



Control Number: 44547



Item Number: 1078

Addendum StartPage: 0

SOAH DOCKET NO. 473-15-3595
DOCKET NO. 44547
(NEED PHASE)

2015 AUG 14 PM 1:18

UTILITY COMMISSION
FILING CLERK

APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC §
TO AMEND A CERTIFICATE OF §
CONVENIENCE AND NECESSITY FOR § OF
A PROPOSED 345-KV TRANSMISSION §
LINE WITHIN GRIMES, HARRIS, AND §
WALLER COUNTIES § ADMINISTRATIVE HEARINGS

SOAH DOCKET NO. 473-15-3596
DOCKET NO. 44649
(NEED PHASE)

APPLICATION OF CROSS TEXAS §
TRANSMISSION, LLC TO AMEND A § BEFORE THE STATE OFFICE
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE §
PROPOSED LIMESTONE TO GIBBONS § OF
CREEK 345-KV TRANSMISSION LINE §
IN BRAZOS, FREESTONE, GRIMES, §
LEON, LIMESTONE, MADISON AND § ADMINISTRATIVE HEARINGS
ROBERTSON COUNTIES, TEXAS §

**CALPINE CORPORATION AND NRG ENERGY, INC.'S
FIRST SUPPLEMENTAL RESPONSES TO CENTERPOINT
ENERGY HOUSTON ELECTRIC, LLC'S
FIRST SET OF REQUESTS FOR INFORMATION**

Calpine Corporation and NRG Energy, Inc. (together, "Complainants") submit the following attached First Supplemental Responses to CenterPoint Energy Houston Electric, LLC's ("CenterPoint") First Set of Requests for Information to Calpine Corporation and NRG Energy, Inc., filed on July 22, 2015. Calpine Corporation and NRG Energy, Inc. stipulate that all parties may treat these responses as if the answers were filed under oath. These responses are filed subject to, and without waiving, the Objections that Complainants filed on July 29, 2015.

1078

Respectfully submitted,

By: 

Chris Reeder
State Bar No. 16692300
Elizabeth G. Bloch
State Bar No. 02495500
HUSCH BLACKWELL, LLP
111 Congress Avenue, Suite 1400
Austin, Texas 78701
Telephone: (512) 472-5456
Facsimile: (512) 479-1101
Email: chris.reeder@huschblackwell.com

**ATTORNEYS FOR CALPINE
CORPORATION AND NRG ENERGY,
INC.**

Diana Woodman Hammett
Calpine Corporation
717 Texas Avenue, Suite 1000
Houston, Texas 77002
Direct: (713) 820-4030
Email: diana.woodman@calpine.com

**ATTORNEY FOR CALPINE
CORPORATION**

Christopher O'Hara
NRG Energy, Inc.
1000 Main Street
Houston, Texas 77002
Phone: (832) 357-5745
Email: chris.ohara@nrgenergy.com

ATTORNEY FOR NRG ENERGY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading has been filed with the Commission, forwarded by electronic mail to counsel for Cross Texas, served on the party listed below via United States Mail, and served on all other parties via the PUC Interchange on this 14th day of August, 2015.

Barbara McCutcheon
5807 Sugar Hill Drive
Houston, Texas 77047


Chris Reeder

**CALPINE CORPORATION AND NRG ENERGY, INC.'S FIRST SUPPLEMENTAL
RESPONSES TO CENTERPOINT'S FIRST REQUESTS FOR INFORMATION**

CP 1-3 For each of the testifying experts for Calpine and NRG provide:

- a. the expert's name, address, and telephone number;
- b. the subject matter(s) on which the expert will testify;
- c. the facts known by the expert that relate to or form the basis of the expert's mental impressions and opinions formed or made in connection with this case;
- d. the expert's mental impressions and opinions formed or made in connection with the case, and any methods used to derive them;
- e. any bias of the witness;
- f. all documents, tangible things, reports, models, or data compilations provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
- g. the expert's current resume and bibliography.

RESPONSE:

a. Martin Baughman
 5703 Painted Valley Drive
 Austin, Texas 78759
 512-345-8255

 Songhoon Yang
 1300 Eye Street, N.W., Suite 600
 Washington, D.C. 20005
 202-747-2086

 Collin Cain
 1300 Eye Street, N.W., Suite 600
 Washington, D.C. 20005
 202-216-1156

- b. Please refer to the direct testimony of these experts.
- c. Please refer to the direct testimony of these experts.
- d. Please refer to the direct testimony of these experts.
- e. No known biases.
- f. See the workpapers of and list of materials reviewed by these experts provided herein.
- g. Please refer to the resumes attached to each of the experts' direct testimony.

PREPARER: Elizabeth G. Bloch

SPONSORING WITNESS: Martin Baughman, Songhoon Yang and Collin Cain

SUPPLEMENTAL RESPONSE:

f. In addition to the information previously specified, Dr. Baughman identified at his August 11, 2015 deposition two pieces of information he reviewed after preparing his direct testimony that possibly relate to the need for the HIP. These include:

1. The report entitled "Electricity and Economic Growth," available at: <https://books.google.com/books?id=QSpG6YsnUEUC&printsec=frontcover&dq=edition+s:dKYKhjZMk90C&hl=en&sa=X&ved=0CBwQ6AEwAGoVChMIn4fZ4YykwIVxRuSCh0chwAZ#v=onepage&q&f=false>

2. The data ERCOT produced in response to Luminant RFI 1-1.

PREPARER: Chris Reeder

SPONSORING WITNESS: Martin Baughman

CP 1-5 Please produce all work papers, reports, studies, and powerflow models in your possession and not publicly available relating to the need for the HIP.

RESPONSIVE DOCUMENTS:

See workpapers of Martin Baughman, Songhoon Yang and Collin Cain provided herein.
Additional documents were produced in response to CP 1-7 and TIEC 3-1 in Docket 42511.
In addition, see the two documents attached.
See also, documents referenced in CP RFI 1-27 and 1-28.
See also, voluminous documents produced in response to CTT 2-36.
Voluminous and protected material is being produced separately on a CD.

PREPARER: Elizabeth G. Bloch

SPONSORING WITNESS: Martin Baughman, Songhoon Yang and Collin Cain, with respect to their workpapers.

SUPPLEMENTAL RESPONSE:

Please see the supplemental response to CP RFI 1-3 (f) for a description of additional responsive material.

PREPARER: Chris Reeder

SPONSORING WITNESS: Martin Baughman