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

**Houston Coalition of Cities’ Fifth Requests for Information
to CenterPoint Energy Houston Electric, LLC**

In connection with the Application of CenterPoint Energy Houston Electric, LLC (“the Company” or “CEHE”) 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
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Counsel for Houston Coalition of Cities

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April 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'
Fifth Requests for Information to CenterPoint Energy Houston Electric, LLC

- 5-1.** Please refer to page 13 of John Durland's testimony and provide a summary of the allocation methodologies used in CEHE's proposed rate class cost allocation studies in this case, which are different from those approved in CEHE's last rate case, Docket No. 49421.
- 5-2.** Please refer to page 16 of John Durland's testimony and please answer the following questions:
- a. Did CEHE use the same methodology, as described on lines 1 through 2, to allocate costs in FERC Account 366--the Underground Conduit and FERC Account 367 Conductors?
 - b. Please explain in detail how CEHE determines the costs associated with each of these categories: UG Network, UG Getaways and Street Dips, UG Device from Terminal Poles, and Residential UG.
- 5-3.** Please provide the DCRF revenues CEHE collected from retail customers for each of the following periods:
- a. 9/1/18 thru 8/31/19
 - b. 9/1/19 thru 8/31/20
 - c. 9/1/20 thru 8/31/21
 - d. 9/1/21 thru 8/31/22
 - e. 9/1/22 thru 8/31/23
 - f. 9/1/23 thru 12/31/23
- 5-4.** Please refer to page 20 of John Durland's direct testimony and provide a summary of revenues for the combination of distribution, meter, and customer revenues only, using the same format for the summary of revenues table as shown on this page. The summary should reflect the total on distribution revenues (including distribution, meter, and customers), revenues that were collected from CEHE's retail customers for the test year, and the total distribution revenues that CEHE proposes to collect from its retail customers for the rate year.
- 5-5.** Please refer to page 20 of John Durland's direct testimony and provide a summary of revenues for TCRF revenues only, using the same format for the summary of revenues table as shown on this page. The summary should reflect the TCRF revenues that were collected from CEHE's retail customers for the test year and the transmission revenues that CEHE proposes to collect from its retail customers for the rate year.

- 5-6.** Please provide the following information by rate class for each of the calendar years from 2019 through 2022:
- Monthly and annual numbers of customers
 - Monthly and annual numbers of meters
 - Monthly and annual Non-Coincident Peak (“NCP”) KWs
 - Monthly and annual Coincident Peak (“CP”) KWs
 - Monthly and annual four Coincident Peak (“4CP”) KWs
 - Monthly and annual energy usage (kWh)
- 5-7.** Please refer to page 30 of John Durland’s testimony and provide the following information for the Street Lighting rate class for the test year:
- Total number of street lights.
 - Total number of LED street lights by type of initial lumen and watt.
 - Total number of non-LED street lights by type of initial lumen and watt.
 - Total number of LED street lights by type of initial lumen and watt for City of Houston.
 - Total number of non-LED street lights by type of initial lumen and watt for City of Houston.
- 5-8.** Please refer to page 30 of John Durland’s testimony and provide the following information:
- Total number of street lights in each of the calendar years from 2018 through 2022.
 - Total number of LED street lights by type of initial lumen and watt in each of the calendar years from 2018 through 2022.
 - Total number of non-LED street lights by type of initial lumen and watt in each of the calendar years from 2018 through 2022.
 - Total number of LED street lights by type of initial lumen and watt for City of Houston in each of the calendar years from 2018 through 2022.
 - Total number of non-LED street lights by type of initial lumen and watt for City of Houston in each of the calendar years from 2018 through 2022.