



Control Number: 38339



Item Number: 76

Addendum StartPage: 0

**P.U.C. DOCKET NO. 38339
SOAH DOCKET NO. 473-10-5001**

APPLICATION OF CENTERPOINT	§	BEFORE THE
ENERGY HOUSTON ELECTRIC, LLC	§	PUBLIC UTILITY COMMISSION
FOR AUTHORITY TO CHANGE	§	OF TEXAS
RATES	§	

CITY OF HOUSTON'S FIRST REQUEST FOR INFORMATION

In connection with the 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 twenty (20) 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.

RECEIVED
PUBLIC UTILITY COMMISSION
HOUSTON, TEXAS
MAY 20 11:11 AM

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” or “CenterPoint Energy Houston Electric, LLC” includes CenterPoint Energy Resources and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

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

- I-1 (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2011. If this report is not yet available, please provide it as soon as it is.
- I-2. (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2010.
- I-3. (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2009.
- I-4 (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2008.
- I-5. (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2007.
- I-6. (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2006.
- I-7 (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2005.
- I-8. (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2004
- I-9. (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2003.
- I-10. (Pension) Provide a complete copy of the actuarial report for pension and OPEB costs for 2002.
- I-11. (Pension) Provide the date and amount of each cash contribution to the company's pension plan from January 2000 through June 2010.
- I-12. (Pension) Explain in detail the cash inflows and outflows related to the FAS 87 pension expense. Provide examples.
- I-13. (General) On what date did rates from Docket 32093 go into effect?
- I-14. (Injuries & Damages) What is the annual accrual to the injuries and damages reserve in current rates? In what docket was this accrual established?
- I-15. (Aircraft) Provide a schedule that includes all charges included in the Company's proposed revenue requirement for the use of corporate aircraft. Provide the flight log

information for each trip. If the log does not include a list of the passengers that was on each trip, please include that information.

- 1-16. (Wages) Provide a listing of all Company job descriptions as of the end of the test year. For each job description provide:
- a. The authorized pay range.
 - b. The number of filled positions as of test year end and as of March 31, 2010.
 - c. The number of unfilled positions as of test year end and as of March 31, 2010.
 - d. For each unfilled position at test year end, provide the wages and salaries included in the Company's proposed revenue requirement.
 - e. For each unfilled position at test year end, provide the employee benefits included in the Company's proposed revenue requirement.
 - f. For each unfilled position at test year end, provide the payroll taxes included in the Company's proposed revenue requirement.
 - g. For each unfilled position at March 31, 2010, provide the wages and salaries included in the Company's proposed revenue requirement.
 - h. For each unfilled position at March 31, 2010, provide the employee benefits included in the Company's proposed revenue requirement.
 - i. For each unfilled position at March 31, 2010, provide the wages and salaries included in the Company's proposed revenue requirement.
 - j. For each unfilled position at March 31, 2010, provide the payroll taxes included in the Company's proposed revenue requirement.
- I-17. (Affiliates) Does the Company agree that allocations based on the assets of the business units are a size based allocation? If not, please explain.
- I-18. (Affiliates) Refer to Exhibit KCD-2. Explain the Service Company's process for printing accounts payable and payroll checks.
- a. Include a complete description for accounts payable from receipt of an invoice to disbursement.
 - b. Provide a complete description of the payroll process that takes places each pay period.
 - c. Provide the total number of check disbursements processed during the test year by affiliate. Explain how this data is gathered in the course of normal operations.
- I-19. (Affiliates) Refer to the statement made at page 29, lines 4-6 of Ms. Dominguez's testimony. Provide the findings of fact and conclusions of law from previous dockets which support this statement.
- I-20. (Affiliates) Please provide a detailed description of the methodology used to allocate SFAS 87 pension expense to the business units.

Respectfully submitted,

DAVID FELDMAN
City Attorney

MELBA T. POURTEAU
Senior Assistant City Attorney
P.O. Box 1562
Houston, Texas 77251
(832) 393-6320
(832) 393-6259 (Fax)

ALTON J. HALL, JR.
State Bar No. 08743740
TAMMY WAVLE-SHEA
State Bar No. 24008908
Epstein Becker Green Wickliff & Hall, P.C.
1000 Louisiana, Suite 5400
Houston, Texas 77002
(713) 750-3114
(713) 750-3101 (Fax)
email: ahall@ebglaw.com
tshea@ebglaw.com

By: Tammy Wavle-Shea with permission
Tammy Wavle-Shea *(Signature)*

ATTORNEYS FOR CITY OF HOUSTON

CERTIFICATE OF SERVICE

On this the 20th day of July, 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.

Tammy Wavle-Shea with permission
Tammy Wavle-Shea *(Signature)*