



Filing Receipt

Filing Date - 2024-07-16 01:41:13 PM

Control Number - 56211

Item Number - 452

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

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

**Houston Coalition of Cities' Responses to
Texas Industrial Energy Consumers' First Request for Information**

Houston Coalition of Cities ("HCC") files its Responses to Texas Industrial Energy Consumers' ("TIEC") First Request for Information. The discovery request was received by HCC on July 3, 2024. Therefore, this response is timely filed.

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

-cmd-

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/ Alton J. Hall, Jr.
Alton J. Hall, Jr.

Counsel for Houston Coalition of Cities

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July 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/ Alton J. Hall, Jr.
Alton J. Hall, Jr.

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

**Houston Coalition of Cities' Responses to
Texas Industrial Energy Consumers' First Request for Information**

TIEC 1-1. To Ms. Pevoto's knowledge, has the Commission ever approved the use of a 4 NCP methodology (one that uses "the four class NCP peak demands for June, July, August, and September") to allocate distribution demand costs? If so, please identify the Commission order(s) that approved that methodology.

RESPONSE:

Ms. Pevoto has not conducted research on this specific question and, therefore, does not know if the Commission has approved the use of a 4 NCP to allocate distribution demand costs.

Prepared by: Kit Pevoto
Sponsored by: Kit Pevoto

TIEC 1-2. What was the single NCP demand for each of CEHE's customer classes in the test year, and in what month did each class's single NCP demand occur?

RESPONSE:

Please see page 4 of 18 in CEHE's Schedule II-I-1.3.

Prepared by: Kit Pevoto
Sponsored by: Kit Pevoto

TIEC 1-3. What was the peak demand that Ms. Pevoto calculated for each of CEHE's customer classes using "the four class NCP peak demands for June, July, August, and September" from the test year?

RESPONSE:

Ms. Pevoto has not calculated the requested peak demand. Peak demand can be located on page 4 of 18 in CEHE's Schedule II-I-1.3.

Prepared by: Kit Pevoto
Sponsored by: Kit Pevoto

TIEC 1-4. What was the difference in peak demand (on an absolute and percentage basis) for each of CEHE's customer classes between the class's single NCP demand and the class's demand calculated using "the four class NCP peak demands for June, July, August, and September"?

RESPONSE:

Ms. Pevoto has not determined the difference (on an absolute and percentage basis) for each of CEHE's customer classes between the class's single NCP demand and the class's demand calculated using "the four class NCP peak demands for June, July, August, and September". However, the difference can be determined by comparing the information shown in CEHE's Schedule II-I-2 Class Allocation Factors, Schedule II-I-2 Class Allocation Ratios, and HCC's Schedule-Rate Class Allocation Factors-RCCOS, included in Ms. Pevoto's Workpaper KP-2.

Prepared by: Kit Pevoto
Sponsored by: Kit Pevoto