



## **Filing Receipt**

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<b>APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES</b>	§ § § § §	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**Houston Coalition of Cities' Fourth Requests for Information and  
Third Requests for Production to CenterPoint Energy Houston Electric, LLC**

In connection with the Application of CenterPoint Energy Houston Electric, LLC ("the Company") for Authority to Change Rates, Houston Coalition of Cities ("HCC") requests the following information within fifteen (15) days of receipt of these requests, unless shortened or extended by agreement of the parties.

It is further requested that the answers to the requests for information be made under oath and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by the Company, such changed answer should be submitted immediately as supplement to the Company's original answer.

### **Definitions and Explanatory Notes**

1. When a request calls for identification of a "Person" or "Witness," the identification shall include a name, employer name, job title, business address, and business telephone number.
2. The term "Document" is used in its broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms "non-privileged document" and "non-privileged documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification of a "Document," as defined herein, the identification should include the following:
  - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
  - b. the date of the document;
  - c. the title and/or 're' of the document;
  - d. the subject matter of the document;
  - e. the full name and address of the recipient and every person who received copies of the document;
  - f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and

- g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
5. The term “Studies” includes any Document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information with the subjects referred to in this proceeding.
6. The term “the Company” includes CenterPoint Energy Houston Electric, LLC and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

Respectfully submitted,

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By: /s/ Steven T. Moritz  
Steven T. Moritz

**Counsel for Houston Coalition of Cities**

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of March 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/ Steven T. Moritz  
Steven T. Moritz

**Houston Coalition of Cities'**  
**Fourth Requests for Information to CenterPoint Energy Houston Electric, LLC**

- 4-1.** Regarding Schedule C: Rate of Return/Financial Information, please explain whether the financial information includes data pertaining to CenterPoint Energy Houston Electric subsidiaries or is impacted by financial data of those subsidiaries.
- 4-2.** Refer to the Direct Testimony of Jacqueline M. Richert at page 16:30 – 17:3. Does CenterPoint Energy Houston Electric have a formal credit rating target and/or financial metric(s) target for planning or other purposes? If yes, please describe the targets.
- 4-3.** Refer to the Direct Testimony of Jacqueline M. Richert at page 13:11 – 14:4. Please explain why the analysis utilized data sourced from a corporate bond yield index as opposed to a utility bond yield index.
- 4-4.** Refer to the Direct Testimony of Jacqueline M. Richert at page 13:11 – 14:4. Has CenterPoint Energy Houston Electric prepared an analysis that measures the cost impact to customers from using the requested return on equity and capital structure as compared to a lower return on equity and lower equity ratio as part of the capital structure?
- 4-5.** Refer to the Direct Testimony of Jacqueline M. Richert at Table JRichert-9 and the supporting workpaper entitled “WP JRichert-5 (Table JRichert-9 CEHE rate case file \_ROE cap struct Support)”. Please confirm the funds from operations do not include the amortization of securitized debt.

**Houston Coalition of Cities'**  
**Third Requests for Production to CenterPoint Energy Houston Electric, LLC**

- 3-1.** Refer to Schedule C, section II-C-2.5a WEIGHTED AVERAGE COST OF SHORT-TERM DEBT- DAILY. Please provide equivalent data in respect of the 2021 and 2022 years.
- 3-2.** Refer to the supporting schedule entitled "CEHE RFP Workpapers Support" at tab BalSheet. Please provide the balance sheet for CenterPoint Energy Houston Electric on a quarterly basis for the years 2021 through 2023, with similar FERC Account and CenterPoint Energy Houston Electric Account detail.
- 3-3.** Refer to WP JRichert-5 (Table JRichert-9 CEHE rate case file \_ROE cap struct Support). Please provide supporting workpapers, documentation or other material used to derive the values relied upon in the analysis.
- 3-4.** Please refer to the response to Request for Information 4-2 supra and provide documents supporting or reflecting the responses.
- 3-5.** Please refer to the response to Request for Information 4-4 supra and provide documents supporting or reflecting the responses.
- 3-6.** Refer to Exhibit AEB-15- LTDCost. Please provide supporting workpapers, documentation or other material used to derive the Moody's index data relied upon in the analysis.