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**SOAH DOCKET NO. 473-24-19708
PUC DOCKET NO. 56690**

APPLICATION OF CENTERPOINT	§	BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC	§	
TO ADJUST ITS ENERGY	§	OF
EFFICIENCY COST RECOVERY	§	
FACTOR	§	ADMINISTRATIVE HEARINGS

**CITY OF HOUSTON’S FIRST REQUEST FOR INFORMATION (COH 1-1 THROUGH
COH 1-6) TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

The City of Houston, Texas (Houston) files this first information request to CenterPoint Energy Houston, Electric, LLC (CenterPoint) pursuant to PUC Proc. R. 22.144 in the above styled proceeding. CenterPoint is hereby requested to provide its full and detailed responses under oath within the time limit provided by the Presiding Officer or the Public Utility Commission rules if not deadline is set by the Presiding Officer. The responses will be provided through its authorized representative to Houston’s authorized representatives:

YuShan Chang
Sr. Assistant City Attorney
City of Houston Legal Department
900 Bagby, 4th Floor
Houston, TX 77002
832.393.6442
832.393.6259 (Facsimile)
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Alisa Talley
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City of Houston
611 Walker, 13th Floor
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The responses are continuing in nature and are to be amended under oath and delivered as soon as the information becomes available.

Definitions and Instructions

Terms

- A. Singular references include the plural herein.
- B. Conjunctive and disjunctive terms **‘and’** and **‘or’** shall be read to include all information within scope of this Request.
- C. The words **‘each’**, **‘all’** and **‘any’** mean ‘any and all’ and ‘each and every.’
- D. The words **‘the Company’** or **‘CenterPoint’** refer to CenterPoint Energy Houston Electric, LLC, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- E. The terms **‘document’** or **‘documents’** are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control including every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.
- F. **‘Including’** means ‘including but not limited to’ and ‘including without limitation.’
- G. **‘Identify’** means to state as much information as you now have or that is now subject to your control, or that you may hereafter come to have or that hereafter becomes subject to your control, including the following: a. when used in reference to a natural person, state the person's full name, title, present (or last known) address, telephone

number, occupation, present business affiliation or employer, business address, and exact duties and responsibilities of such individual; b. when used in reference to an entity, state the full name of the company, organization, association, partnership, or other business enterprise; and c. when used in reference to a document, state the date and title of the document and, if already produced in this case, the Bates-number of such document.

H. The term '**including**' means and refers to 'including but not limited to.'

Instructions

1. If the response to any request is voluminous, please provide a detailed index of the voluminous material P.U.C. Proc. R. 22.144(h)(4).
2. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
3. If CenterPoint objects to any portion of a request on any ground other than privilege, provide documents responsive to the remaining non-objectionable portion.
4. Itemize each basis separately for each request to which CenterPoint objects in whole or in part, describing in detail each basis of your objection.
5. Specifically identify any statute, agreement or contract that CenterPoint claims as a basis for an objection to a request herein.
6. Construe each request herein independently, not to limit the scope of any other request. Indicate by specific request number any portion of a response covered by your response to another request herein.

7. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, any electronic or magnetic data responsive to a request herein (which is included in the definition of 'document') is to be produced on CD-ROM in a format that is compatible with Microsoft Office as part of CenterPoint's response to these requests. Further, CenterPoint is to produce electronic copies of all paper documents and all electronic originals with intact formulas, if any, of all responsive documents.
8. As part of the response to each request for information, indicate below the answer, the name and job title of each person who participated in any way, other than clerical assistance, in the preparation of the response. State the name of the witness in this docket who will sponsor the answer to the request and may verify the truth of the response.

Respectfully Submitted,

CITY OF HOUSTON, TEXAS
ARTURO G. MICHEL, CITY ATTORNEY

By: 
YuShan Chang
Senior Assistant City Attorney
State Bar No. 24040670

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ATTORNEYS FOR THE CITY OF
HOUSTON, TEXAS

CERTIFICATE OF SERVICE

On this __16th__ day of July 2024, a true and correct copy of the City of Houston's **First Request For Information (COH 1-1 Through COH 1-6) To CenterPoint Energy Houston Electric, LLC** was served upon all parties of record by email pursuant to the Order Suspending Rules in PUC Docket No. 50664.

DocuSigned by:
YuShan Chang
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YuShan Chang

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**CITY OF HOUSTON'S FIRST REQUEST FOR INFORMATION (COH 1-1 THROUGH
COH 1-6) TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

- COH 1-1 See page 10 in witness Richardson's testimony. What are the reasons for the change in the 2023 filed budgets, projected demand reduction and energy savings for program year 2024?
- COH 1-2 Please see SAR-1, Table 5. Provide the reasons for the planned \$4.2M increase in program incentive costs from 2024 to 2025.
- COH 1-3 See witness Richardson's testimony on page 14 and R&D expenditures to conduct research for Aggregated Distributed Energy Resources ("ADER") within the Company's Energy Efficiency Program Portfolio and the Market Potential Study.
- a. Please provide a projected cost for the research studies and the detailed description and calculations used to develop the budget for each effort.
 - b. For the ADER research and development, please provide additional detail, information, and example studies that CenterPoint would conduct with this budget.
 - c. For the ADER research and development, how is CenterPoint taking into account the ERCOT market redesign and potential capacity components into consideration in its study?
- COH 1-4 See witness Richardson's testimony on page 36. Please provide expenses and receipts for all out of state travel, lodging, meals or conference costs included in the 2023 EECRF Expense.
- COH 1-5 Refer to SAR-1, Table 5. Please explain the reasons for significant differences between 2024 and 2025 for the projected savings in kW and kWhs at meter for the Retro-Commissioning MTP.
- COH 1-6 Refer to SAR-1, Table 8. Please provide the reasons and details for the significant reduction in verified versus the projected energy savings for the following programs:
- a. Commercial MTP,
 - b. Retro-commissioning MTP,
 - c. Commercial High Efficiency Foodservice MTP,
 - d. Winter Load Management Pilot,
 - e. Retail Products and Services Residential MTP,
 - f. Midstream MTP, and
 - g. Multi-family MTP Market Rate programs.