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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 §

PUBLIC UTILITY COMMISSION
~~COMMISSION~~

OF TEXAS

**CITY OF HOUSTON AND COALITION OF CITIES' SEVENTEENTH
REQUEST FOR INFORMATION TO CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC, RELIANT ENERGY RETAIL SERVICES, LLC,
AND TEXAS GENCO, LP**

Pursuant to Sections 22.141-145 of the Procedural Rules of the Public Utility Commission of Texas, Intervenors, the City of Houston and Coalition of Cities, request that CenterPoint Energy Houston Electric LLC ("CPE"), Reliant Energy Retail Services LLC (RERS), and Texas Genco LP (Genco), by and through their attorney of record, provide the following information within the time limit provided by the Presiding Officer or within twenty (20) days of receipt thereof, if the Presiding Officer has not provided a time limit. It is further requested that the answers to the request for information be made under oath, and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer.

DEFINITIONS AND EXPLANATORY NOTES

1. When the request calls for the identification of a "person or witness," the identification shall include a full name, business address and business telephone number. The identification should also include a job title and name of employer.
2. The terms "document" and "documents" are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms "non-privileged document" and "non-privileged documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for the identification of a "document," the identification should include the following:
 - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
 - b. the date of the document;
 - c. the title and/or "re" of the document;
 - d. the subject matter of the document;

- e. the full name and address of the recipient and every person who received copies of the document;
 - f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
 - g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
- 5. The term “studies” includes any document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information in connection with the subjects referred to in this proceeding.
 - 6. The term “CenterPoint” or “CenterPoint Energy Houston Electric LLC” includes CenterPoint Energy Houston Electric LLC and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.
 - 7. The term “Texas Genco” or “Texas Genco LP” includes Texas Genco LP and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.
 - 8. The term “Reliant” or “Reliant Energy Retail Services LLC” includes Reliant Energy Retail Services LLC and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors or assigns.

Respectfully submitted,

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By: Tammy Wavle Shea
Tammy Wavle Shea *by permission*
Debra Ellis
**ATTORNEYS FOR CITY OF HOUSTON
AND COALITION OF CITIES**

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of April, 2004, a true and correct copy of the foregoing document was served upon on all parties of record by facsimile and/or First-Class, United States mail, postage paid.

Tammy Wavle Shea
Tammy Wavle Shea *by permission*
Debra Ellis

**CITY OF HOUSTON AND COALITION OF CITIES' SEVENTEENTH
REQUEST FOR INFORMATION TO CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC, RELIANT ENERGY RETAIL SERVICES, LLC,
AND TEXAS GENCO, LP**

- COH 17-1. Do any of the applicants in this docket have regulatory assets that meet the qualifications under PURA Sec. 39.262(f)? If yes, provide cites to the testimony that addresses these items. If no, explain why not.
- COH 17-2. Provide the section of PURA under which the Applicants are including the regulatory assets of \$150,473,181.
- COH 17-3. Refer to Mr. Hriszko's testimony at page 7, line 21. Are the regulatory assets in this discussion the same as those shown on Schedule VIII-B? If so, please identify the offsetting deferred income tax amount on Schedule IX referred to in this testimony.
- COH 17-4. Refer to Figure JBM-6 Accumulated Interest, note number 10) J: Annual interest equal to 11.37% applied to principle and accumulated interest.
- a. Please verify that the 11.37% interest rate is equivalent to the weighted average cost of capital of the TDU.
 - b. Please provide an investment schedule that shows the selection of investments that yields the equivalent rate of return of 11.37%. The schedule should show the weighted allocation for each type of investment vehicle and the rate of return on each type of investment.