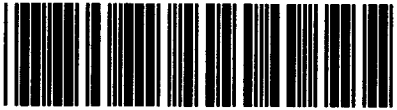




Control Number: 38339



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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

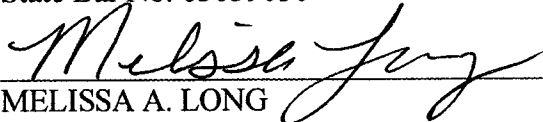
GULF COAST COALITION OF CITIES'
RESPONSE TO CENTERPOINT ENERGY HOUSTON ELECTRIC LLC'S
FIFTH SET OF REQUESTS FOR INFORMATION

The Gulf Coast Coalition of Cities ("GCCC" or "Cities") hereby files its response to the Fifth Set of Requests for Information ("RFIs") to GCCC filed by CenterPoint Energy Houston Electric, LLC ("CenterPoint"). CenterPoint's Fifth Set of RFIs was filed at the Commission and received by GCCC on September 21, 2010. Pursuant to P.U.C. PROC. R. 221.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

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& TOWNSEND, P.C.
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(512) 322-5800
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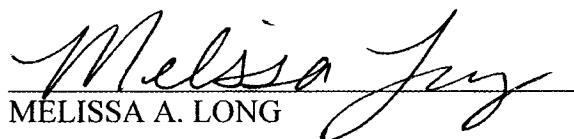
THOMAS L. BROCATO
State Bar No. 03039030


MELISSA A. LONG
State Bar No. 24063949

ATTORNEYS FOR THE 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 28th day of September, 2010 to the parties of record.


MELISSA A. LONG

**GCCC Response to CenterPoint's 5th RFI
Question No. 1**

5-1. In response to the Company's RFI 3-18, you stated you will timely file an objection. If you object based on joint defense privilege, please identify the issues or topics in this case for which you claim the joint defense privilege applies and with which parties the privilege applies. The Company is not seeking an explanation of your legal strategy or the substance of your joint defense for a specific issue. This RFI seeks only a list of issues or topics and parties.

Response

GCCC claims a joint defense privilege exists with respect to communications on CenterPoint's cost of service, including but not limited to the cost of capital and rate base, with GCCC, the City of Houston and Houston Coalition of Cities, Texas Coast Utilities Coalition, Texas Industrial Energy Customers, the State of Texas, and Office of Public Utility Counsel.

GCCC claims a joint defense privilege exists with respect to communications relating to procedural matters, including scheduling and defective notice, with GCCC, the City of Houston and Houston Coalition of Cities, Texas Coast Utilities Coalition, Texas Industrial Energy Customers, the State of Texas, Office of Public Utility Counsel, and PUC Staff.

The referenced issues and parties listed above are subject to change and updating. The process of identifying issues and parties with whom GCCC shares a joint defense or common interest will continue throughout this case, and may encompass prior communications not addressed by the above. GCCC will update this response accordingly.

Prepared by: Thomas Brocato
Sponsored by: Thomas Brocato