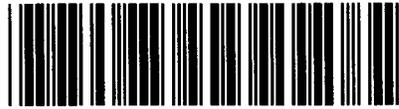


Control Number: 39504



Item Number: 193

Addendum StartPage: 0

DOCKET NO. 39504

REMAND OF DOCKET NO. 29526
(APPLICATION OF CENTERPOINT
ENERGY HOUSTON ELECTRIC
LLC, RELIANT ENERGY RETAIL
SERVICES, LLC AND TEXAS
GENCO, LP TO DETERMINE
STRANDED COSTS AND OTHER
TRUE-UP BALANCES PURSUANT
TO PURA §39.262)

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BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS

FILED
AUG 21 AM 10:27
PUBLIC UTILITY COMMISSION

CITY OF HOUSTON AND HOUSTON COALITION OF CITIES'
FIRST SET OF REQUESTS FOR INFORMATION TO
NRG ENERGY INC.

TO: NRG Energy Inc., by and through its attorneys of record, Jonathon Heller, NRG Energy Inc., P.O. Box 148, Houston, Texas 77001-0148, (713)537-2254 (phone), (832)584-2298 (fax), jheller@reliant.com (email), and Bryan Sams, NRG Energy Inc., 1005 Congress Avenue, Suite 1000, Austin, Texas 78701, (512)494-3009 (phone), (512)494-3050 (fax), bsams@reliant.com (email).

The City of Houston and Houston Coalition of Cities (collectively referred to as "COH/HCOC") requests that NRG Energy Inc., by and through its attorneys of record, provide the following information within **five (5) business 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.

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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”, “CenterPoint Energy Houston Electric, LLC”, and/or “CEHE” includes CenterPoint Energy Resources and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.
7. The term “NRG Energy” includes NRG Energy Inc. and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.
8. The term “Texas Genco” refers to Texas Genco, LP, and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors or assigns, and specifically includes any and all entities that purchased the generation assets of Texas Genco, L.P.

**CITY OF HOUSTON AND HOUSTON COALITION OF CITIES'
FIRST REQUEST FOR INFORMATION TO
NRG ENERGY INC.**

- 1-1 Please provide a copy of the Power Purchase and Sale Agreement with a member of the Goldman Sachs group as referenced on page 82 of Exhibit RW-1 to Mr. Wood's testimony, along with the total annual volume of energy sold, total annual revenues and annual profits received under this agreement for each year such agreement was in effect.
- 1-2 Please provide a copy of the Back-to-Back Power Purchase agreements as referenced on page 82 of Exhibit RW-1 to Mr. Wood's testimony, along with the total annual volume of energy sold, total annual revenues and annual profits received under this agreement for each year such agreement was in effect.
- 1-3 Please provide any questions received from potential buyers of CenterPoint Energy's 81% interest in Texas Genco regarding Texas Genco's planned acquisition of a portion of AEP TCC's ownership share of STP, along with the responses provided to such questions.
- 1-4 Texas Genco's September SEC filing describes the Nuclear Acquisition under the Transaction Agreement as follows:

The Nuclear Acquisition

In connection with the Nuclear Acquisition, in an order from the NRC dated April 4, 2005, approving the indirect transfer of the STP license from CenterPoint Energy to Texas Genco LLC, the NRC required Texas Genco LLC to enter into a support agreement with our subsidiary Texas Genco, LP to provide up to \$120 million to Texas Genco, LP if necessary to support operations at STP. We entered into that support agreement on April 13, 2005.

Please provide a copy of the referenced support agreement and identify any amounts paid to support operations at STP subject to this agreement.

- 1-5 Please provide monthly invoices for power sold and purchased under the two PPAs referenced on page 82 of Exhibit RW-1 from the start of such transactions through December 2005.

Respectfully submitted,

David Feldman
City Attorney

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email: tshea@cozen.com

By: Michelle R. Moore
Michelle R. Moore

**ATTORNEYS FOR THE CITY OF HOUSTON
AND HOUSTON COALITION OF CITIES**

CERTIFICATE OF SERVICE

I hereby certify that on this the 21st day of September, 2011, a true and correct copy of the foregoing document was served upon on all parties of record by facsimile, e-mail and/or First-Class Mail United States mail, postage paid.

Michelle R. Moore
Michelle R. Moore