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

BEFORE THE STATE OFFICE
PUBLIC UTILITIES COMMISSION
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

**OBJECTIONS TO CITY OF HOUSTON'S THIRTY-FOURTH REQUEST FOR
INFORMATION**

CenterPoint Energy Houston Electric, LLC and Texas Genco, LP (together "CenterPoint") received City of Houston's ("COH") thirty-fourth set of Requests for Information (RFI) on May 27, 2004. Counsel for CenterPoint was unable to reach counsel for COH before this objection deadline, but will contact counsel for COH and negotiate these issues diligently and in good faith. Therefore, in order to preserve its rights, CenterPoint objects to the following RFIs on the grounds stated below. These objections are timely filed 5 working days after the request was received.

RFI COH 34-5

For each of your witnesses who will file testimony in this proceeding, please:

- a. Identify all documents, including reports, models, data, or publications provided to or obtained by the witness in the course of preparing his/her testimony;
- b. 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;
- c. Identify all persons, other than legal counsel, who the witnesses interviewed or with whom the witness discussed his/her testimony;

- d. 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
- e. 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.

CenterPoint's Objections

CenterPoint objects to subparts (a) and (c) as being overly broad, unduly burdensome and seeking irrelevant information. These subparts seek all documents obtained by a witness, regardless of whether they were used by the witness in preparing testimony, or whether they are even related to this proceeding in any way. They also seek the identity of all people the witness talked to about his/her testimony, which would include people that are in no way related to this proceeding, and conversations that have nothing to do with the substance of the testimony. Both subparts are overly broad and seek irrelevant information that is not reasonably calculated to lead to the discovery of admissible evidence. TEX. R. CIV. P. 192.3(a) and PUC PROC. R. §22.141(a). Requiring CenterPoint to conduct such work and produce such irrelevant information constitutes an undue burden on CenterPoint because the burden of production greatly outweighs any benefit this information might provide to COH or any other party. TEX. R. CIV. P. 192.4(b).

RFI COH 34-6

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;

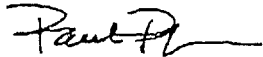
- c. Identify all documents and facts provided to, or obtained by the consulting expert or which formed the basis on which the consulting expert derived his/her opinions and mental impressions that are related to this proceeding;
- d. Provide the opinions and mental impressions of the consulting expert 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 of 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.

CenterPoint's Objections

CenterPoint objects to subpart (e) as being overly broad, unduly burdensome and seeking irrelevant information. This subpart seeks the identity of all people that any potential consulting expert talked to about his/her testimony, which would include people that are in no way related to this proceeding, and conversations that have nothing to do with the substance of the testimony. This question is overly broad and seeks irrelevant information that is not reasonably calculated to lead to the discovery of admissible evidence. TEX. R. CIV. P. 192.3(a) and PUC PROC. R. §22.141(a). Requiring CenterPoint to conduct such work and produce such irrelevant information constitutes an undue burden on CenterPoint because the burden of production greatly outweighs any benefit this information might provide to COH or any other party. TEX. R. CIV. P. 192.4(b).

June 4, 2004

Respectfully submitted,



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**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 parties of record in this proceeding by hand delivery, overnight delivery, or United States first class mail on this 4th day of June, 2004.

Bunny Browning