



Control Number: 44649



Item Number: 350

Addendum StartPage: 0

NEED PHASE

SOAH DOCKET NO. 473-15-3595
DOCKET NO. 44547

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 STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

2015 JUN 16 PM 5:53
FILED CLERK

SOAH DOCKET NO. 473-15-3596
DOCKET NO. 44649

APPLICATION OF CROSS TEXAS
TRANSMISSION, LLC TO AMEND A
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

CALPINE CORPORATION'S AND NRG ENERGY, INC.'S FIFTH REQUEST FOR INFORMATION TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

COME NOW Calpine Corporation ("Calpine") and NRG Energy, Inc., ("NRG") (collectively, "Intervenors"), each on its own behalf and on behalf of its subsidiaries that own or operate generation facilities in The Electric Reliability Council of Texas ("ERCOT"), by and through its attorneys of record, and request that CenterPoint Energy Houston Electric, LLC ("CenterPoint") produce information and answer the attached questions under oath within the time produced by law. It is further requested that the questions be answered in the order in which they are asked with as much detail so as to fully present all of the relevant facts.

INSTRUCTIONS

Please answer the attached questions on separate pages and copy the question immediately above the answer to each question. Following each answer, please identify the person who prepared the answer and the witness or witnesses who will sponsor each of your

answers at the hearing in PUCT Docket No. 44547 (SOAH Docket No. 473-15-3595). These questions are continuing in nature and, should there be a change in circumstances which would modify or change any of your answers, then, in such case, please change or modify each answer and submit such changed answer as a supplement to the original answer within five (5) working days of your discovery that such change or modification is appropriate.

In answering this request for information, you are requested to furnish such information as is available to you, including information which you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf.

If you are unable to answer any request fully and completely after exercising the due diligence to make inquiry and to secure information, you are to answer such request as fully and completely as you can and to specify the portions which you are unable to answer in such request. In addition to specifying those portions, you are to state with regard to each portion:

1. The fact on which you base the contention that you are unable to answer that portion;
2. The knowledge, information, and belief you have concerning that portion; and
3. The acts done and inquiries made by you in attempting to answer such request.

The singular includes the plural and the plural includes the singular.

Masculine, feminine, or neuter pronouns do not exclude the other genders.

The words "document" and "documents" have the broadest meaning that can be ascribed to them pursuant to the Texas Rules of Civil Procedure. Among other things, the words "document" and "documents" mean the final form and all drafts and revisions of any kind of written or graphic mater, original or reproduced copy, however produced or reproduced, of any kind and of every kind, and all copies there from which are different in any way from the original regardless of whether designated "confidential," "privileged," or otherwise restricted. Without limiting the generality of the foregoing, the words "document" and "documents" also include information stored or maintained on, or which could be reproduced from, film, microfilm, computer printout, disk or diskette, magnetic tape, cassette, phonographic disc, videotape or similar means.

"Concerning" means constituting, arising out of, incident to, referring to, mentioning, bearing upon, reflecting, evidencing, affecting, concerning or relating in any manner to the

transaction, communication, document, individual, entry, act, object, conference, activity or thing identified.

The words "and" and "or" shall be construed conjunctively or disjunctively as necessary to bring within each request all documents which might otherwise be construed as outside its scope.

The words "communication" and "communications" include, without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia. These words include, without limitation of their generality, both communications and statements which are face-to-face and those which are transmitted by any writing or document or by media such as intercoms, telephones, email, television or radio.

The words "identify" and "identification," when used with respect to a natural person or persons, mean to state the name, address(es) and telephone number(s) of each such person. If any of the foregoing information is not available, state any other available means of identifying such person.

The words "identify" and "identification," when used in reference to a person other than a natural person, mean to set forth its:

- (1) full name or title;
- (2) nature or organization, including the state under which the same was organized or incorporated;
- (3) address and telephone number (with area code prefix); and
- (4) principal line of business.

If any of the foregoing information is not available, state any other available means of identifying such person.

The words "identify" and "describe," when used in reference to a fact, mean to state not only the fact itself, but also:

- (1) its date, time and place
- (2) the name, address and telephone number of each person with knowledge of the fact;
- (3) whether the act is supported by an oral communication, a document, or other event;
and
- (4) any other evidence which supports such fact.

The words "identify" and "identification," when used in reference to a document, mean to state:

- (1) its date;
- (2) its author;
- (3) its addressee;
- (4) the type of document (e.g., letter, memorandum, receipt, invoice, schedule, report, telegram, chart, photograph, etc.); and
- (5) its present location and identity of its custodian. If any document was, but is no longer, in your possession, custody, or control, or is no longer in existence, explain why.

If any of the foregoing information is not available, state any other available means of identifying such document. If a document is one of a series of pages contained in a book, pamphlet, binder, folder, microfilm (or other storage device), include in your identification of such document(s) any available numerical reference (or other aid) to the pages and line or other portion thereof at which the information referred to can be found. A true and correct copy of any document may be produced and filed with your Answers hereto in lieu of the above information.

The words "identify" and "describe," when used with respect to an oral communication mean:

- (1) to state the substance of each such oral communication;
- (2) to state the exact words used by each person participating in the oral communication;
- (3) to identify each speaker;
- (4) to identify each person present at the making or reception of such oral communication;
- (5) to specify the date, time and place of each oral communication;
- (6) to identify each person repeating such oral communication;
- (7) to identify every document which records, memorializes, or relates to all or part of such communication; and
- (8) to identify the mode of such communication (e.g., telephone, face-to-face, etc.)

The words "person" and "persons" as used herein, mean all individuals and entities, and shall be deemed to include natural persons, firms, partnerships, associations, organizations, joint

ventures, corporations, and any other entities, including without limitation, any electric utility, cogenerator, independent power producer, qualifying facility, or any other entity which generates electricity.

The words “regarding,” “relate,” “related,” “relates” and “relating,” as used herein, mean involving, relating to, referring to, having any relationship to, pertaining to, evidencing or constituting evidence of, in whole or in part.

The term “Commission” refers to the Public Utility Commission of Texas.

The term “HIP” shall refer to the Houston Import Project as approved by the ERCOT Board of Directors on April 17, 2014, and includes any portion of the project.

The term “Independent Review” shall refer to the February 20, 2014 report entitled “ERCOT Independent Review of Houston Import RPG Project” and supporting analysis.

The term “SSWG” shall refer to the Steady State Working Group.

The term “Houston Import Project Needs Reassessment” shall refer to Exhibit MSS-2 to the testimony of Mandhir S. Sahni (“Dr. Sahni”).

The term “Houston area” is the Southeast study area and the Coastal weather zone referenced in the Independent Review.

The term “Applicants” shall refer to Cross Texas Transmission, LLC and CenterPoint Energy Houston Electric, LLC.

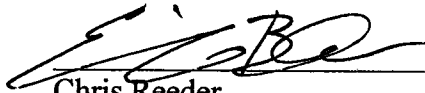
The term “CTT” shall refer to Cross Texas Transmission, LLC.

The term “CenterPoint” shall refer to CenterPoint Energy Houston Electric, LLC.

The words “you,” and “your” mean CenterPoint and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

If you have any question concerning the attached Questions or any of these instructions, please contact the undersigned.

Respectfully submitted,



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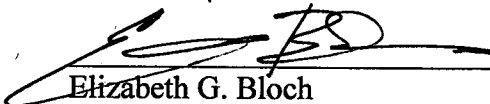
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**ATTORNEYS FOR CALPINE
CORPORATION AND NRG ENERGY,
INC.**

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 CenterPoint, and served on all other parties via the PUC Interchange on this 16th day of June, 2015.



Elizabeth G. Bloch

INTERVENORS' FIFTH REQUESTS FOR INFORMATION TO CENTERPOINT

Note: If any of the information requested herein has already been provided in response to another RFI, please state which RFI it was provided in response to and identify the information already provided.

The following RFIs are follow-up requests to RFI 1-3 directed to Dr. Sahni: regarding the scenario #1 base and G-1 cases without HIP (Attachment 6 to 10 power flow cases).

- 5-1. Please explain why the load bus # 40140 (BARBUR_138A) was removed from the 2014 RTP 2017 Summer Coastal/East base and G-1 cases (RFI 1-1 Attachment 1 to 5 power flow cases) in creating the scenario #1 base and G-1 cases.
- 5-2. Please explain why there are differences in weather-zone level load MWs (other than Coastal and East weather zones) between the scenario # 1 base and G-1 cases.
- 5-3. Please explain why there are differences in transmission topologies (e.g., transformer circuit numbers) between the scenario #1 base and G-1 cases.
- 5-4. Confirm or deny that all the load buses outside the Coastal/East region were scaled proportionally in order to maintain the load generation balance (referenced in Exhibit MSS-2, page 10). If denied, please list all the load buses that were excluded from the load scaling above and provide the basis for such exclusions.
- 5-5. Please explain why generation bus #s 120011 (ATK_ATKINS3 N5) and 120012 (ATK_ATKINS6 N6) were turned off-line (these are not listed in MSS-2 Table 4) in creating the scenario #1 base and G-1 cases from the 2014 RTP 2017 Summer Coastal/East base and G-1 cases (RFI 1-1 Attachment 1 to 5 power flow cases).

The following RFIs are follow-up requests to RFI 1-7 directed to Dr. Sahni: regarding the scenario #2 base and G-1 cases without HIP (Attachment 1 to 3 power flow cases).

- 5-6. Please explain why generation bus #s 110095 (GBY_GBYGT82 N4), 120011 (ATK_ATKINS3 N5), 120012 (ATK_ATKINS6 N6), and 110273 (AMOC_AMOCO_5 PE) were turned on-line (these are not listed in MSS-2 Table 9) in creating the scenario #2 base from the scenario #1 base.
- 5-7. Confirm or deny that all the load buses outside the Coastal/East region were scaled proportionally in order to maintain the load generation balance (referenced in Exhibit MSS-2, page 19). If denied, please list all the load buses that were excluded from the load scaling above and provide the basis for such exclusions.
- 5-8. Please explain why there are differences in transmission topologies (e.g., transformer circuit numbers) between the scenario #2 base and G-1 cases.

The following RFIs are follow-up requests to RFI 1-11 directed to Dr. Sahni: regarding the scenario #3 base and G-1 cases without HIP (Attachment 1 to 3 power flow cases).

- 5-9. Confirm or deny that all the load buses outside the Coastal/East region were scaled proportionally in creating the scenario #3 cases from the scenario #2 cases. If denied, please list all the load buses that were excluded from the load scaling above and provide the basis for such exclusions.
- 5-10. Please explain why there are differences in transmission topologies (e.g., transformer circuit numbers) between the scenario #3 base and G-1 cases.