



Control Number: 38339



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

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

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**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

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PUBLIC UTILITY COMMISSION
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CITY OF HOUSTON'S SEVENTEENTH REQUEST FOR INFORMATION

In connection with the Application filed by CenterPoint Energy Houston Electric, LLC ("CenterPoint"), the City of Houston ("the City") requests that CenterPoint, by and through its attorney of record, provide the following information within ten (10) days of receipt of these requests. It is further requested that the answers to the requests 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 "nonprivileged 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 Resources and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

**CITY OF HOUSTON'S SEVENTEENTH REQUEST FOR INFORMATION
TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

- 17-1. In Alan Ahrens testimony at pg. 8, Ins. 1-25 (Bates page 2274), he indicates that CEHE "plans to continue to fund [energy efficiency programs that are currently funded by the settlement agreement in Docket 32093] in 2011." Does CEHE intend to continue to fund programs at these levels after 2011?
- 17-2. On page 30 of Exhibit AA-1, CEHE's Energy Efficiency Plan and Report shows that CEHE plans to cut incentives levels to the Agency in Action program from \$4.5 million to \$2.9 million. Please indicate how this reduction is consistent with commitments made in the settlement agreement in Docket 32093 to fund "not less than \$3 million of the residential share of the energy efficiency expenditures will be used in coordination with the federal weatherization program described in PURA 39.903(f)(2)."
- 17-3. Please explain the source of the \$504,858 regulatory liability related to the low income program arising out of the settlement in Docket 32093 described in Walter Fitzgerald's testimony at pg. 12, Ins. 7-11.
- 17-4. Please show the derivation of the calculation for the EECRF rider for residential service of \$0.963232 per retail customer per month as shown in Exhibit MAT-7 at Bates page 2674.
- 17-5. Please indicate whether CEHE believes that it can still meet its energy efficiency targets under the Commission's proposed rule in Project 37623 (25% of load growth in 2012 and 30% of load growth in 2013 with per customer cost cap of \$1.30 in 2011 and 2012 and \$1.60 in 2013 and beyond).
- 17-6. Please describe CEHE's plans to distribute \$3 million for in-home displays in 2011.
- 17-7. As indicated in footnote 20 of CEHE's Revised EEPR, attached as Exhibit AA-1 (Bates page 2335), CEHE has "calculated its 2009 incentive based on CenterPoint Houston's total spending for all energy efficiency programs." As indicated in footnote 2 of Mr. Ahrens testimony at Bates page 2280, the performance bonus would be \$3,007,344 without the approximately \$10 million spent on energy efficiency as a result of the settlement in Docket 32093. Please provide an electronic spreadsheet with the re-calculation of CEHE's performance bonus without the disputed \$10 million from Docket 32093.

Respectfully submitted,

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By: Michelle R. Moore with permission
Michelle R. Moore *Mary E. Murphy*

ATTORNEYS FOR CITY OF HOUSTON

CERTIFICATE OF SERVICE

On this the 16th day of August, 2010, a true copy of the foregoing document was served upon all parties of record by facsimile, email and/or U.S. mail, postage paid.

Michelle R. Moore with permission
Michelle R. Moore *Mary E. Murphy*