

Exhibit No.:
Issue: Rate Design
Witness: Howard Solganick
Type of Exhibit: Direct Testimony
Sponsoring Party: Kansas City, Missouri
Case No.: HR-2011-0241

MISSOURI PUBLIC SERVICE COMMISSION

Case No. HR-2011-0241

**Direct Testimony
of**

Howard Solganick

On Behalf of the City of Kansas City, Missouri

September 2, 2011

NP

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the Veolia Energy Kansas City, Inc.'s) File No. HR-2011-0241
Tariffs to Increase Rates) Tracking Nos. YH-2011-0532 and 533

AFFIDAVIT OF Howard Solganick

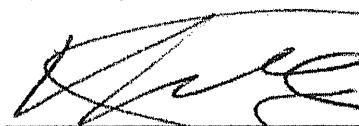
STATE OF PENNSYLVANIA)
) ss.
COUNTY OF BUCKS)

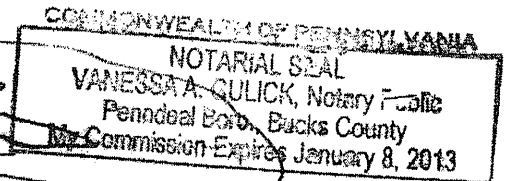
I, Howard Solganick, of lawful age, and being duly sworn, do hereby
depose and state:

1. My name is Howard Solganick. I am the Principal at Energy Tactics & Services, Inc.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.


Howard Solganick

Subscribed and sworn to before me, this 1 day of Sept., 2011


Notary Public



Qualifications

Q. **Please state your name, position and business address.**

A. My name is Howard Solganick. I am a Principal at Energy Tactics & Services, Inc. My business address is 810 Persimmon Lane, Langhorne, PA 19047. I am performing this assignment under subcontract to Blue Ridge Consulting Services, Inc.

Q. **Please summarize your qualifications and experience.**

A. I am licensed as a Professional Engineer in Pennsylvania (active) and New Jersey (inactive). I hold a Professional Planner's license (inactive) in New Jersey. I served on the Electric Power Research Institute's Planning Methods Committee and on the Edison Electric Institute Rate Research Committee. I have been appointed as an arbitrator in cases involving a pricing dispute between a municipal entity and an on-site power supplier and a commercial landlord-tenant case concerning submetering and billing. I also previously served on two New Jersey Zoning Boards of Adjustment as Chairman and member and a Pennsylvania Township Planning Commission as Chairman and member.

I have been actively engaged in the utility industry for over 35 years, holding utility management positions in generation, rates, planning, operational auditing, facilities permitting, and power procurement. I have delivered expert testimony in utility planning and operations, including rate design and cost of service, tariff administration, generation, transmission, distribution and customer service operations, load forecasting, demand side management, capacity and system planning, and regulatory issues.

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1 I have also led and/or participated in consulting projects to develop,
2 design, optimize, and implement both traditional utility operations and e-
3 commerce businesses. These projects focused on the marketing, sale
4 and delivery of retail energy, energy related products and services, and
5 support services provided to utilities and retailers.
6

7 I have been engaged by clients to review proposed distributed generation
8 contracts and the operation and integration of generating assets within
9 power pool operations, and have advised the Board of Directors of a
10 public power utility consortium. For a period of four years I was engaged
11 by a multiple site commercial real estate organization to manage its
12 solicitation for the purchase of retail energy. As a subcontractor, I have
13 performed management audits for the Connecticut Department of Public
14 Utility Control and the Public Utilities Commission of Ohio. I also provided
15 (as a subcontractor) support for the Staff and Commissioners of the
16 District of Columbia Public Service Commission for electric rate cases.
17

18 I have also been engaged to review utility performance before, during and
19 after outages resulting from major storms including Hurricane Ike.
20

21 From 1994 to the present, I have been President of Energy Tactics &
22 Services, Inc. From 1996 to 1998, I was a Managing Consultant for AT&T
23 Solutions. From 1990 to 1994, I was Vice President of Business
24 Development for Cogeneration Partners of America. In that position, I was
25 responsible for the development of independent power facilities, most of
26 which were fueled by natural gas and oil.
27

28 From 1978 to 1990, I held progressively increasing positions of
29 responsibility with Atlantic City Electric Company in generation, regulatory,
30 performance, planning, major procurement, and permitting areas.
31

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1 From 1971 to 1978, I was an Engineer or Project Engineer for Univac,
2 Soabar, Bickley Furnaces and deLaval Turbine, designing card handling
3 equipment, tagging and printing machines, high temperature industrial
4 furnaces, and utility and industrial power generation equipment,
5 respectively.

6
7 I received a Bachelor of Science in Mechanical Engineering (minor in
8 Economics) from Carnegie-Mellon University and a Master of Science in
9 Engineering Management (minor in Law) from Drexel University. I have
10 also taken courses on arbitration and mediation presented by the
11 American Arbitration Association, scenario planning presented by the
12 Electric Power Research Institute and load research presented by the
13 Association of Edison Illuminating Companies. I have also taken courses
14 in zoning and planning theory, practice and implementation in both New
15 Jersey and Pennsylvania.

16
17 **Q. Have you previously submitted testimony in regulatory proceedings?**

18
19 **A.** Yes. I have testified and/or presented testimony (summarized in Schedule
20 HS-1) before the following regulatory bodies.

- 21 • Delaware Public Service Commission
- 22 • Georgia Public Service Commission
- 23 • Jamaica (West Indies) Electricity Appeals Tribunal
- 24 • Maine Public Utilities Commission
- 25 • Maryland Public Service Commission
- 26 • Michigan Public Service Commission
- 27 • Missouri Public Service Commission
- 28 • New Jersey Board of Public Utilities
- 29 • Public Utilities Commission of Ohio
- 30 • Pennsylvania Public Utility Commission
- 31 • Public Utility Commission of Texas

Direct Testimony

Q. For whom are you appearing in this proceeding?

A. I am appearing on behalf of the City of Kansas City, Missouri (the "City").

Q. What is the purpose of your testimony?

A. My testimony analyzes various provisions of the Veolia Energy Kansas City's ("Company") tariff; the Company's use of property owned by the City; the impact of the tariff definition of Billing Demand for LCS customers; and the concept of demand response.

Based on my review of the Company's application, supporting testimony, responses to data requests and input of my fellow witnesses for the City, I make the following recommendations:

- The Commission should modify or interpret the Company's tariff to recognize the delivery arrangements that presently exist for the City's service.
- The Company's use of a two-year demand ratchet for Billing Demand is inappropriate and should be reduced to the demand level reached in the previous heating season.
- The Company should develop a demand response capability within the LCS rate schedule

Delivery Arrangements

Q. Have you reviewed the specific delivery arrangements for steam supplied by the Company?

A. I have discussed the steam delivery arrangements with Mr. Robert Rives, Manager of the Facilities Services Division for the City, and Mr. Keith Kraus, General Counsel, Talisen Technologies, Inc.

1 **Q. Are the delivery arrangements used by the Company for service to**
2 **the City unusual?**

3 A. Yes. As explained to me, on the Company's East Loop the City Hall,
4 Police Headquarters and the Municipal Court are supplied by a single
5 takeoff from the Company's steam line located in 11th Street. The flow of
6 steam in this single line is metered by a Company owned meter ("Meter
7 A") and a portion of the steam flows through a city owned steam line
8 through the City Hall basement, then through a City owned utility tunnel
9 under Locust Street and then is measured by a second meter ("Meter B").
10 This portion of the steam supplied serves the Police Headquarters and the
11 Municipal Court on the east side of Locust Street. The usage for City Hall
12 is derived by subtracting Meter B's measurements from Meter A's
13 measurements. The usage for the two remaining facilities is allocated
14 between the Police Headquarters account and the Municipal Court
15 account, which are billed on the LCS and SCS rate schedules
16 respectively.

17
18 **Q. Who owns the steam line between the City Hall and the Police**
19 **Headquarters and Municipal Court?**

20 A. The City's witness Robert Rives has informed me that the steam line
21 located within the utility tunnel under Locust Street and between the City
22 Hall and the Police Headquarters and Municipal Court is owned and
23 maintained by the City.

24
25 **Q. Who owns the utility tunnel between the City Hall and the Police**
26 **Headquarters and Municipal Court?**

27 A. The City's witness Robert Rives has informed me that the utility tunnel
28 under Locust Street and between the City Hall and the Police
29 Headquarters and Municipal Court is owned and maintained by the City.
30 Mr. Rives also indicated that the utility tunnel can and is used to allow

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1 access for personnel between the City Hall and the Police Headquarters
2 and Municipal Court.

3
4 **Q. Has the Company paid rent or other compensation for the use of the**
5 **steam line between the City Hall and the Police Headquarters and**
6 **Municipal Court?**

7 A. The City's witness Robert Rives has informed me that the Company has
8 not provided compensation for the use of the steam line under Locust
9 Street and between the City Hall and the Police Headquarters and
10 Municipal Court.

11
12 **Q. Does the Company's tariff address this situation?**

13 A. The Company's tariff PSC Mo. No. 2 states:

14 "1.1 BUILDING. A single structure which is unified in its entirety,
15 both physically and in operation. Separate structures on the same
16 tract of land, or separate structures on adjoining tracts of land (even
17 though separated by a public or private way), may be considered
18 as a building if such separate structures are physically joined by an
19 enclosed and unobstructed passageway, at, below or above ground
20 level and both are occupied and used by the Customer for a single
21 business enterprise."

22
23 The City's complex on the Company's East Loop is composed of separate
24 structures (City Hall, Police Headquarters and Municipal Court) on
25 adjoining tracts of land that are physically connected by the City owned
26 utility tunnel and are occupied by the City for its purpose of providing
27 municipal services to the citizens of Kansas City and the general public.

28
29 "1.5 CUSTOMER'S INSTALLATION All pipes, appliances and
30 apparatuses of every kind and nature on the Customer's premises
31 on the Customer's side of the Point of Delivery (except the

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1 Company's pressure reducing station, meter installation and other
2 equipment installed and maintained by the Company) used or
3 useful to the Customer in connection with the receipt and utilization
4 of steam service supplied by the Company."

5
6 The above definition encompasses the City's steam tunnel and the steam
7 pipe located within that tunnel connecting City Hall and the Police
8 Headquarters and Municipal Court.

9
10 "1.0 POINT OF DELIVERY The point at which the Company's
11 equipment and piping system connects with the Customers' steam
12 infrastructure, unless otherwise specified in the Customer's service
13 agreement."

14
15 The above definition indicates that the Point of Delivery is located nearby
16 or within the City Hall.

17
18 **Q. What is the significance of the above discussion to the City?**

19 A. As detailed by the City's witnesses Rives and Kraus, the City has
20 requested that the Company provide the City with the opportunity to be
21 billed as a single entity for all consumption served through City Hall and
22 the City owned steam piping. To date the Company has not responded to
23 this request. As of August 12, 2011 the Company indicated in its Highly
24 Confidential response to Data Request No. City of KC-1-2 that:

25 **
26
27
28
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**

Q. Is the Company's concern about revenue loss understandable?

A. The Company's loss of revenue is actually revenue taken from the City and citizens that are entitled to a single point of billing because there is a clear Point of Delivery and the City owned steam line and utility tunnel are a Customer Installation.

I recognize that the Company will have to adjust its billing determinants for the Test Year if the City chooses to designate its steam service(s) as one "building". I would recommend that the City not object to the Company changing its billing determinants when it makes its tariff compliance filing at the conclusion of this case.

Rate Design

Q. What is decoupling?

A. Decoupling is the term used to define a rate design that is designed to disconnect a utility's earnings or revenue from sales of energy or commodity. Decoupled rates can be designed to eliminate or reduce a utility's disincentive to encourage energy conservation, impacts of the business cycle and/or the effects of weather.

Q. Have you reviewed specific decoupled rate design proposals?

A. I have reviewed proposals for decoupled electric and gas rate designs in Delaware for the Staff of the Delaware Public Service Commission, provided testimony in three decoupling proceeding and I also assisted in a public workshop focusing on decoupling on August 29, 2011. I have reviewed decoupling proposals by gas utilities and offered testimony in Maryland for the People's Counsel and in Michigan for the Attorney General. I assisted the Staff of the District of Columbia Public Service

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Commission in the evaluation and implementation of a decoupled rate design for electricity. I am presently reviewing a decoupling proposal for electricity in Arizona for the Staff of the Arizona Corporation Commission.

Q. Does the Company's LCS rate schedule include a provision that provides some facets of decoupling?

A. The LCS rate schedule includes a demand ratchet provision that encompasses the maximum demand of steam for the two previous heating seasons.

"Billing Demand: For the purposes of calculating Demand Charges, the term "Billing Demand" for existing Customers means the Customer's highest hourly peak consumption of steam in any 60-minute interval in the two immediately preceding, completed December 1 - March 1 time frames."¹

In the case of the LCS rate schedule this two-year demand ratchet effectively stabilizes a significant portion (over ** ^{**2}) of the Company's revenue for this class for a two-year period. I note that this provision is not included in the Company's other demand based rate schedule IHS.

Q. When a decoupling proposal is accepted by a regulatory commission is there a compensating benefit to customers?

A. In most cases when decoupling is implemented customers see at least two benefits. The utility's return on equity is reduced by 0 to 50 basis points to reflect the reduced business risk that is the result of a more stable revenue stream to the utility. The second benefit that commonly precedes or occurs simultaneously with a decoupling proposal is an

¹ Company Tariff P.S.C. Mo. No. 1 1st Revised SHEET No. 9

² HIGHLY CONFIDENTIAL **

1 aggressive utility sponsored or supported energy efficiency program to
2 assist customers within the rate class to reduce their energy consumption
3 and energy costs.
4

5 **Q. Has the Company proposed an energy efficiency or conservation**
6 **program?**

7 A. The City's witness Keith Kraus has informed me that besides not offering
8 an aggressive energy efficiency or conservation program to the City, the
9 two year ratchet for the steam demand charge acts as a large impediment
10 for the City to implement energy conservation measures that would reduce
11 costs for the residents of the City by delaying the majority of the saving by
12 two heating seasons.
13

14 **Q. Does the Company's cost of capital witness Stephen Hill analyze the**
15 **stability of the Company's revenue stream?**

16 A. I could not find any analysis of revenue or earning stability or decoupling
17 and there is no reduction in the cost of equity proposed for the implicit
18 revenue stability of the LCS class due to the two heating season ratchet.
19

20 **Q. Does the Company recognize the inherent stability of the LCS rate**
21 **schedule's demand ratchet?**

22 A. The Company indicated in its Highly Confidential response to Data
23 request No. City of KC-1-5 that:
24

25 **
26
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31

**

It should be noted that while the Company thinks that provision **

** it serves to raise costs

for those customers. The variability of weather under the present LCS rate schedule provides a “heads the Company wins, tails the customers lose” environment. If the weather is colder than normal in either of the two heating seasons the present two-season ratchet imposes a two-year cost penalty on a customer for one cold winter. If the weather is warmer than normal then the present two-season ratchet eliminates a reduction in demand charges for the customer for an additional year.

Q. Do you recommend a reduction in the return on equity to recognize the stability inherent in the LCS rate schedule?

A. Recommending a reduction in return on equity is beyond the scope of my testimony in this proceeding.

Q. If a reduction in the return on equity is determined to be appropriate to recognize the stability of the LSC rate schedule should it apply to all customers?

A. The reduction in the return on equity should apply only to the LCS class. In Maryland this precise issue arose and I suggested that the ratebase for the class be used to calculate and apply a dollar value reduction for that class.

1 **Q. If the demand ratchet for the LCS class was changed to only the**
2 **previous heating season would that impact the Company's LCS rate**
3 **design in this case?**

4 A. The change to a single season ratchet would require the Company to
5 refine its going forward billing determinants for LCS peak demand that
6 would be used to produce compliance rates.

7
8 **Q. What do you recommend for a peak demand ratchet for the LCS**
9 **class?**

10 A. I recommend that the Billing Demand for the LCS rate schedule be set
11 using the previous time frame's (heating season's) peak demand to
12 provide a level of revenue stability for the Company. This would serve to
13 balance the needs of the Company and its customers.

14
15 **Q. Are there any operating detriments that arise from a two-season**
16 **ratchet?**

17 A. Any inadvertent action that increases consumption (even for one single
18 hour) may result in the setting of new and more costly Billing Demand for
19 the next two years. For example, a failure in the Customer's Installation
20 that caused an unusual and not expected to be repeated spike in steam
21 consumption could set a peak demand reading and penalize the customer
22 for the next two years without requiring the Company to plan for or add
23 facilities to meet this unusual spike.

24
25 **Q. What do you suggest to protect LCS customers from inadvertent**
26 **demand peaks?**

27 A. I suggest that the Company tariff include language to reflect a
28 collaborative effort by the Company and its customer to review demand
29 peaks to determine if they are reasonable and representative for the
30 customer's operation. This tariff language would be appropriate even if
31 there were no demand ratchet.

1

2 **Interruptible Service**

3 **Q. Does the Company offer the equivalent of interruptible service for its**
4 **customers?**

5 A. The Company offers the IHS rate for customers that can demonstrate the
6 capability to provide heat from another source under the customer's
7 control.

8

9 **Q. What is demand response?**

10 A. Demand response is the reaction of a customer (or group of customers) to
11 the utility's need to control its load by reducing consumption during high
12 load or emergency periods. Demand response is sometimes achieved by
13 operating on-site generators to reduce electrical consumption or shifting to
14 propane-air mixtures to reduce natural gas consumption. However,
15 another form of demand response is a customer's reaction to price or
16 emergency conditions by reducing or curtailing consumption.

17

18 **Q. What is FERC Order 745?**

19 A. Unrelated to this case, FERC Order 745 was issued on March 15, 2011
20 and requires actions by independent system operators ("ISO"). The FERC
21 Order defined the value of demand response as the marginal price when a
22 net benefits test is met. In this emerging area demand response has been
23 clearly recognized as a resource within an energy system.

24

25 **Q. Should the Company offer a demand response rate?**

26 A. The Company's IHS rate demonstrates that the Company can operate
27 within a demand response concept, however the tariff requires an auxiliary
28 source of heat rather than a response by the customer. The Company
29 should offer a rate provision for LCS customers that recognizes the value
30 of demand response.

31

1 **Q. How could a demand response rate be constructed for LCS**
2 **customers?**

3 A. A customer could designate a portion of its steam load as interruptible and
4 be subject to a rate structure similar to the IHS rate instead of the LCS
5 rate. Because this concept is new to both the Company and customers, I
6 suggest that certain limitations would apply:

- 7 • No more than 20% of the existing LCS customer load could be
8 designated as interruptible.
- 9 • While a specific area or customer function should not have to be
10 designated for interruption, the customer would have to describe
11 what actions would be taken to produce the demand response.
- 12 • Specific communication procedures between the Company and the
13 customer would be needed to provide the requested demand
14 response within the time period requested.
- 15 • The customer's metering must have real time demand capability to
16 allow the Company to verify the customer's demand response.
- 17 • Failure to provide the requested demand response during a month
18 would shift the portion of demand response that was not provided
19 back to the LCS rate.
- 20 • Failure to provide the requested demand response during two
21 months would lead to a cancelation (upon adequate notice) of the
22 customer's demand response provision.

23
24 **Q. Does this conclude your testimony?**

25 A. Yes.

Testimony - Howard Solganick

Public Service Commission of Delaware

Case - Delmarva Power & Light Company Docket No. 10-237 (October 2010)

Client - Staff of the Delaware Public Service Commission

Scope - Testimony covered cost of service, revenue allocation, rate design and other related issues including revenue stabilization and miscellaneous charges.

Case - Delmarva Power & Light Company Docket No. 09-414 (February 2010)

Client - Staff of the Delaware Public Service Commission

Scope - Testimony covered cost of service, revenue allocation, rate design and other related issues including revenue stabilization and weather normalization.

Case - Delmarva Power & Light Company Docket No. 09-277T (November 2009)

Client - Staff of the Delaware Public Service Commission

Scope - Testimony covered an analysis of a straight fixed variable rate design for small gas customers and implementation issues.

Case - Delmarva Power & Light Company Docket No. 06-284 (January 2007)

Client - Staff of the Delaware Public Service Commission

Scope - Testimony covered cost of service, revenue allocation, rate design and other related issues including revenue stabilization or normalization.

Georgia Public Service Commission

Case – Atlanta Gas Light Company Docket No. 31647 (August 2010)

Client – Public Interest Advocacy Staff of the Georgia Public Service Commission

Scope - Testimony covered revenue forecast, cost of service, revenue allocation, rate design and other related issues.

Case – Atmos Energy Corporation Docket No. 27163 (July 2008)

Client – Public Interest Advocacy Staff of the Georgia Public Service Commission

Scope - Testimony covered rate design and other related issues.

Jamaica (West Indies) Office of Utility Regulation

Case - Electricity Appeals Tribunal (August 2007)

Client - Jamaica public Service Company, Ltd.

Scope - “Witness Statement” on behalf of the Jamaica Public Service Company Limited. This Statement covered issues relating to recovery of expenses incurred due to Hurricane Ivan.

Maine Public Utilities Commission

Case - Northern Utilities, Accelerated Cast Iron Replacement Program Docket No. 2005-813 (2005)

Client - Public Advocate of the State of Maine

Scope - Testimony covered an analysis of the program's economics and implementation.

Public Service Commission of Maryland

Case - Chesapeake Utilities Corporation Case No. 9062 (August 2006)

Client - Office of the Maryland People's Counsel

Scope - Testimony covered cost of service, rate design and other related issues.

Case - Baltimore Gas & Electric's (1993)

Client - As president of the Mid Atlantic Independent Power Producers

Scope - Testimony covered BG&E's capacity procurement plans.

Michigan Public Service Commission

Case - Consumers Energy Company Case No. U-15245 (November 2007)

Client - Attorney General Michael A. Cox (Don Erickson, Esq.)

Scope - Testimony covered cost of service, rate design and revenue allocation.

Case - Consumers Energy Company Case No. U-15190 (July 2007)

Client - Attorney General Michael A. Cox (Don Erickson, Esq.)

Scope - Testimony covered issues related to Consumers Energy's gas revenue decoupling proposal.

Case - Consumers Energy Company Case No. U-15001 (June 2007)

Client - Attorney General Michael A. Cox (Don Erickson, Esq.)

Scope - Testimony covered issues related to Consumers Energy and the MCV Partnership.

Case - Consumers Energy Company Case No. U-14981 (September 2006)

Client - Attorney General Michael A. Cox (Don Erickson, Esq.)

Scope - Testimony covered issues relating to the sale of Consumers interest in the Midland Cogeneration Venture.

Case - Consumers Energy Company Case No. U-14347 (June 2005)

Client - Attorney General Michael A. Cox (Don Erickson, Esq.)

Scope – Testimony covered cost of service and revenue allocation.

Missouri Public Service Commission

Case – AmerenUE Storm Adequacy Review (July 2008)

Client – KEMA/AmerenUE

Scope – Oral testimony covered KEMA's review of AmerenUE's system major storm restoration efforts.

New Jersey Board of Public Utilities

Case - Cogeneration and Alternate Energy Docket # 8010-687 (1981)

Case - PURPA Rate Design and Lifeline Docket # 8010-687 (1981)

Case - Atlantic Electric Rate Case - Phases I & II Docket # 822-116 (1982)

Case - Power Supply Contract Litigation – Wilmington Thermal Systems Docket # 2755-89 (1989)

Case - NJBPU Atlantic Electric Rate Case - Phase II (1980-81) Docket # 7911-951 (Before the Commissioners of the New Jersey Board of Public Utilities)

Client - Employer was Atlantic City Electric Company.

Scope - The cases listed above covered load forecasting, capacity planning, load research, cost of service, rate design and power procurement.

Public Utilities Commission of Ohio

Case - The Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company Case 07-551-EL-AIR (January 2008)

Client - Ohio Schools Council

Scope - Testimony covers issues related to rate treatment of schools.

Case - The Application of the Columbus Southern Power Company 08-917-EL-SSO and the Ohio Power Company Case 08-918-EL-SSO (October 2008)

Client - Ohio Hospital Association

Scope - Testimony covers issues related to rates for net metering and alternate feed service and related treatment of hospitals.

Pennsylvania Public Utilities Commission

Case - York Water Company Docket No. R-00061322 (July 2006)

Client - Pennsylvania Office of Consumer Advocate

Subject - Testimony covered cost of service, rate design and other related issues, also supported the settlement process.

Case – Pennsylvania- American Water Company Docket No. R-2008-232689 (August 2010)

Client – Municipal Sewer Group

Subject - Testimony covered capacity planning, construction, treatment of future load and associated revenue, cost of service, rate design, capacity fee and other related issues.

Case – Pennsylvania- American Water Company Docket No. R-2008-232689
(August 2008)

Client – Municipal Sewer Group

Subject - Testimony covered cost of service, rate design, capacity fee and other related issues, also supported the settlement process.

Public Utilities Commission of Texas

Case – Determination of Hurricane Restoration Costs Docket No. 36918 (April 2009)

Client – CenterPoint Energy Houston Electric, LLC

Subject – Testimony covered the reasonableness of the client's Hurricane Ike restoration process for an outage covering over two million customers and a restoration period of 18 days.