



Control Number: 38339



Item Number: 284

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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 §
§
§
§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

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COMMISSION STAFF'S NINTH REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
REQUEST NOS. RC-1-1 THROUGH RC-1-16

The Staff of the Public Utility Commission of Texas requests that CenterPoint Energy Houston Electric, LLC respond to the following requests for information in accordance with the Commission's Procedural Rules.

DEFINITIONS AND INSTRUCTIONS

1. "Commission" means the Public Utility Commission of Texas.
2. "Communication" means any disclosure, transfer, or exchange of information, whether oral or written.
3. "Commissioners" means any or all of the Commissioners of the Public Utility Commission of Texas.
4. "CenterPoint" means CenterPoint Energy Houston Electric, LLC. The terms "you," "your" and "Company" may also be used to refer to CenterPoint.
5. "Concerning" means relating to, referring to, describing, concerning, evidencing, or constituting.
6. "Document" means any writing, drawing, email, graph, chart, photograph, sound recording, image, and any data or data compilations stored in any medium from which information can be obtained. A draft or non-identical copy is a separate document.
7. "Identify" has the following meanings depending on the context:
 - (a) "Identify" when used with a natural person means to supply his or her name, last known residential and business addresses, and last known residential and business telephone numbers. If the above information is unavailable, provide some other means of identifying the person and his or her present location.

(b) “Identify” when used with an entity means to provide its name, manner of organization (*e.g.*, corporation, partnership, joint venture, etc.), address, and telephone number.

(c) “Identify” when used with a document means to provide its date, author, addressee, and the identity of the natural person known or believed by you to have possession, custody, or control of the document. If this information is unavailable, provide some other means of identifying the document and its present location with sufficient particularity to allow a party to this action to request its production under Procedural Rule 22.144.

(d) “Identify” when used with any other thing or matter means to provide a description with detail sufficient to allow a party to this action to identify it and determine its present location.

8. “Person” means any natural person, business, organization, legal entity, or governmental entity.

9. “Representative” means an officer, director, employee, agent, spokesperson, or attorney of a person.

10. “Staff” means the Staff of the Public Utility Commission of Texas.

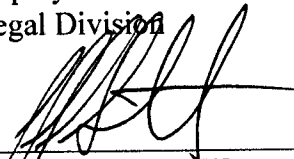
11. The words “and” and “or” are to be construed conjunctively or disjunctively as necessary to give each request its broadest scope.

12. The singular form of a word also refers to the plural, unless the context requires otherwise.

Respectfully Submitted,

Thomas S. Hunter
Division Director
Legal Division

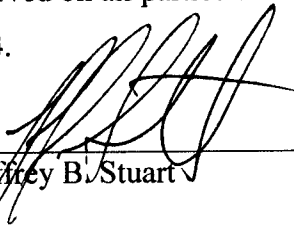
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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on August 30, 2010, in accordance with P.U.C. Procedural Rule 22.74.



Jeffrey B. Stuart

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**COMMISSION STAFF'S NINTH REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
REQUEST NOS. RC-1-1 THROUGH RC-1-16**

- RC-1-1 Please confirm that the tree trimming program (Bates pages 817-819) costs are not included in the Grid Hardening Initiative costs listed on Figure TF-16 (Bates page 831). If they are included, identify the particular Grid Hardening Initiative programs that include the tree trimming program.
- RC-1-2 Please confirm that the service restoration process (Bates pages 820-822) costs are not included in the Grid Hardening Initiative costs listed on Figure TF-16 (Bates page 831). If they are included, identify the particular Grid Hardening Initiative programs that include the tree trimming program.
- RC-1-3 Admit or deny that Subst. R. 25.95 requires CenterPoint to develop storm hardening procedures that require expenditures by CenterPoint.
- RC-1-4 Admit or deny that the current vegetation management and storm restoration procedures practiced by CenterPoint do not provide a reliable distribution system and reasonable restoration times for the CenterPoint system.
- RC-1-5 What is the current trim cycle for 35kV and 12kV circuits in the CenterPoint system?
- RC-1-6 What is the source for the three and five year trim cycles for 35 kV and 12 kv circuits, respectively, that are presented by Mr. Finley?
- RC-1-7 Please refer to Finley workpaper on page 3 (Bates 4504).
A. Please explain how the 3% annual increase was divided between system growth and inflation and provide the source for each one of the estimates.
B. Please explain the decrease of costs from 2012 to 2013.
C. Please explain how the \$/mile for 2009 was determined.
D. Please explain the "10% efficiency savings."
E. Please provide the actual values for 2005 through 2008 that you provide for the \$/mile and miles in 2009.
- RC-1-8 Please refer to Finley workpaper on page 4 (Bates 4505).
A. Please explain how the "study area" was determined.
B. Please explain how the values for each category except subtotal and total were derived.
- RC-1-9 Please provide the number of distribution poles that were inspected for each year from 2005 through 2008.

- RC-1-10 What was the basis for the 15 year cycle for pole inspections? Provide any and all documents that support the use of 15 years by CenterPoint.
- RC-1-11 What is the basis for the proposed 10 year cycle for pole inspections? Provide any and all documents that support the use of 10 years by CenterPoint.
- RC-1-12 Please provide the derivation of each line item category on Finley workpaper (Bates page 4506) for pole inspections and pole replacement.
- RC-1-13 Please explain the derivation of the values for each line item on Finley workpaper (Bates page 4507) for distribution feeder inspection costs.
- RC-1-14 Please provide the number of distribution poles at the end of each year from 2005 through 2008.
- RC-1-15 Please provide all documents related to the two-month pilot in the Bellaire Service Area as referenced on Bates page 830 of Mr. Finley's testimony.
- RC-1-16 Please explain the justification for a feeder inspection every five years and the source of this justification.