7.7055
11	described y 4-10 livin	Pater Jase Expense Yurcharge (1905)	per KWT	877,091,920	29		a".	1.000024	- 1	-
67		Temporary Emergency Fire Inc. Energy Excit los. (FEEEE)	per 1995	873,864,625	1,205,413	\$ 0.001403	1,025,413	\$ 0.001403	1,225,413	0.00140
17		Fransmission Great Recovery Factors (CRF)	DenKW-	762,873,378	1.562,028	\$ 0.010007	4,941,397	f 0.010029	7,8% 702 1	0.01073
22		Tracilion Charge 5 (TC5)	per lass	873,864,625	1,316,040		1,310,246	1 0,001506	1,310,246	0.00150
11		- ranchise - eas	D+FKW-	20,78/ 927	(12,777)	5 (0.002028)	22010	f (0.002029)	22010 1	(0.00203
22		Nuclear Decement alouing Change (NDC)	particos	673,864,625	5,550		5.556	3,00000 4	1 602	0.0000
34		Yubtotal kiden kevenues	1	,,	10,112,996		10,090,969		10201829	
25		Total Revenues			33,113,453		33,368,515		35.610,047	
37										
27		Customer NCN ICR	por Claroner per Month	1,765,752	0.203.335	S 4.5	6,115,047	£ 480	5,067,256 1	i ab
· .				20 200 40 200	0.203,335		2,160,072	45.40	2,170,546	
		IL.	par Clar arrender March	2 7	12/32,034	5 45.74	2,181,272	4:.4	2,100 545 1	
1.		Ya air g							I.	
4		NON-ILI:	perMeetier Vorth	1,796,762		5 9.27	19,000,989	7.09	12,031,323 1	· · · · · · · · · · · · · · · · · · ·
14		IDE.	pa Move by Morh	57 701	5.006,040	S 85.56	4,047,701	\$ 05.63	4,150,180, 4	72.
41		Fransmissi: 1								
11		NON IDB	por NOR level	72,170,315	n	S		ŧ	14	
45		IL /	per folitikva	27,0/1 (99	U	s -	7	† - I		-
1:		5 drientic	por Billing swa	106,447,285	460,105,464	\$ 4469600	405,611,401	£ 4 537450	408,975,755 []	4 4444
47		Yubtotal Base Pates			720 797,973		527,916,997		011,077, 989	
4:	T	Distribution Call Receivary Typics (PCST)		109,447,265		s		1	87,025,600	0.61420
4"	Secondary > 10 Kva	Yubtotal Base Pates with DUPF			920,897,932		537,916,997		673 91a 713	
1.								. 1	l.	
4		energy efficiency Cost Receivery Hactor (#ECICH)		?1 930,599 496	17,168,907		17.178,007	1 00002	17.108,607 1	0.0003
		Rate Carle Expense Suicharge (RCT)		100,447,265	6.15		0.9	\$ 0,00036	i 1	i
14			1	109,147,396	66,261,376		22.291,279	† 0.00191	99,291,279 4	0.7049
57		Temptrary Emergency Electric Energy Hacilities (LEEE+)				8 3,650015		F 3 911466	206,441,003 1	
		Training and Received Training (TCRT)		51,956,060	204,006,464	8 3 820 6.2	003,255,503	2 17 1488	300,441,555	4 (300)
52				51,956,062 31,358,112,131	204,755,494 60,119,990		00a 200 50a 90 126,980	† 0.001897	90,126,980	
57 14		Trainin alor Coll Replyary Tellor (TGRT)				\$ 0.001897				0.00189
57 14 55		Trace major fice. Recovery Tellor (TCST) Transition Unarge 5 (195) Tracet se Teop		71 799,112 131 3,525,275	00,119,990 0,273,180	S 0.001897 S (0.544820)	90 120,980 2 273,168	† 0.001897 \$ (0.844000)	90 146,980 { (2,973 186) J	0.00189 (0.54482
57 14 55 12 57		Trainin alor Co. Redway Tellar (TCRT) Iranston Grante of Co) Trainin se Train Number Deciring strainin (Charte (NDC)		31,399,112,131	60,119,930 0,973,180 139,767	5 0.001897	90 146,980 2 273,166 169,737	f 0.001897	90 146,980 1 (2,273 186) 1 96 769 1	4 05096 0 00189 0 54467 0 00000
57 14 55 11		Trace major fice. Recovery Tellor (TCST) Transition Unarge 5 (195) Tracet se Teop		71 799,112 131 3,525,275	00,119,990 0,273,180	S 0.001897 S (0.544820)	90 120,980 2 273,168	† 0.001897 \$ (0.844000)	90 146,980 { (2,973 186) J	0.00187 (0.54482

ATTACHMENT LATA PROOF OF REVENUE - CHERENT, CHIE DROPOSED, AND OPIC PROPOSED BATES PUBLIC LITLITY COMMISSION OF TEXAS CENTIFED BY EATHER POINT AFFECT MOISTON ELECTRIC, LLC TILST YEAR MIND DATE LITLINGS.

DOCKET NO. SMITH

Class	Charges	71≟.		1	Tid Clarge	ī	Tid Clarge	1	Tid. Charge
	Customer NON IDR	per Customer cent/1 mth	1 172	120,099	s 24.72	121 919	t 20.21	21.769 4	1
	L.Z	per Claimer or Month	7 743	450,040		440 105	1 27.2 57.06	241 JR4 1	
	Valait a	Parkin are in Francis		4,			*	/ ['	,
	NON IDB	parMove per Vicili	4.604	1,376,024	\$ 265.56	1,345,655	\$ 076.05	1,373,776	
	IL ?	pa More per Vicili	0.584	702,044	S 81.00	564 505	\$ 00.15	1,524,504	
	Tracercation								
	NON-ILIC	parNOF sys	1,161,347		S	:	ŧ	1.	i
	Ins.	per full liva	7,004,902		s -		† ·		
	2 stroutor	por Billing swar	14,040 507	50 475,634	\$ 3,504070	52,428,296	# 3.73590.0	32,770,405 [4	7.
	Situated Paid Refer Distribution Cost Recovery Factor (DC 2+)		14,040 507	78 129,730	c	67,076,167	,	59,120,709 5,374,505 1	
Primary	Side of all Designations and the Community of the Communi		12,12115.5	55,129,730	3	55,076,167	•	21.316,897	
	3 30 4 31 5 3 5 5 6 6 6 6 6 7 5 7 6 7 6 7 6 7 6 7 6 7			33,12 30					
	Theogy Tiffeigney Cool Receivery Factor (TECRT)	per KW-	7 709 28/ 939	6,137,132	S 0.00770	5728 123	† 0.00110	7,128 123 4	
	Pate Case Expense Yurcharge (ICCE)	por Billino sva	14,040,627	64		<u> </u>	\$ 0.00606	.,	
	Temporary Emergency Fieldic Energy Excit as (CEEE):	penBritini; Kva	11,010,927	0,819,107	S 0.21996	9.216.107	† 071985	9,510,107	
	Trainin alor for Recessory Tellar (TCRT)		4,437,345	21,896,711	8 4 800047	21.568,320	\$ 4.058947	16,835,106,14	- 4
	Transition Unartje 6 (TC6)		n/s	10,157 739		107756,629	7/6		V£
	Trandi se Teos	por Biling eval	400,400	052,600		250,066	\$ 0.631010	279.066	0
	Nuclear Determinissioning Charge (NDC)	perBilini; Ava	11,010 927	22,799	S 0.001632	22,769	† 0.001622	7 217 4	7
	Yubtotal laden keyendes			43,887,342		43,553,054		41,550,100	
	Total Revertions			96,797,092		97,900,112	l	33.0401013	
	Customer	per Customer cer Morth	2 799	652,899	S 190 98	720 (6)	† 189. <i>2</i> /	986 ten 1	
	Ve air g	pa Moler der Verlin	4 752	3,400,850	S 73248	3,410,286	\$ 716.07	3,760,556	i
	Fransmissi; 1	per folitiva	a7,271.070	٠,	5 -	7	1 -	- 1	-
	Distribution	per folitikva	57,271070	19 989,2%	S 0.756270	19,939,050	† 0.5%6270	23,176,507 4	1 :
	Yubtotal Base Pates			21,002,796	_	27,932,310		29,690,169	
	Distribution Co., Receiving Tellor (DCRT) Vubrotal Base, Pates with UUPF		37,074 575	21,003 706	S	37 932,217	1	520,606 1 27,090,089	i
	energy entiremety Cost Receivery Hactor (EECKH)		?477 9,28 9731	290 789	S 0.00034	390,879	† 0.000a/	11 /16,877	1 0
Transmission	Salo Cele Exporte Sale harge (RCC)		37,074 575			325	£ 0.00075	. 0,01	۰
	Temptrary Emergency Electric Energy Hacilities (HEEE+)		87,277.776	 U	5 -		t -		
	Training along the Repleting Tellor (TCST)		19,041,666	120,046,361	8 840375	128 234 401	£ 5,48001	63 670,043	4
	Transition Unartje 5 (105)		55,097,329	18,193 ?76	S 0.75795	13792,679	† 0.7550?	13732,579 1	1 0
	Tranchise Tees		143,561,641	63.104		93,164	\$ (0.00065)	104,067	F 20
	Nuclear Decemin latenth g Change (NDC)		37,074,575	155,682	S 0.00410	155,052	\$ 0.00416	20,487	
	Sido dal Rida Reversies			147,864,659		147 (00 75)		124 104 582	
	Lots/IkeverLes			17 1,69 7,7 11		171 002 990	l	151 191 619	
	oustomer	parClaranerae Marti		507,089		580,307		14 04-044	
	Ya air g	pertitiet der Vorth		U		;			
	Fransmissi; T	per 40P Kva		n		.			
	Distriction Color	per Britini; Kva		71,047,890		70,579,129		57,121,781	
	Side dal Delic Relet: Distribution Con Receivery Tellon (DCRT)			71 952,779		71,19975?		67,131,981 17,613,500	
	Yubtotal Base Pates with DoPH			71,832,779		71 159,433		75.035,871	
Street Lighting/Miscellaneous Lighting							l		
and a right infinite contractor right infi	Triengy Tiffeigney Cool Receivery Factor (TECRT) Rate Page Experies Suicharge (ROT)	per KWT per KW5		-07 50		47		:	
	Temptrary Emergency Electric Emergy Hacilities (HEEE+)	nor I/W		837.684		637,064		657,964	
	Transmission Cost Recovery Factor (CRF)	DELKAL DELKAL	I	914			l		
	Transition Charge 6 (TC6)	D+LKM-	I	GY9 900		909,900	l	959,900	
	Trandica Tess	per 1995	I	àà 700		00,766	l	134 055	
	Nuclear Decorrer (doning Grange (NDG)	per 1998		00		1,100		427	
	Yubtotal kiden kevenues			1,199,196		1 199 159		1.16a.125	
	Total Revertions			72,851 975		73 798,690	L	77.199,099	
	Customer	per Meter per Month		78,240,698		76,542,944		80,808,086	
Total	Metering	per Meter per Month	I	114.656,438		112,502.417	l	69,657.305	
	Transmission Distribution	per 4CP KVBJNCP KVa per Billing Kva	I	1,472,996,574		1,439,742,077	l	1.260,268.763	
	Discretion	I hat commit was		1,4/2,996,5/4		1.429,742.077		1.260,266.763	

WORKPAPERS

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ATTACHMENT LATA PROOF OF BRYINIE - CURBENT, CERT PROPOSED, AND OPIC PROPOSED RATE PUBLIC UTILITY COMMISSION OF TIXAS CERT PROOF TYPERCY BUBILITY FLECTED, LLC THEY THAN AND DATE DEFENDED.

THEY THAN AND DATE DEFENDED.

DOCKET TWO ARCH.

(EEE Em4. 3 Proposed Pales, New Co., Errala . Billing Determinants Proposed New 1 des thanges Unit Jin ti Chergia Jin ti Chargia Unit Charge . Condemen er Custimer der Micht 92 393,2? 67,790 528 | S 61,570 150 | S 2.09 2.60 Metenni; or Malar air Morth 20,463,70 60,200,74 00,700,560 Transmission :etky/h 51,818,982,094 030,475,44 028100 706,156 199 0.024773 545,370 610 G 0.020314 Listrib_tion 770,716 49 1 108,080 800 e EWh 0.003963 Listribution Cost Recovery Hactor (DC 7F) Ruboral Back Rade With DORF 971,271,13 929,776,706 901,815 1 B Freegy Tiller by Call Recovary Fisch (TTCRT) 9 10 or Libbits 31,954,678,410 28 407,43 1,010034 26,407,432, 8 0.000606 28 407 432 | 8 0.000026 Residential Itate Case Bilipense Surchange (PCB) Ten powny En ogen by Florini Tuengy Trailli (b. (TEEFE)) 1 900,773 76 129,633 terkwh. 51 818 987 997 0.000003 13570,792 0.000000 0.072792 76,129,538 п erkyyh 51,818,982,094 1.012593 79,120,788 0.002893 12 ransmission Cost Recovery Halton (10.4H). erkwh 17,825 (01,072 o/11a7,a7 0.018290 a12,6%a 7a6 205,917,702 | \$ 0.0108?? 13 14 ransition Unlarge 6 (10%). :etkWh 83,196,962,033 92/377,699 0.00190 63,271,769 0.001949 62,277 999 S 0.001943 1.982,978 (0.00176) (2.097) \$ Franchise Hees erkyyh. -3.976 -2 979 **1** 10.0017367 (0.001859) ь Nutlear Letomnissioning Unarge (NLC) 438 319 **1** 0.077712 51,818,982,094 127,215 1.000013 0.0000003 hi Subtota ik ben kevendes 009,5/8/50 17 о и Врушце 1,170 (211.67 7 89,001 211 1.270,631,706 Customer ter Custimer der Vicht ? 756 25? 5 514 505 5,671.287 5,421.340 7,322,026,12 4,355,031,50 2.25 20 21 Metenni; or Malar per Morth 1,056,024 ransmiss on :erky\h 376,094,936 13,751,465 015740 3 545,30 1.00 14,023,285 0.015514 22 23 Listrib_tion < FWh 673 B54 62 0.01620 22,100 778 3,303,843 Subtota Base Pates 25 022,2 27.525 785 21 e PWh 673,684,025 0.00376 Listribution Cost Recovery Hactor (DIGPH) Subtotal Base Pates with DURH 25 722,2 Z?,525 785 26 27 ? 04Z 167 6,043/37 5,0/2/97 S Energy Enrolency Clost Percovery Hactorie EC PH (:etk//h 909 789,199 0.00334 0.005524 0.0055 Secondary <=10 Kva 28 or FWh 873,864,625 29,103 0.000000 26,604 Ikate Usse Elipense Surcharge (PUE) 29 emporary Emergenty Electro Energy reclaies (1556H) :erkyh 775 907,920 1,325,113 0.001103 1,220716 4,541,268 0.001202 1,220716 0.001100 4.055.754 | 5 30 31 450 072 006 0.010089 0.0011909 Transmission Cod Roowery Table (TORE) or LWh. 7,762,601 2.020023 0.0000228 ransition Unlarge 6 (10%) :etk/yh 376 902,923 1718 217 1,517,328 1,517,328 \$ 0.001603 0.001603 92 33 Franchise Fess or EWh 20 704 827 (40,047 (42.347) (42.347) S (0.00202) (0.003028 (0.00202) Nutlear Detormissioning Unarge (NDC) erkwh 975 907,93 5,558 0.000000 10,120,700 0.011104 1.992 0.070073 10.141.31 10,401,606 Ribora Ricca Revenuer 37 ов Врушие ?6 16?,67 5?,146.485 57,812,317 36 37 lust:men 38 39 48 NON IDB e Cultaner ber Var h 1,765,750 7,310,135 7,021,840 4.06 5,067,258 S 3 00 44 95 0,170,546 8 DB. per Cultamen per Marih 46.260 3 125 197 84.73 3,064,535 e crinc NON IDE e Malar per Morth 1,765,750 18,080,501 18,050,598 9.06 13,004,220, 8 42 cerMetercer Month 37.730 0.008948 89.69 1,947,721 75.62 1,190,190 5 72.00 13 randining of 44 terNU Fikiya 72,173,316 NON IDE 15 4ii 13 or 4CE oval 20,541,769 rod_drder terBiling Kva 109.147.29 1.1/01/1 500,432,72 511,867,639 Silona BackBack 48 Distribution Cod Recovery Table (DCRF) 109 / 17,290 0.6112?1 Secondary > 10 Kva 19 30 Subtota Base Pates with DUIRH 521 467 01 500 400 70 51,920,399,488 0.00054 51 52 Freigy Tife ency Call Becayary Fields (TECRE) 17,156,80 17,156,607 0.00054 17,156,607 0.00054 901,079 919 705 55,061 276 Ra e Ĉe o Ехройзе Su charge (R∩E) . 109 / 17,290 10829 0.00810 55,081,278 S 53 14 emporary Emergenty Electro Energy replaces (1 ±±EH). 100 447 065 0.5040 0.50401 0.5040 207 182 169 305,273,172 209,121,035 \$ ransmission Gost Recovery Hactor (100 AH). 91,967,093 7,92977 5.911463 1.070993 99 36 Transition Orange 5 (TCS) 31,059,440,134 50,145,06 0.001067 50,145,560 0.001603 60,148,600 S 0.001067 7 020,276 00 447,065 (2,277,198) 156,757 (2,277,198) S 55,350 S Franchise Hees -2/277,198 (0.02182) (0.027820 (0.021820 Nuclea Department or ing Or age (NDC) 0.00148 0.00080 57 78 0.0146 Subtota i/ per /evenues 664,000729 084,000 153 59 60

ATTACHMENT LATA PROOF OF BRYINIE - CURBENT, CERT PROPORED, AND OPIC PROPORED RATE PUBLIC UTILITY COMMISSION OF TIXAS CERTIFROMET TYPERO HOUSTON ELECTRIC, LLC
TEST VLAR LAD DATE DEFINED
DOCKET NO AREL

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For body y Pringer by Place - Treggr Ts, title (TTTTP):
Transmits on Dos Repowery Table (TDSP)
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The following files are not convertible:

WP OPUC Schedule H 2023.xlsx
WP OPUC Schedule I and J 2023 Errata 1

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WP OPUC Tomczyk Testimony Tables Errata

1 Final.xlsx

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