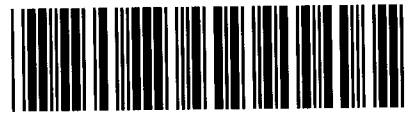


Control Number: 44649



Item Number: 196

Addendum StartPage: 0

**P.U.C. DOCKET NO. 44547
SOAH DOCKET NO. 473-15-3595**

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**APPLICATION OF CENTERPOINT
ENERGY HOUSTON ELECTRIC, LLC
TO AMEND A CERTIFICATE OF
CONVENIENCE AND NECESSITY FOR
A PROPOSED 345-KV TRANSMISSION
LINE WITHIN GRIMES, HARRIS, AND
WALLER COUNTIES**

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BEFORE THE
PUBLIC UTILITY COMMISSION
FILING CLERK

STATE OFFICE OF

ADMINISTRATIVE HEARINGS

**P.U.C. DOCKET NO. 44649
SOAH DOCKET NO. 473-15-3596**

**APPLICATION OF CROSS TEXAS
TRANSMISSION, LLC TO AMEND ITS
CERTIFICATE OF CONVENIENCE AND
NECESSITY FOR THE PROPOSED
LIMESTONE TO GIBBONS CREEK 345
KV TRANSMISSION LINE IN BRAZOS,
FREESTONE, GRIMES, LEON,
LIMESTONE, MADISON AND
ROBERTSON COUNTIES, TEXAS**

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BEFORE THE

STATE OFFICE OF

ADMINISTRATIVE HEARINGS

**NOTICE OF CONFIDENTIAL FILING BY
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC AND
CROSS TEXAS TRANSMISSION, LLC**

CenterPoint Energy Houston, LLC ("CenterPoint Energy" or "CNP") and Cross Texas Transmission, LLC ("Cross Texas" or "CTT") (together, "Joint Parties") submit this notice, pursuant to paragraph 4 of the proposed Protective Order in Docket No. 44547, that it has today submitted under seal certain responses to the First Requests for Information from Calpine Corporation and NRG Energy, Inc.

THE TEXAS PUBLIC INFORMATION ACT

The Texas Public Information Act ("TPIA"), set forth in Chapter 552 of the Texas Government Code, exempts from public disclosure certain categories of information, including but not limited to:

- (1) information that is considered confidential by law (section 552.101);
- (2) information related to competition or bidding (section 552.104); and

- (3) trade secrets and commercial or financial information (section 552.110).

Paragraph 4 of the proposed Protective Order in Docket No. 44547 requires that CenterPoint Energy identify any information produced in discovery that is exempt from disclosure under the TPIA:

On or before the date the Protected Materials or Highly Sensitive Protected Materials are provided to the Commission, the producing party shall file with the Commission and deliver to each party to the proceeding a written statement, which may be in the form of an objection, indicating: (a) any exemptions to the Public Information Act claimed to apply to the alleged Protected Materials; (b) the reasons supporting the producing party's claim that the responsive information is exempt from public disclosure under the Public Information Act and subject to treatment as protected materials; and (c) that counsel for the producing party has reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials designation.

TPIA-EXEMPT INFORMATION PROVIDED IN DISCOVERY

CAL-NRG01-01 The following request pertains to the testimony of Dr. Mandir S. Sahni, Exhibit MSS-2 (the "HIP Needs Reassessment"), and the page (native), table, figure, appendix, and footnote references are to Exhibit MSS-2. Please produce the entire base case and the G-1 cases referenced in footnote 4 with all of accompanying data and materials you received from ERCOT and Applicants.

Joint Parties' response to this request contains confidential Critical Energy Infrastructure Information ("CEII"), which is excepted from disclosure under the TPIA pursuant to TPIA section 552.101, as such information is considered confidential under TEX. GOV'T CODE § 418.181¹, and contains third-party commercially sensitive competitive and business operations information, which is excepted from disclosure under TPIA sections 552.104 and 552.110.

CAL-NRG01-03 The following request pertains to the testimony of Dr. Mandir S. Sahni, Exhibit MSS-2 (the "HIP Needs Reassessment"), and the page (native), table, figure, appendix, and footnote references are to Exhibit MSS-2. Please produce the scenario #1 base and G-1 cases in ".pwb" format⁽¹⁾ with all accompanying data, study assumptions, solution settings, and results/logs fully loaded (with and without HIP).

¹ See TEX. GOV'T CODE § 418.181 (establishing that any documents, or portions of documents, are confidential "if they identify technical details of particular vulnerabilities of critical infrastructure to an act of terrorism.").

Joint Parties' response to this request contains confidential CEII, which is excepted from disclosure under the TPIA pursuant to TPIA section 552.101, as such information is considered confidential under TEX. GOV'T CODE § 418.181, and contains third-party commercially sensitive competitive and business operations information, which is excepted from disclosure under TPIA sections 552.104 and 552.110.

CAL-NRG01-04 The following request pertains to the testimony of Dr. Mandir S. Sahni, Exhibit MSS-2 (the "HIP Needs Reassessment"), and the page (native), table, figure, appendix, and footnote references are to Exhibit MSS-2. Please produce the scenario #1 N-1 and G-1+N-1 cases in ".pwb" format with all accompanying data, contingency and monitoring elements, study assumptions, solution settings, and results/logs fully loaded (with and without HIP).

Joint Parties' response to this request contains confidential CEII, which is excepted from disclosure under the TPIA pursuant to TPIA section 552.101, as such information is considered confidential under TEX. GOV'T CODE § 418.181, and contains third-party commercially sensitive competitive and business operations information, which is excepted from disclosure under TPIA sections 552.104 and 552.110.

CAL-NRG01-07 The following request pertains to the testimony of Dr. Mandir S. Sahni, Exhibit MSS-2 (the "HIP Needs Reassessment"), and the page (native), table, figure, appendix, and footnote references are to Exhibit MSS-2. Please produce the scenario #2 base and G-1 cases in ".pwb" format with all accompanying data study assumptions, solution settings, and results/logs fully loaded (with and without HIP).

Joint Parties' response to this request contains confidential CEII, which is excepted from disclosure under the TPIA pursuant to TPIA section 552.101, as such information is considered confidential under TEX. GOV'T CODE § 418.181, and contains third-party commercially sensitive competitive and business operations information, which is excepted from disclosure under TPIA sections 552.104 and 552.110.

CAL-NRG01-11 The following request pertains to the testimony of Dr. Mandir S. Sahni, Exhibit MSS-2 (the "HIP Needs Reassessment"), and the page (native), table, figure, appendix, and footnote references are to Exhibit MSS-2. Please produce the scenario #3 base and G-1 cases in ".pwb" format with all accompanying data study assumptions, solution settings, and results/logs fully loaded (within without HIP).

Joint Parties' response to this request contains confidential CEII, which is excepted from disclosure under the TPIA pursuant to TPIA section 552.101, as such information is considered confidential under TEX. GOV'T CODE § 418.181, and contains third-party commercially sensitive competitive and business operations information, which is excepted from disclosure under TPIA sections 552.104 and 552.110.


CAL-NRG01-23 The following request pertains to the testimony of Dr. Mandir S. Sahni, Exhibit MSS-2 (the "HIP Needs Reassessment"), and the page (native), table, figure, appendix, and footnote references are to Exhibit MSS-2. Please produce underlying power flow cases used to generate Table 1 in ".pwb" format with all accompanying data, study assumptions, solution settings, and results/logs fully loaded. Please produce from-to bus numbers for each path listed in Table 1.

Joint Parties' response to this request contains confidential CEII, which is excepted from disclosure under the TPIA pursuant to TPIA section 552.101, as such information is considered confidential under TEX. GOV'T CODE § 418.181.

CAL-NRG01-24 The following request pertains to the testimony of Dr. Mandir S. Sahni, Exhibit MSS-2 (the "HIP Needs Reassessment"), and the page (native), table, figure, appendix, and footnote references are to Exhibit MSS-2. Please produce all data and materials you received from ERCOT and applicants related to the HIP Reassessment Study.

Attachments 1–8 and 11 to the Joint Parties' response to this request contain confidential CEII, which is excepted from disclosure under the TPIA pursuant to TPIA section 552.101, as such information is considered confidential under TEX. GOV'T CODE § 418.181. In addition, Attachments 1–11 contain third-party commercially sensitive competitive and business operations information, which is excepted from disclosure under TPIA sections 552.104 and 552.110.

Respectfully submitted,

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ATTORNEYS FOR CROSS TEXAS
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served to the propounding party and all parties specifically requesting service of the same record in this proceeding via email, fax, hand delivery or U.S. first class mail on the 1st day of June, 2015.


James H. Barkley