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

APPLICATION OF CENTERPOINT	§	PUBLIC UTILITY COMMISSION
ENERGY HOUSTON ELECTRIC, LLC	§	OF
FOR AUTHORITY TO CHANGE RATES	§	TEXAS

**OBJECTIONS AND RESPONSES TO CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC'S FIRST REQUESTS FOR INFORMATION TO WALMART INC.**

Walmart Inc. ("Walmart") submits the following Objections and Responses to CenterPoint Energy Houston Electric, LLC's ("CenterPoint Houston" or "Company") First Requests for Information to Walmart Inc. ("RFIs"). The RFIs were filed with the Commission and transmitted to the undersigned via electronic mail on or about June 24, 2024. Walmart's response is timely filed pursuant to SOAH Order No. 2. Walmart's responses to specific RFIs are attached hereto on separate pages.

GENERAL OBJECTIONS

Walmart generally objects to the instructions propounded by the Company to the extent that any instruction differs from, is in conflict with, or in excess of the requirements of the Texas Public Utility Commission's Rules of Practice and/or the Texas Rules of Civil Procedure or Rules of Evidence. In addition, Walmart generally objects to the RFIs propounded by the Company to the extent that any RFI differs from, is in conflict with, or in excess of the requirements of the Texas Public Utility Commission's Rules of Practice and/or the Texas Rules of Civil Procedure or Rules of Evidence. Walmart's answers, as well as any supplements thereto, will be made in conformance with such rules. Walmart also generally objects to any RFI that seeks information protected from disclosure by any privilege recognized by Texas law.

Dated this 5th day of July, 2024.

Respectfully submitted,

CLARK FLEGE LLP

/s/ Julie A. Clark

Julie A. Clark

Texas Bar No. 00796362

3440 Youngfield St., Suite 276

Wheat Ridge, CO 80033

Direct Dial: (303) 731-6106

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ATTORNEYS FOR WALMART INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on the 5th day of July, 2023, by electronic mail.

/s/ Julie A. Clark

Julie A. Clark

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**APPLICATION OF CENTERPOINT § PUBLIC UTILITY COMMISSION
ENERGY HOUSTON ELECTRIC, LLC § OF
FOR AUTHORITY TO CHANGE RATES § TEXAS**

**OBJECTIONS AND RESPONSES TO CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC'S FIRST REQUESTS FOR INFORMATION TO WALMART INC.**

- 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

RESPONSE

All responsive documents were provided by email on June 19, 2024.

Preparer: Julie A. Clark

Sponsors: Lisa V. Perry

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FOR AUTHORITY TO CHANGE RATES	§	TEXAS

**OBJECTIONS AND RESPONSES TO CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC'S FIRST REQUESTS FOR INFORMATION TO WALMART INC.**

- 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.

RESPONSE

- a. *See Exhibit LVP-1.*
- b. Copies of the testimony cited in Exhibit LVP-1 are publicly available to CenterPoint.
- c. Ms. Perry is a salaried employee of Walmart Inc.
- d. Ms. Perry reviewed the *Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates* and supporting documentation, including testimony, filed in this docket and responses to RFI's issued in this docket and the final Orders issued in Docket Nos. 49421, 51415, 52195, 53601, and 53719. Ms. Perry also reviewed the S&P Global website cited in her direct testimony and filtered raw data from that website to create Exhibit LVP-2. All documents are either already in the Company's possession or publicly available. No other documents were provided to or prepared for Ms. Perry.

Preparer: Julie A. Clark

Sponsors: Lisa V. Perry

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**OBJECTIONS AND RESPONSES TO CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC'S FIRST REQUESTS FOR INFORMATION TO WALMART INC.**

- 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.

RESPONSE

- a. Not Applicable.
- b. Not Applicable.
- c. Not Applicable.
- d. Not Applicable.

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Sponsors: Lisa V. Perry

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**OBJECTIONS AND RESPONSES TO CENTERPOINT ENERGY HOUSTON
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2-4. Please separately state whether each witness is testifying as an expert witness.

RESPONSE

Lisa V. Perry is testifying as an expert witness.

Preparer: Julie A. Clark

Sponsors: Lisa V. Perry