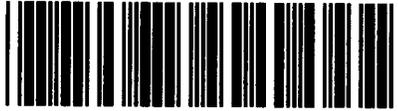




Control Number: 38339



Item Number: 62

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

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

FILED
MAY 19 11:54 AM
PUC

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

The Gulf Coast Coalition of Cities ("GCCC") file this third 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 twenty (20) 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.

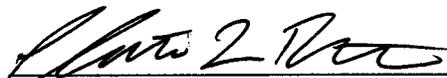
L. Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

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

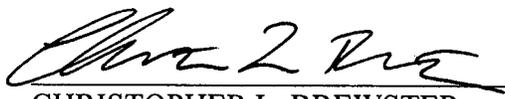
THOMAS L. BROCATO
State Bar No. 03039030

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 19th day of July, 2010 to the parties of record.


CHRISTOPHER L. BREWSTER

- CJ 3-1 Please provide an executable retail class cost of service study in electronic model form (Excel spreadsheet). Please provide any instructions which are necessary in order to modify allocation factor tables or cost and revenue data inputs.
- CJ 3-2 Please provide a full explanation and details regarding the class allocation and recovery of municipal franchise fees.
- CJ 3-3 Please provide all internal correspondence associated with decisions related to CenterPoint's pricing and class cost allocation proposals in this proceeding.
- CJ 3-4 Please provide the replacement cost / foot for each size of underground and overhead secondary conductor installed on the Company's system. Provide the Kva carrying capacity for each size of conductor.
- CJ 3-5 Please provide the replacement cost / foot for each size underground and overhead primary conductor installed on the Company's system. Provide the Kva carrying capacity for each size of conductor.
- CJ 3-6 Does the Company believe that economies of scale exist with respect to the load carrying capability of underground conduit and conductors? If yes, explain the basis for the opinion. If no, explain why not. Provide supporting data for the answers.
- CJ 3-7 Provide Exhibits MAT-1 through MAT-5 and MAT-11 in machine readable Excel spreadsheet format.
- CJ 3-8 Mr. Troxel states at page 21: "The proposed change will eliminate the existing intra-class subsidy that has kept the residential revenue requirement below its actual cost of service." What is the nature of the intra-class subsidy within the residential class, and what rate elements are causing the subsidy?
- CJ 3-9 Mr. Troxel states at page 21: "Additionally, the municipal account franchise credit has been changed to reflect the average franchise expense in the Residential rate." Please explain the reason for this credit, how it has been calculated in past cases, and whether the Company proposes to calculate it differently in this case.
- CJ 3-10 Please provide a billing analysis at different consumption levels and load factors (if load factor is material to the exception) which shows the impact of removing the "headroom exception" from the Secondary >10 Kva class rate design. Provide a machine readable Excel spreadsheet for this answer.
- CJ 3-11 Provide the SIC classifications of the commercial accounts which are most significantly affected by the removal of the headroom exception referenced above.
- CJ 3-12 What proportion (number and percentage) of municipal accounts take service under Secondary >10kva, and how many of those accounts (number and

percentage) are affected by the removal of the "headroom exception" to the Secondary >10kva class rate design.

- CJ 3-13 Provide the answers to CJ 3-10 – 12 as the questions would apply to the Primary class.
- CJ 3-14 Please provide all pricing studies of SLS as referenced on page 28, line 8-14 of Mr. Troxel's direct testimony. If the studies are available in electronic spreadsheet form, provide the data on a CD. Include all supporting documents and data for assumptions used in the studies, such as expected life, manufacturers' cost, etc.
- CJ 3-15 Please explain why the 2005 SLS pricing study was not updated to provide current pricing information.
- CJ 3-16 Please provide the 1980's pricing studies discussed by Mr. Troxel on page 28 of his direct testimony.
- CJ 3-17 Please explain how customer allocation factors are calculated for lighting services. If the lighting share of customer allocation factors vary for different types of distribution accounts, please explain the differences with specificity. Provide the supporting data for development of lighting customer allocation factors in electronic spreadsheet form.
- CJ 3-18 Please provide a narrative explanation of the difference between the end users of the MLS and SLS rate. What percentage of the revenue for each rate is associated with municipal accounts?
- CJ 3-19 Would Mr. Troxel agree that the alternative customer charge reflects a pricing strategy associated with unregulated monopolistic market power? If not, please provide all academic support for his position.
- CJ 3-20 Please provide all mitigation or exceptions to the distribution demand charge ratchet which the Company considered in light of the pending Commission project on ratchets.
- CJ 3-21 Please provide the intra-class revenue impacts of providing a 20 Kw exception, like the Commission adopted in the most recent TNMP and Oncor general rate cases, to the 80% demand ratchets for distribution classes.
- CJ 3-22 Provide the answer to CJ 3-21 above for a 25 Kw exception and a 30 Kw exception.
- CJ 3-23 For each class which includes municipal water pumping, provide the monthly average and maximum Kw contribution of municipal water pumping to the class (expressed as Kw and percentage of class totals). Also provide municipal water pumping Kwh and revenue as a percent of class totals.

- CJ 3-24 For each class which includes agricultural water pumping, provide the monthly average and maximum Kw contribution of agricultural water pumping to the class (expressed as Kw and percentage of class totals). Also provide agricultural water pumping Kwh and revenue as a percent of class totals.
- CJ 3-25 Provide the intra class revenue impact of the agricultural ratchet exception as it applies to agricultural water pumping.
- CJ 3-26 Provide all supporting documentation for the minimum system study in electronic spreadsheet form. This includes all data for distribution system components used to develop the minimum sized facility relationship.
- CJ 3-27 With respect to the minimum system study, provide all tests of statistical significance and R-square for zero or minimum intercept studies.
- CJ 3-28 Identify the smallest pole currently in service on the Company's distribution system. Provide the average original cost of the pole and the average number of years which have elapsed since the pole was installed.
- CJ 3-29 Identify the smallest kva transformer currently in service on the Company's distribution system. Provide the average original cost of that transformer and the average installation date for the transformer. The scope of costs should be equivalent to the scope of transformer costs used in the minimum system study.
- CJ 3-30 Identify the smallest overhead conductor wire currently in service on the Company's distribution system. Provide the average original cost of that size conductor and the average installation date associated with the average original cost.