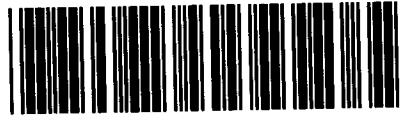


Control Number: 38339



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SOAH DOCKET NO. 473-10-5001  
PUC DOCKET NO. 38339

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

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§  
§  
§

BEFORE THE  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS

FILED  
10/13 PM 2:38  
CLERK

**NOTICE OF CONFIDENTIAL FILING BY  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston”) submits this notice, pursuant to paragraph 4 of the Protective Order in this case, that it has today submitted under seal certain responses to the City of Houston’s Ninth Request for Information.

The response to the following request contains information that is filed as Protected Material under the Protective Order:

COH 09-01

Refer to Direct Testimony of Gregory S. Wilson, Page 7, Lines 12-20. Please refer to the Monte Carlo Simulation model developed to simulate individual losses on an annual basis.

- a. What software was used to run the simulation model? If Excel, please provide the Excel model with all links intact and working formulas.
- b. Please describe how the simulation is designed, including the input distributions, all calculations, and the output distribution.
- c. Please provide all historical loss data used to develop the input distribution in electronic format.
- d. Please provide documentation demonstrating the detailed calculations of all adjustments made to the historical loss data prior to using it in the simulation model.
- e. Please describe the type of input distribution selected for the simulation model including all necessary parameters for defining the distribution.
- f. Please provide all statistical analyses conducted to select the input distribution and test its goodness of fit.
- g. Please provide all 5,000 simulation trial outputs produced by the simulation model in electronic format.

Specifically, the request seeks formulas and confidential information contained in a proprietary simulation model. That information qualifies as Protected Material because it is also commercial


and/or financial information excepted from public disclosure under the Texas Public Information Act, TEX. GOV'T CODE ANN., Chapter 552 ("TPIA").

In 1999, the Texas Legislature amended § 552.110 of the TPIA by specifically recognizing that the disclosure of commercial or financial information can cause substantial harm to the person from whom the information was obtained. This amendment removed the express requirement that the information needed to be privileged or confidential by statute or judicial decision to be exempted from disclosure. The express language of the liberalized exemption in § 552.110(b) is designed to protect commercial or financial information.

CenterPoint Houston asserts that the information provided in response to the above request is commercial and/or financial information, the disclosure of which would cause substantial harm to CenterPoint Houston and/or its affiliates. The information is therefore exempt from public disclosure under TPIA § 552.110(b).

Counsel for CenterPoint Houston has reviewed the information sufficiently to state in good faith that the information is exempt from disclosure under the TPIA and merits Protected Material designation.

Respectfully submitted,



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COUNSEL FOR CENTERPOINT ENERGY  
HOUSTON ELECTRIC, LLC

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 facsimile, hand delivery, e-mail, or United States first class mail on this 13<sup>th</sup> day of August 2010.

Alice A. Hart