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BEFORE THE  
PUBLIC UTILITY COMMISSION  
FILING CLERK

PUBLIC UTILITY COMMISSION

OF TEXAS

APPLICATION OF CENTERPOINT §  
ENERGY HOUSTON ELECTRIC, LLC §  
FOR APPROVAL OF A §  
DISTRIBUTION COST RECOVERY §  
FACTOR PURSUANT TO P.U.C. §  
SUBST. R. 25.243 §

**GULF COAST COALITION OF CITIES’  
FIRST REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

The Gulf Coast Coalition of Cities (“GCCC”) files this first request for information (“RFI”) to CenterPoint Energy Houston Electric, LLC (“CenterPoint” or “Company”) in the above-styled docket. CenterPoint is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701, (512) 322-5800 within ten (10) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if CenterPoint receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

**DEFINITIONS AND INSTRUCTIONS**

A. ‘CenterPoint Energy Houston Electric’ or ‘CenterPoint’ refers to its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The term ‘document’ shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations,

messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper documents is a separate document within the meaning of this term.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, GCCC specifically requests that any electronic or magnetic data (which is included in the definition of 'document') that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. GCCC further requests that CenterPoint produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms 'and' and 'or' shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. 'Each' shall be construed to include the word 'every' and 'every' shall be construed to include the word 'each.'

F. 'Any' shall be construed to include 'all' and 'all' shall be construed to include 'any.'

G. The term 'concerning,' or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term 'including,' or one of its inflections, means and refers to 'including but not limited to.'

I. 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.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. 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.

L. Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

Austin, Texas 78701

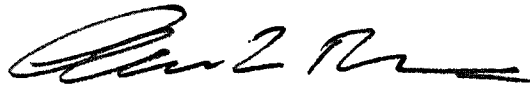
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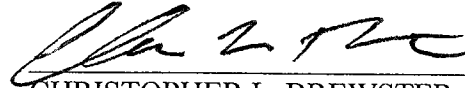
HANNAH M. WILCHAR

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ATTORNEYS FOR THE GULF COAST  
COALITION OF CITIES

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was transmitted by e-mail, fax, hand-delivery and/or regular, first class mail on this 24th day of April, 2015 to the parties of record.



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CHRISTOPHER L. BREWSTER

SOAH DOCKET NO. 473-15-3257  
PUC DOCKET NO. 44572

GCCC'S FIRST  
RFI TO CENTERPOINT

- GCCC 1-1. Refer to the Direct Testimony of Mary Kirk, page 13, lines 8-22. Please provide sample calculations showing how the property accounting and accounts payable departments charge time to distribution construction overhead.
- GCCC 1-2. Refer to the Direct Testimony of Mary Kirk, page 14, lines 1-7. Please provide workpapers supporting the amount of the property accounting and accounts payable departments charges of \$270,000 and \$129,000, respectively, included in the requested distribution capital investment.
- GCCC 1-3. Refer to the Direct Testimony of Mary Kirk, page 14, lines 15-20. Please explain if the property accounting and accounts payable costs included in the Company's current rates consisted of Hurricane Rita reconstruction costs as discussed in Ms. Romine's testimony.
- GCCC 1-4. Refer to the Direct Testimony of Mary Kirk, page 19, lines 11-18. Please provide by year and FERC account the amount of underground cable assessment program costs included in the requested distribution capital investment.
- GCCC 1-5. Refer to the Direct Testimony of David Baker, Exhibit DEB-1. Please provide the distribution plant investment by FERC account for each project category and year listed.