

RAILROAD COMMISSION OF TEXAS

**STATEMENT OF INTENT OF
CENTERPOINT ENERGY
RESOURCES CORP., D/B/A
CENTERPOINT ENERGY ENTEX
AND CENTERPOINT ENERGY
TEXAS GAS TO INCREASE RATES
IN THE TEXAS GULF DIVISION**

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GUD NO. _____

**CENTERPOINT ENERGY RESOURCES CORP., D/B/A CENTERPOINT ENERGY
ENTEX AND CENTERPOINT ENERGY TEXAS GAS' STATEMENT OF INTENT TO
INCREASE RATES IN THE TEXAS GULF DIVISION**

COMES NOW CenterPoint Energy Resources Corp. ("CERC"), d/b/a CenterPoint Energy Entex and CenterPoint Energy Texas Gas ("CenterPoint Texas" or the "Company"), a gas utility under Gas Utility Regulatory Act ("GURA")¹ § 101.003(7), and, pursuant to GURA §§ 104.101-104.111 and the rules of the Gas Services Division of the Railroad Commission of Texas ("Commission"), files with the Commission this Statement of Intent to Increase Rates ("Statement of Intent") in the unincorporated areas of the Company's Houston and Texas Coast Divisions and in the following cities in the Houston and Texas Coast Divisions that have ceded original jurisdiction to the Commission pursuant to GURA § 103.003(a): Clear Lake Shores, Cut and Shoot, Danbury, El Lago, Galena Park, Hillcrest Village, Hitchcock, Jacinto City, Jones Creek, Liverpool, New Waverly, Panorama Village, Pleak, Richwood, Roman Forest, South Houston, Southside Place, West University Place, Weston Lakes, and Willis. In addition to requesting a change in rates, the Company is proposing to consolidate the Houston and Texas Coast Divisions into a new single division, the Texas Gulf Division. Consistent with this request to consolidate the Houston and Texas Coast Divisions, the Company's proposed rates were developed based on the cost of providing service to the entire new Texas Gulf Division.

¹ TEX. UTIL. CODE ANN. §§ 101.001 *et seq.*

Contemporaneously with this filing, CenterPoint Texas is also filing a statement of intent to increase rates for the municipalities retaining original jurisdiction in the Houston and Texas Coast Divisions. CenterPoint Texas intends to implement the revised gas tariffs on a division-wide basis for customers in the Company's Texas Gulf Division effective December 21, 2016, which is 35 days from the date of this filing.

I. INTRODUCTION

The Company is required to make this statement of intent filing in its Houston Division pursuant to Texas Utilities Code §104.301(h). However, the filing also presents the opportunity to consolidate the Texas Coast Division and Houston Division into a single division, the Texas Gulf Division, to achieve certain administrative efficiencies and to more accurately reflect the operational realities of the Company's system. Accordingly, CenterPoint Texas is proposing to adopt rates for the consolidated Texas Gulf Division based on the consolidated cost of providing service to all customers within the two divisions, inclusive of both incorporated and unincorporated areas. With respect to the cost of service presented by the Company, the Company's filing demonstrates that the need for a rate increase is primarily driven by the continuing investment that is being made to ensure the safety and reliability of the system, changes to depreciation rates that better reflect the actual life and salvage characteristics of the Company's assets, and necessary increases in operating expenses.

The new rates will affect all general sales residential, small commercial and large volume customers within the Texas Gulf Division. Within the Texas Gulf Division, there was an average of approximately 1.3 million general sales customers during the test year, of which amount approximately 620,000 customers reside in the areas of the Houston and Texas Coast

Divisions over which the Commission has original jurisdiction.² The number of customers in each affected class is as follows:

<u>Houston Division Classes*</u> <u>(without Conroe PGA Customers)</u>	<u>Number of Customers</u> <u>(Total/Commission OJ)</u>	<u>Non-Gas Revenue Change,</u> <u>exclusive of revenue-related taxes</u>
Residential	962,665/498,756	\$31.5 million
General Service – Small	45,350/18,322	\$1.7 million
General Service – Large Volume	1,922/522	(\$5.8) million
TOTAL	1,009,937/517,600	\$27.5 million

<u>Houston Division Classes*</u> <u>(Conroe PGA Customers only)</u>	<u>Number of Customers</u> <u>(Total/Commission OJ)</u>	<u>Non-Gas Revenue Change,</u> <u>exclusive of revenue-related taxes</u>
Residential	18,006/1,716	\$0.6 million
General Service – Small	1,524/182	\$0.05 million
General Service – Large Volume	81/25	(\$0.2) million
TOTAL	19,610/1,922	\$0.4 million

<u>Texas Coast Division Classes*</u>	<u>Number of Customers</u> <u>(Total/Commission OJ)</u>	<u>Non-Gas Revenue Change,</u> <u>exclusive of revenue-related taxes</u>
Residential	284,384/104,649	\$3.2 million
General Service – Small	13,524/4,437	(\$0.04) million
General Service – Large Volume	347/54	(\$0.04) million
TOTAL	298,255/109,140	\$3.1 million

*The classes and number of customers affected by this Statement of Intent are identified on a city-by-city and unincorporated-area basis in Exhibit B to this Statement of Intent, which is incorporated herein by reference. The sum of the class amounts may not equal the total due to rounding.

The rate schedules attached hereto as Exhibit A to this Statement of Intent evidence the rate changes proposed by the Company. As reflected in the proposed schedules, CenterPoint Texas will consolidate its Residential (“R”), General Service-Small (“GSS”), General Service-Large Volume (“GSLV”), Franchise Fee Adjustment (“FFA”), Tax Adjustment (“TA”), and Miscellaneous Service Charge (“MISC”) schedules for the separate Houston and Texas Coast Divisions into single R, GSS, GSLV, FFA TA, and MISC schedules applicable to all general sales customers within the new Texas Gulf Division.

The Company also seeks approval to consolidate its Texas Coast and Houston Purchased Gas Adjustment (“PGA”) tariffs into a single PGA tariff, which will include additional changes

² Please note that the corporate limits of the cities of Houston, Deer Park, Missouri City, and Pasadena extend into the Texas Coast Division, but the 3,362 customers that take service within these areas are served under tariffs approved for the Houston Division.

as described below. Additionally, CenterPoint Texas proposes a new Safety and System Integrity (“SSI”) Rider that will track certain operations and maintenance (“O&M”) expenses associated with activities necessary to comply with changes in state or federal regulations relating to natural gas pipeline safety and integrity. In addition, the Company is including a Rate Case Expense recovery rider in its filing package to ensure that the Company can recover the reasonable and reimbursable rate case expenses incurred in this proceeding. The Company also proposes certain revenue-neutral changes to its rate schedules, as described below.

Finally, the Company is seeking Commission approval of new depreciation rates for distribution and general plant within the Texas Gulf Division and seeks a prudence determination with regard to its capital investment booked to plant in the Houston and Texas Coast Divisions through September 30, 2016, including all capital investment reflected in the Company’s interim rate adjustment (“IRA”) filings made since each division’s last statement of intent rate proceeding, pursuant to Texas Utilities Code § 104.301.

II. JURISDICTION

CenterPoint Texas is a gas utility under GURA § 101.003(7). Pursuant to GURA § 102.001(a), the Commission has exclusive original jurisdiction to set the rates requested for the residential and general service customers in the Texas Gulf Division unincorporated areas. In addition, the Commission has exclusive original jurisdiction to set the rates requested for the residential and general service customers within the cities in the Houston and Texas Coast Divisions that have ceded original jurisdiction over rates to the Commission pursuant to GURA § 103.003(a), as shown on Exhibit B.

III. CONSOLIDATION OF SERVICE AREAS

The Company proposes to consolidate the Houston Division and Texas Coast Division into a new, combined division known as the Texas Gulf Division. The Houston and Texas Coast

Divisions are currently separate service territories comprised of the incorporated areas listed in Exhibit B to this application and their associated environs. However, the existing boundaries of the divisions were implemented more than 40 years ago before the system achieved its current level of integration, and the current separation between the divisions is no longer necessary or efficient. As demonstrated throughout the Company's filing, the two divisions are contiguous, with distribution lines and gas supply lines intersecting and crossing the existing divisional boundaries, and the Company operates the two divisions as a single division. Consolidation will result in requiring fewer regulatory filings thereby also reducing the administration and maintenance of regulatory filings and tariffs for both the Company and the Commission. And, the Company's consolidation request is consistent with Commission policy and precedent.³ System-wide rate requests have been approved by the Commission in no fewer than 22 gas utility dockets, either as part of a contested case or pursuant to settlement.⁴ For these reasons, the Company seeks to use a system-wide cost of service for the entire Texas Gulf Division.

IV. ORGANIZATION OF FILING

In addition to this Statement of Intent, the Rate Filing Package includes the following:

Exhibit A	Proposed Tariffs and Rate Schedules
Exhibit B	List of Classes and Number of Customers by City and Division
Exhibit C	Proposed Notice
Exhibit D	Direct Testimony and Exhibits
Exhibit E	Proposed Protective Order

³ See, e.g., GUD No. 10506, Final Order at FoFs 45-49 & CoL 12 (Sept. 29, 2016); GUD No. 10488, Final Order at CoL 21 (May 4, 2016); GUD No. 10174, Examiners' Letter No. 29 at 7-8 (Aug. 3, 2012); GUD No. 10170, Examiners Letter No. 32 at 7 (Aug. 3, 2012); GUD No. 10038, Examiners' Letter No. 15 at 2 (Feb. 23, 2011); GUD No. 9902, Interim Order at FoFs 2-5, CoL 4 (Oct. 22, 2009); GUD No. 9869, Interim Order at FoFs 5-7, CoL 7 (July 14, 2009); GUD No. 9791, Order on Rehearing at FoFs 30, 57, 70 (Dec. 16, 2008); GUD No. 9762, Final Order at FoF 25 (June 24, 2008) and Interim Order at CoL 8 (Feb. 12, 2008); GUD No. 9670, Interim Order at FoFs 22-24, CoL 9 (Aug. 15, 2006); GUD No. 9400, Final Order (May 25, 2004).

⁴ *Id.*; see, e.g., GUD Nos. 9353, 9361, 9365, 9366, 9370, 9376, 9377, 9379, 9488, 10235, 10432 and 10506.

V. PROPOSED TARIFFS AND SCHEDULES

CenterPoint Texas proposes the following tariffs and rate schedules, which are attached to this Statement of Intent as Exhibit A and incorporated herein by reference:

(a) Proposed Rates for General Sales Customers

CenterPoint Texas proposes the attached rates (Rate Schedules R-2094, GSS-2094 and GSLV-625) for its various classes of general sales customers, consistent with the revenue requirement demonstrated in the rate filing package. The schedules consolidate the Company's general sales class tariffs from the Houston and Texas Coast Division under single R, GSS and GSLV rate schedules that will apply to all general sales customers within the Company's Texas Gulf Division. The proposed tariffs have been updated to include language relating to rate-case expense recovery.

(b) Cost of Gas (Rate Schedule PGA-14)

CenterPoint Texas proposes to consolidate its existing Conroe, Houston, and Texas Coast Division PGA rate schedules into a single Rate Schedule PGA-14, based on the existing Texas Coast PGA, which will apply to all general sales customers within the Texas Gulf Division. The proposed consolidated PGA adds language that provides for the inclusion of costs associated with the Company's participation in FERC matters and bad debt expense, costs to be refunded to or recovered from customers pursuant to orders previously issued by the Commission, and changes to the reconciliation period for over- or under-recoveries to a 12-month period from August through July of each year. It also removes references to revenue associated fees and taxes that will be recovered through the FFA tariff. The tariff also incorporates changes adopted by this Commission in GUD No. 10432 for the Texas Coast Division that have not previously been approved in the Houston Division.

(c) Miscellaneous Service Charge (Rate Schedule MISC-15)

CenterPoint Texas proposes to consolidate its existing Schedule of Miscellaneous Service Charges schedule for the Houston and Texas Coast Divisions into a single schedule that will apply to all general sales customers within the Company's Texas Gulf Division. The language in this proposed schedule is consistent with schedules currently implemented in the Company's Texas Coast Division. The tariff also removes the Encoder Receiver Transmitter ("ERT") installation charge of \$180 that is currently included in this schedule in the Houston Division.

(d) Tax Adjustment (Rate Schedule TA-12)

CenterPoint Texas proposes to consolidate its Tax Adjustment rate schedules for the Houston and Texas Coast Divisions into a single Rate Schedule TA-12 that will apply to all general sales customers within the Company's Texas Gulf Division. The proposed schedule language is largely consistent with those currently implemented in the Company's Houston, Texas Coast and South Texas Divisions.

(e) Franchise Fee Adjustment (Rate Schedule FFA-7)

The Company proposes to consolidate its existing Franchise Fee Adjustment schedules for the Houston and Texas Coast Divisions into a single Rate Schedules FFA-7 that will apply to all general sales customers within the Company's Texas Gulf Division. Consistent with the changes approved by this Commission in GUD No. 10432 for the Texas Coast Division, the proposed schedule requires the Company to maintain on file with the Commission a current listing of cities within the Texas Gulf Division and their applicable franchise fees.

(f) Rate Case Expense Recovery Rate Schedule (Rate Schedule RCE-10)

CenterPoint Texas includes a proposed new Rate Case Expense Recovery Rate Schedule that will be used to recover the Company's expenses associated with preparing and filing this Statement of Intent proceeding. The rider will also include the costs of any notice the Company

will provide. Because these rate-case expenses are incurred in developing this division-wide filing, they are properly allocated to all customers within the Houston and Texas Coast Divisions.⁵ The Company proposes to continue the existing rate case expense riders that are currently in effect for the Texas Coast Division until the rate case expenses approved for recovery in those tariffs are recovered.

(g) SSI Rider (Rate Schedule SSI-1)

CenterPoint Texas proposes a new SSI Rider in order to recover incremental third-party O&M expenses incurred for activities necessary to comply with changes in state or federal regulations relating to natural gas pipeline safety and integrity.

(h) General Rules and Regulations

The company proposes to continue the same General Rules and Regulations currently in effect in the Houston and Texas Coast Divisions.

VI. CAPITAL INVESTMENT PRUDENCE DETERMINATION

CenterPoint Texas requests a prudency determination for all Houston Division plant placed in service from April 1, 2009 through September 30, 2016 and on all Texas Coast Division plant placed in service from October 1, 2014 through September 30, 2016. The information contained in the Rate Filing Package demonstrates the reasonableness and necessity of this capital investment.

VII. EFFECT OF PROPOSED CHANGE ON COMPANY REVENUES AND CUSTOMER BILLS

The proposed changes to CenterPoint Texas' rate schedules and tariffs are calculated on a division-wide basis and will affect all general sales customers in the new Texas Gulf Division. Based on current annual non-gas revenue from all customers in the Texas Gulf Division, the

⁵ See *Rate Case Expense Issues Severed from GUD Nos. 10038, 10047, 10052, 10058, 10070 and 10071*, GUD No. 10051, Finding of Fact 34 (Aug. 21, 2012).

estimated total increase in annual non-gas revenue proposed by this Statement of Intent is approximately \$31.0 million, which represents an increase of about 4.6% including gas costs or 10.7% excluding gas cost. This revenue increase does not include the effect of revenue-related taxes.

The calculated revenue deficiency is based on a twelve-month Test Year ending June 30, 2016, adjusted for actual known and measurable changes to invested capital through September 30, 2016. The proposed increase in rates constitutes a “major change” as that term is defined under GURA § 104.101. The proposed rates will not exceed 115% of the average of all rates for similar services of all municipalities served by CenterPoint Texas within the same county. Proposed rates for all classes are shown in Exhibit A. The proposed non-gas revenue change and average bill impacts of the proposed rate change for each customer class in each division is as follows:

	Non-Gas Revenue Change \$ MM	Percentage Change With/Without Gas Costs**		Average Current Monthly Bill, including Gas Cost*	Average Proposed Monthly Bill, including Gas Cost*	Proposed Monthly Change
Houston Division (without Conroe)						
Residential	\$31.5	7.3%	16.2%	\$35.35	\$37.94	\$2.59
General Service-Small	\$1.7	2.1%	12.6%	\$115.42	\$117.80	\$2.38
General Service-Large Volume	(\$5.8)	-17.2%	-64.1%	\$1,513.48	\$1,253.43	(\$260.05)
Houston Division (Conroe only)						
Residential	\$0.6	19.2%	16.6%	\$32.37	\$38.57	\$6.20
General Service-Small	\$0.05	19.4%	12.0%	\$93.17	\$111.24	\$18.07
General Service-Large Volume	(\$0.2)	-4.7%	-64.5%	\$1,250.94	\$1,192.76	(\$58.18)
Texas Coast Division						
Residential	\$3.2	3.0%	5.0%	\$36.22	\$37.32	\$1.10
General Service-Small	(\$0.04)	0.5%	-0.9%	\$102.41	\$102.90	\$0.49
General Service-Large Volume	(\$0.04)	0.1%	-6.5%	\$1,316.42	\$1,317.74	\$1.32

* In the Houston Division without Conroe, the adjusted test-year average monthly usage is 34 Ccf for Residential Service, 167 Ccf for General Service Small, and 2,068 Ccf for General Service Large Volume. The current average cost of gas is \$0.54261 per Ccf for all classes. In the Houston Division Conroe only area, the adjusted test-year average monthly usage is 35 Ccf for Residential Service, 156 Ccf for General Service Small, and 1,962 for General Service Large Volume. The current average cost of gas is \$0.44111 per Ccf for all classes. In the Texas Coast Division, the adjusted test-year average monthly usage is 33 Ccf for Residential Service, 142 Ccf for General Service Small, and 2,225 Ccf for General Service Large Volume. The current average cost of gas is \$0.53299 per Ccf for Residential Service and General Service Small and \$0.52228 per Ccf for General Service Large Volume. The listed dollar amounts include an estimate of the effect of the proposed PGA rate schedules consolidation.

** The percent change with gas cost includes an estimate of the effect of the proposed PGA rate schedules consolidation.

As set forth in Exhibit A to this Statement of Intent, the proposed tariffs, upon approval, will supersede the existing versions of these tariffs on file with the cities retaining original jurisdiction and at the Commission for the unincorporated areas of the Houston and Texas Coast

Divisions and those cities that have ceded their original jurisdiction over rates to the Commission.

VIII. NOTICE AND MOTION FOR APPROVAL OF NOTICE

Notice of this proceeding will be made pursuant to the provisions of GURA § 104.103(a) and other applicable requirements, including publication in a newspaper having general circulation in the counties that encompass the territory affected by the proposed rate increase. Attached to this Statement of Intent as Exhibit C is CenterPoint Texas' proposed Form of Notice. CenterPoint Texas asks that the Examiners review and approve this form of notice in order that the Company may begin publication. Upon receiving approval and after compliance with all notice requirements, and no later than 60 days from the date this Statement of Intent is filed, the Company will file proof of notice with the Commission.

IX. SUPPORTING WITNESS TESTIMONY

Attached to this Statement of Intent as Exhibit D is the pre-filed direct testimony of the following witnesses:

- Randal Pryor, Vice President – Regional Operations. Mr. Pryor provides an overview of CERC's Gas Operations in Texas and of its rate filing package and testifying witnesses. In addition, he supports the Company's request to consolidate its Houston and Texas Coast Divisions into the Texas Gulf Division and explains the need for a SSI Rider to recover costs related to the Company's on-going obligations to satisfy state and federal pipeline safety requirements.
- Mary Kirk, Director of Financial Accounting. Ms. Kirk attests to the accuracy of the Company's books and its compliance with applicable Commission rules. In addition, Ms. Kirk sponsors the cost of service calculation, including appropriate adjustments to the test year.

- Randolph Sutton, Manager of Compensation. Mr. Sutton supports the reasonableness of the Company's request to recover expenses related to compensation, pension and benefits.
- Jane George, Manager of Business Services, Planning & Performance Management. Ms. George sponsors the jurisdictional cost assignments from CenterPoint Energy Service Company, LLC ("Service Company") and other affiliates that are charged to the Company's Texas Gulf Division. Ms. George also testifies to the Company's compliance with the statutory standards applicable to affiliate expenses and the reasonableness of the inclusion of these costs in the proposed rates.
- Bruce Coogler, Division Vice President of Gas Supply. Mr. Coogler describes the gas purchasing practices and gas supply portfolio structure as it relates to Company's Houston and Texas Coast Divisions, including the Conroe area.
- Talmadge Centers, Division Vice President of Safety and Gas System Integrity. Mr. Centers describes the Company's pipeline integrity management program and activities and supports the reasonableness of Company's test year pipeline integrity management costs. He also explains the need for the Company's proposed SSI Rider based on increasing regulations and fluctuating expense associated with complying with these requirements.
- Charles Pringle, Director of Tax. Mr. Pringle sponsors the income tax information and schedules included in the computation of the Company's cost of service and computation of rate base.
- Robert McRae, Assistant Treasurer. Mr. McRae explains the program under which the Texas Gulf Division factors (or sells) its customer accounts receivables and supports the expenses associated with the Company's factoring program.

- Timothy Lyons, Principal, Sussex Economic Advisors, LLC. Mr. Lyons sponsors the results of the lead-lag study for purposes of measuring the cash working capital allowance required for the Company.
- Robert Hevert, with ScottMadden, supports the Company's requested cost of equity, appropriate capital structure, and resulting rate of return.
- Dane Watson, Partner, Alliance Consulting Group. Mr. Watson supports the depreciation and amortization rates requested by the Company for distribution and general plant assets in the Texas Gulf Divisions.
- Burl Drews, Manager of Rates. Mr. Drews sponsors the Company's current and proposed revenues and calculates maximum demand requirements and proposed billing determinants. Mr. Drews also sponsors the Company's proposed cost allocations and rate design.
- Chasta Martin, Director of Rates. Ms. Martin sponsors the Company's proposed rate schedules.
- Kathy Lloyd, Manager of Regulatory Requirements. Ms. Lloyd sponsors the consolidated PGA tariff and the SSI tariff presented by the Company.

X. REQUEST FOR APPROVAL OF PROTECTIVE ORDER

The Company's Rate Filing Package includes certain confidential and highly sensitive protected materials. In addition, the scope of discovery in this case may require the production of additional protected material. Accordingly, CenterPoint Texas attaches as Exhibit E to this Statement of Intent a proposed Protective Order and respectfully requests that the Commission issue an order approving the Protective Order. CenterPoint Texas will provide protected material to parties upon execution of a protective order certification, which is included as Exhibit A to the proposed Protective Order.

XI. AUTHORIZED REPRESENTATIVES

CenterPoint Texas' business address and telephone number are:

CenterPoint Energy
P.O. Box 2628
Houston, Texas 77252-2628
713-207-1111 (telephone)
713-207-9840 (facsimile)

CenterPoint Texas' authorized representatives are:

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Please serve all pleadings, motions, orders, and other documents filed in this proceeding upon CenterPoint Texas' authorized representatives at the above-stated addresses.

XII. RATE-CASE EXPENSES AND MOTION TO SEVER

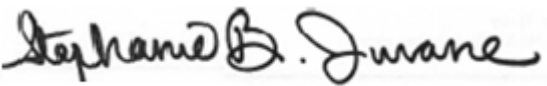
CenterPoint Texas requests recovery from affected customers of its reasonable and necessary rate-case expenses, including any reasonable and necessary municipal rate-case expenses incurred to review this rate request that are deemed reimbursable. CenterPoint Texas further requests approval of a surcharge to the final rates in order to collect its reasonable rate-case expenses. Otherwise, CenterPoint Texas requests that the Commission sever consideration

of rate-case expenses into a separate docket for determination of the amount of reasonable rate-case expenses and the method of recovery.

XIII. CONCLUSION

WHEREFORE, PREMISES CONSIDERED, CenterPoint Texas requests the Commission (1) approve the Tariffs and Rate Schedules attached as Exhibit A to this Statement of Intent, effective for bills rendered on and after December 21, 2016; (2) approve the Company's request to consolidate the existing Houston Division and Texas Coast Division into a combined Texas Gulf Division; (3) approve the prudence of capital investment made in the Texas Gulf Division through September 30, 2016; (4) approve new depreciation rates; (4) approve the Company's proposed notice and protective order; (5) approve a surcharge to recover reasonable rate-case expenses or otherwise sever consideration of rate-case expenses into a separate docket; and (6) grant the Company such further relief to which it may be entitled.

Respectfully submitted,

By 

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