



Filing Receipt

Filing Date - 2024-03-25 05:01:54 PM

Control Number - 56211

Item Number - 60

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

AGREED PROPOSED PROCEDURAL SCHEDULE

On March 6, 2024, CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston” or the “Company”) filed its Statement of Intent and Application for Authority to Change Rates (“Application”) with the Public Utility Commission of Texas (“Commission”).¹

On March 7, 2024, the Commission “refer[red] this docket to State Office of Administrative Hearings (SOAH) and request[ed] the assignment of an administrative law judge [(“ALJ”)] to conduct a hearing and issue a proposal for decision if necessary to resolve any issues that are contested by the parties.”² On March 7, 2024, the ALJs scheduled a prehearing conference for this docket on March 19, 2024, to, in part, address “[a] procedural schedule, including dates for the hearing on the merits.”³ CenterPoint Houston and the other parties to the proceeding, which include Environmental Defense Fund, Inc.; Gulf Coast Coalition of Cities; Houston Coalition of Cities; International Brotherhood of Electrical Workers Local 66; Office of Public Utility Counsel; Commission Staff; Texas Coast Utilities Coalition; Texas Consumers Association; Texas Industrial Energy Consumers; and Walmart, Inc. (collectively with CenterPoint Houston, the “Parties”), have agreed to the following proposed procedural schedule.

I. AGREED PROPOSED PROCEDURAL SCHEDULE AND SPECIAL PROVISIONS

Events	Deadlines
Intervention Deadline	4/22/2024
Submission of publisher’s affidavits	4/22/2024
Objections to CEHE Direct Testimony	4/22/2024
Response to Objections to CEHE’s Direct Testimony	4/26/2024
Settlement Conference	6/3/2024
Deadline for Discovery on CEHE Direct Testimony	6/4/2024

¹ Statement of Intent and Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates (Mar. 6, 2024).

² Order of Referral at 1 (March 7, 2024).

³ SOAH Order No. 1 at 4-5 (March 7, 2024).

Intervenors' Direct Testimony	6/19/2024
Objections to Intervenors' Direct Testimony	6/24/2024
Staff Direct Testimony	6/26/2024
Response to Objections to Intervenors' Direct Testimony	6/28/2024
Settlement Conference	7/2/2024
Objections to Staff's Direct Testimony	7/3/2024
Deadline for discovery on Intervenor and Staff Direct Testimony	7/3/2024
Response to objections to Staff's direct	7/8/2024
Staff and Intervenor Cross Rebuttal	7/10/2024
CEHE's Rebuttal Testimony	7/12/2024
Objections to cross rebuttal	7/15/2024
Responses to objections to cross rebuttal	7/18/2024
Objections to Rebuttal	7/18/2024
Deadline for written discovery on rebuttal and cross rebuttal	7/22/2024
Responses to Objections to Rebuttal	7/24/2024
Deadline for Statement of Position	7/23/2024
Hearing on the Merits start	7/29/2024
Hearing on the Merits end	8/2/2024
Initial Briefs	8/13/2024
Reply Briefs and Proposed Findings of Facts, Conclusions of Law and Ordering Paragraphs	8/21/2024
Proposal for Decision	10/21/2024

Consistent with this procedural schedule, CenterPoint Houston agrees to extend the effective date of the proposed rates until July 23, 2024, which if suspended for 150 days pursuant to 16 Tex. Admin. Code §22.33(c), provides a jurisdictional deadline of December 20, 2024.

Additionally, to “assist in the disposition of this case in a fair and efficient manner,”⁴ The Parties request that the following terms apply to this proceeding:

1. Drafts of testimonies and emails transmitting drafts of testimonies are not discoverable.
2. Workpapers for testimony are due within one business day of filing the associated testimony.
3. Depositions may be scheduled any time before July 25, 2024,
4. Written discovery on CenterPoint Houston's direct testimony.
 - a. Responses are due within 15 calendar days of service of the RFI;
 - b. Objections are due within five business days of service of the RFI;

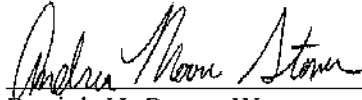
⁴ *Id.* at 4.

- c. Motions to compel are due within four business days of receipt of an objection; and
 - d. Responses to motions to compel are due within three business days of the receipt of a motion to compel.
- 5. Written discovery on intervenor and Staff direct.
 - a. Responses are due within eight business days of service of RFIs;
 - b. Objections are due within five business days of service of the RFI;
 - c. Motions to compel are due within three business days of receipt of an objection; and
 - d. Responses to motions to compel are due within three business days of the receipt of a motion to compel.
- 6. Written discovery on cross-rebuttal testimony and on CenterPoint Houston's Rebuttal.
 - a. Responses are due within five business days of service of RFIs;
 - b. Objections are due within three business days of service of the RFI;
 - c. Motions to compel are due within three business days of receipt of an objection; and
 - d. Responses to motions to compel are due within three business days of the receipt of a motion to compel.

II. CONCLUSION AND PRAYER FOR RELIEF

The Parties respectfully request that the ALJs issue an order adopting the agreed proposed procedural schedule, adopting the agreed special provisions, and providing any other relief to which the Parties may be entitled.

Respectfully submitted,



Patrick H. Peters III
State Bar No. 24046622
Vice President, Associate General Counsel
CenterPoint Energy Service Company, LLC
1005 Congress Avenue, Suite 650
Austin, Texas 78701
512.397.3032
512.379.3050 (fax)
patrick.peters@centerpointenergy.com

Sam Chang
State Bar No. 24078333
Director, Associate General Counsel
CenterPoint Energy Service Company, LLC
1005 Congress Avenue, Suite 650
Austin, Texas 78701
512.397.3005
512.397.3050 (fax)
se.chang@centerpointenergy.com

Andrea Stover
State Bar No. 24046924
Baker Botts L.L.P.
401 South 1st Street, Suite 1300
Austin, Texas 78704
512.322.2695
512.322.3695 (fax)
andrea.stover@bakerbotts.com

James H. Barkley
State Bar No. 00787037
Baker Botts L.L.P.
910 Louisiana Street
Houston, Texas 77002
713.229.1234
713.229.1522 (fax)
james.barkley@bakerbotts.com

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

CERTIFICATE OF SERVICE

I certify that on March 25, 2024, this document was filed with the Public Utility Commission of Texas in Docket No. 56211, and a true and correct copy of it was served by electronic mail on all parties of record in this proceeding in accordance with the *Second Order Suspending Rules* issued in Project No. 50664.


Andrea Moore Stover