



Control Number: 29526



Item Number: 1196

Addendum StartPage: 0

**SOAH DOCKET NO. 473-04-5555
PUC DOCKET NO. 29526**

RECEIVED

2004 MAY 28 AM 10:42

PUBLIC UTILITY COMMISSION
FILING CLERK

**APPLICATION OF CENTERPOINT
ENERGY HOUSTON ELECTRIC LLC,
TEXAS GENCO LP AND RELIANT
ENERGY RETAIL SERVICES, LLC TO
DETERMINE STRANDED COSTS AND
OTHER BALANCES PURSUANT TO
PURA § 39.262**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

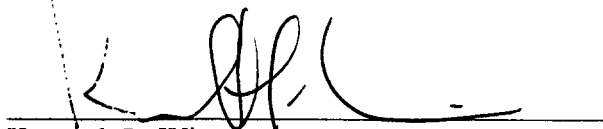
**HOUSTON COUNCIL FOR HEALTH AND EDUCATION'S
TWELFTH SET OF REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC,
RELIANT ENERGY RETAIL SERVICES, LLC, AND TEXAS GENCO, LP**

Pursuant to Section 22.14 of the Commission's Procedural Rules and Order No. 1 in this proceeding, the Houston Council for Health and Education ("HCHE") requests that CenterPoint Energy Houston Electric, LLC ("CenterPoint"), Reliant Resources, Inc. ("RRI") and Texas Genco, LP ("Texas Genco" or "TGN") (collectively, "CenterPoint" unless the context indicates otherwise), by and through their attorneys of record, provide all of the information requested in the Attached Exhibit A within ten (10) days of the receipt thereof pursuant to P.U.C. Proc. R. 22.144(c)(1).

Also, please note that HCHE hereby incorporates by reference each and every instruction and definition set forth in HCHE's First through Eleventh Sets Of Requests For Information To CenterPoint Energy Houston Electric, LLC and Texas Genco, LP. Each request for information set forth herein incorporates fully by reference each and every such instruction and definition as if set forth fully herein. CenterPoint is requested to provide its responses on an as-available basis, *i.e.*, in advance of the response deadline, if possible, and by means of overnight delivery.

Respectfully submitted,

ANDREWS KURTH LLP



Kenneth L. Wiseman

Mark F. Sundback

Jennifer L. Spina

Andrews Kurth LLP

1701 Pennsylvania Avenue, N.W., Suite 300

Washington, D.C. 20006

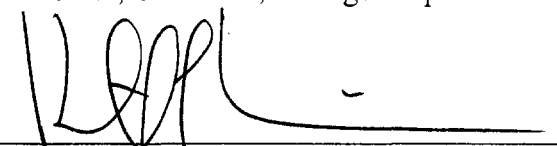
(202) 662-2700

(202) 662-2739 (fax)

ATTORNEYS FOR HOUSTON COUNCIL FOR
HEALTH AND EDUCATION

CERTIFICATE OF SERVICE

I, Kenneth L. Wiseman, an attorney for HCHE, hereby certify that a copy of HCHE's Twelfth Set of Requests for Information was served on all parties of record in this proceeding on this 27th day of May, 2004 by Facsimile or First Class, U.S. Mail, Postage Prepaid.



Kenneth L. Wiseman

Exhibit A

- HCHE XII-1. For this proceeding, have you or any of your attorneys, consultants, or representatives entered into any joint defense agreement, joint litigation agreement, or joint privilege agreement (or any other form of agreement that allows the attorney work product and attorney-client communications privileges to be maintained for information exchanged between unaffiliated parties) with any other party to this proceeding. If so, please identify the party or parties with whom you have such an agreement and provide the date or dates the agreement(s) was/were entered into.
- HCHE XII-2. Please identify and provide copies of all documents, including e-mails, that you or any of your attorneys, consultants, or representatives have sent to or received from any other party or any attorney, consultant, or representative of any other party to this proceeding that relate to this proceeding. For purposes of this response, you do not have to identify or provide copies of filings made at the Commission or at the State Office of Administrative Hearings in this proceeding. documents sent to or received from any of the Applicants, or e-mails on which any representative of any of the Applicants was copied.
- HCHE XII-3. For each of your witnesses who will file testimony in this proceeding and contemporaneous with the filing of the testimony, please:
- a. Provide a complete copy of the workpapers supporting the testimony of the witness;
 - b. Identify all documents, including reports, models, data, or publications provided to or obtained by the witness in the course of preparing his/her testimony;
 - c. Identify any expert, other than the Applicants' experts, whose testimony, publications, or work the witness reviewed, in whole or in part, in the course of the preparing his/her testimony regardless of whether the witness relied on that expert's testimony, publications, or work to support the testimony filed;
 - d. Identify all persons, other than legal counsel, who the witnesses interviewed or with whom the witness discussed his/her testimony;
 - e. Provide the witness' complete current resume and bibliography;
 - f. Identify and provide copies of all testimony or reports the witness has presented before, or had filed with, any court or other governmental body since January 1, 1999 (you do not need to provide copies of testimony or reports filed with the Public Utility Commission of Texas, but please identify such testimony and provide the name or style of the proceeding, the docket or project number, and the date filed); and

- g. Identify and provide copies of all articles, commentaries, editorials, or written work that the witness has had published since January 1, 1999 in any journal, newspaper, magazine, or other publication.

HCHE XII-4. For each of your witnesses who will file testimony in this proceeding and contemporaneous with the filing of the testimony, please send a copy of the testimony and a complete copy of the workpapers supporting the testimony of the witness by e-mail to:

kwiseman@andrewskurth.com
msundback@andrewskurth.com
giacribbs@andrewskurth.com
jenniferspina@andrewskurth.com
lkollen@jkenn.com
johnpeavy@sbcglobal.net

HCHE XII-5. Identify any consulting expert whose work has been reviewed by any of your witnesses in this proceeding and for each such consulting expert, please:

- a. Provide the expert's name and employer, and the address and telephone number by which the expert can be contacted;
- b. Identify the subject matter for which the expert was consulted;
- c. Identify all documents and facts provided to, or obtained by, the consulting expert or which formed the basis on which the consulting expert derived his/her opinions and mental impressions that are related to this proceeding;
- d. Provide the opinions and mental impressions of the consulting expert that are related to this proceeding and identify the techniques and methods the consulting expert used to reach those opinions and mental impressions;
- e. Identify all persons, other than legal counsel, who the consulting expert interviewed or with whom the consulting expert discussed his/her testimony;
- f. Provide the consulting expert's complete current resume and bibliography;
- g. Identify and provide copies of all testimony or reports the consulting expert has presented before, or had filed with, any court or other governmental body since January 1, 1999 (you do not need to provide copies of testimony or reports filed with the Public Utility Commission of Texas, but please identify such testimony and provide the name or style of the proceeding, the docket or project number, and the date filed); and

- h. Identify and provide copies of all articles, commentaries, editorials, or written work that the consulting expert has had published since January 1, 1999 in any journal, newspaper, magazine, or other publication.

HCHE XII-6. Pursuant to the instructions in HCHE's First through Eleventh Sets of Requests For Information, please properly identify all documents that CenterPoint has produced to HCHE heretofore, as well as documents responsive to the present set of RFIs.