



Control Number: 38339



Item Number: 43

Addendum StartPage: 0

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

FILED  
12/11/11  
PM 12:47  
CLERK

GULF COAST COALITION OF CITIES'  
SECOND REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

The Gulf Coast Coalition of Cities ("GCCC") file this second information request to CenterPoint Energy Houston Electric, LLC ("CenterPoint" or "Company") in the above-styled docket. CenterPoint is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701, (512) 322-5800, the undersigned attorney, within ten (10) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if CenterPoint receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings. Where applicable, please identify, by bates numbers, all documents responsive to a question and previously provided in response to another question. Also, where data is requested, provide it in hard copy and electronic Excel format.

**DEFINITIONS AND INSTRUCTIONS**

A. "CNP," "CEHE" or "CenterPoint" refers to CenterPoint Energy Houston Electric, LLC (an indirect subsidiary of CenterPoint Energy, Inc.), its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The term "document" shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses,

summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper document is a separate document within the meaning of this term.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, GCCC specifically requests that any electronic or magnetic data (which is included in the definition of document) that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. GCCC further requests that CenterPoint produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms "and/or" shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."

F. "Any" shall be construed to include "all" and "all" shall be construed to include "any."

G. The term "concerning," or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term "including," or one of its inflections, means and refers to including but not limited to.

I. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

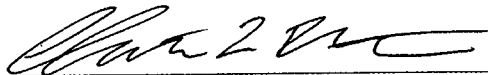
L. Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
(512) 322-5800  
(512) 472-0532 (Fax)



CHRISTOPHER L. BREWSTER  
State Bar No. 24043570

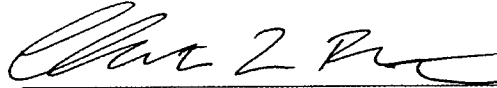
THOMAS L. BROCATO  
State Bar No. 03039030

MELISSA A. LONG  
State Bar No. 24063949

ATTORNEYS FOR GULF COAST  
COALITION OF CITIES

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was transmitted by e-mail, fax, hand-delivery and/or regular first-class mail on this 12<sup>th</sup> day of July 2010 to the parties of record.



CHRISTOPHER L. BREWSTER

- CJ 2-1 Please provide a complete explanation and step by step narrative for the formulas shown on page 48, Ex. AA-1, for converting the rule's avoided cost values into PV avoided capacity and energy costs.
- CJ 2-2 Please provide all tables in Ex. AA-1 in excel spreadsheet formats.
- CJ 2-3 Please show the calculation for footnote 2 of Mr. Ahrens' testimony in excel spreadsheet format.
- CJ 2-4 Mr. Ahrens states: "Between base rate cases, utilities have a financial incentive to increase retail sales of electricity (relative to the historic levels in the test year which set base rates) and to maximize the "throughput" of electricity across their wires." With respect to this statement: Please identify, describe, and list each action or directive undertaken by CenterPoint to maximize throughput of electricity across the Company's wires.
- CJ 2-5 With respect to the actions or directives referenced in No. 2-4, above, please identify which of those actions or directives will not be undertaken if the lost revenue adjustment is approved.
- CJ 2-6 With respect to Mr. Ahrens' discussion on page 20, please identify any previous rate proceeding filed by CenterPoint or its predecessors, Reliant Energy or Houston Lighting & Power Co., in which the requested tariffs and rate calculations include adjustments in contemplation of legislative action during the pendency of the rate proceeding.
- CJ 2-7 Please provide all supporting calculations for the lost revenue amounts alleged on page 15 of Ahrens' testimony. Explain and describe each assumption and supporting study which is embedded in the calculations.
- CJ 2-8 With respect to No. 7, above, please explain how the calculations avoid double counting of energy efficiency effects which may influence the weather adjusted baseline for revenues.
- CJ 2-9 With respect to Mr. Finley's direct testimony, provide all analyses and supporting source material, including transformer price changes, associated with the \$3.4 million cost increase for DOE transformer standards referenced on page 66, line 4.
- CJ 2-10 With respect to Mr. Finley's figure TF 15, provide the expected transformer price increase for each size of transformer. Compare the price increases to the expected life cycle energy cost savings, under a typical Total Ownership Cost analysis.
- CJ 2-11 With respect to Mr. Sumner's testimony at page 5, provide all supporting documentation, source data, and calculations for the transmission voltage customer adjustment referenced at lines 20-22.

- CJ 2-12 Has the Company considered or tested the use of weather data from Galveston as part of its weather modeling? Why or why not? If the Company has tested such data, provide information on those results.
- CJ 2-13 Has the Company considered, or performed a sensitivity test, of its weather modeling based on shorter periods of data, other than 30 years? Please explain why or why not? Provide the results of all sensitivity testing using shorter periods.
- CJ 2-14 Please provide the results of the Company's weather adjustment if 10 years of weather data is used in lieu of 30 years.
- CJ 2-15 For the energy weather model, the NCP weather model, and the 4 CP weather model, provide all statistical tests which were performed for each analysis. These include tests of statistical significance, Durbin Watson statistic (with associated degrees of freedom), and R-squared values. Provide an explanation of the Company's interpretation of the statistics and the extent that they support the validity of the modeling results.
- CJ 2-16 With respect to the examination of individual customers' weather response for development of a NCP weather adjustment, please provide a detailed explanation of the manner in which the results can be scaled up for class NCP demands. In particular, (a) explain the manner in which class diversity is taken into account in summing the sampled customers' weather adjustments; and (b) provide all statistical parameters for the sample data, including confidence intervals by class associated with applying the sampled data to the total class level.
- CJ 2-17 Please explain in detail how the Company performed weather adjustments to 4 CP demands for non-IDR metered customers. To the extent that load sampling is used, provide all statistical parameters for the sample data, including confidence intervals by class associated with applying the sampled data to the total class level. In addition, provide the number of years of data used to develop the historic normal weather for the ERCOT 4 CP.
- CJ 2-18 Please explain in detail why the Energy Efficiency Program adjustment to billing determinants qualifies as a known and measurable adjustment. Provide any statistical measures of significance or reliability which demonstrate that the adjustments are known with a high level of certainty.
- CJ 2-19 Please provide all analyses which support the EEP adjustment referenced in No. 2-18, above, including all supporting data sources and assumptions.
- CJ 2-20 What is the purpose and use of the weather normalized system peak referenced in Sec. X of Mr. Sumners' testimony?