



Control Number: 38339



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SOAH DOCKET NO. 473-10-5001
DOCKET NO. 38339

10-15-10 PM 2:25

APPLICATION OF CENTERPOINT
ENERGY HOUSTON ELECTRIC, LLC
FOR AUTHORITY TO CHANGE
RATES

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BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

OFFICE OF PUBLIC UTILITY COUNSEL'S
FIFTH REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

COMES NOW, the Office of Public Utility Counsel ("OPC"), and files this, its Fifth Request for Information to CenterPoint Energy Houston Electric, LLC ("CenterPoint") in the captioned proceeding.

Under Commission Procedural Rules 22.141-145, 16 Tex. Admin. Code Ch. 22, OPC requests that CenterPoint, as defined herein, provide the following information and answer the following question under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

Definitions

As used in this introduction and in these questions,

- (1) "CenterPoint", the "Company", and "Applicant" refer to CenterPoint Energy Houston Electric, LLC and its affiliates;
- (2) "You", "yours" and "your" refer to CenterPoint (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
- (3) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile,

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computer storage device or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.

Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.

If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.

If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

Claim of Privilege

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Questions

The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.

If any question appears confusing, please request clarification from the undersigned counsel.

In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.

As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.

If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.

If the response to any question is voluminous, please provide separately an index to the materials contained in the response.

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.

To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

SOAH Docket No. 473-10-5001
PUC Docket No. 38339
OPC's Fifth Request For Information To
CenterPoint Energy Houston Electric, LLC

Mr. Woods' Rebuttal Testimony

- 5-1. Please provide the due date(s) for the publication of CNP's 2010 annual disclosure filings.
- 5-2. Please provide the dates upon which the annual disclosure filings were published for 2006, 2007 and 2009.
- 5-3. Please provide the currently anticipated date when the 2010 year end audit will be completed by CNP's external auditors.
- 5-4. Please provide the complete list of year end audit adjustments and reclassifications required by CNP's auditors for 2007, 2008 and 2009 along with the date on which each adjustment was recorded in CNP's books and records.
- 5-5. For each of the Companies listed on Rebuttal Exhibit CDW-1, please provide evidence that the full amount of the associated LTI plan is currently included in base rates in the State of Texas, along with the associated docket number and the date rates went into effect.
- 5-6. For each individual receiving an award under the LTI plan during 2009 and 2010, please provide the employee evaluation or other evidence that directly includes the following items in the determination and calculation of the individual awards: (1) phone responses, (2) customer satisfaction surveys, (3) resource utilization, (4) recordable incident rate, (5) lost time incident rate, (6) preventable vehicle incident rate.

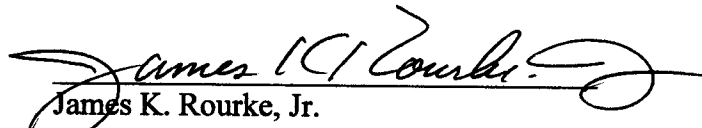
Mr. Felsenthal's Rebuttal Testimony

- 5-7. For uncertain tax positions accounted for in accordance with FIN 48, please provide a schedule providing the following information for 2007, 2008, 2009 and 2010: actual amounts paid for federal income taxes related to previously deducted amounts, actual amounts paid for penalties, actual amounts paid for interest, the year the related tax deduction was taken, the original amount of the deduction, the date(s) the payment(s) were made.

October 5, 2010

Respectfully submitted,

Sheri Sanders Givens
Public Counsel
State Bar No. 24037430


James K. Rourke, Jr.
Assistant Public Counsel
State Bar No. 17323700

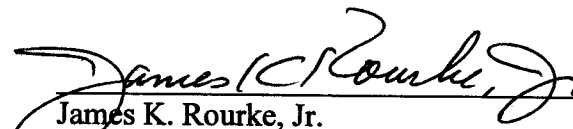
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CERTIFICATE OF SERVICE

SOAH Docket No. 473-10-5001

PUC Docket No. 38339

I certify that today, October 5, 2010, I served a true copy of the foregoing Office of Public Utility Counsel's Fifth Request for Information To CenterPoint Energy Houston Electric, LLC on all parties of record via United States First-Class Mail, hand-delivery or facsimile.


James K. Rourke, Jr.