



Control Number: 38339



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Addendum StartPage: 0

**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**

CITY OF HOUSTON'S THIRTY-FIRST REQUEST FOR INFORMATION

In connection with the Rebuttal Testimony and 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 **three (3) 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”, “CenterPoint Energy Houston Electric, LLC”, and/or “CEHE” includes CenterPoint Energy Resources and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

**CITY OF HOUSTON'S THIRTY-FIRST REQUEST FOR INFORMATION
TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

31-1 Identify the workpaper or schedule in the Company's rate filing package where the actuarial report for each of the following is provided:

- a. The 2010 FAS 87 expense
- b. The 2010 FAS 106 expense
- c. The 2010 FAS 112 expense
- d. The 2009 FAS 87 expense
- e. The 2009 FAS 106 expense
- f. The 2009 FAS 112 expense
- g. The 2008 FAS 87 expense
- h. The 2008 FAS 106 expense
- i. The 2008 FAS 112 expense
- j. The 2007 FAS 87 expense
- k. The 2007 FAS 106 expense
- l. The 2007 FAS 112 expense
- m. The 2006 FAS 87 expense
- n. The 2006 FAS 112 expense
- o. The 2006 FAS 106 expense

31-2 Identify the EIN in which CEHE is included on the 2009 Consolidated Federal 1120 Tax Return schedule by legal entity (see page 185-190 or Bates pages 176-181 of the 2009 Consolidated Federal 1120 Tax Return). Provide a breakout of the income, expenses, and taxable for each entity that is included in that EIN such that the information for each entity is separately shown in the same format as the schedule included in the consolidated tax return.

Respectfully submitted,

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By: Michelle R. Moore
Michelle R. Moore

**ATTORNEYS FOR CITY OF HOUSTON AND
HOUSTON COALITION OF CITIES**

CERTIFICATE OF SERVICE

On this the 4th day of October, 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
Michelle R. Moore