



Control Number: 32093



Item Number: 564

Addendum StartPage: 0

SOAH DOCKET NO. 473-06-2043
PUC DOCKET NO. 32093

PETITION BY COMMISSION STAFF	§	BEFORE THE
FOR A REVIEW OF THE RATES OF	§	
CENTERPOINT ENERGY HOUSTON	§	STATE OFFICE OF
ELECTRIC, LLC PURSUANT TO PURA	§	
§ 36.151	§	ADMINISTRATIVE HEARINGS

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July 18, 2006

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CenterPoint Energy Houston Electric, LLC Response to Gulf Coast Coalition of Cities'
Twenty-Eighth Set of Request for Information 2-24

ELECTRONIC FILES:

GCCC28-01.pdf through GCCC28-05.pdf

Certificate of Service25

Request No: GCCC28-01

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 32093
SOAH DOCKET NO. 473-06-2043**

GULF COAST COALITION OF CITIES

QUESTION:

28NH 1 When CNP's electric transmission or distribution lines have to be moved or relocated due to highway and road projects, state whether CNP receives any compensation or reimbursement from government agencies or other entities for the cost of moving and relocating its lines.

ANSWER:

Yes. CenterPoint TDU is reimbursed by government agencies for the relocation of transmission or distribution facilities due to highway and road projects in the following cases:

1. CenterPoint TDU owns a property interest (fee or easement) in the land that supersedes the government's interests.
2. The relocations for Interstate Highway projects are funded with federal dollars. Interstate Highway projects funded without federal dollars are not reimbursable.
3. The governing authority requesting the relocation lacks jurisdictional authority over the road right-of-way. For example: Harris County cannot require adjustment of facilities located in a city street to build a county-owned toll road and the Harris County Flood Control District cannot require adjustment of facilities located on city streets for improvements to a bayou or ditch.
4. Facilities are located within the street right-of-way by contract with relocation terms. For example: Streetlight contracts with the various cities have terms covering costs of relocations even though the streetlights are in street right-of-way.

Sponsor: Don Cortez (Distribution related)
John C. Houston (Transmission related)

Responsive Documents:
None

Request No: GCCC28-02

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 32093
SOAH DOCKET NO. 473-06-2043

GULF COAST COALITION OF CITIES

QUESTION:

28NH 2 For each year, 1996 through 2005, identify by transmission and distribution plant account the amount of compensation or reimbursement that CNP or its predecessor companies received from government agencies or other entities for the cost of moving and relocating transmission and distribution lines due to highway and road projects.

ANSWER:

Following is the amount of compensation or reimbursement that CNP received from government agencies or other entities due to highway and road projects. These amounts can only be identified as transmission and distribution, not by plant account. For years 1996-1998, we are unable to identify as transmission or distribution due to the change in systems in 1999.

	<u>Total</u>	<u>Transmission</u>	<u>Distribution</u>
1996	\$383,634.84	N/A	N/A
1997	\$401,283.74	N/A	N/A
1998	\$875,672.73	N/A	N/A
1999	\$3,552,912.30	2,763,536.80	789,375.50
2000	\$3,110,899.69	2,668,734.09	442,165.60
2001	\$23,779,788.64	16,859,805.81	6,919,982.83
2002	\$3,458,216.17	2,638.12	3,455,578.05
2003	\$7,029,114.41	4,788,707.45	2,240,406.96
2004	\$29,191,135.51	14,670,725.20	14,520,410.31
2005	\$26,500,053.81	13,814,884.05	12,685,169.76

Sponsor: Walter L. Fitzgerald

Responsive Documents:

None

Request No: GCCC28-03

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 32093
SOAH DOCKET NO. 473-06-2043**

GULF COAST COALITION OF CITIES

QUESTION:

28 NH 3 Describe how any compensation CNP received for reimbursement of costs for moves and relocations of electric lines due to highway and road projects was recorded on CNP's books. If this accounting treatment has changed over the time period covered in CNP's net salvage analyses, please describe these changes.

ANSWER:

The reimbursements are recorded as a reduction to the costs for moves and relocations on CNP's books. The accounting treatment has not changed.

Sponsor: Walter L. Fitzgerald

Responsive Documents:
None

Request No: GCCC28-04

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 32093
SOAH DOCKET NO. 473-06-2043**

GULF COAST COALITION OF CITIES

QUESTION:

28NH4 Provide a copy of simulated plant record method analyses using Gannett Fleming's computer model showing the simulated and book balances for the following plant accounts and survivor curves. Please provide both the table and graph of simulated and book balances.

Account 354 80-R2.5

Account 355 30-L2

Account 356 47-R2

Account 364 33-R0.5

Account 365 36-R0.5

Account 368 33- L0

Account 369 32-R0.5

Account 370 34-R0.5

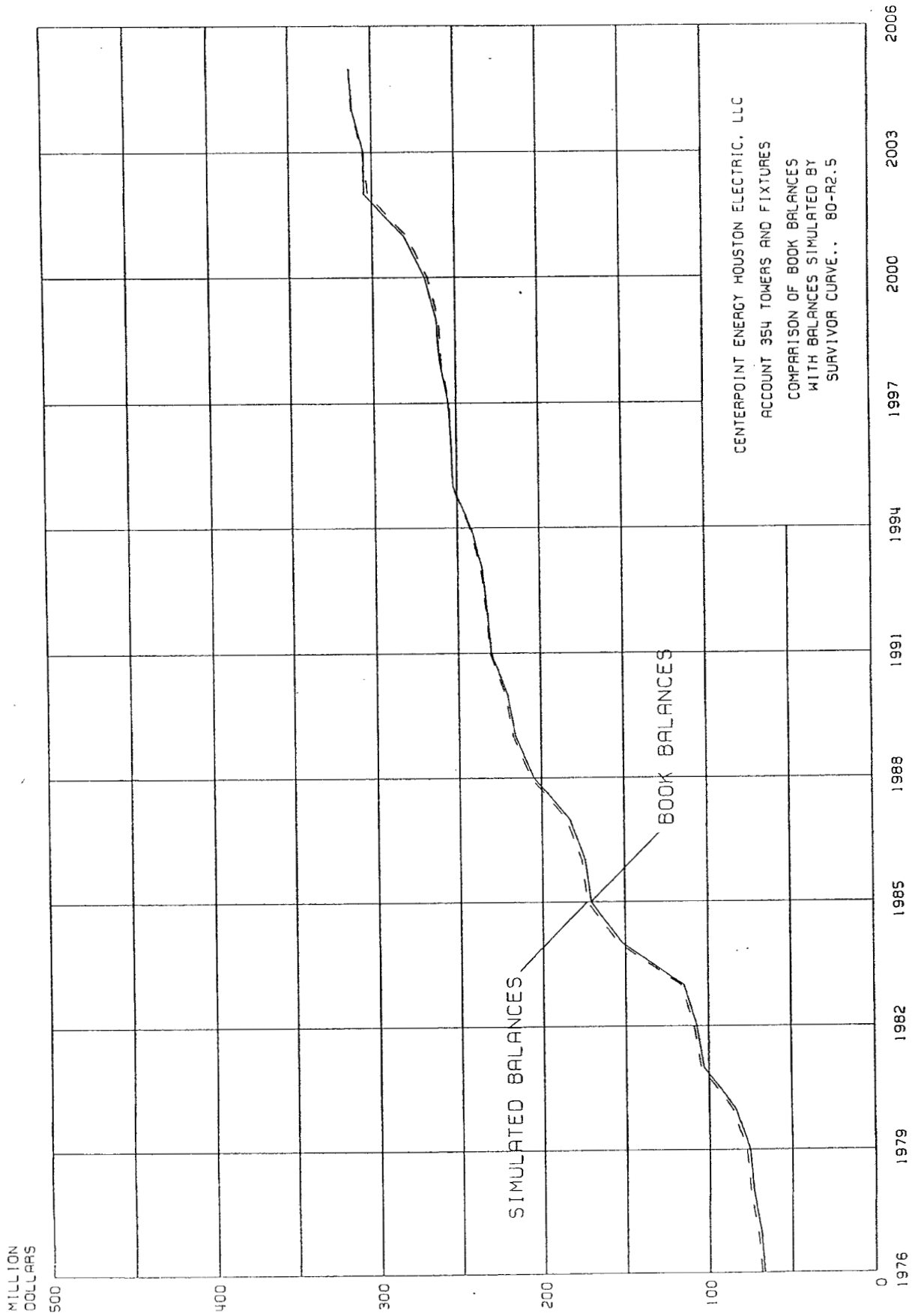
Account 373 35 R0.5

ANSWER:

The attached pages set forth the tables and graphs of the simulated and book balances of the requested survivor curves for each account.

Sponsor: John J. Spanos

Responsive Documents:
GCCC28-04 Attachment



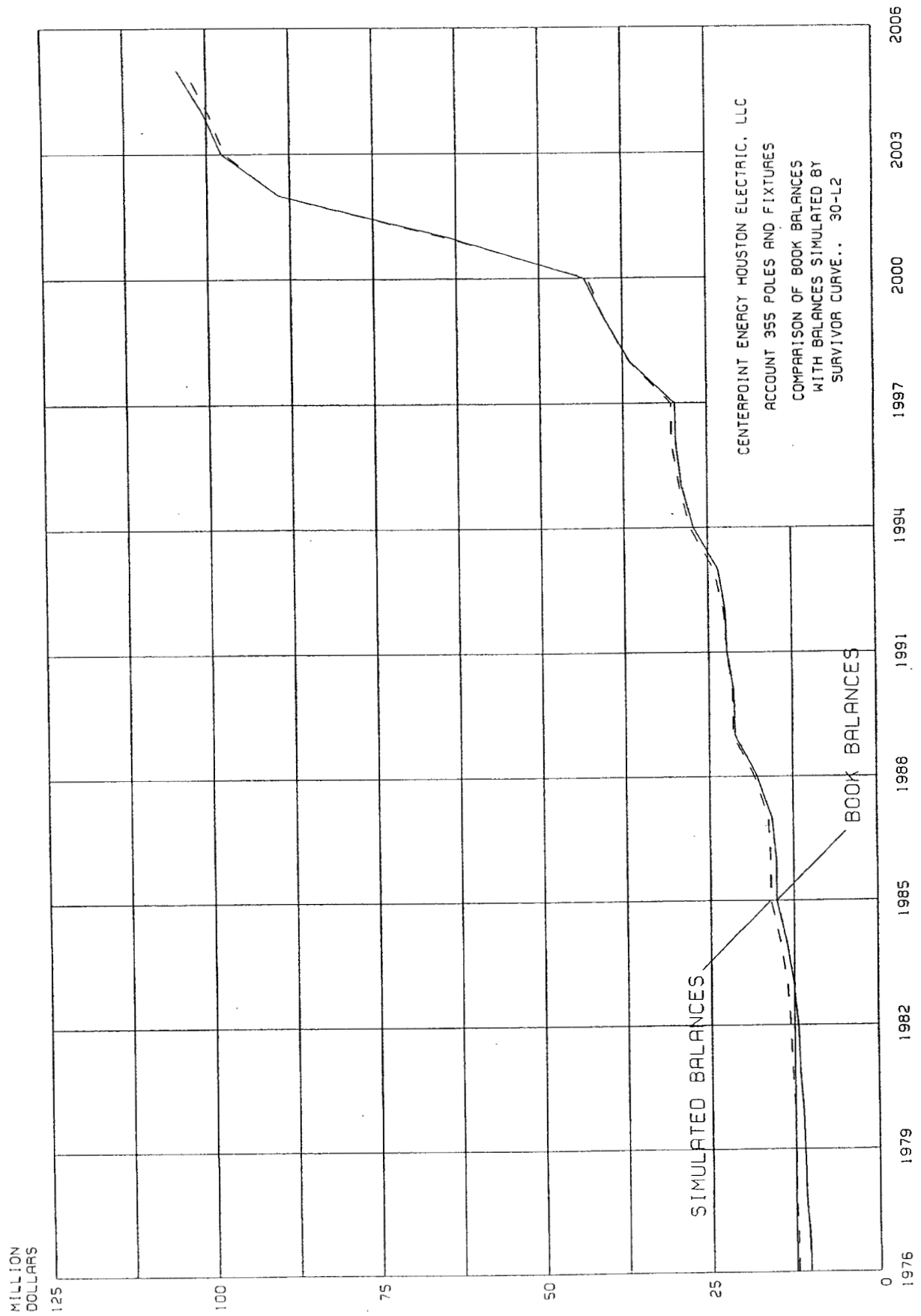
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

ACCOUNT 354 TOWERS AND FIXTURES

SIMULATED PLANT BALANCES BASED ON
 SURVIVOR CURVE.. 80-R2.5

YEAR	BOOK BALANCE	SIMULATED BALANCE	DIFFERENCE
1976	67,254,768	68,946,923	1,692,155-
1977	69,231,421	71,097,788	1,866,367-
1978	73,733,247	75,674,129	1,940,882-
1979	76,035,412	77,914,740	1,879,328-
1980	84,159,365	85,985,096	1,825,731-
1981	102,838,973	104,598,180	1,759,207-
1982	107,074,629	108,805,647	1,731,018-
1983	114,777,013	116,543,998	1,766,985-
1984	151,905,532	154,214,929	2,309,397-
1985	170,390,749	172,617,710	2,226,961-
1986	173,698,022	175,849,692	2,151,670-
1987	182,755,055	184,684,209	1,929,154-
1988	204,336,965	206,079,434	1,742,469-
1989	215,727,937	217,203,072	1,475,135-
1990	220,309,330	221,498,425	1,189,095-
1991	230,085,649	230,979,764	894,115-
1992	232,416,817	232,991,959	575,142-
1993	235,109,471	236,159,604	1,050,133-
1994	241,625,484	242,349,695	724,211-
1995	252,215,447	252,651,441	435,994-
1996	253,217,566	253,246,369	28,803-
1997	254,633,432	254,235,011	398,421
1998	259,721,045	258,872,892	848,153
1999	261,519,609	260,198,183	1,321,426
2000	268,250,569	266,431,041	1,819,528
2001	280,924,916	279,014,617	1,910,299
2002	304,889,076	302,413,612	2,475,464
2003	304,748,667	305,507,491	758,824-
2004	311,420,045	311,925,780	505,735-
2005	313,204,666	313,149,654	55,012

AVERAGE BOOK BALANCE	RESIDUAL MEASURE	CONFORMANCE INDEX	RETIREMENTS EXPERIENCE	
			BEG	END
200,607,029	1,537,939	130.4	14.5	46.4



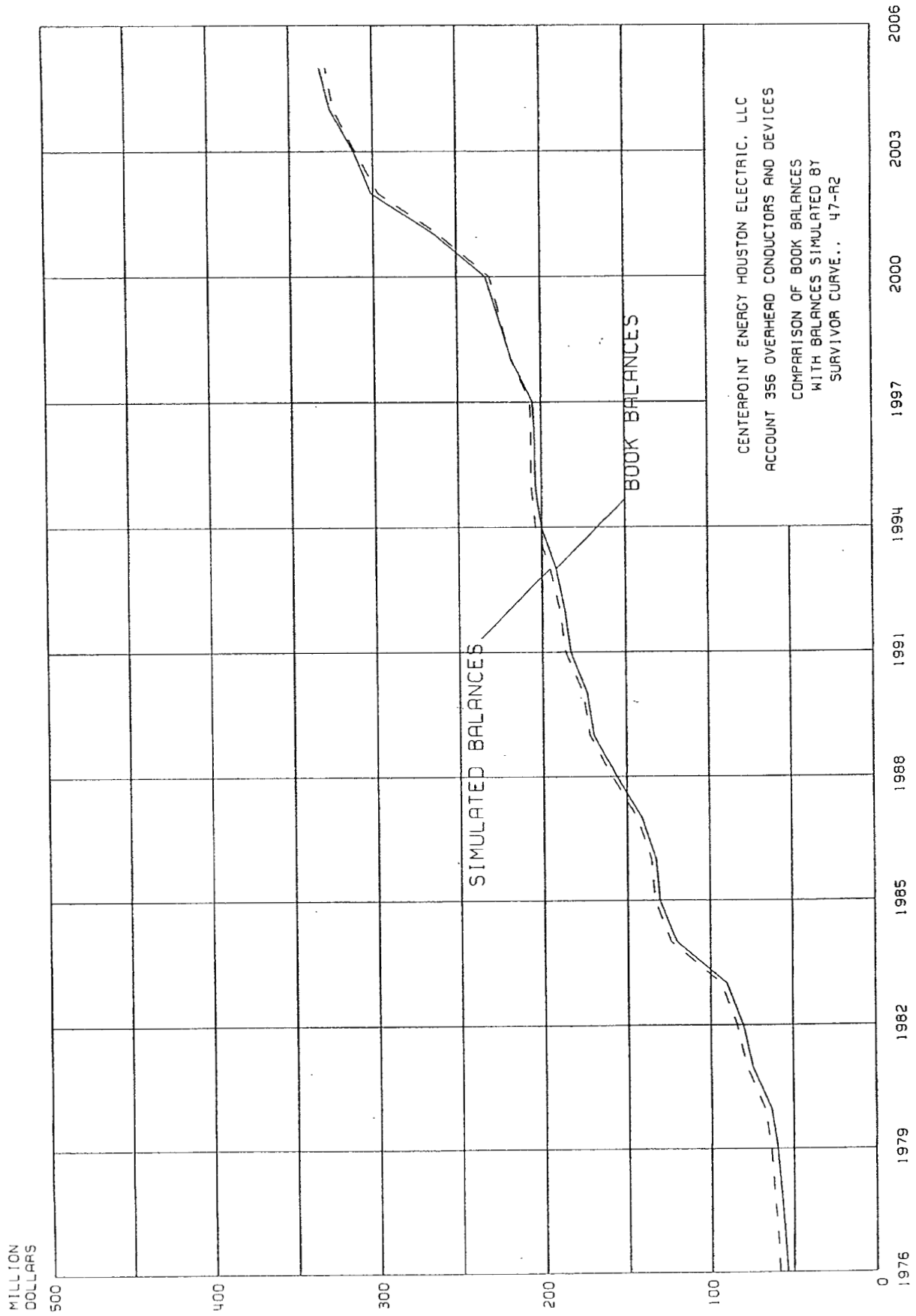
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

ACCOUNT 355 POLES AND FIXTURES

SIMULATED PLANT BALANCES BASED ON
 SURVIVOR CURVE.. 30-L2

YEAR	BOOK BALANCE	SIMULATED BALANCE	DIFFERENCE
1976	10,459,121	12,212,650	1,753,529-
1977	10,563,603	12,209,116	1,645,513-
1978	10,917,991	12,429,222	1,511,231-
1979	11,081,592	12,470,292	1,388,700-
1980	11,323,784	12,563,790	1,240,006-
1981	11,715,015	12,882,286	1,167,271-
1982	11,930,271	13,073,460	1,143,189-
1983	12,563,933	13,535,422	971,489-
1984	13,630,767	14,561,567	930,800-
1985	15,091,332	15,968,750	877,418-
1986	15,115,138	15,971,104	855,966-
1987	15,720,076	16,257,346	537,270-
1988	17,898,631	18,305,283	406,652-
1989	21,099,857	21,381,282	281,425-
1990	21,211,773	21,419,688	207,915-
1991	22,235,390	22,286,227	50,837-
1992	22,491,158	22,731,547	240,389-
1993	23,536,117	24,162,749	626,632-
1994	27,108,243	27,634,267	526,024-
1995	28,847,649	29,197,993	350,344-
1996	29,630,968	30,249,993	619,025-
1997	29,761,532	30,277,675	516,143-
1998	36,423,401	36,582,445	159,044-
1999	40,061,240	40,067,805	6,565-
2000	43,187,089	42,651,507	535,582
2001	63,760,267	64,517,581	757,314-
2002	89,170,760	89,242,455	71,695-
2003	97,764,880	97,283,819	481,061
2004	100,590,244	99,838,474	751,770
2005	104,412,504	102,990,857	1,421,647

AVERAGE BOOK BALANCE	RESIDUAL MEASURE	CONFORMANCE INDEX	RETIREMENTS EXPERIENCE BEG END
32,310,144	881,318	36.7	95.3 100.0

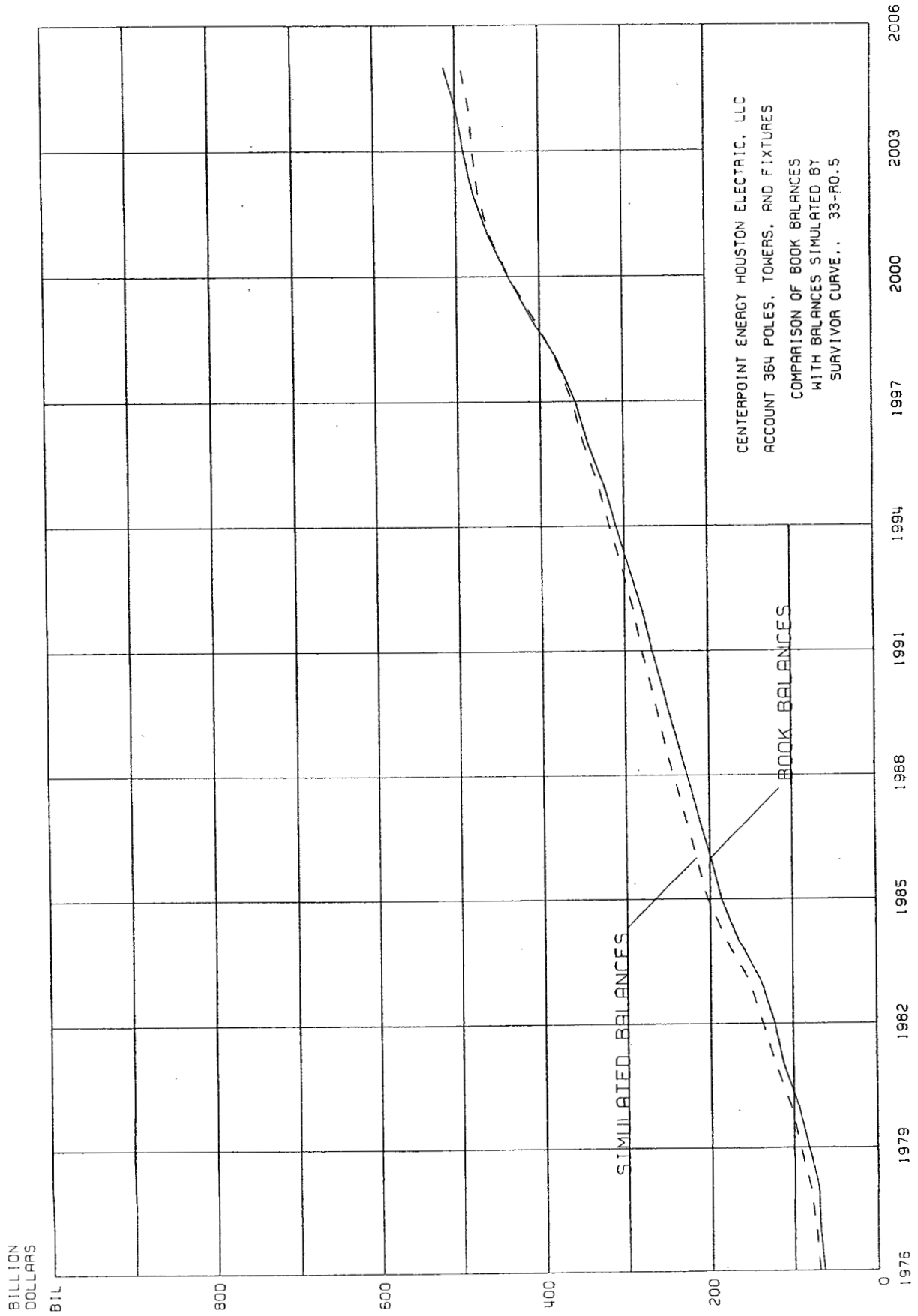


CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
 ACCOUNT 356 OVERHEAD CONDUCTORS AND DEVICES

SIMULATED PLANT BALANCES BASED ON
 SURVIVOR CURVE.. 47-R2

YEAR	BOOK BALANCE	SIMULATED BALANCE	DIFFERENCE
1976	54,068,779	58,608,820	4,540,041-
1977	55,583,371	60,002,671	4,419,300-
1978	57,722,285	62,106,437	4,384,152-
1979	59,851,981	63,998,560	4,146,579-
1980	64,040,934	67,949,513	3,908,579-
1981	75,122,070	78,675,235	3,553,165-
1982	80,494,860	84,080,464	3,585,604-
1983	90,097,789	93,572,459	3,474,670-
1984	120,110,548	123,435,643	3,325,095-
1985	130,326,696	133,336,608	3,009,912-
1986	132,427,648	135,279,445	2,851,797-
1987	140,960,858	143,770,505	2,809,647-
1988	155,997,001	158,661,752	2,664,751-
1989	169,585,940	172,043,444	2,457,504-
1990	173,355,627	175,684,207	2,328,580-
1991	182,966,669	186,029,745	3,063,076-
1992	186,305,487	189,324,877	3,019,390-
1993	191,561,101	195,264,533	3,703,432-
1994	200,323,591	203,573,925	3,250,334-
1995	203,360,938	205,979,561	2,618,623-
1996	203,606,251	205,947,275	2,341,024-
1997	204,826,037	206,250,782	1,424,745-
1998	217,278,302	217,611,255	332,953-
1999	225,141,377	224,004,176	1,137,201
2000	232,901,521	230,426,092	2,475,429
2001	262,883,931	260,336,251	2,547,680
2002	301,267,078	296,799,263	4,467,815
2003	311,844,212	310,813,458	1,030,754
2004	325,627,774	323,609,597	2,018,177
2005	331,888,089	327,994,830	3,893,259

AVERAGE BOOK BALANCE	RESIDUAL MEASURE	CONFORMANCE INDEX	RETIREMENTS EXPERIENCE	
			BEG	END
171,384,292	3,138,565	54.6	63.1	99.9



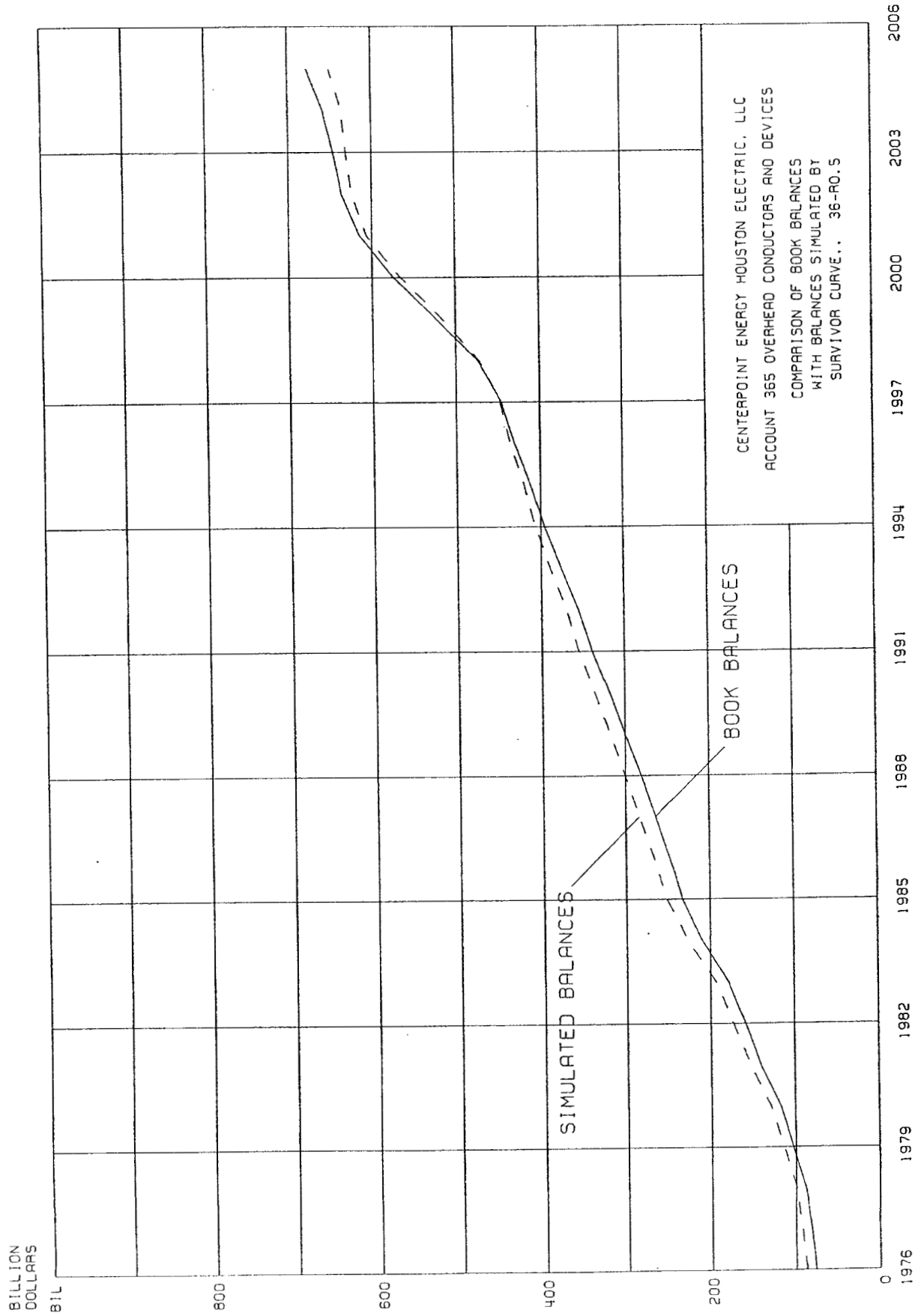
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

ACCOUNT 364 POLES, TOWERS, AND FIXTURES

SIMULATED PLANT BALANCES BASED ON
 SURVIVOR CURVE.. 33-R0.5

YEAR	BOOK BALANCE	SIMULATED BALANCE	DIFFERENCE
1976	64,947,787	70,360,744	5,412,957-
1977	69,612,005	74,615,961	5,003,956-
1978	71,344,506	80,931,213	9,586,707-
1979	82,699,348	91,992,135	9,292,787-
1980	93,831,743	103,139,858	9,308,115-
1981	111,516,557	120,972,021	9,455,464-
1982	122,012,781	136,490,344	14,477,563-
1983	138,297,718	152,876,592	14,578,874-
1984	165,313,917	180,310,255	14,996,338-
1985	186,342,452	202,962,266	16,619,814-
1986	198,844,453	216,047,162	17,202,709-
1987	213,058,641	229,631,608	16,572,967-
1988	226,775,713	242,595,853	15,820,140-
1989	240,513,239	255,239,208	14,725,969-
1990	253,276,765	266,981,956	13,705,191-
1991	267,278,106	279,614,133	12,336,027-
1992	278,951,731	289,437,025	10,485,294-
1993	294,389,661	303,292,995	8,903,334-
1994	310,110,435	317,897,311	7,786,876-
1995	323,555,383	330,224,487	6,669,104-
1996	342,921,761	348,456,508	5,534,747-
1997	357,701,349	361,405,467	3,704,118-
1998	379,250,631	380,863,406	1,612,775-
1999	409,907,432	406,797,447	3,109,985
2000	437,376,457	436,269,443	1,107,014
2001	461,391,790	459,645,188	1,746,602
2002	479,152,711	473,362,698	5,790,013
2003	490,157,328	479,513,218	10,644,110
2004	499,116,815	482,832,857	16,283,958
2005	513,912,541	492,919,412	20,993,129

AVERAGE BOOK BALANCE	RESIDUAL MEASURE	CONFORMANCE INDEX	RETIREMENTS EXPERIENCE	
			BEG	END
269,452,059	11,427,398	23.6	97.9	100.0

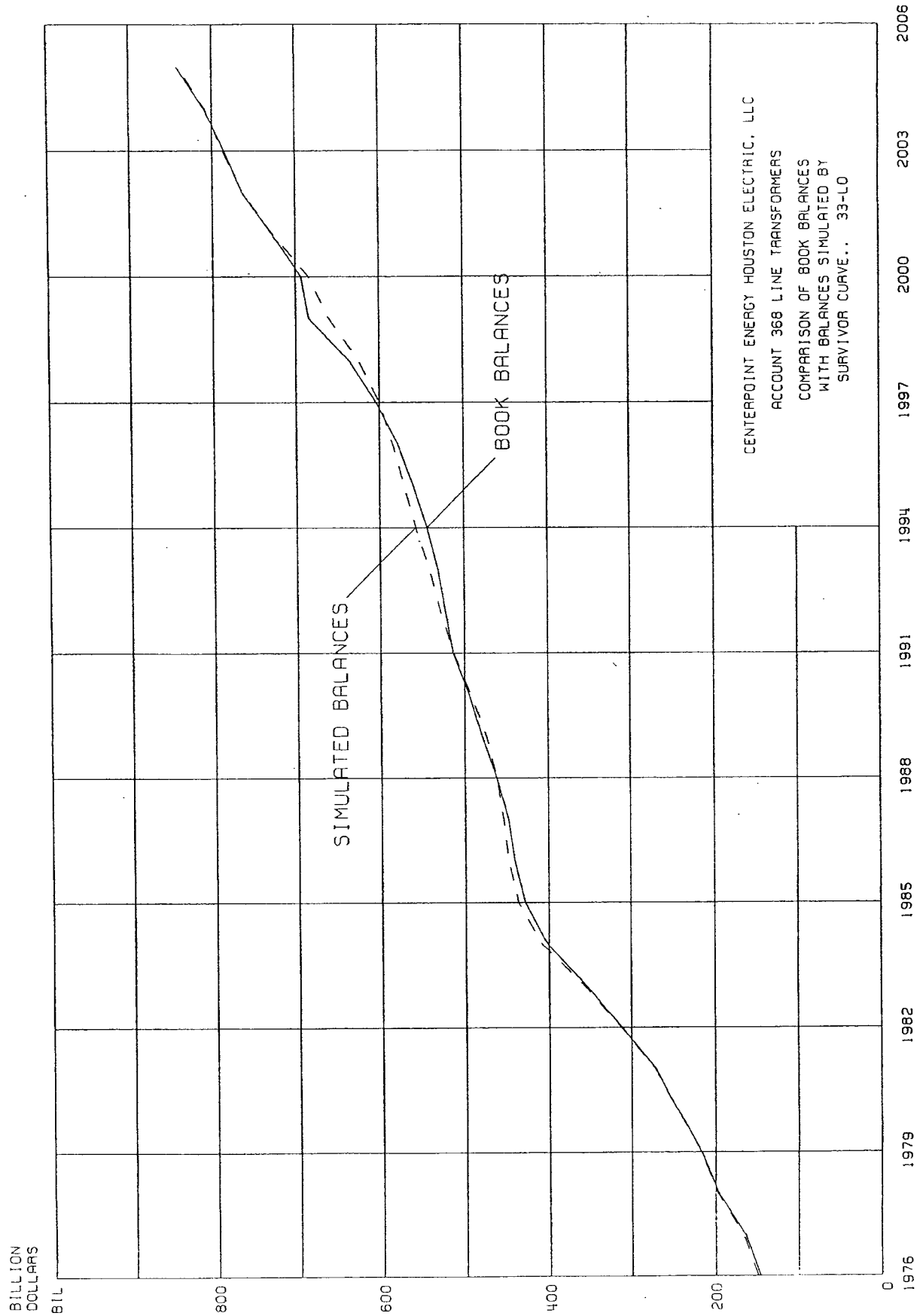


CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
 ACCOUNT 365 OVERHEAD CONDUCTORS AND DEVICES

SIMULATED PLANT BALANCES BASED ON
 SURVIVOR CURVE.. 36-R0.5

YEAR	BOOK BALANCE	SIMULATED BALANCE	DIFFERENCE
1976	76,770,476	87,326,517	10,556,041-
1977	81,553,645	92,106,703	10,553,058-
1978	88,246,909	99,029,894	10,782,985-
1979	103,374,463	114,450,599	11,076,136-
1980	117,819,254	129,523,457	11,704,203-
1981	141,212,576	153,813,113	12,600,537-
1982	159,292,913	172,999,808	13,706,895-
1983	178,821,710	193,344,273	14,522,563-
1984	209,992,393	227,083,345	17,090,952-
1985	233,247,783	250,917,916	17,670,133-
1986	247,095,302	266,424,781	19,329,479-
1987	264,223,303	283,713,137	19,489,834-
1988	280,967,106	300,308,184	19,341,078-
1989	300,046,754	318,093,397	18,046,643-
1990	318,205,099	335,614,867	17,409,768-
1991	338,538,060	354,912,664	16,374,604-
1992	354,917,032	369,682,452	14,765,420-
1993	375,802,613	388,992,496	13,189,883-
1994	395,252,398	406,380,833	11,128,435-
1995	411,800,363	419,919,242	8,118,879-
1996	430,743,811	435,802,974	5,059,163-
1997	446,641,166	448,089,580	1,448,414-
1998	473,666,822	472,207,388	1,459,434
1999	523,271,620	515,797,350	7,474,270
2000	573,965,436	565,644,213	8,321,223
2001	614,791,651	606,706,520	8,085,131
2002	636,185,801	623,794,897	12,390,904
2003	645,534,414	630,670,159	14,864,255
2004	657,429,225	635,801,478	21,627,747
2005	677,456,622	649,658,919	27,797,703

AVERAGE BOOK BALANCE	RESIDUAL MEASURE	CONFORMANCE INDEX	RETIREMENTS EXPERIENCE	
			BEG	END
345,228,891	14,378,340	24.0	92.5	100.0



CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

ACCOUNT 368 LINE TRANSFORMERS

SIMULATED PLANT BALANCES BASED ON
 SURVIVOR CURVE.. 33-L0

YEAR	BOOK BALANCE	SIMULATED BALANCE	DIFFERENCE
1976	146,883,400	149,818,338	2,934,938-
1977	164,862,239	167,097,407	2,235,168-
1978	196,209,789	197,437,304	1,227,515-
1979	216,647,617	217,163,162	515,545-
1980	244,140,632	244,479,604	338,972-
1981	270,474,657	271,433,065	958,408-
1982	311,414,999	312,515,576	1,100,577-
1983	354,243,950	356,732,248	2,488,298-
1984	401,652,603	408,084,490	6,431,887-
1985	428,220,667	436,363,929	8,143,262-
1986	440,632,013	447,578,075	6,946,062-
1987	447,726,667	453,931,147	6,204,480-
1988	461,955,240	461,728,633	226,607
1989	479,498,033	474,239,686	5,258,347
1990	494,345,671	492,094,466	2,251,205
1991	513,919,801	513,120,169	799,632
1992	523,168,515	529,248,862	6,080,347-
1993	532,141,248	542,274,916	10,133,668-
1994	544,727,721	557,914,822	13,187,101-
1995	560,620,359	570,879,584	10,259,225-
1996	578,285,306	584,250,188	5,964,882-
1997	603,561,862	599,793,896	3,767,966
1998	636,169,459	624,601,956	11,567,503
1999	684,717,560	660,123,548	24,594,012
2000	693,601,064	684,671,205	8,929,859
2001	727,285,676	726,251,882	1,033,794
2002	763,275,652	762,662,746	612,906
2003	785,048,165	787,179,150	2,130,985-
2004	808,823,968	807,779,389	1,044,579
2005	842,315,281	839,807,950	2,507,331

AVERAGE BOOK
BALANCE

RESIDUAL
MEASURE

CONFORMANCE
INDEX

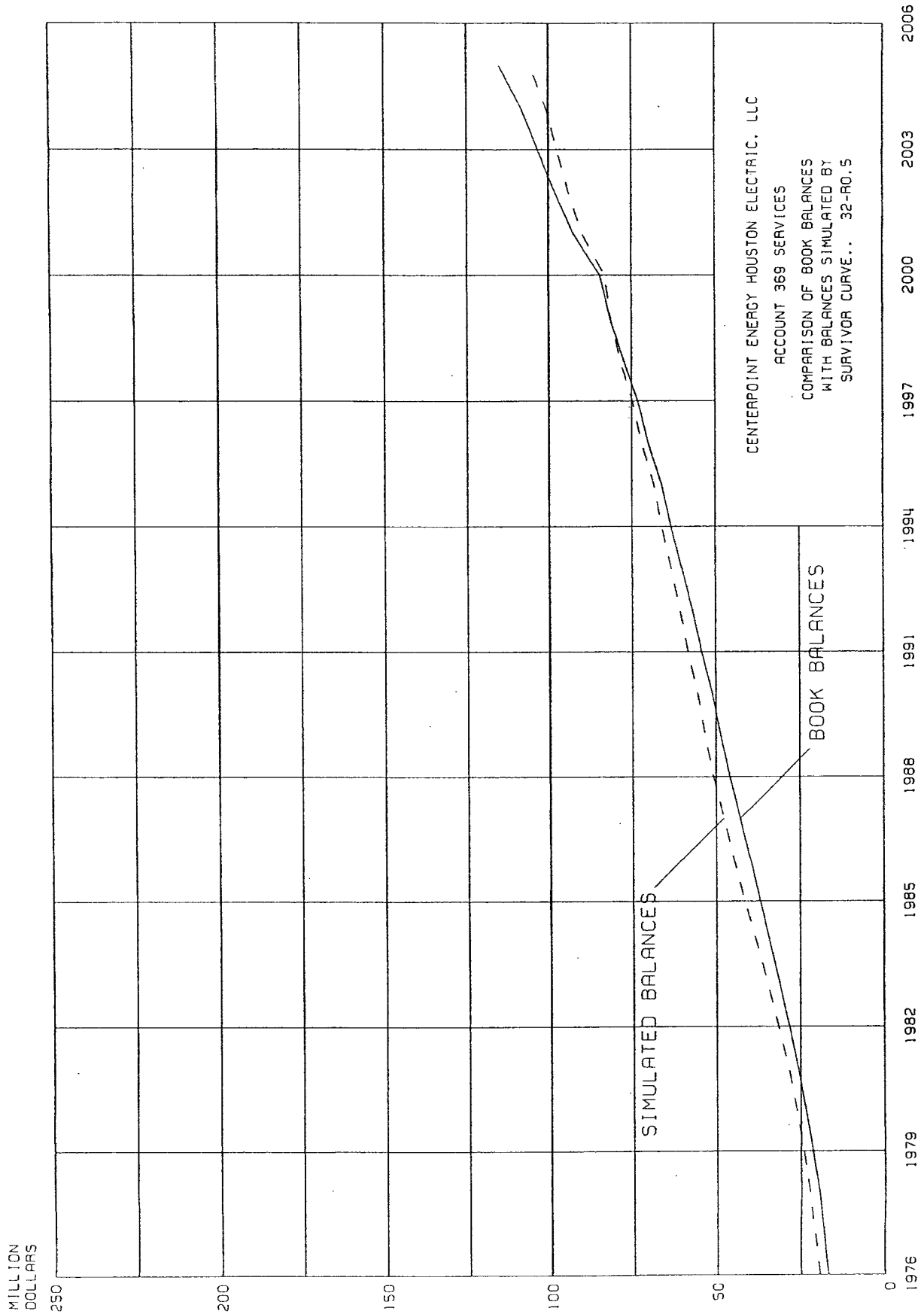
RETIREMENTS
EXPERIENCE
BEG END

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7,192,639

68.9

90.8 99.4



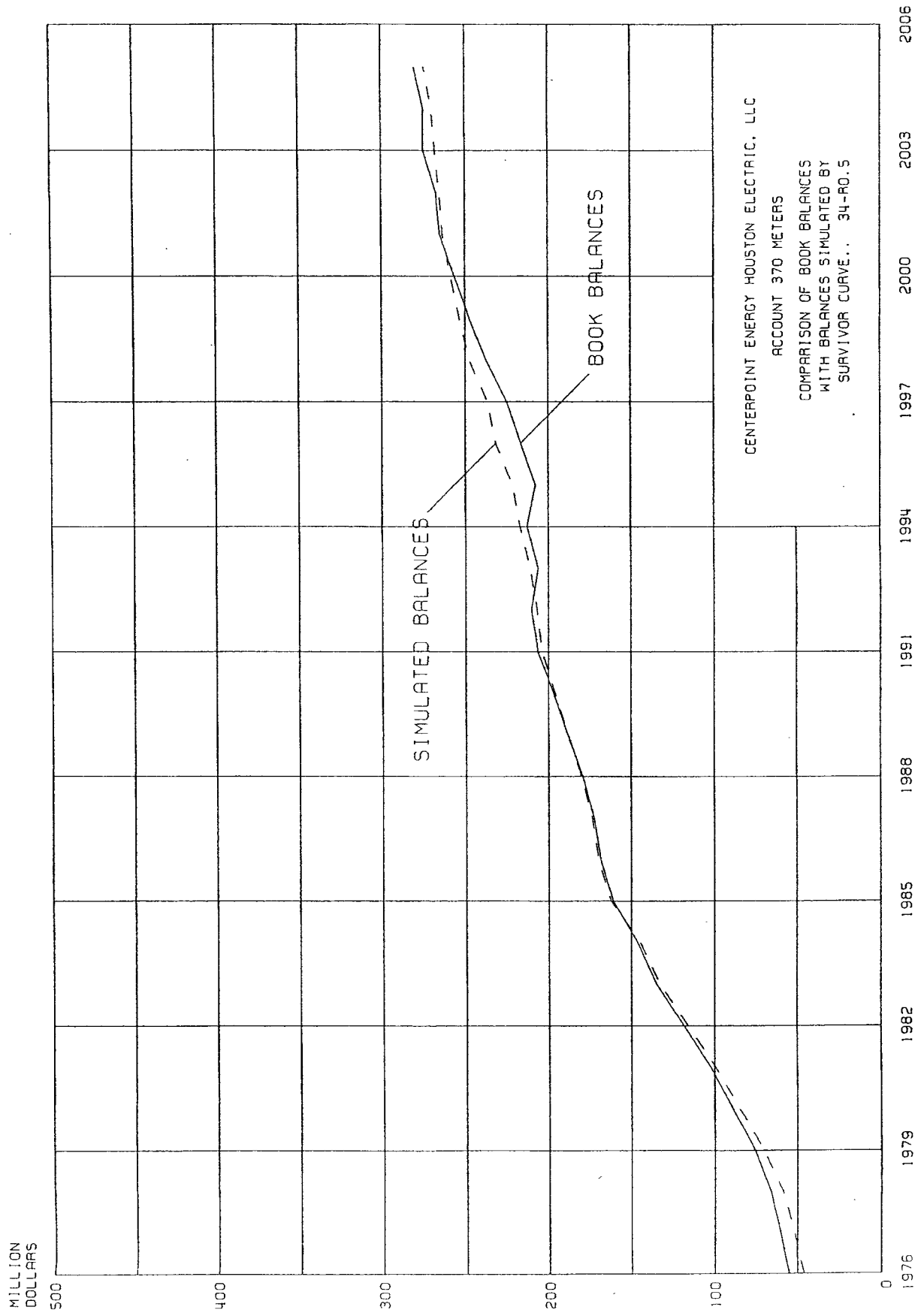
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

ACCOUNT 369 SERVICES

SIMULATED PLANT BALANCES BASED ON
 SURVIVOR CURVE... 32-R0.5

YEAR	BOOK BALANCE	SIMULATED BALANCE	DIFFERENCE
1976	16,808,554	19,423,196	2,614,642-
1977	18,015,710	20,690,341	2,674,631-
1978	19,606,678	22,317,927	2,711,249-
1979	21,400,574	24,119,251	2,718,677-
1980	23,415,853	26,207,283	2,791,430-
1981	25,690,422	28,617,011	2,926,589-
1982	28,411,266	31,695,583	3,284,317-
1983	31,251,751	34,847,269	3,595,518-
1984	34,232,477	38,254,355	4,021,878-
1985	37,159,460	41,619,655	4,460,195-
1986	39,972,206	44,754,991	4,782,785-
1987	42,891,784	47,746,522	4,854,738-
1988	45,935,866	50,732,650	4,796,784-
1989	48,661,770	53,299,948	4,638,178-
1990	51,048,667	55,460,520	4,411,853-
1991	54,200,101	58,283,295	4,083,194-
1992	56,926,857	60,529,787	3,602,930-
1993	59,978,305	63,170,284	3,191,979-
1994	63,154,777	65,961,444	2,806,667-
1995	65,987,133	68,295,123	2,307,990-
1996	70,013,060	72,041,931	2,028,871-
1997	73,121,501	74,746,368	1,624,867-
1998	77,445,612	78,462,402	1,016,790-
1999	81,395,865	81,148,870	246,995
2000	84,367,356	82,933,806	1,433,550
2001	92,532,568	89,822,265	2,710,303
2002	98,209,711	94,030,922	4,178,789
2003	103,317,592	97,481,562	5,836,030
2004	108,369,155	100,739,420	7,629,735
2005	115,178,264	105,626,571	9,551,693

AVERAGE BOOK BALANCE	RESIDUAL MEASURE	CONFORMANCE INDEX	RETIREMENTS EXPERIENCE BEG END
56,290,030	4,027,282	14.0	99.6 100.0



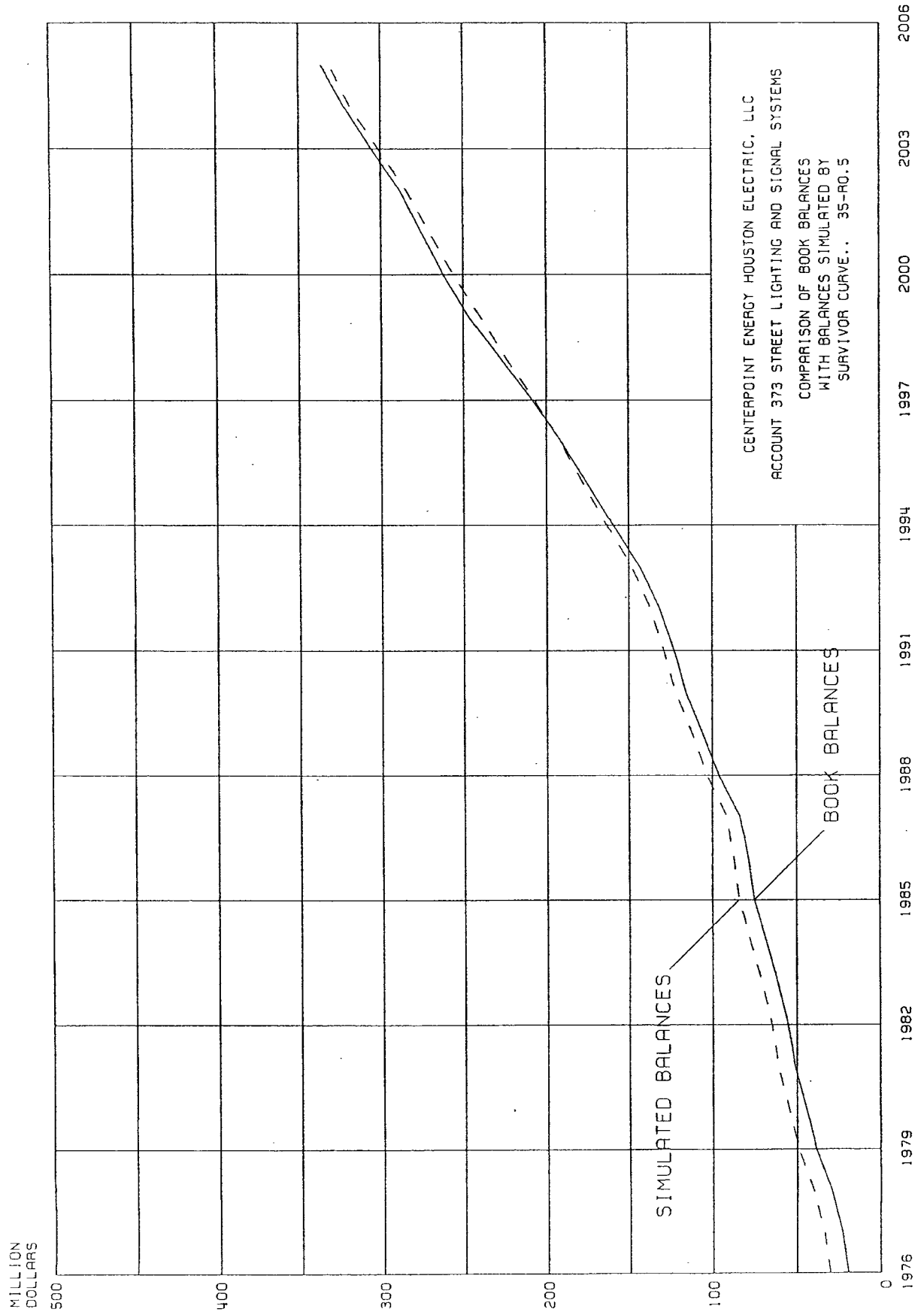
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

ACCOUNT 370 METERS

SIMULATED PLANT BALANCES BASED ON
 SURVIVOR CURVE.. 34-R0.5

YEAR	BOOK BALANCE	SIMULATED BALANCE	DIFFERENCE
1976	55,094,487	46,030,787	9,063,700
1977	60,187,896	51,686,509	8,501,387
1978	66,057,355	58,715,802	7,341,553
1979	75,732,869	70,304,052	5,428,817
1980	88,908,568	84,726,262	4,182,306
1981	102,351,102	99,319,336	3,031,766
1982	118,431,448	115,966,612	2,464,836
1983	134,660,100	132,588,118	2,071,982
1984	146,065,136	144,387,412	1,677,724
1985	160,871,023	162,198,898	1,327,875-
1986	168,259,473	169,546,014	1,286,541-
1987	172,428,763	173,503,811	1,075,048-
1988	179,240,126	180,015,929	775,803-
1989	188,282,729	187,937,971	344,758
1990	196,880,394	196,008,677	871,717
1991	206,239,149	203,832,930	2,406,219
1992	210,198,903	206,750,539	3,448,364
1993	206,060,652	211,047,026	4,986,374-
1994	212,729,554	217,056,757	4,327,203-
1995	207,622,389	221,571,225	13,948,836-
1996	216,553,443	231,717,957	15,164,514-
1997	224,905,280	236,600,918	11,695,638-
1998	237,442,788	247,503,360	10,060,572-
1999	247,432,438	253,532,145	6,099,707-
2000	256,255,076	258,502,035	2,246,959-
2001	265,093,672	263,312,045	1,781,627
2002	267,518,225	265,405,695	2,112,530
2003	275,084,010	268,011,254	7,072,756
2004	274,927,122	270,122,878	4,804,244
2005	280,358,139	274,635,143	5,722,996

AVERAGE BOOK BALANCE	RESIDUAL MEASURE	CONFORMANCE INDEX	RETIREMENTS EXPERIENCE BEG END
183,395,744	6,227,013	29.5	96.2 100.0



CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
 ACCOUNT 373 STREET LIGHTING AND SIGNAL SYSTEMS

SIMULATED PLANT BALANCES BASED ON
 SURVIVOR CURVE.. 35-R0.5

YEAR	BOOK BALANCE	SIMULATED BALANCE	DIFFERENCE
1976	19,369,241	30,460,004	11,090,763-
1977	22,919,356	33,840,588	10,921,232-
1978	29,430,583	40,138,392	10,707,809-
1979	38,530,601	49,014,612	10,484,011-
1980	44,409,171	54,675,831	10,266,660-
1981	51,059,573	61,075,277	10,015,704-
1982	55,087,462	64,927,238	9,839,776-
1983	61,239,267	70,778,951	9,539,684-
1984	68,216,840	77,580,897	9,364,057-
1985	75,241,035	84,240,458	8,999,423-
1986	78,905,233	87,402,347	8,497,114-
1987	83,650,547	91,417,995	7,767,448-
1988	96,091,429	103,103,879	7,012,450-
1989	105,666,009	112,010,860	6,344,851-
1990	115,767,048	121,753,574	5,986,526-
1991	122,412,623	128,678,258	6,265,635-
1992	131,132,828	137,001,740	5,868,912-
1993	143,231,892	148,057,092	4,825,200-
1994	159,340,502	163,070,697	3,730,195-
1995	174,971,878	177,386,379	2,414,501-
1996	190,760,805	191,269,922	509,117-
1997	208,125,130	206,793,439	1,331,691
1998	227,644,979	224,208,337	3,436,642
1999	246,791,332	239,932,238	6,859,094
2000	261,987,803	255,797,642	6,190,161
2001	275,295,910	270,376,406	4,919,504
2002	288,054,724	284,203,571	3,851,153
2003	305,822,491	301,508,756	4,313,735
2004	322,107,196	318,706,895	3,400,301
2005	336,123,813	330,625,238	5,498,575

AVERAGE BOOK BALANCE	RESIDUAL MEASURE	CONFORMANCE INDEX	RETIREMENTS EXPERIENCE BEG END
144,646,243	7,308,100	19.8	94.4 100.0

Request No: GCCC28-05

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 32093
SOAH DOCKET NO. 473-06-2043
GULF COAST COALITION OF CITIES**

QUESTION:

28 NH 5 State whether CNP records and maintains its book depreciation reserve at the functional level (e.g. transmission, distribution, general plant) or by depreciable plant account.

ANSWER:

CNP records and maintains its book depreciation reserve at the group asset level within each depreciable plant account.

Sponsor: Walter L. Fitzgerald

Responsive Documents:

None

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 18th day of July 2006.

Linda M Johnston