

Control Number: 49421



Item Number: 276

Addendum StartPage: 0

## SOAH DOCKET NO. 473-19-3864 PUC DOCKET NO. 49421

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

BEFORE THE STATE OFFICE

OF

FOR AUTHORITY TO CHANGE RATES

ADMINISTRATIVE HEARINGS

## CONFIDENTIALITY STATEMENT UNDER SECTION 4 OF THE PROTECTIVE ORDER

§

The undersigned attorney for CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston" or the "Company") submits this statement under Section 4 of the protective order entered in this case.

I have reviewed the information produced by the Company in response to Texas Industrial Energy Consumers' ("TIEC") requests for information ("RFI") TIEC03-03, TIEC03-04, TIEC03-08, and TIEC03-16, sufficiently to state in good faith that certain information contained in the Company's response is exempt from public disclosure under the Texas Public Information Act ("TPIA").<sup>1</sup>

Certain materials contained in the Company's response to the RFIs identified above contain information related to energy service providers that is commercially sensitive and/or consists of trade secret information. The public disclosure of this information would cause substantial competitive harm to CenterPoint Houston and the persons from whom the information is obtained. Accordingly, certain designated materials contained in the Company's response to the RFIs identified above are protected under Tex. Gov't Code §§ 552.101, 552.104 and 552.110 and Tex. Util. Code § 39.001(b)(4) and merit the Protected Materials (Confidential) and the Highly Sensitive Protected Materials (Highly Sensitive) designations they are given in CenterPoint Houston's response.

276

<sup>&</sup>lt;sup>1</sup> Tex. Gov't Code §§ 552.101-552.353.

Respectfully submitted,

Ann M. Coffin

State Bar No. 00787941

Mark A. Santos

State Bar No. 24037433

C. Glenn Adkins

State Bar No. 24103097

Coffin Renner LLP

1011 West 31st Street

Austin, Texas 78705

512.879.0900

512.879.0912 (fax)

ann.coffin@crtxlaw.com

mark.santos@crtxlaw.com

glenn.adkins@crtxlaw.com

COUNSEL FOR CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of May 2019, a true and correct copy of the foregoing document was served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74.

Muth Buns