



Control Number: 38339



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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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COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
REQUEST NOS. BA-2-1 THROUGH BA-2-14

The Staff of the Public Utility Commission of Texas requests that CenterPoint Energy Houston Electric, LLC respond to the following requests for information in accordance with the Commission's Procedural Rules. Your response should be served on the attorney listed below no later than 20 days after you receive this request.

DEFINITIONS AND INSTRUCTIONS

1. "Commission" means the Public Utility Commission of Texas.
2. "Communication" means any disclosure, transfer, or exchange of information, whether oral or written.
3. "Commissioners" means any or all of the Commissioners of the Public Utility Commission of Texas.
4. "CenterPoint" means CenterPoint Energy Houston Electric, LLC. The terms "you," "your" and "Company" may also be used to refer to CenterPoint.
5. "Concerning" means relating to, referring to, describing, concerning, evidencing, or constituting.
6. "Document" means any writing, drawing, email, graph, chart, photograph, sound recording, image, and any data or data compilations stored in any medium from which information can be obtained. A draft or non-identical copy is a separate document.
7. "Identify" has the following meanings depending on the context:
 - (a) "Identify" when used with a natural person means to supply his or her name, last known residential and business addresses, and last known residential and business telephone numbers. If the above information is unavailable, provide some other means of identifying the person and his or her present location.

(b) “Identify” when used with an entity means to provide its name, manner of organization (*e.g.*, corporation, partnership, joint venture, etc.), address, and telephone number.

(c) “Identify” when used with a document means to provide its date, author, addressee, and the identity of the natural person known or believed by you to have possession, custody, or control of the document. If this information is unavailable, provide some other means of identifying the document and its present location with sufficient particularity to allow a party to this action to request its production under Procedural Rule 22.144.

(d) “Identify” when used with any other thing or matter means to provide a description with detail sufficient to allow a party to this action to identify it and determine its present location.

8. “Person” means any natural person, business, organization, legal entity, or governmental entity.

9. “Representative” means an officer, director, employee, agent, spokesperson, or attorney of a person.

10. “Staff” means the Staff of the Public Utility Commission of Texas.

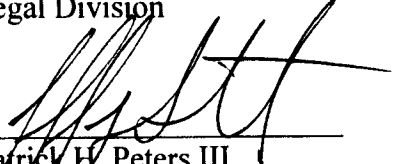
11. The words “and” and “or” are to be construed conjunctively or disjunctively as necessary to give each request its broadest scope.

12. The singular form of a word also refers to the plural, unless the context requires otherwise.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on July 23, 2010,
in accordance with P.U.C. Procedural Rule 22.74.



Jeffrey B. Stuart

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

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
REQUEST NOS. BA-2-1 THROUGH BA-2-14**

- BA-2-1 Is the Company including any liability losses in its calculation of the storm cost accrual? If so, please identify those losses in Mr. Wilson's workpapers.
- BA-2-2 Please provide an example of how the values in each column of Mr. Wilson's workpapers are used to develop his recommendation.
- BA-2-3 Please divide the "Trans & Dist Gross Loss" values shown on Mr. Wilson's workpapers into their respective FERC accounts for transmission and distribution. If FERC account information is not available, then distinguish between transmission and distribution.
- BA-2-4 What was the type of storm that caused the loss on September 24, 2005 as shown on page 1 of Mr. Wilson's workpapers?
- BA-2-5 Please explain the development of the \$100,000 cutoff for charges against the property reserve and provide all justification that supports this particular amount.
- BA-2-6 Please confirm the following amounts from FERC Form 1 filed in response Staff's 1st RFI, question 1-12 and from Schedule II-D-1. If amounts are correct, please explain the large differences between the FERC amounts and the test year amounts for Transmission Operation, Distribution Operation and Distribution Maintenance.

<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>II-D-1 2009</u>
Transmission Operation (\$000,000)				
239.0	247.9	272.9	317.3	164.8
Transmission Maintenance (\$000,000)				
15.1	13.7	16.7	15.0	17.5
Distribution Operation (\$000,000)				
89.5	85.1	89.9	89.8	103.9
Distribution Maintenance (\$000,000)				
64.0	65.2	64.9	63.3	81.2

- BA-2-7 Please reconcile the O&M costs presented in the testimonies of Houston (\$56.3 million) and Finley (\$192.1 million) with the respective amounts in Schedule II-D-1.
- BA-2-8 Please provide the number of residential, commercial, and industrial customers for each calendar year from 2005 through 2009.
- BA-2-9 Please refer to Bates page 800, lines 7-9 of Mr. Finley's testimony. Please provide correspondence or other documents that relate to the advice on the alliance process and the benchmarking of price and performance against appropriate indices.
- BA-2-10 Please refer to Bates page 801, lines 4-6 of Mr. Finley's testimony. Please identify cost savings initiatives developed by the contractors and explain if they were implemented. If they were not implemented, then explain why.
- BA-2-11 Please refer to Bates page 802, lines 20-21 of Mr. Finley's testimony. Does Centerpoint Houston have a specific corporate goal for SAIDI reporting? If so, what is it?
- BA-2-12 Does Centerpoint have company personnel in the field that can quickly resolve issues that may arise between the tree trimming contractor and the utility customer? Please provide any operating procedure that addresses this question.
- BA-2-13 How does Centerpoint budget and plan for the decrease in company personnel during the coming year because of the potential response for mutual assistance support to other utilities?
- BA-2-14 Please refer to Bates page 824, lines 1-3 of Mr. Finley's testimony. By what measure has the new security improvements proven to be effective?