



## **Filing Receipt**

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**Item Number - 449**

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

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

**COMMISSION STAFF’S RESPONSE TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC’S  
FIRST SET OF REQUESTS FOR INFORMATION  
QUESTION NOS. CEHE 1-1 THROUGH CEHE 1-6**

The Staff (Staff) of the Public Utility Commission of Texas (Commission) stipulates that the following responses to requests for information may be treated by all parties as if the answers were filed under oath.

Dated: July 16, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Marisa Lopez Wagley  
Division Director

Andy Aus  
Managing Attorney

*/s/ David Berlin*

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**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on July 16, 2024, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ David Berlin

David Berlin

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With regard to the Direct Testimony of Ms. Vonetta Jackson filed in Docket No. 56211:

**CEHE 1-1** Does Ms. Jackson agree that under the Office of Attorney General's July 17, 2023 memorandum referenced in her testimony, the hourly rates for attorneys at \$525 per hour could be exceeded with express approval by the First Assistant Attorney General? To the extent Ms. Jackson disagrees in whole or in part, provide all support for her position.

**RESPONSE:** Agree.

Prepared by: Counsel  
Sponsored by: Vonetta Jackson

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With regard to the Direct Testimony of Ms. Vonetta Jackson filed in Docket No. 56211:

**CEHE 1-2** Does Ms. Jackson agree that law firm hourly rates typically escalate over time? To the extent Ms. Jackson disagrees in whole or in part, provide all support for her position.

**RESPONSE:** Ms. Jackson agrees in part. The escalation of law firm hourly rates could depend on the contract and underlying terms, which could include the duration of the contract.

Prepared by: Counsel  
Sponsored by: Vonetta Jackson

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With regard to the Direct Testimony of Ms. Vonetta Jackson filed in Docket No. 56211:

**CEHE 1-3** Did Ms. Jackson perform a study of the hourly rates charged by attorneys representing utilities in base-rate cases before the Commission or other utility regulatory authorities? If not, please explain why no such study was performed.

**RESPONSE:** No. Due to the time constraints imposed by the shortened procedural schedule in this proceeding, Ms. Jackson did not perform the study described in this RFI.

Prepared by: Counsel  
Sponsored by: Vonetta Jackson

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With regard to the Direct Testimony of Ms. Vonetta Jackson filed in Docket No. 56211:

**CEHE 1-4** Is it Ms. Jackson's position that any hourly rate charged by any attorney representing CenterPoint Houston in this case is extreme or excessive? If so, please:

- a. identify the attorney and hourly rate, and
- b. explain, with specificity, each basis for the position that the hourly rate is extreme or excessive.

**RESPONSE:** No.

Prepared by: Counsel  
Sponsored by: Vonetta Jackson

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With regard to the Direct Testimony of Ms. Vonetta Jackson filed in Docket No. 56211:

- CEHE 1-5** In the past five years, has the Commission hired an attorney, consultant, or service provider on an hourly basis? If so, please:
- a. identify any such instance in which the Commission agreed to an hourly rate in excess of \$550/hour for the retained attorney, consultant, or service provider; and
  - b. provide the details of such engagements, including the engagement letter, the hourly rates by timekeeper, a description of the service provided, and the total amount paid to the attorney, consultant, or service provider.

**RESPONSE:** Please see attachment CEHE-Staff 1-5, confidential in its entirety.

Prepared by: Counsel  
Sponsored by: Jay Stone, Vonetta Jackson



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With regard to the Direct Testimony of Ms. Vonetta Jackson filed in Docket No. 56211:

**CEHE 1-6** Before filing her testimony, did Ms. Jackson investigate the circumstances under which the Office of the Attorney General has made exceptions to the \$525 per hour cap set forth in the July 17, 2023 memorandum referenced in her testimony? If so, please provide all documents and information related to that investigation.

**RESPONSE:** No.

Prepared by: Counsel  
Sponsored by: Vonetta Jackson