



## **Filing Receipt**

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**Control Number - 56211**

**Item Number - 99**

**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**

**April 17, 2024**

**Contact: Peggy Sorum  
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- **Please note that the discovery responses were prepared under the direction of the sponsors.**

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-01**

**QUESTION:**

Please provide:

- a. A graphic representation showing CenterPoint Energy, Inc.'s subsidiaries;
- b. The 2022 and 2023 operating revenues and profits of each subsidiary; and
- c. The amount of capital, as well as the capital structure (amount of short-term debt, long term debt, and common equity), invested in each subsidiary as of December, 31, 2022, and December, 31, 2023.

**ANSWER:**

- a. Please see the attachment to this response for the requested graphic representation showing CenterPoint Energy, Inc's (CNP) subsidiaries.
- b. The CNP and Subsidiaries, CenterPoint Energy Resources Corp. (CERC) and Subsidiaries, and CenterPoint Energy Houston Electric, LLC (CEHE) and Subsidiaries financial information can be found in the Form 10K Financial Statements (Part II, Item 8). Please follow the link pasted below for that financial information.

[EDGAR Search Results \(sec.gov\)](#)

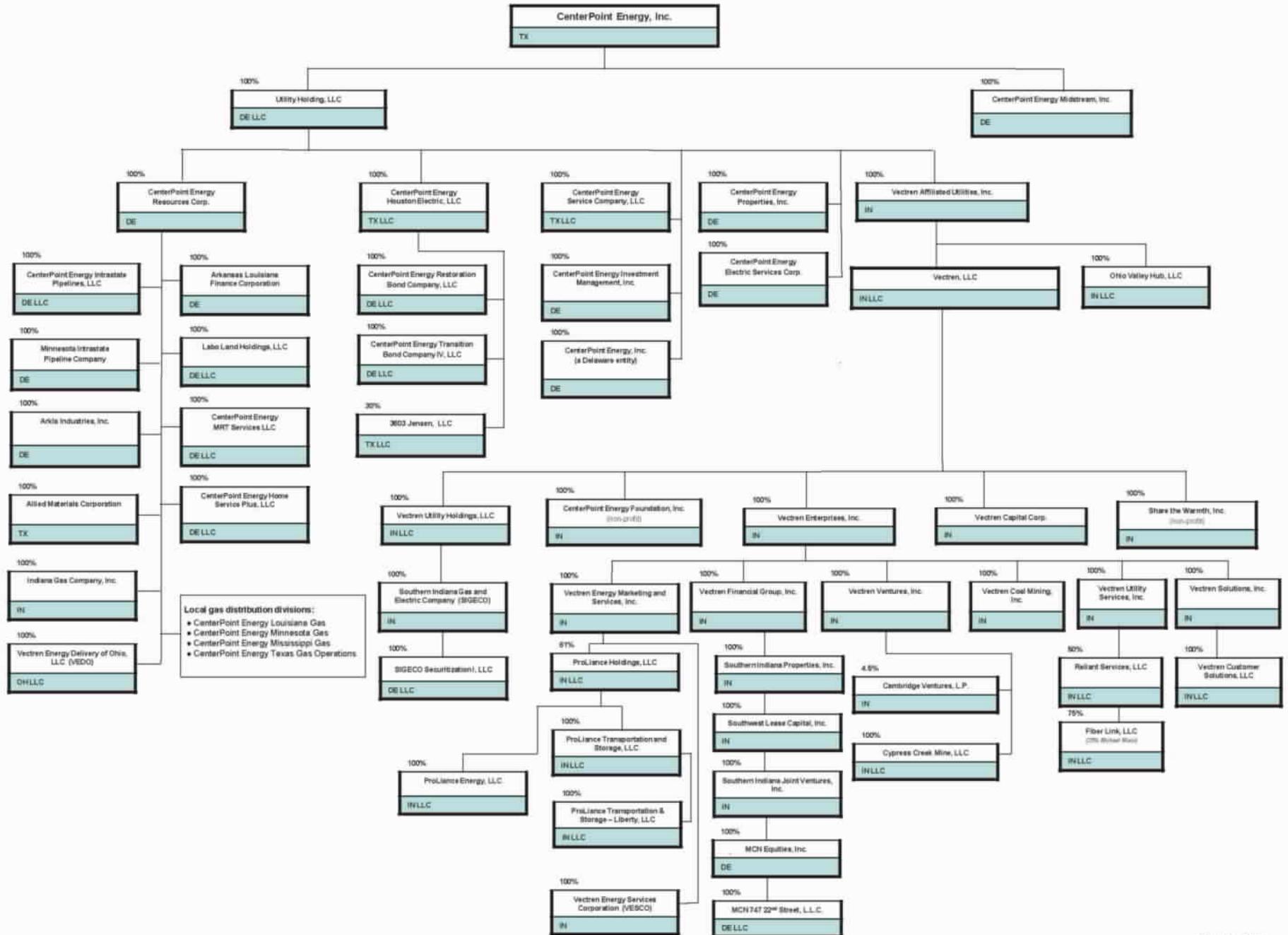
- c. The invested capital amounts are not available for each CNP subsidiary. For the Company's 2023 invested capital amount, please see Schedule II-B of the Rate Filing Package. For the Company's 2022 invested capital amount, please see the EMR provided in the response to TCUC RFP 01-10.

**SPONSOR:**

Shane Kimzey/Kristie Colvin

**RESPONSIVE DOCUMENTS:**

TCUC RFP01-01 Attachment 1.pdf



**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-02**

**QUESTION:**

Please provide copies of all presentations made to rating agencies, financial institutions, banks, and/or investment firms by CenterPoint Energy Houston Electric, LLC and CenterPoint Energy, Inc. between January 1, 2021 and the present.

**ANSWER:**

Please refer to CenterPoint Houston's response to Request No. HCC-RFP02-02 for rating agency presentations.

Please see documents attached for presentations not filed with the SEC.

Please visit [investors.centerpointenergy.com](https://investors.centerpointenergy.com) for presentations to investors.

**The attachments are confidential and are being provided pursuant to the Protective Order issued in Docket No. 56211.**

**SPONSOR:**

Jackie Richert

**RESPONSIVE DOCUMENTS:**

TCUC-RFP01-02 CNP Convertible Marketing Presentation (confidential).pdf

TCUC-RFP01-02 CNP Lender Presentation 2021 (confidential).pdf

TCUC-RFP01-02 CNP Lender Presentation 2022 (confidential).pdf

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-03**

**QUESTION:**

Please provide copies of credit reports for the CenterPoint Energy Houston Electric, LLC and CenterPoint Energy, Inc. from the major credit rating agencies (S&P, Moody's, and Fitch) published since January 1, 2021. Please update your response with any credit reports newly published after the due date for responses to this request up to the time before the Commission issues its order in this case.

**ANSWER:**

Please refer to CenterPoint Houston's response to Request No. HCC-RFP02-01.

**SPONSOR:**

Jackie Richert

**RESPONSIVE DOCUMENTS:**

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-04**

**QUESTION:**

Please provide copies of all known investment reports for the CenterPoint Energy Houston Electric, LLC and CenterPoint Energy, Inc. published since January 1, 2021.

**ANSWER:**

Please see attachment TCUC-RFP01-04 (confidential). **The attachment is confidential and is being provided pursuant to the Protective Order issued in Docket No. 56211.**

**SPONSOR:**

Jackie Richert

**RESPONSIVE DOCUMENTS:**

TCUC-RFP01-04 (confidential).zip

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-05**

**QUESTION:**

Please provide copies of all prospectuses for any security issuances by CenterPoint Energy, Inc. or CenterPoint Energy Houston Electric, LLC between January 1, 2018 and the present.

**ANSWER:**

Please see the attachment.

**SPONSOR:**

Jackie Richert

**RESPONSIVE DOCUMENTS:**

TCUC-RFP01-05.xlsx

Issuer	Security	Prospectus Supplement Link
CenterPoint Energy Houston Electric	5.15% General Mortgage Bonds, Series AN, due 2034	<a href="#">Form 424B2 for Centerpoint Energy Houston Electric LLC filed 02/27/2024</a>
CenterPoint Energy, Inc.	Shares of Common Stock	<a href="#">Form 424B5 for Centerpoint Energy INC filed 01/11/2024</a>
CenterPoint Energy Houston Electric	5.20% General Mortgage Bonds, Series AM, due 2028	<a href="#">Form 424B2 for Centerpoint Energy Houston Electric LLC filed 09/14/2023</a>
CenterPoint Energy, Inc.	5.25% Senior Notes due 2026	<a href="#">Form 424B2 for Centerpoint Energy INC filed 08/09/2023</a>
CenterPoint Energy, Inc.	4.25% Senior Convertible Notes due 2026	<a href="#">Form 8-K for Centerpoint Energy INC filed 08/04/2023</a>
CenterPoint Energy, Inc.	Form S-3 Registration Statement	<a href="#">Form S-3ASR for Centerpoint Energy INC filed 05/17/2023</a>
CenterPoint Energy Houston Electric	4.95% General Mortgage Bonds, Series AK, due 2033	<a href="#">Form 424B2 for Centerpoint Energy Houston Electric LLC filed 03/21/2023</a>
CenterPoint Energy Houston Electric	5.30% General Mortgage Bonds, Series AL, due 2053	<a href="#">Form 424B2 for Centerpoint Energy Houston Electric LLC filed 03/21/2023</a>
CenterPoint Energy Houston Electric	4.45% General Mortgage Bonds, Series AI, due 2032	<a href="#">Form 424B2 for Centerpoint Energy Houston Electric LLC filed 09/12/2022</a>
CenterPoint Energy Houston Electric	4.85% General Mortgage Bonds, Series AJ, due 2050	<a href="#">Form 424B2 for Centerpoint Energy Houston Electric LLC filed 09/12/2022</a>
CenterPoint Energy, Inc.	Form S-3 Registration Statement	<a href="#">5fddbeed-0b47-466b-be03-7a73462059dd (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	Form S-8 Registration Statement	<a href="#">Form S-8 for Centerpoint Energy INC filed 04/25/2022</a>
CenterPoint Energy Houston Electric	3.00% General Mortgage Bonds, Series AG, due 2032	<a href="#">49529049-be5e-42d2-ab08-dcfe48c0204c (centerpointenergy.com)</a>
CenterPoint Energy Houston Electric	3.60% General Mortgage Bonds, Series AH, due 2052	<a href="#">49529049-be5e-42d2-ab08-dcfe48c0204c (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	Floating Rate Senior Notes due 2024	<a href="#">1a255716-9103-4a16-a2d3-2a5be855011a (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	1.45% Senior Notes due 2026	<a href="#">1a255716-9103-4a16-a2d3-2a5be855011a (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	2.65% Senior Notes due 2031	<a href="#">1a255716-9103-4a16-a2d3-2a5be855011a (centerpointenergy.com)</a>
CenterPoint Energy Houston Electric	2.35% General Mortgage Bonds, Series AE, due 2031	<a href="#">aac3bb95-6b58-4075-a3e1-5d433dde0432 (centerpointenergy.com)</a>
CenterPoint Energy Houston Electric	3.35% General Mortgage Bonds, Series AF, due 2051	<a href="#">aac3bb95-6b58-4075-a3e1-5d433dde0432 (centerpointenergy.com)</a>
CenterPoint Energy Houston Electric	2.90% General Mortgage Bonds, Series AD, due 2050	<a href="#">f6e6585d-02fc-491c-823e-6020a78d7f47 (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	Series C Mandatory Convertible Preferred Stock	<a href="#">c0490561-c4ab-4a9a-997e-91d5ffef0dca (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	Form S-3 Registration Statement	<a href="#">d12a93da-a361-4835-8ce3-f1a853aaa956 (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	2.50% Senior Notes due 2024	<a href="#">85c66b8e-d5be-4428-a9ee-410064206d74 (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	2.95% Senior Notes due 2030	<a href="#">85c66b8e-d5be-4428-a9ee-410064206d74 (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	3.70% Senior Notes due 2049	<a href="#">85c66b8e-d5be-4428-a9ee-410064206d74 (centerpointenergy.com)</a>
CenterPoint Energy Houston Electric	4.25% General Mortgage Bonds, Series AC, due 2049	<a href="#">24038efc-9296-4d18-a04d-033db5a3a3ac (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	3.60% Senior Notes due 2021	<a href="#">429cb4b7-184f-43eb-8a34-7ec3a1c44048 (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	3.85% Senior Notes due 2024	<a href="#">429cb4b7-184f-43eb-8a34-7ec3a1c44048 (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	4.25% Senior Notes due 2028	<a href="#">429cb4b7-184f-43eb-8a34-7ec3a1c44048 (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	7.00% Series B Mandatory Convertible Preferred Stock	<a href="#">d1df2520-1019-4433-9882-44b2144f89ca (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	Common Stock	<a href="#">d7f28d4c-4195-4a3a-b2a3-7be8152da9af (centerpointenergy.com)</a>
CenterPoint Energy, Inc.	Series A Fixed-to-Floating Rate Cumulative Redeemable Perpetual Preferred Stock	<a href="#">15301203-b10d-4bf9-9581-c67f81cd4444 (centerpointenergy.com)</a>
CenterPoint Energy Houston Electric	3.95% General Mortgage Bonds, Series AB, due 2048	<a href="#">7153c667-311d-453b-be28-c5a7bf331723 (centerpointenergy.com)</a>

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-06**

**QUESTION:**

For the years 2019-present, by year, please provide the dollar amount and dates of:

- a. All equity infusions into CenterPoint Energy Houston Electric, LLC; and
- b. All dividend payments paid by CenterPoint Energy Houston Electric, LLC to CenterPoint Energy, Inc.

**ANSWER:**

Please refer to attachment TCUC-RFP01-06.xlsx.

**SPONSOR:**

Jackie Richert

**RESPONSIVE DOCUMENTS:**

TCUC-RFP01-06.xlsx

TCUC-RFP01-06

## a. All equity infusions into CenterPoint Energy Houston Electric, LLC:

3/28/2019	590,000,000.00
12/29/2020	62,000,000.00
12/29/2021	130,100,000.00
3/31/2022	637,000,000.00
5/24/2022	500,000,000.00
1/9/2023	650,000,000.00
9/29/2023	235,000,000.00
3/28/2024	230,000,000.00

## b. All dividend payments paid by CenterPoint Energy Houston Electric, LLC:

3/26/2019	24,000,000.00
6/28/2019	16,200,000.00
9/30/2019	60,000,000.00
12/30/2019	276,000,000.00
3/30/2020	384,400,000.00
6/26/2020	19,800,000.00
9/28/2020	52,200,000.00
12/16/2020	94,200,000.00
3/31/2022	37,000,000.00
6/28/2022	30,500,000.00
9/30/2022	73,500,000.00
12/28/2022	175,000,000.00
3/27/2023	51,000,000.00
6/29/2023	109,200,000.00
9/29/2023	79,300,000.00
12/28/2023	127,900,000.00
3/28/2024	35,200,000.00

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-07**

**QUESTION:**

Please provide copies of the FERC Form 1 for CenterPoint Energy Houston Electric, LLC for the years 2022 and 2023.

**ANSWER:**

Please refer to the Public Utility Commission of Texas (PUC) website for the Electric Utilities Financial and Operating Reports Project No. 35588, Item Number 462, for the Company's 2022 FERC Form 1.

The Company's 2023 FERC Form 1 is expected to be filed April 18. An update will be provided once filed.

**SPONSOR:**

Kristie Colvin

**RESPONSIVE DOCUMENTS:**

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**  
**PUC DOCKET NO. 56211**  
**SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION**  
**REQUEST NO.: TCUC-RFP01-08**

**QUESTION:**

Please provide:

- a. The end-of-quarter rate-base amounts for CenterPoint Energy Houston Electric, LLC for the years 2019 through 2023, by year;
- b. The end-of-quarter amounts for CenterPoint Energy Houston Electric, LLC of short-term debt, long-term debt, and common equity, for the years 2019 through 2023, by year; and
- c. The data and work papers in both PDF and electronic (Microsoft Excel) formats, with all data and formulas intact.

**ANSWER:**

- a. The Company does not maintain end-of-quarter rate base.

Please see Schedule II-B for the rate base amounts for calendar year end 2023. For the Company's rate base amounts for the years 2019 through 2022, please refer to Schedule III of the EMR in the Projects listed in the response to TCUC-RFP01-10.

- b. Please see TCUC-RFP01-08b Attachment 1.xlsx for the Company's end-of-quarter amounts for short-term debt, long-term debt and common equity, for years 2019 through 2023.

- c. See the responses to parts a and b.

**SPONSOR:**

Kristie Colvin/Jacqueline Richert

**RESPONSIVE DOCUMENTS:**

TCUC-RFP01-08b Attachment 1.xlsx

**CenterPoint Energy Houston Electric, LLC.**  
**Short-Term Debt, Long-Term Debt, and Common Equity**  
**For the Years 2019 - 2023**

	<b>Short-term debt</b>	<b>Long-term debt</b>	<b>Common equity</b>
<b>2019.Q1</b>	-	3,903,597,181.81	3,274,180,130.95
<b>2019.Q2</b>	-	3,905,683,316.08	3,358,480,513.04
<b>2019.Q3</b>	-	3,908,140,476.21	3,482,858,843.25
<b>2019.Q4</b>	-	3,910,597,636.40	3,251,672,367.34
<b>2020.Q1</b>	132,883,000.00	3,913,054,796.55	2,899,972,700.25
<b>2020.Q2</b>	5,203,242.70	4,193,127,165.23	2,981,760,953.70
<b>2020.Q3</b>	5,203,242.70	4,195,587,579.28	3,086,920,750.78
<b>2020.Q4</b>	7,571,391.18	4,198,205,541.55	3,111,610,287.14
<b>2021.Q1</b>	-	5,184,184,601.84	3,164,854,527.32
<b>2021.Q2</b>	-	4,884,627,811.34	3,267,947,187.10
<b>2021.Q3</b>	40,172,772.04	4,887,201,351.06	3,419,041,111.15
<b>2021.Q4</b>	511,862,023.41	4,889,849,690.85	3,623,064,652.48
<b>2022.Q1</b>	-	5,676,929,981.68	4,322,293,331.84
<b>2022.Q2</b>	-	5,679,233,566.41	4,824,278,293.93
<b>2022.Q3</b>	-	6,171,544,460.24	4,947,492,465.15
<b>2022.Q4</b>	641,971,744.58	5,969,730,327.04	4,888,082,519.39
<b>2023.Q1</b>	-	6,849,526,355.05	5,594,817,967.40
<b>2023.Q2</b>	109,871,920.96	6,850,131,405.60	5,645,754,736.39
<b>2023.Q3</b>	-	7,348,664,247.51	6,046,692,832.83
<b>2023.Q4</b>	-	7,351,041,104.97	5,990,929,790.17

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-09**

**QUESTION:**

Please provide the breakdown in the expected return on the pension plan assets of CenterPoint Energy Houston Electric, LLC. Specifically, please provide the expected return on different asset classes (bonds, US stocks, international stocks, etc.) used in determining the expected return on plan assets. Please provide all associated source documents and work papers.

**ANSWER:**

The breakdown in the expected return on the Retirement Plan assets is shown in the actuarial reports provided in response to RFP Schedule II-D-3.8. Please refer to page 29 of 63 and page 29 of 62 of the documents entitled "WP II-D-3.8.1 CNP Retirement Plan 2022 (HSPM).pdf" and "WP II-D-3.8.1 CNP Retirement Plan 2023 (HSPM).pdf", respectively.

The non-qualified Benefit Restoration Plan is an unfunded plan, and thus there are no underlying assets.

**SPONSOR:**

Kristie Colvin/Bertha Villatoro

**RESPONSIVE DOCUMENTS:**

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-10**

**QUESTION:**

Please provide the authorized and earned return on common equity for CenterPoint Energy Houston Electric, LLC over the past five years (2018-23), by year.

**ANSWER:**

CenterPoint Energy Houston Electric, LLC. has an authorized return on common equity of 9.40% approved in Docket No. 49421 Order on Rehearing (FOF 61) dated March 9, 2020.

For the Company's earned return on common equity for the years ended 2018-2022, please refer to the Public Utility Commission of Texas (PUC) website for the Year End Electric Utility Earnings Reports in the Projects listed below for all workpapers and calculations. Please reference Schedule III line 29 and its related workpapers for the earned return on common equity in the following projects:

<b>Year</b>	<b>PUC Docket No.</b>	<b>Item No.</b>
2018	49355	67
2019	50655	19
2020	51718	12
2021	52952	14
2022	54451	8

Per the PUC Earnings Report General Instructions for Investor-Owned Transmission and Distribution Service Providers In the Electric Reliability Council of Texas, General Instruction number 3, the Company intends to defer filing its Earnings Report for the 2023 calendar year until 45 days after the Commission final order in its current base rate proceeding; and therefore, has not calculated an earned return on common equity for 2023.

**SPONSOR:**

Kristie Colvin

**RESPONSIVE DOCUMENTS:**

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-11**

**QUESTION:**

For the past five years (2019-2024), by year, please list the credit ratings for CenterPoint Energy Houston Electric, LLC and CenterPoint Energy, Inc. by the three major credit rating agencies. For each time a credit rating was changed either up or down by any of the three rating agencies, please provide a copy of the related credit rating report.

**ANSWER:**

Please see attachment TCUC-RFP01-11.xlsx. Refer to CenterPoint Houston's response to Request No. TCUC-RFP01-03 for the related credit rating reports.

**SPONSOR:**

Jackie Richert

**RESPONSIVE DOCUMENTS:**

TCUC-RFP01-11.xlsx

**CenterPoint Energy Houston Electric, LLC**

	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>
S&P Issuer Credit Rating	BBB+	BBB+	BBB+	BBB+	BBB+	BBB+
Moody's LT Issuer Rating	A3	Baa1	Baa1	Baa1	Baa1	Baa1
Fitch Long-Term IDR	A-	BBB+	BBB+	BBB+	BBB+	BBB+

**CenterPoint Energy, Inc.**

	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>
S&P Issuer Credit Rating	BBB+	BBB+	BBB+	BBB+	BBB+	BBB+
Moody's LT Issuer Rating	Baa2	Baa2	Baa2	Baa2	Baa2	Baa2
Fitch Long-Term IDR	BBB	BBB	BBB	BBB	BBB	BBB

Please refer to TCUC-RFP01-03 for the related credit rating reports.

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-12**

**QUESTION:**

With reference to the testimony of Anne E. Bulkley, please provide copies of all articles, publications, regulatory decisions, references, and/or documents cited in the testimony and/or footnotes. If the reference is a book, please provide a copy of the relevant section of the book.

**ANSWER:**

Please see the response to HCC RFP02-04.

**SPONSOR:**

Ann Bulkley

**RESPONSIVE DOCUMENTS:**

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-13**

**QUESTION:**

With reference to the testimony of Anne E. Bulkley, if not already provided, please provide copies of:

- a. Exhibits AEB-2 – AEB-15 in Microsoft Excel, with all data and formulas intact; and
- b. The source documents and work papers associated with the development of Exhibits AEB-2 – AEB-15 in Microsoft Excel, with all data and formulas intact.

**ANSWER:**

Please see the electronic filed exhibits and workpapers for Ann E. Bulkley.

**SPONSOR:**

Ann Bulkley

**RESPONSIVE DOCUMENTS:**

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-14**

**QUESTION:**

Please provide copies of the:

- a. Source documents, data and work papers associated with the development of Figure Nos. 1-16;  
and
- b. Data and work papers in both paper and electronic (Microsoft Excel Worksheet) forms. For the Microsoft Excel version, please include keep all formulas embedded in the worksheet.

**ANSWER:**

Please see the response to TCUC RFP01-13.

**SPONSOR:**

Ann Bulkley

**RESPONSIVE DOCUMENTS:**

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 56211  
SOAH DOCKET NO. 473-24-13232**

**TEXAS COAST UTILITIES COALITION  
REQUEST NO.: TCUC-RFP01-15**

**QUESTION:**

With reference to pages 30-33 of Ms. Bulkley's testimony, please provide copies of all empirical studies that compare the business, financial, and overall investment risk of the CenterPoint Energy Houston Electric, LLC relative to the companies in the proxy group.

**ANSWER:**

Ms. Bulkley is not aware of any empirical studies that compare the business, financial and overall investment risk of the Company relative to the companies included in Ms. Bulkley's proxy group. However, please see Section VII (pages 42 through 61) of Ms. Bulkley's Direct Testimony for a discussion of the specific regulatory, business, and financial risks faced by the Company as compared with the proxy group. Additionally, the analyses presented by Ms. Bulkley related to the relative business, financial and overall investment risk of the Company as compared to the proxy group are presented in Exhibit AEB-10 through Exhibit AEB-14.

Additionally, Ms. Bulkley has provided the data relied upon for the business and financial risk assessment in Workpapers AEB-10 and 11.

**SPONSOR:**

Ann Bulkley

**RESPONSIVE DOCUMENTS:**

None

## CERTIFICATE OF SERVICE

I certify that on April 17, 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.

  
\_\_\_\_\_

The following files are not convertible:

TCUC-RFP01-05.xlsx  
TCUC-RFP01-06.xlsx  
TCUC-RFP01-08b Attachment 1.xlsx  
TCUC-RFP01-11.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.