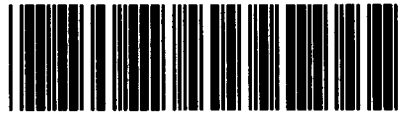


Control Number: 38339



Item Number: 101

Addendum StartPage: 0

P.U.C. DOCKET NO. 38339
SOAH DOCKET NO. 473-10-5001

APPLICATION OF CENTERPOINT §
ENERGY HOUSTON ELECTRIC, LLC §
FOR AUTHORITY TO CHANGE RATES §

BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

RECEIVED
10 JUL 29 PM 2:49
PUBLIC UTILITY COMMISSION
FILING CLERK

**CITY OF HOUSTON'S OBJECTIONS TO
CENTERPOINT HOUSTON ELECTRIC, LLC'S
FIRST REQUEST FOR INFORMATION**

To: CenterPoint Energy Houston Electric, LLC, by and through their attorneys of record, Jason M. Ryan, CenterPoint Energy, Inc., P.O. Box 61867, Houston, Texas 77208 and Ann Coffin and Dane McKaughan, Parsley, Coffin & Renner, LLP, 98 San Jacinto Boulevard, Suite 1450, Austin, Texas 78701.

COMES NOW, City of Houston ("City"), by and through their attorney of record, and files these objections to CenterPoint Energy Houston Electric, LLC's First Request for Information.

Respectfully submitted,

DAVID FELDMAN
City Attorney

MELBA T. POURTEAU
Senior Assistant City Attorney
P.O. Box 1562
Houston, Texas 77251
(832) 393-6320
(832) 393-6259 (Fax)

ALTON J. HALL, JR.
State Bar No. 08743740
TAMMY WAVLE-SHEA
State Bar No. 24008908
Epstein Becker Green Wickliff & Hall, P.C.
1000 Louisiana, Suite 5400
Houston, Texas 77002
(713) 750-3114
(713) 750-3101 (Fax)
email: ahall@ebglaw.com
tshea@ebglaw.com

By: Tammy Wavle-Shea with permission
Tammy Wavle-Shea *Arlin Hall*

ATTORNEYS FOR CITY OF HOUSTON

CERTIFICATE OF SERVICE

On this the 29th day of July, 2010, a true and correct copy of the City of Houston's Responses to CenterPoint Energy Houston, LLC's First Request for Information was served upon all parties of record by facsimile, email and/or U.S. mail, postage paid.

Jason M. Ryan
Assistant General Counsel
CenterPoint Energy, Inc.
P.O. Box 61867
Houston, Texas 77208
Assistant: Rosemarie
Via Facsimile: 713 574.2261

Ann Coffin
Dane McKaughan
PARSLEY COFFIN
300 West 6th Street, 15th Floor
Austin, Texas 78701
Via Facsimile: 512.879.0900

Bryan L. Baker
Susan M. Kelley
Office of the Attorney General
Consumer Protection & Public Health
Division
P. O. Box 12548
Austin, Texas 78711-2548
Via Facsimile: 512).322.9114

Thomas L. Brocato
LLOYD GOSSELINK ROCHELLE & TOWNSEND, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
Via Facsimile : 512.472.0532

Thomas S. Hunter
Keith Rogas
Patrick H. Peters III
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78711-3326
Via Facsimile: (512) 936.7268

James K. Rourke, Jr.
Assistant Public Counsel
Sheri Sanders Givens
Public Counsel
1701 N. Congress Avenue, Suite 9-180
Austin, Texas 78711-2397
Via Facsimile (512) 936.7525

Alfred R. Herrera
Jim Boyle
Felipe Alonso, III
Carrie Tournillon
HERRERA & BOYLE, PLLC
816 Congress Avenue, Suite 1250
Austin, Texas 78701
Via Facsimile: 512) 474-2507

Stephen J. Davis
LAW OFFICES OF STEPHEN J. DAVIS, PC
701 Brazos, Suite 1040
Austin, Texas 78701
Via Facsimile: 512 479.9996

Lino Mendiola
Tammy Cooper
Michael Boldt
ANDREWS KURTH, LLP
111 Congress Avenue, Suite 1700
Austin, Texas 78701
Via Facsimile: 512.320.9292

Jonathan L. Heller
Regional Asst., General Counsel
RELIANT ENERGY RETAIL SERVICES, LLC
P.O. Box 148
Houston, Texas 77001-0148
Via Facsimile: 713.537-5045

Bryan P. Sams
RELIANT ENERGY RETAIL SERVICES, LLC
1005 Congress Avenue, Suite 1000
Austin, Texas 78701
Via Facsimile: 512.494-3050

John L. Munn
Senior Counsel
TXU ENERGY
6555 Sierra Boulevard, Third Floor
Irving, Texas 75039
Via Facsimile: 972.556.6119

Tammy Wavle-Shea with permission

Tammy Wavle-Shea *Admitted*

**CITY OF HOUSTON'S OBJECTIONS TO CENTERPOINT ENERGY'S
FIRST REQUEST FOR INFORMATION**

1-1. Produce all documents provided to, relied upon or produced by each consultant or expert as part of the City's consideration of whether the Company should be relieved of its obligation to file this rate case and/or be required to file this rate case.

OBJECTION:

The City of Houston objects to this request in that the term "City" is vague and ambiguous. The governing body of a municipality is City Council. There are no documents responsive to this request when the "City" is defined as "City Council." However, without waiving this objection, and subject thereto, the City of Houston, in an effort to be responsive, will search for, and produce, any non-privileged documents responsive to this request as it pertains to City of Houston employees.

The City of Houston further objects to this request to the extent it seeks information from purely "consulting only experts" whose mental impressions and opinions have not been reviewed by a testifying expert pursuant to Tex. R. Civ. Proc. 192.3(e).

1-2. Produce all documents upon which the City relied or reviewed as part of the City's consideration of whether the Company should be relieved of its obligation to file this rate case and/or be required to file this rate case.

OBJECTION:

The City of Houston objects to this request in that the term "City" is vague and ambiguous. The governing body of a municipality is City Council. There are no documents responsive to this request when the "City" is defined as "City Council." However, without waiving this objection, and subject thereto, the City of Houston, in an effort to be responsive, will search for, and produce, any non-privileged documents responsive to this request as it pertains to City of Houston employees.

The City of Houston further objects to this request to the extent it seeks information from purely "consulting only experts" whose mental impressions and opinions have not been reviewed by a testifying expert pursuant to Tex. R. Civ. Proc. 192.3(e). Additionally, the City of Houston objects to producing any information that is protected by the attorney client privilege and/or work product privileges.

1-3. Produce all city council meeting agendas or other documents that relate to or reflect the meetings at which the City considered its decision to:

- a. not relieve the Company of its obligation to file this rate case and/or require the Company to file this rate case;
- b. hire outside counsel to represent it in this case; and/or
- c. intervene in this rate case.

OBJECTION:

The City of Houston objects to this request in that the term "City" is vague and ambiguous. The governing body of a municipality is City Council. There are no documents responsive to this request when the "City" is defined as "City Council." However, without waiving this objection, and subject thereto, the City of Houston, in an effort to be responsive, will search for, and produce, any non-privileged documents responsive to this request as it pertains to City of Houston employees.

The City of Houston further objects to this request to the extent it seeks information from purely "consulting only experts" whose mental impressions and opinions have not been reviewed by a testifying expert pursuant to Tex. R. Civ. Proc. 192.3(e). Additionally, the City of Houston objects to producing any information that is protected by the attorney client privilege and/or work product privileges.

