



Control Number: 28980



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**Rebecca Klein**  
Chairman

**Julie Parsley**  
Commissioner

**Paul Hudson**  
Commissioner

**W. Lane Lanford**  
Executive Director



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## *Public Utility Commission of Texas*

December 22, 2003

**VIA FACSIMILE (713) 497-9595**

Julie Unruh, Manager  
Regulatory Planning & Analysis  
Reliant Resources, Inc.  
P. O. Box 3765  
Houston, Texas 77253

**VIA FACSIMILE (713) 497-0116**

Jonathan L. Heller  
Senior Counsel  
Reliant Resources, Inc.  
P. O. Box 1384  
Houston, Texas 77251

RE: Docket No. 28980, Application of CenterPoint Energy Houston Electric, LLC  
for Finding that 40% Threshold under PURA §39.202(E) has been met for  
Small Commercial Customers

Dear Ms. Unruh and Mr. Heller.

Please be advised that Darrin Pfannenstiel will be out of the office until January 5, 2004. I will be attending the proceedings in this matter next week in his stead.

Enclosed is Staff's First Set of Requests for Information to Reliant. Staff will most likely require the attendance of the witness(es) sponsoring the responses to the requests at the technical conference and the hearing next week. Please advise me whether you will make the witness(es) available. It is my understanding that under the agreement in this proceeding your responses will be provided tomorrow, December 23.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Rosa L. Rohr".

Rosa L. Rohr  
Staff Attorney  
512/936-7275

cc: All Parties of Record



**DOCKET NO. 28980**

**APPLICATION OF CENTERPOINT § PUBLIC UTILITY COMMISSION**  
**ENERGY HOUSTON ELECTRIC, LLC §**  
**FOR FINDING THAT 40% THRESHOLD §**  
**UNDER PUA §39.202(e) HAS BEEN MET §**  
**FOR SMALL COMMERCIAL §**  
**CUSTOMERS § OF TEXAS**

**STAFF'S FIRST REQUEST FOR INFORMATION TO  
RELIANT ENERGY RETAIL SERVICES, LLC**

The Commission Staff ("Staff") of the Public Utility Commission of Texas ("Commission") requests that Reliant Energy Retail Services, LLC ("RERS") provide the following information and answer the following question(s) under oath. The question(s) are to be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer. These question(s) are continuing in nature, and if there is a relevant change in circumstances, you are to submit an amended answer, under oath, as a supplement to your original answer.

Please copy the question immediately above the answer to each question. Please also state the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

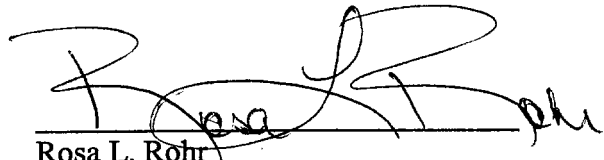
Provide an original and ten copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

**DATED: DECEMBER 22, 2003**

Respectfully submitted,

Thomas S. Hunter  
Division Director  
Legal and Enforcement Division

Keith Rogas  
Director – Legal and Enforcement Division,  
Electric Section

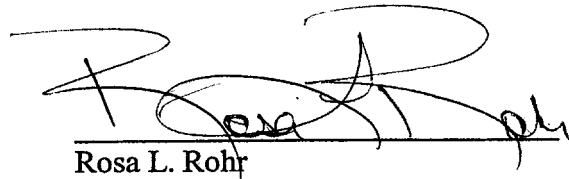
A handwritten signature in black ink, appearing to read 'Rosa L. Rohr', written over a horizontal line.

Rosa L. Rohr  
Attorney – Legal & Enforcement Division  
Electric Section  
State Bar No. 24030187  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P. O. Box 13326  
Austin, Texas 78711-3326  
512/936-7275  
512/936-7268 fax

**PUC DOCKET NOS. 28980**

**CERTIFICATE OF SERVICE**

I, Rosa L. Rohr, Staff Attorney, certify that a copy of this document was served on all parties of record in these proceedings on December 22, 2003 via facsimile.

A handwritten signature in black ink, appearing to read 'Rosa L. Rohr', written over a horizontal line.

## INSTRUCTIONS

### DEFINITION OF THE WORD "DOCUMENT"

"Document" includes any written, recorded or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.

In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document.

In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

## **DOCKET NO 28980**

### **STAFF'S FIRST REQUEST FOR INFORMATION TO RELIANT ENERGY RETAIL SERVICES, LLC**

- 1-1** Please identify the date when the General Land Office signed the first contract with its first end-use customer under the GLO State Power Program.
- 1-2** Did the General Land Office contracts in 2000 with end use customers provide that the effective date of the contract would be the date that power first flowed to that end use customer?
- 1-3** Did the General Land Office deliver power to any of its end user customers during the year 2000? If so, when did power first flow?
- 1-4** If the answer to 1-3 is "yes," did CenterPoint/Reliant include in the small commercial target as described in P.U.C. SUBST. R. 25.41(i)(1)(B), kWh amounts associated with end user customers with which the General Land Office had signed contracts but had not yet delivered power under those contracts?
- 1-5** When did the General Land Office enter into its Energy Supply and Services Agreement with Reliant Energy Solutions? Please identify the dates of any subsequent amendments to that Agreement.
- 1-6** Please identify the date when the General Land Office became financially responsible for payment to Reliant Energy Solutions for services provided to the General Land Office's end user customers.