

Control Number: 28980



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PUC DOCKET NO. 28980

**PETITION OF CENTERPOINT ENERGY §
HOUSTON ELECTRIC, LLC FOR §
FINDING THAT THE 40% THRESHOLD §
UNDER PURA § 39.202(E) HAS BEEN §
MET FOR SMALL COMMERCIAL §
CUSTOMERS §**

PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS

2003 DEC 16 AM 11:13

**Contact: Julie Unruh
(713) 497-5973**

Date: December 16, 2003

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AFFIDAVIT

STATE OF TEXAS §

COUNTY OF HARRIS §

1. My name is Derek Mauzy. I am Director, Retail Market Analysis, of Reliant Energy Retail Services, LLC.
2. I swear or affirm that I have personal knowledge of the facts stated in this, my Affidavit, that I am competent to testify to them, and that I have the authority to make this Affidavit on behalf of Reliant Energy Retail Services ("RERS"). I further swear or affirm that all of the statements and/or representations made in this Affidavit are true, complete, and correct.
3. RERS is a retail electric provider in the State of Texas serving retail customers pursuant to Certificate No. 10007. For purposes of this filing, and pursuant to the Commission's Order in Docket No. 21956, Reliant Energy, Incorporated Business Separation Plan Filing Package, (approved on 3/15/01), RERS is considered the affiliated REP of CenterPoint Energy Houston Electric, LLC ("CNP").
4. For each group of aggregated customers that has been removed from the calculation of the threshold target, the customers' names, electric service identifiers ("ESI IDs"), size of the customers' loads (individually and in the aggregate), and how those customers meet the requirements of P.U.C. Subst. R. 25.41(h)(3) are contained in Exhibit DMM-1, a confidential document submitted under seal with this pleading.
5. In some instances, the sum of the demands for ESI IDs in the CNP area for a given aggregation group is less than 1,111 kVA, although the total demand in the aggregation group exceeds 1,111 kVA, because some of the ESI IDs in the aggregation group are in other transmission and distribution service providers' service areas, or because ongoing revenue activity in CNP's billing system precluded obtaining load history at the time of this analysis. For those aggregation groups, I have provided demand information for ESI IDs that are in the aggregation group but that were not included in CNP's analysis. Information for both the CNP-area ESI IDs and the supplemental ESI IDs is included in Exhibit DMM-1. While Exhibit DMM-1 contains demand data for ESI IDs inside and outside the CNP area in order to demonstrate that each aggregation group exceeds 1,111 Kva, the exhibit contains no kWh for any ESI ID that was disqualified from the CNP analysis, such as an ESI ID outside the CNP area. KVA and kWh information for each aggregation group is summarized in Exhibit DMM-2, a confidential document submitted under seal with this pleading.

6. Certain RERS customers within the CNP service territory are being served under signed contracts with RERS as of October 24, 2003 that allow those customers to aggregate their consumption into amounts that exceed 1,111 kVA, thereby making those customers eligible to be offered a price other than price to beat pursuant to P.U.C. Subst. R. 25.41(h)(3). Service to these customers began in the month of November. The aggregated load served by the affiliated REP that complies with the requirements of P.U.C. Subst. R. 25.41(h)(3) is subtracted from the calendar year 2000 base pursuant to subsection P.U.C. Subst. R. 25.41(i)(1)(B). The total consumption for these customers is illustrated in Exhibit DMM-3, a confidential document submitted under seal with this pleading. Because these customers' consumption is allowed to be excluded from the threshold calculation pursuant to P.U.C. Subst. R. 25.41(i)(1)(B), combining this consumption with the product of CNP's 40% threshold calculation results in an additional 1.3% of the target, for a total of 112.9% of the target.
7. The General Land Office ("GLO") serves retail customers throughout the state, including CNP's service territory. GLO ESI IDs contain a Reliant Energy Solutions or RERS DUNS number in the service record at ERCOT and in CNP's records. This approach to completing the "REP of record" field in the service history was agreed to by RERS, the GLO and ERCOT as an easy and quick way to handle the GLO ESI IDs when the retail market was initially established. The GLO is providing an affidavit in this docket identifying its customers. To provide independent verification that the list of GLO ESI IDs supplied to CNP and ERCOT by RERS was accurate, the auditing firm of Mann, Frankfort, Stein & Lipp was retained by RERS and GLO. Mann, Frankfort, Stein & Lipp confirmed that each ESI ID referenced in the GLO's affidavit was present in a GLO customer contract.

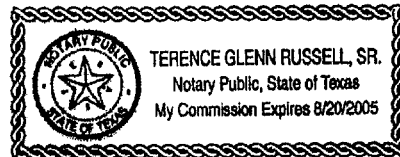
Derek Mauzy

Signature of Derek Mauzy
Director, Retail Market Analysis
Reliant Energy Retail Services, LLC

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 16th day of December, 2003.

Terence Glenn Russell Sr.
Notary Public in and for the State of Texas

My Commission Expires: 8/20/2005



Revised Threshold Target Calculation - Including Aggregations Signed by 10/24/03, Effective 1st Meter Read After 11/1/03

As filed in Purdue Affidavit	Incremental Aggregations Signed by 10/24/03, Effective 1st Meter Read After 11/1/03	
Year 2000 kWh Col A	Additional Aggregations Col B	Revised Year 2000 kWh Col C
19,690,521,290		19,690,521,290
(2,518,581,834)	(182,962,263)	(2,701,544,097)
<u>17,171,939,456</u>		16,988,977,193
6,868,775,782		6,795,590,877
(438,937,209)		(438,937,209)
<u>6,429,838,573</u>		6,356,653,668
7,175,301,248		7,175,301,248
111.6%		112.9%

Small Commercial

Year 2000 Usage for PTB Qualified Accounts

Minus kWh of Aggregated Customers @ Price Other than Price to Beat

Equals Market Adjusted for Aggregation

Times 40%

Minus Customers no longer eligible for PTB

Equals Threshold Target

Small commercial consumptions served by nonaffiliated REPs

October 2003 Achievement Level

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding by hand delivery, courier, overnight delivery, certified mail (return receipt requested), registered mail, facsimile, electronic mail, or United States first class mail on this 16th day of December, 2003.

Melma S Cisneros