



Control Number: 26195



Item Number: 79

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**SOAH DOCKET NO. 473-02-3473  
PUC DOCKET NO. 26195**

**APPLICATION OF RELIANT ENERGY, INC. TO RECONCILE ELIGIBLE FUEL REVENUES AND EXPENSES HEARINGS**      §      **BEFORE THE STATE OFFICE**  
§  
§      **OF ADMINISTRATIVE**

**OFFICE OF PUBLIC UTILITY COUNSEL'S  
SIXTH REQUEST FOR INFORMATION TO RELIANT ENERGY, INC.**

RECEIVED  
AUG 27 AM 9:05  
FILED  
CLERK

COMES NOW, the Office of Public Utility Counsel ("OPC"), and files this, its Sixth Request for Information to Reliant Energy, Inc. ("Reliant") in the captioned proceeding.

Under Commission Procedural Rules 22.141-.145, 16 Tex. Admin. Code Ch. 22, OPC requests that Reliant, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the questions.

**Definitions**

As used in this introduction and in these questions,

- (1) "Reliant", the "Company", and "Applicant" refer to Reliant Energy, Inc. and its affiliates;
- (2) "You", "yours" and "your" refer to Reliant Energy, Inc. (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
- (3) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records,

photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.

Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.

If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.

If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

### **Claim of Privilege**

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

### **Questions**

**The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.**

**If any question appears confusing, please request clarification from the undersigned counsel.**

**In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.**

**As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.**

**Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.**

**These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.**

**If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.**

**If the response to any question is voluminous, please provide separately an index to the materials contained in the response.**

**If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.**

**To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.**

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Data Request Related to the Testimony of:

Charlene Thomas

- 6-1. In reference to the Ancillary Services revenues discussed on page 7, please provide detail showing revenue booked and sales (in units, such as mWh) for each month and category of ancillary services the reconciliation period.
- 6-2. In reference to the Kerr McGee contract costs referenced on page 11, please provide a copy of the pertinent sections of the Reliant's testimony concerning the treatment of these costs in either the ECOM (Rate Unbundling) proceeding or the Regulatory Asset (Securitization) proceeding recently completed by HL&P/Reliant.
- 6-3. Explain why the Kerr McGee contract deferral costs were not treated as a regulatory asset for Securitization purposes.

Balcom Testimony

- 6-4. Are any costs related to the D&D fees referenced on page 14 of Balcom's testimony included in EFE? If so, provide authority for its inclusion, and the monthly amounts.
- 6-5. If the answer to the preceding question is yes, explain whether the entire amount of the DOE assessment was included in EFE, or whether a portion of the total HLP share of the assessment was included. (In other words, has HL&P included all of the D&D fee in this reconciliation period, or has some of it been assigned to past or future periods.) Explain.
- 6-6. In reference to the STP outage listed on RLB-4, which one was due to a personnel error (page 23, line 7). Explain why, and provide supporting documentation concerning the cause and result of this outage.
- 6-7. In reference to the STP outage caused by a personnel error (page 23, line 7) what was the cost of replacement power during that outage? Provide supporting documents.

Chandler Testimony

- 6-8. How much cost and revenue related to the GSI (referenced on page 18 of Chandler's testimony) is included is in EFE? Provide authority for GSI inclusion, and the monthly amounts.
- 6-9. Quantify the equity return or profit margin for the Channelview purchases referenced on page 19 of Chandler's testimony) is included is in EFE?

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- 6-10. In reference the "Reconcilable costs" from the Reliant QSE referenced on page 10, identify the amounts of those costs, provide detail as to type of these costs and explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-11. Provide support for the statement on page 12, lines 1-4.
- 6-12. In reference to balancing fees and the inadvertent energy flows referenced on page 12, lines 1-4, identify the amounts of those costs, provide detail as to type of these costs and explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-13. In reference to ancillary services referenced on page 12, lines 15-18, identify the amounts of those costs if any included in EFE. Explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-14. In reference to BENA fees referenced on page 14, line 19, identify the amounts of those costs, if any, included in EFE. Explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-15. In reference to Resource Imbalance fees and payments referenced on page 20, lines 9-12, identify the amounts of those costs if any included in EFE. Explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-16. In reference to ERCOT QSE and SCF fees referenced on page 17, identify the amounts of those costs, if any, included in EFE. Explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-17. In reference to Uninstructed Resource Charge referenced on page 20, identify the amounts of those costs, if any, included in EFE. Explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-18. In reference to Congestion Collection Charges referenced on page 22, identify the amounts of those costs, if any, included in EFE. Explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-19. In reference to ERCOT OOME and OOMC fees referenced on page 22, identify the amounts of those costs, if any, included in EFE. Explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)

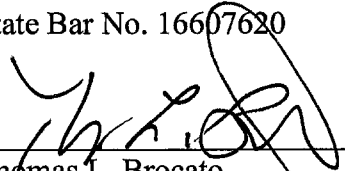
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- 6-20. In reference to Replacement Reserve uplift fees referenced on page 23, identify the amounts of those costs, if any, included in EFE. Explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-21. In reference to RMR fees referenced on page 23, identify the amounts of those costs, if any, included in EFE. Explain the basis for the assumption that these may be included in EFE. (Provide monthly data.)
- 6-22. For each of the ERCOT Charges or Payments listed on AP-1, explain the basis or authority for inclusion or exclusion from EFE. For all costs assumed to be part of EFE, provide a monthly breakdown of the cost included in the reconciliation period for each specific category listed.

Dated: August 27, 2002

Respectfully submitted,

Suzi Ray McClellan  
Public Counsel  
State Bar No. 16607620

  
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Thomas L. Brocato  
Assistant Public Counsel  
State Bar No. 03039030

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**CERTIFICATE OF SERVICE**

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I certify that today, August 27, 2002, I served a true copy of the foregoing Office of Public Utility Counsel's Sixth Request for Information To Reliant on all parties of record via United States First-Class Mail, hand-delivery or facsimile.

  
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Thomas L. Brocato