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SOAH DOCKET NO. 473-02-34-73
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PUBLIC UTILITY COMMISSION
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JOINT APPLICATION OF TEXAS	§	
GENCO, LP AND CENTERPOINT	§	PUBLIC UTILITY COMMISSION
ENERGY HOUSTON ELECTRIC, LLC	§	
TO RECONCILE ELIGIBLE FUEL	§	OF TEXAS
REVENUES AND EXPENSES	§	
PURSUANT TO SUBST. R. 25.236	§	

**CITY OF HOUSTON'S FIFTEENTH REQUEST FOR INFORMATION
TO TEXAS GENCO, LP AND CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Pursuant to Sections 22.141-145 of the Procedural Rules of the Public Utility Commission of Texas, Intervenor, the City of Houston, Texas ("City of Houston"), requests that Texas Genco, LP and CenterPoint Energy Houston Electric, LLC ("CenterPoint"), by and through its attorney of record, provide the following information within the time limit provided by the Presiding Officer or within twenty (20) days of receipt thereof, if the Presiding Officer has not provided a time limit. It is further requested that the answers to the request 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 you, such changed answer should be submitted immediately as a supplement to your original answer.

DEFINITIONS AND EXPLANATORY NOTES

1. When the request calls for the identification of a "person or witness," the identification shall include a full name, business address and business telephone number. The identification should also include a job title and name of employer.
2. The terms "document" and "documents" are used in their 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 (including matter used in data processing) 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 punch cards, paper or magnetic tapes, drums, disks or core 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 the identification of a "document," 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 in connection with the subjects referred to in this proceeding.

Respectfully submitted,

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By: Michelle R. Moore by permission to
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**ATTORNEYS FOR CITY OF HOUSTON,
TEXAS**

CERTIFICATE OF SERVICE

PUC Docket No. 26195

SOAH Docket No. 473-02-3743

I hereby certify that on October 17, 2002, a true and correct copy of the foregoing document was served upon on all parties of record by facsimile and/or First-Class Mail United States mail, postage paid.

Michelle R. Moore by permission to
Michelle R. Moore

**CITY OF HOUSTON'S FIFTEENTH REQUEST FOR INFORMATION
TO TEXAS GENCO, LP AND CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Generation

- COH 15-1 When did Texas Genco initiate RCM? When did Texas Genco become aware of RCM?
- COH 15-2 Has Reliant Energy Renewables developed, constructed, owned or managed any renewable power generation holdings during the reconciliation period? Did CenterPoint purchase power from these holdings during the Reconciliation Period?

ERCOT

- COH 15-3 Why are mismatched schedule fees and uninstructed resource charges "ISO fees related to planned and unplanned transmission service" and/or "payments to parties related to unplanned transmission service"? What planned or unplanned transmission service caused these charges?
- COH 15-4 Why were mismatched schedule fees and uninstructed resource charges originally included in the Protocols? What purpose do they serve?

General

- COH 15-5 In Docket 23833, Reliant Energy HL&P, requested a surcharge of under-collected fuel costs from TNMP. Please provide any and all documents related to this request, any correspondence between the parties, and any agreements made between TNMP and Reliant.
- COH 15-6 Please refer to COH 8-19, why didn't Reliant Energy's QSE schedule the correct amount of load?
- COH 15-7 Reference COH 10-1, do any of the fees discussed in the response flow through reconcilable fuel costs to consumers?
- COH 15-8 Has CenterPoint Renewables developed, constructed, owned or managed any renewable power generation holdings during the reconciliation period? Did CenterPoint purchase power from these holdings during the Reconciliation Period?

- COH 15-9 Please reconcile the differences between the over/under ending balance provided in response to final order November 14, 2001 in Docket No. 23098 and the over/under ending balance provided in this docket.
- COH 15-10 Please refer to COH 10-4, did CenterPoint use the south zone market prices as a surrogate for avoided cost?
- COH 15-11 Do CenterPoint employees keep the minutes of ERCOT meetings that are provided after the meeting by ERCOT?
- COH 15-12 Who is CenterPoint or affiliated company's member representative to the ERCOT Board, Technical Advisory Committee, Wholesale Market Subcommittee, Retail Market Subcommittee, Reliability and Operations Subcommittee?
- COH 15-13 Who was CenterPoint or affiliated company's member representative on the ERCOT Retail User Group and Special Task Force?

STP

- COH 15-14 Why were upgrades to the air operated valves added to the scope of work in 2RE08?