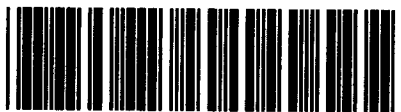




Control Number: 38339



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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**

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

The Gulf Coast Coalition of Cities (“GCCC”) file this eleventh 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 three (3) working 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,

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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.

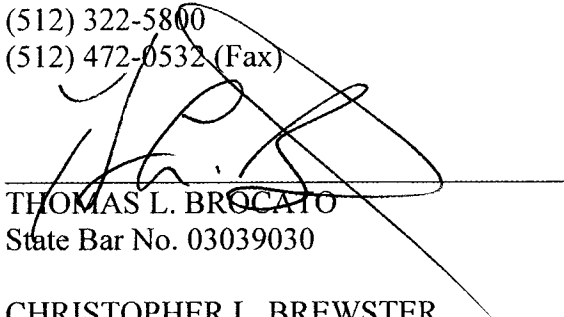
L. Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

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)



THOMAS L. BROCATO
State Bar No. 03039030

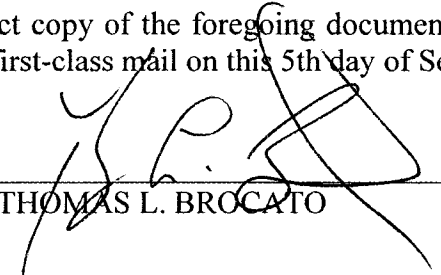
CHRISTOPHER L. BREWSTER
State Bar No. 24043570

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 5th day of September, 2010 to the parties of record.



THOMAS L. BROCATO

The following requests pertain to the Rebuttal Testimony of Bill Sumners:

- CJ 11-1 At page 3, Mr. Sumners discusses the effect of Hurricanes Ike and Rita on weather data. (a) Did Mr. Sumners consider adjusting the historic weather data to normalize the reductions in consumption due to the two hurricanes? Please provide any documents or e-mail which discuss this possibility. Please explain why such an adjustment was made, or not made, to the historical weather data. (b) Did Mr. Sumners consider utilizing a variable in the weather normalization regression model to recognize the effect of specific months when major hurricanes occurred? Please provide any documents or e-mail which discuss this possibility. Please explain why the regression model was, or was not, structured to capture the effect of the two hurricanes, above.
- CJ 11-2 At page 3, Mr. Sumners points out that Hurricanes Ike and Rita occurred during the most recent ten year period and states that the “effects are significant because hurricane season coincides with the time of year when electric demand is high.” If the hurricanes cause kilowatt hour consumption to be understated during the ten year period, is it correct that the ten year model will indicate less cooling impact than the 30 year model? If the answer to this question is other than “yes,” please explain all reasons that you believe the statement is incorrect, and provide all documents and calculations which support your answer.
- CJ 11-3 At page 3, Mr. Sumners states that Hurricane Rita caused \$3.2 million of lost revenues and Hurricane Ike caused \$12 million of lost revenues. If those annual periods were restated to reflect normal weather, is it true that the restated historic ten year data would reflect that normal weather produces higher revenues than the actual weather which occurred in the ten year period? If the answer to this question is other than “yes,” please explain all reasons that you believe the statement is incorrect, and provide all documents and calculations which support your answer.
- CJ 11-4 With respect to Mr. Sumner’s statement on page 4, lines 6 – 12, would a comparison of both cooling degree hours and smoothed cooling degree hours show the same results for the two ten year intervals? Please provide calculations and data which support the answer to this question.

The following questions pertain to the Rebuttal Testimony of Mr. Troxle:

- CJ 11-5 At page 3, lines 5-8, Mr. Troxle states that the Commission Staff, and ultimately the Commission, will review the Storm Hardening Rider costs. Does any provision in the Storm Hardening Rider permit intervenors to review the costs? Does Mr. Troxle expect that intervenors will be permitted to intervene, engage in discovery, and submit testimony regarding the Storm Hardening Costs when the Rider’s rate is changed?
- CJ 11-6 (a) With respect to Mr. Troxle’s statement on page 32, lines 20-22, does Mr. Troxle know whether the electrical code would require a pole larger than 20 feet

if the conductors did not carry any electrical current? Please explain this answer in the context of a minimum system which has no load carrying capability. (b) Did the electrical code permit 20 foot poles at the time that such poles were installed on the CenterPoint system? Please explain this answer.

- CJ 11-7 With respect to Mr. Troxle's opinion at page 25, lines 1 – 5, that the minimum distribution system concept follows cost causation, did Mr. Troxle ever testify as a Texas PUC Staff witness in support of a minimum system? If yes, identify each proceeding and utility in which he provided such testimony.
- CJ 11-8 As a Texas PUC Staff witness, has Mr. Troxle ever prepared a class cost of service study which classified Accounts 364 – 368 as 100% demand related? Please identify each proceeding and utility in which he provided such testimony.
- CJ 11-9 With respect to Mr. Troxle's statement at page 50, lines 6-8, that energy use was used to allocate transformer costs, does Mr. Troxle agree that peak month energy use, and not annual energy use, was used to estimate classes' use of transformers? If not, please explain more specifically how energy use was used.
- CJ 11-10 With respect to Mr. Troxle's statement on page 49, line 4-6, is it correct that the poles, lines, services allocation factors shown on the region operations spreadsheet has been used in the past to allocate these costs? Please explain this answer.