



Filing Receipt

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Item Number - 426

**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 RATES	§	ADMINISTRATIVE HEARINGS

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC’S
THIRD PETITION FOR REVIEW OF MUNICIPAL ORDINANCES/RESOLUTIONS
AND MOTION TO CONSOLIDATE**

CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston” or the “Company”) hereby appeals the rate decisions adopted by the cities of Hedwig Village, La Porte, Simonton, the Village of Pleak and Webster (collectively, “Cities”) to deny the Company’s Statement of Intent and Application to increase its base rates. CenterPoint Houston further moves to consolidate the appeals of the Cities’ denials with Docket No. 56211. Appeals of these rate decisions are filed pursuant to Section 33.051 of the Public Utility Regulatory Act (“PURA”).

I. CENTERPOINT HOUSTON’S REQUESTED RATE CHANGE

On March 6, 2024, CenterPoint Houston filed with the Public Utility Commission of Texas (“Commission”) in this proceeding a Statement of Intent and Application to increase its base rates to be charged in areas over which the Commission has original jurisdiction. Concurrently with that filing, CenterPoint Houston also filed its Statement of Intent and Application with each city having original jurisdiction over the Company’s rates within the city.

II. JURISDICTION

The Commission has jurisdiction over this Petition for Review and Motion to Consolidate pursuant to PURA Sections 32.001, 33.051, 33.053, 33.054, and 36.001.

III. PETITION FOR REVIEW OF THE CITIES’ ACTIONS

The Company’s requested rate changes have been denied by the Cities on the dates identified in the table below:

Date of Municipal Action	City
May 21, 2024	Simonton
June 2, 2024	Webster
June 10, 2024	La Porte
June 13, 2024	Hedwig Village
June 19, 2024	Village of Pleak

Copies of each ordinance or resolution within the Company's possession are attached to the Petition for Review as Exhibit A. The Company's appeal is based on actions, resolutions, and ordinances it received notice of from the Cities between June 14, 2024 and July 9, 2024. CenterPoint Houston hereby appeals the Cities' denials of the proposed rate change and requests that the Commission exercise its appellate jurisdiction to conduct a *de novo* review of the Cities' denials of the rate change request.

IV. MOTION TO CONSOLIDATE

CenterPoint Houston requests that its appeal of the Cities' denials be consolidated with Docket No. 56211. This appeal involves issues of law and fact common to those in Docket No. 56211, and separate hearings of this appeal and Docket No. 56211 would result in unwarranted expense, delay, or substantial injustice.¹ In the alternative, if this Motion to Consolidate is denied, CenterPoint Houston requests that these appeals be assigned a new docket number by the Commission.

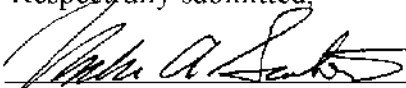
V. PRAYER

CenterPoint Houston respectfully requests that the Administrative Law Judges enter an order granting the Company's petition for review and consolidating this appeal of the denials by the Cities with Docket No. 56211. CenterPoint Houston also requests such further relief to which it may be entitled.

¹ See P.U.C. Proc. R. 22.34(a).

Respectfully submitted,

By:



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Vice President, Associate General Counsel

Sam Chang

State Bar No. 24078333

Director, Associate General Counsel

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

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 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, filed in Project No. 50664.


Mark A. Santos

RESOLUTION NO. 06-13-24D

A RESOLUTION OF THE CITY OF HEDWIG VILLAGE, TEXAS FINDING THAT CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S REQUESTED INCREASE TO ITS ELECTRIC TRANSMISSION AND DISTRIBUTION RATES AND CHARGES WITHIN THE CITY SHOULD BE DENIED; FINDING THAT THE CITY'S REASONABLE RATE CASE EXPENSES SHALL BE REIMBURSED BY THE COMPANY; FINDING THAT THE MEETING AT WHICH THIS RESOLUTION IS PASSED IS OPEN TO THE PUBLIC AS REQUIRED BY LAW; REQUIRING NOTICE OF THIS RESOLUTION TO THE COMPANY AND GCCC LEGAL COUNSEL

WHEREAS, on or about March 6, 2024, CenterPoint Energy Houston Electric, LLC ("CenterPoint" or "Company"), pursuant to PURA §§ 33.001 and 36.001 filed with the City of Hedwig Village, Texas ("City") a Statement of Intent to change electric delivery rates in all municipalities exercising original jurisdiction within its service area, effective April 10, 2024; and

WHEREAS, the City is an electric utility customer of CenterPoint and a regulatory authority with exclusive original jurisdiction over the rates and charges of CenterPoint within the City; and

WHEREAS, the City is a member of the Gulf Coast Coalition of Cities ("GCCC"), a membership of similarly situated cities served by CenterPoint that have joined together to efficiently and cost-effectively review and respond to electric issues affecting rates charged in CenterPoint's service area; and

WHEREAS, GCCC is an intervenor in the parallel proceeding at the Public Utility Commission of Texas to review CenterPoint's filing; and

WHEREAS, the City, in a reasonably noticed meeting that was open to the public, considered the Company's application; and

WHEREAS, pursuant to its exclusive original jurisdiction over CenterPoint's rates and operations within city limits, the City previously suspended the effective date of the Company's requested rate increase; and

WHEREAS, PURA § 33.023 provides that costs incurred by cities in ratemaking activities are to be reimbursed by the regulated utility; and

WHEREAS, the City's attorneys and consultants recommend that the City deny the application.

THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF HEDWIG VILLAGE, TEXAS:

SECTION 1. That the rates proposed by CenterPoint in an application submitted to the City by CenterPoint on or about March 6, 2024, are hereby found to be unreasonable, and are denied.

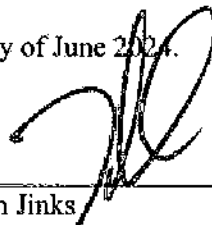
SECTION 2. That the Company shall continue to charge its existing rates for transmission and distribution service to customers with the City,

SECTION 3. That GCCC's reasonable rate case expenses shall be reimbursed by CenterPoint within 30 days of presentation of an invoice to CenterPoint.

SECTION 4. That it is hereby officially found and determined that the meeting at which this Resolution is passed is open to the public as required by law, and that the public notice was given of the time, place, and purpose of said meeting, as required.


SECTION 5. A copy of this Resolution shall be sent to CenterPoint, care of Patrick Peters, CenterPoint Energy, Inc., 1005 Congress Avenue, Suite 650, Austin, Texas 78701 (patrick.peters@centerpointenergy.com), and to Roslyn Dubberstein at Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701 (rdubberstein@lglawfirm.com).

PASSED AND APPROVED this 13th day of June 2024.



Tom Jinks
Mayor

ATTEST:



Lisa Modisette
City Secretary

City of La Porte, Texas Ordinance No. 2024-3991

AN ORDINANCE RELATING TO THE RETAIL ELECTRIC RATES OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC WITHIN THE CITY OF LA PORTE, TEXAS; DENYING RATE INCREASE REQUEST AND REVISED RATE SCHEDULES AND MAINTAINING CURRENT RATES IN EFFECT; CONTAINING FINDINGS AND OTHER PROVISIONS RELATING TO THE FOREGOING SUBJECT; PROVIDING FOR SEVERABILITY.

* * * * *

WHEREAS, on March 6, 2024, CenterPoint Energy Houston Electric, LLC ("CenterPoint") submitted a Statement of Intent and Application for Authority to Change Rates ("Application") within the City of La Porte, Texas ("City"), requesting a rate increase, riders, and tariff changes (collectively "New Rates"); and

WHEREAS, the City, as a local regulatory authority, exercises original jurisdiction over the rates, operations and services of CenterPoint for customers located within the City under Section 33.001 of the Public Utility Regulatory Act ("PURA") in the Texas Utilities Code; and

WHEREAS, the City is a member of the Coalition of Cities ("Coalition") in this CenterPoint electric base rate proceeding, as approved by Resolution 2024-09 by City Council on April 8, 2024.

WHEREAS, the New Rates would affect rates, operations or services for CenterPoint retail customers within the City; and

WHEREAS, the expert utility rate consultants retained to review CenterPoint's New Rates on behalf of the Coalition are still reviewing CenterPoint's Application and New Rates; and

WHEREAS, City Council determines that CenterPoint's rates in effect as of March 6, 2024, ("Current Rates") are the just and reasonable rates to be observed and to remain in force within the City; and

WHEREAS, City Council anticipates that a denial of the New Rates will be appealed to the PUC; and

WHEREAS, denial of the New Rates would maintain the Current Rates in effect for customers within La Porte, Texas until further changed under the Utilities Code; and

WHEREAS, the City Council finds that the public interest will be served by the adoption of an ordinance denying the New Rates; **NOW, THEREFORE**,

**BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF LA PORTE,
TEXAS:**

Section 1. That the facts contained in the preamble of this Ordinance are determined to be true and correct and are hereby adopted as part of this Ordinance.

Section 2. That CenterPoint's Application for New Rates on file with the City is denied in total.

Section 3. That the rates currently in effect as of March 6, 2024, for CenterPoint customers receiving service within the City of La Porte, Texas shall remain in effect until further changed under applicable law.

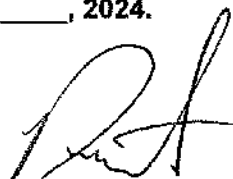
Section 4. That If any provision, section, subsection, sentence, clause or phrase of this ordinance, or the application of same to any person or set of circumstances is for any reason held to be invalid, the validity of the remaining portions of this ordinance or their application to other persons or sets of circumstances shall not be affected thereby, it being the intent of the City Council in adopting this ordinance that no portion hereof or provision or regulation contained herein shall become inoperative or fail by reason of any unconstitutionality, voidness or invalidity of any other portion hereof, and all provisions of this ordinance are declared to be severable for that purpose.

Section 5. That the City Council officially finds, determines, recites and declares that a sufficient written notice of the date, hour, place and subject of this meeting of the City Council was posted at a place convenient to the public at the City Hall of the City for the time required by law preceding this meeting, as required by the Open Meetings Law, Chapter 551, Texas Government Code; and that this meeting has been open to the public

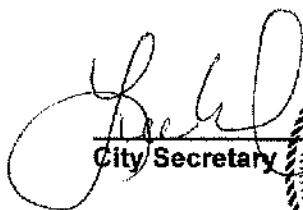
as required by law at all times during which this ordinance and the subject matter thereof has been discussed, considered and formally acted upon. The City Council further ratifies, approves and confirms such written notice and the contents and posting thereof.

PASSED AND APPROVED this 10th day of June, 2024

APPROVED this 10th day of June, 2024.



Mayor of the City of La Porte, Texas



City Secretary



RESOLUTION NO. 24 - 127

A RESOLUTION OF THE VILLAGE OF PLEAK, TEXAS FINDING THAT CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S REQUESTED INCREASE TO ITS ELECTRIC TRANSMISSION AND DISTRIBUTION RATES AND CHARGES WITHIN THE CITY SHOULD BE DENIED; FINDING THAT THE CITY'S REASONABLE RATE CASE EXPENSES SHALL BE REIMBURSED BY THE COMPANY; FINDING THAT THE MEETING AT WHICH THIS RESOLUTION IS PASSED IS OPEN TO THE PUBLIC AS REQUIRED BY LAW; REQUIRING NOTICE OF THIS RESOLUTION TO THE COMPANY AND GCCC LEGAL COUNSEL

WHEREAS, on or about March 6, 2024, CenterPoint Energy Houston Electric, LLC ("CenterPoint" or "Company"), pursuant to PURA §§ 33.001 and 36.001 filed with the Village of Pleak, Texas ("City") a Statement of Intent to change electric delivery rates in all municipalities exercising original jurisdiction within its service area, effective April 10, 2024; and

WHEREAS, the City is an electric utility customer of CenterPoint and a regulatory authority with exclusive original jurisdiction over the rates and charges of CenterPoint within the City; and

WHEREAS, the City is a member of the Gulf Coast Coalition of Cities ("GCCC"), a membership of similarly situated cities served by CenterPoint that have joined together to efficiently and cost-effectively review and respond to electric issues affecting rates charged in CenterPoint's service area; and

WHEREAS, GCCC is an intervenor in the parallel proceeding at the Public Utility Commission of Texas to review CenterPoint's filing; and

WHEREAS, the City, in a reasonably noticed meeting that was open to the public, considered the Company's application; and

WHEREAS, pursuant to its exclusive original jurisdiction over CenterPoint's rates and operations within city limits, the City previously suspended the effective date of the Company's requested rate increase; and

WHEREAS, PURA § 33.023 provides that costs incurred by cities in ratemaking activities are to be reimbursed by the regulated utility; and

WHEREAS, the City's attorneys and consultants recommend that the City deny the application.

THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE VILLAGE OF PLEAK, TEXAS:

SECTION 1. That the rates proposed by CenterPoint in an application submitted to the City by CenterPoint on or about March 6, 2024, are hereby found to be unreasonable, and are denied.

SECTION 2. That the Company shall continue to charge its existing rates for transmission and distribution service to customers with the City.

SECTION 3. That GCCC's reasonable rate case expenses shall be reimbursed by CenterPoint within 30 days of presentation of an invoice to CenterPoint.

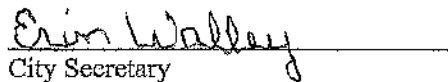
SECTION 4. That it is hereby officially found and determined that the meeting at which this Resolution is passed is open to the public as required by law, and that the public notice was given of the time, place, and purpose of said meeting, as required.

SECTION 5. A copy of this Resolution shall be sent to CenterPoint, care of Patrick Peters, CenterPoint Energy, Inc., 1005 Congress Avenue, Suite 650, Austin, Texas 78701 (patrick.peters@centerpointenergy.com), and to Roslyn Dubberstein at Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701 (rdubberstein@lglawfirm.com).

PASSED AND APPROVED this 19th day of June, 2024.


MAYOR

ATTEST:


City Secretary

APPROVED AS TO FORM:


City Attorney



June 27, 2024

Mr. Patrick Peters
CenterPoint Energy, Inc.
1005 Congress Avenue, Suite 650
Austin, Texas 78701

Re: Resolution No. 2024-09, A Resolution of the City of Simonton, Texas Finding That CenterPoint Energy Houston Electric, LLC'S Requested Increase To Its Electric Transmission and Distribution Rates And Charges Within The City Should Be Denied; Finding That The City's Reasonable Rate Case

Dear Mr. Peters,

Please find attached a certified copy of Resolution No. 2024-09 as adopted by the City of Simonton City Council at a Regular Meeting on May 21, 2024.

Please note that in absence of meeting minutes, the vote was 5 to 0 in favor of adoption.

Respectfully,


Janie Willman
Interim City Secretary

Cc: Mayor Laurie Boudreaux
Mr. Philip Boedeker, Olson & Olson, LLP, Wortham Tower, Suite 600, 2727 Allen Parkway,
Houston, Texas 77019-2133

City of Simonton
www.simontontexas.gov
35011 FM 1093 Simonton, Texas 77476
(281) 533-9809



The State of Texas §
County of Fort Bend §
City of Simonton §

I, Janie Willman, Interim City Secretary of the City of Simonton, hereby certify that the attached Resolution 2024-09 is a true and correct copy of Resolution No. 2024-09, A Resolution of the City Council of the City of Simonton, Texas, Finding That CenterPoint Energy Houston Electric, LLC'S Requested Increase To Its Electric Transmission and Distribution Rates And Charges Within The City Should Be Denied; Finding That The City's Reasonable Rate Case of the City of Simonton, Texas at a meeting of said Council on the 21st day of May, 2024.




Janie Willman
Interim City Secretary
City of Simonton, Texas

City of Simonton
www.simontontexas.gov
35011 FM 1093 Simonton, Texas 77476
(281) 533-9809

RESOLUTION NO. 2024-09

A RESOLUTION OF THE CITY OF SIMONTON, TEXAS FINDING THAT CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S REQUESTED INCREASE TO ITS ELECTRIC TRANSMISSION AND DISTRIBUTION RATES AND CHARGES WITHIN THE CITY SHOULD BE DENIED; FINDING THAT THE CITY'S REASONABLE RATE CASE EXPENSES SHALL BE REIMBURSED BY THE COMPANY; FINDING THAT THE MEETING AT WHICH THIS RESOLUTION IS PASSED IS OPEN TO THE PUBLIC AS REQUIRED BY LAW; REQUIRING NOTICE OF THIS RESOLUTION TO THE COMPANY AND GCCC LEGAL COUNSEL

WHEREAS, on or about March 6, 2024, CenterPoint Energy Houston Electric, LLC ("CenterPoint" or "Company"), pursuant to PURA §§ 33.001 and 36.001 filed with the City of Simonton, Texas ("City") a Statement of Intent to change electric delivery rates in all municipalities exercising original jurisdiction within its service area, effective April 10, 2024; and

WHEREAS, the City is an electric utility customer of CenterPoint and a regulatory authority with exclusive original jurisdiction over the rates and charges of CenterPoint within the City; and

WHEREAS, the City is a member of the Gulf Coast Coalition of Cities ("GCCC"), a membership of similarly situated cities served by CenterPoint that have joined together to efficiently and cost-effectively review and respond to electric issues affecting rates charged in CenterPoint's service area; and

WHEREAS, GCCC is an intervenor in the parallel proceeding at the Public Utility Commission of Texas to review CenterPoint's filing; and

WHEREAS, the City, in a reasonably noticed meeting that was open to the public, considered the Company's application; and

WHEREAS, pursuant to its exclusive original jurisdiction over CenterPoint's rates and operations within city limits, the City previously suspended the effective date of the Company's requested rate increase; and

WHEREAS, PURA § 33.023 provides that costs incurred by cities in ratemaking activities are to be reimbursed by the regulated utility; and

WHEREAS, the City's attorneys and consultants recommend that the City deny the application.

THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SIMONTON, TEXAS:

SECTION 1. That the rates proposed by CenterPoint in an application submitted to the City by CenterPoint on or about March 6, 2024, are hereby found to be unreasonable, and are denied.

SECTION 2. That the Company shall continue to charge its existing rates for transmission and distribution service to customers with the City.

SECTION 3. That GCCC's reasonable rate case expenses shall be reimbursed by CenterPoint within 30 days of presentation of an invoice to CenterPoint.

SECTION 4. That it is hereby officially found and determined that the meeting at which this Resolution is passed is open to the public as required by law, and that the public notice was given of the time, place, and purpose of said meeting, as required.

SECTION 5. A copy of this Resolution shall be sent to CenterPoint, care of Patrick Peters, CenterPoint Energy, Inc., 1005 Congress Avenue, Suite 650, Austin, Texas 78701 (patrick.peters@centerpointenergy.com), and to Roslyn Dubberstein at Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701 (rdubberstein@lglawfirm.com).

PASSED AND APPROVED this 21st day of May, 2024.



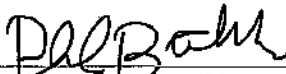
Mayor Laurie Boudreaux

ATTEST:



Interim City Secretary

APPROVED AS TO FORM:



Philip Bodecker, Olson & Olson, LLP
City Attorney



RESOLUTION NO. 24-10

A RESOLUTION OF THE CITY OF WEBSTER, TEXAS FINDING THAT CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S REQUESTED INCREASE TO ITS ELECTRIC TRANSMISSION AND DISTRIBUTION RATES AND CHARGES WITHIN THE CITY SHOULD BE DENIED; FINDING THAT THE CITY'S REASONABLE RATE CASE EXPENSES SHALL BE REIMBURSED BY THE COMPANY; FINDING THAT THE MEETING AT WHICH THIS RESOLUTION IS PASSED IS OPEN TO THE PUBLIC AS REQUIRED BY LAW; REQUIRING NOTICE OF THIS RESOLUTION TO THE COMPANY AND GCCC LEGAL COUNSEL

WHEREAS, on or about March 6, 2024, CenterPoint Energy Houston Electric, LLC ("CenterPoint" or "Company"), pursuant to PURA §§ 33.001 and 36.001 filed with the City of Webster, Texas ("City") a Statement of Intent to change electric delivery rates in all municipalities exercising original jurisdiction within its service area, effective April 10, 2024; and

WHEREAS, the City is an electric utility customer of CenterPoint and a regulatory authority with exclusive original jurisdiction over the rates and charges of CenterPoint within the City; and

WHEREAS, the City is a member of the Gulf Coast Coalition of Cities ("GCCC"), a membership of similarly situated cities served by CenterPoint that have joined together to efficiently and cost-effectively review and respond to electric issues affecting rates charged in CenterPoint's service area; and

WHEREAS, GCCC is an intervenor in the parallel proceeding at the Public Utility Commission of Texas to review CenterPoint's filing; and

WHEREAS, the City, in a reasonably noticed meeting that was open to the public, considered the Company's application; and

WHEREAS, pursuant to its exclusive original jurisdiction over CenterPoint's rates and operations within city limits, the City previously suspended the effective date of the Company's requested rate increase; and

WHEREAS, PURA § 33.023 provides that costs incurred by cities in ratemaking activities are to be reimbursed by the regulated utility; and

WHEREAS, the City's attorneys and consultants recommend that the City deny the application.

THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF WEBSTER, TEXAS:

SECTION 1. That the rates proposed by CenterPoint in an application submitted to the City by CenterPoint on or about March 6, 2024, are hereby found to be unreasonable, and are denied.

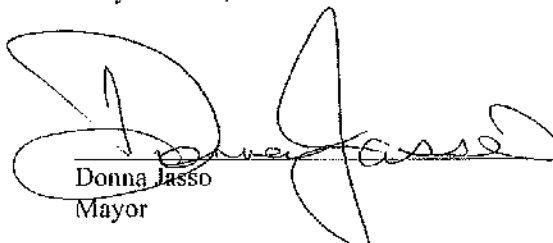
SECTION 2. That the Company shall continue to charge its existing rates for transmission and distribution service to customers with the City.

SECTION 3. That GCCC's reasonable rate case expenses shall be reimbursed by CenterPoint within 30 days of presentation of an invoice to CenterPoint.


SECTION 4. That it is hereby officially found and determined that the meeting at which this Resolution is passed is open to the public as required by law, and that the public notice was given of the time, place, and purpose of said meeting, as required.

SECTION 5. A copy of this Resolution shall be sent to CenterPoint, care of Patrick Peters, CenterPoint Energy, Inc., 1005 Congress Avenue, Suite 650, Austin, Texas 78701 (patrick.peters@centerpointenergy.com), and to Roslyn Dubberstein at Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701 (rdubberstein@lglawfirm.com).

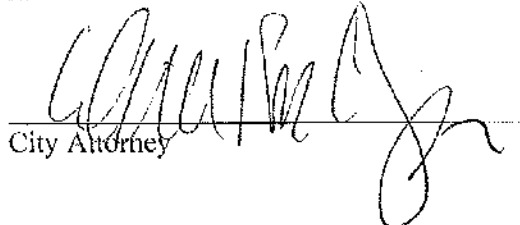
PASSED AND APPROVED this 2nd day of June, 2024.


Donna Jasso
Mayor

ATTEST:


Michael Muscarello, CMC, CPM
City Secretary

APPROVED AS TO FORM:


City Attorney

