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PUBLIC UTILITY COMMISSION FILING CLERK

APPLICATION OF CENTERPOINT	§	BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC,	§	
RELIANT ENERGY RETAIL	§	OF
SERVICES, LLC AND TEXAS GENCO,	§	A TOR WITE TROUBLE A HUTE YET THE A TO TO CO
LP TO DETERMINE STRANDED	§	ADMINISTRATIVE HEARINGS
COSTS AND OTHER TRUE-UP	§	
BALANCES PURSUANT TO PURA	§	
§39.262	§	

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S AND TEXAS GENCO, LP'S NOTICE OF DEPOSITION AND SUBPOENA DUCES TECUM TO JACOB POUS

TO: Jacob Pous, by and through the attorney of record for Coalition of Commercial Ratepayers, Jim Boyle, Law Office of Jim Boyle, 1005 Congress Avenue, Suite 550, Austin, Texas 78701.

CenterPoint Energy Houston Electric, LLC and Texas Genco, LP hereby give notice for an oral deposition of Jacob Pous, on June 6, 2004, at 2:00 p.m. at the Law Office of Jim Boyle, located at 1005 Congress Avenue, Suite 550, Austin, Texas 78701, or at some other time and place mutually agreeable to the parties. The deposition will be recorded by sound and stenographic means, before an officer authorized by law to administer oaths. You are also requested to produce the records identified in Exhibit A, the Subpoena Duces Tecum attached hereto. You are invited to attend to cross-examine the witness.

Respectfully submitted,

Christophert Drikey

Thomas B. Hudson, Jr.
State Bar No. 10168500
Christopher H. Trickey
State Bar No. 24014720
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Executive Vice President and General Counsel
State Bar No. 17359800
Harris S. Leven, Senior Counsel
State Bar No. 12246480
CenterPoint Energy, Inc.
P.O. Box 61867
Houston, Texas 77208
713.207.7789
713.207.0141 (fax)

ATTORNEYS FOR CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC AND TEXAS GENCO, LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all States first class mail on this 79th day of Hay, 2004.

Christopher H. Trickey parties of record in this proceeding by facsimile, hand delivery, overnight delivery, or United

EXHIBIT A

Definitions & Instructions

1. The term "documents" means all written, typed, or printed matter and all magnetic or other records or documentation of any kind or description (including, without limitation, letters, correspondence, telegrams, memoranda, notes, records, minutes, contracts, agreements, records, or notations of telephone or personal conversations, conferences, inter-office communications, E-mail, microfilm, bulletins, circulars, pamphlets, photographs, facsimiles, invoices, tape recordings, computer printouts and work sheets), including drafts and copies not identical to the originals, all photographs and graphic matter, however produced or reproduced, and all compilations of data from which information can be obtained, and any and all writings or recordings of any type or nature, in your actual possession, custody, or control, including those in the possession, custody, or control of any and all present or former directors, officers, partners, managers, employees, consultants, accountants, attorneys, or other agents, whether or not prepared by you.

Please produce:

- 1. Any documents you relied on to prepare your testimony or exhibits in these proceedings.
- 2. Any work papers or other documents showing calculations or mathematical exhibits you relied on to prepare your testimony or exhibits in these proceedings.
- 3. The source documents for the numbers or data used for the calculations or mathematical exhibits you relied on to prepare your testimony or exhibits in these proceedings.
- 4. All documents setting forth any compensation agreement, including any engagement letter between you and the party for whom you are testifying.
- 5. All documents, including a current resume or curriculum vitae, that you contend will establish your qualifications for trial purposes.
- 6. All notes prepared by you or anyone on your behalf that discuss, refer or relate to your opinions or work in this case. This request includes any marginal notes or connotations made by you in any depositions or other documents you have reviewed in connection with this case.
- 7. Your time records (including, but not limited to, all computer records, time sheets, logs or slips, billing records, and billing statements of whatever name or description) evidencing the dates and times spent and work and services performed since your being initially consulted by counsel to the date of your deposition.

- 8. Unless otherwise specifically and completely covered, mentioned or included elsewhere in this *duces tecum* demand, your entire file in the case styled above.
- 9. A list of all cases in which you have been retained, deposed or testified in as an expert.