



Control Number: 39363



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Parsley Coffin Renner

A Limited Liability Partnership

Post Office Box 13366
Austin, Texas 78711
Telephone (512) 879-0900
Fax (512) 879-0912

November 18, 2011

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Public Utility Commission of Texas
1701 N. Congress
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RE: SOAH Docket No. 473-11-5072; PUC Docket No. 39363, *Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to its Energy Efficiency Cost Recovery Factor*

Dear Sir or Madam:

CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston" or the "Company") is in receipt of Commission Staff's Proposed Corrections to the Proposal for Decision filed on November 9, 2011. CenterPoint Houston agrees with Commission Staff's proposals in part and hereby files its own proposed corrections so as to better describe the evidence presented in this proceeding. The Company notes that it has conferred with Commission Staff and that Staff does not object to CenterPoint Houston's proposals. Likewise, CenterPoint Houston does not object to Staff's proposed change to Finding of Fact 36.

The Company's proposed corrections to the Proposal for Decision are as follows:

Finding of Fact No. 29

29. The Secondary <= 10 kVa, Transmission-Industrial, and Lighting rate classes ~~transmission-level industrial customer class~~ did not participate in CenterPoint's 2010 energy efficiency programs.

Finding of Fact No. 30

30. The 2010 performance bonus portion should not be charged to the Secondary <= 10 kVa, Transmission-Industrial, and Lighting rate classes, which did not receive service ~~industrial customers, which were not eligible and did not take service~~ in CenterPoint's energy efficiency programs.

Finding of Fact No. 40

40. CenterPoint's proposed method of allocating its requested performance bonus to each rate class using the same allocation methodology required by the Commission in Docket No. 38213 (CenterPoint's 2011 EECRF Docket) should be modified to reflect no

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allocation to the Secondary <= 10 kVa, Transmission-Industrial, and Lighting rate classestransmission-level industrial customer class.

Conclusion of Law No. 13

13. CenterPoint's proposal to allocate performance bonus to the Secondary <= 10 kVa, Transmission-Industrial, and Lighting rate classestransmission-level industrial customer class is inconsistent with the PURA § 39.905(b)(4), as amended by SB 1125.

Conclusion of Law No. 14

14. Pursuant to PURA § 39.905(b)(4) as amended, none of CenterPoint's 2010 performance bonus should be allocated to the Secondary <= 10 kVa, Transmission-Industrial, and Lighting rate classestransmission-level industrial customer class.

Conclusion of Law No. 17

17. Adopting CenterPoint's proposal to allocate a portion of its under-recovered amounts to the Transmission-Industrial rate classtransmission-level industrial class would contravene PURA § 39.905(b)(4) and P.U.C. SUBST. R. 25.181(f)(3).


Conclusion of Law No. 18

18. Consistent with PURA § 39.905(b)(4) and P.U.C. SUBST. R. 25.181(f)(3), none of CenterPoint's under-recovered amounts should be allocated to the Transmission-Industrial rate classtransmission-level industrial customers.

Conclusion of Law No. 21

21. The assignments and allocations to the rate classes, as approved in this proceeding, are consistent with PURA § 39.905 and P.U.C. SUBST. R. 25.181 and the final order in Docket No. 36952 crediting the Transmission-Industrial rate classtransmission-level industrial customer class.

Sincerely,



Mark Santos

Attorney for CenterPoint Energy Houston, LLC

cc: All Parties of Record