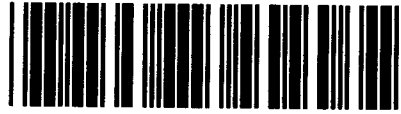




Control Number: 39463



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Addendum StartPage: 0

DOCKET NO. 39463

**COMPLAINT OF DARLENE HAYNES §
AGAINST CENTERPOINT ENERGY §
HOUSTON ELECTRIC LLC §**

**PUBLIC UTILITY COMMISSION
OF TEXAS**

11 JUN 17 PM 2:40
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CENTERPOINT
QUESTION NOS. 1-1 THROUGH 1-10**

The Staff of the Public Utility Commission of Texas (Staff) requests that CenterPoint Energy Houston Electric, LLC (CenterPoint) provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the presiding officer or within 20 days, if the presiding officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

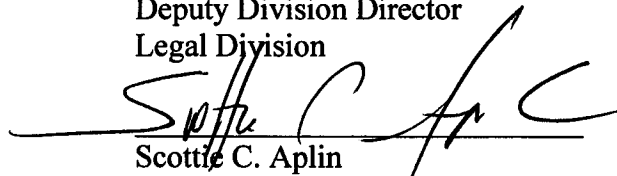
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

DATED: June 17, 2011

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

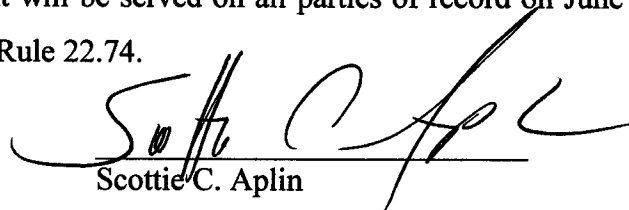
Keith Rogas
Deputy Division Director
Legal Division



Scottie C. Aplin
Attorney-Legal Division
State Bar No. 24001664
(512) 936-7289
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on June 17, 2011, in accordance with P.U.C. Procedural Rule 22.74.



Scottie C. Aplin

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CENTERPOINT
QUESTION NOS. 1-1 THROUGH 1-10**

DEFINITIONS

A. "CenterPoint," "the Company", or "you" refers to CenterPoint Energy Houston Electric, LLC. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

INSTRUCTIONS

1. Pursuant to P.U.C. Proc. R. 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
2. Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
3. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
4. 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.
5. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
6. 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.
7. Pursuant to P.U.C. Proc. R. 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CENTERPOINT
QUESTION NOS. 1-1 THROUGH 1-10**

- Staff 1-1 Please provide the following:
- a. clear copies of the pictures required under P.U.C. Subt. R. 25.126(d)(6)(A) and
 - b. any other pictures of the meter and the premises that were taken.
- Staff 1-2 Please provide copies of any all invoices for Ms. Haynes premises for the months of March 2010 through August 2010.
- Staff 1-3 On what date did CenterPoint first become aware of the unusually low energy consumption at Ms. Hayne's premises? Describe in detail how CenterPoint became aware of the unusually low energy consumption.
- Staff 1-4 What did CenterPoint do after it became aware of the unusually low energy consumption (after CenterPoint became aware of the problem but before it dispatched a repair person)? Describe in detail what steps were taken, when they were taken, and by whom they were taken.
- Staff 1-5 Who made the service request for Ms. Haynes premises on August 16, 2010? Why did that party make the service request?
- Staff 1-6 Describe in detail how CenterPoint first determined that the unusually low energy consumption was a result of meter tampering?
- Staff 1-7 Please describe the methodology for determining the date upon which the meter ceased to accurately register consumption.
- Staff 1-8 Please describe in detail the methodology for estimating the amount back-billed to Ms. Haynes. Provide detailed calculations.
- Staff 1-9 What kind of meter was the original meter replaced with? Were any additional measures taken to secure the meter against any future tampering?
- Staff 1-10 Were any other residences in Ms. Hayne's apartment complex identified as been tampered with either 3 months before or after Ms. Hayne's meter was determined by CenterPoint to have been tampered with?