



Control Number: 49421



Item Number: 473

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

APPLICATION OF CENTERPOINT §
ENERGY HOUSTON ELECTRIC, §
LLC FOR AUTHORITY TO CHANGE §
RATES §

STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

2019 JUN 10 PM 3:00

FILED
FILING CLERK

**RESPONSES OF CALPINE CORPORATION TO CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION**

Calpine Corporation ("Calpine") files these responses to CenterPoint Energy Houston Electric, LLC's First Request for Information ("CenterPoint's First RFI"). Pursuant to SOAH Order No. 2, responses are due within four working days of receipt. As CenterPoint's First RFI was filed on June 6, 2019, these responses are timely filed. Calpine stipulates that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,



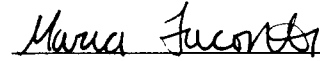
Chris Reeder
State Bar No. 16692300
chris.reeder@huschblackwell.com
Maria Faconti
State Bar No. 24078487
maria.faconti@huschblackwell.com
HUSCH BLACKWELL LLP
111 Congress Avenue, Suite 1400
Austin, Texas 78701
Telephone: (512) 703-5720
Telecopier: (512) 479-1101

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

**ATTORNEYS FOR CALPINE
CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading has been filed with the Commission and served on all parties of record in this proceeding pursuant to SOAH Order No. 2 on this 10th day of June, 2019.



Maria Faconti

**RESPONSES OF CALPINE CORPORATION TO CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION**

1-1: If not provided with your direct testimony in this case, please provide, in native format, all workpapers and documents supporting the testimony of each witness filing testimony on your behalf in this proceeding.

Answer:

Calpine did not file direct testimony in this proceeding.

Sponsor (Preparer): Diana Woodman Hammett

**RESPONSES OF CALPINE CORPORATION TO CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION**

1-2: For each of your testifying experts in this case, please provide (to the extent not provided earlier):

1-2.1. A list of all cases in which the testifying expert has submitted testimony, from 2014 to the present;

1-2.2. Copies of all prior testimony, articles, speeches, published materials and peer review materials written by the testifying expert, from 2014 to the present;

1-2.3. The testifying expert's billing rate for this proceeding; and

1-2.4. All documents provided to, reviewed by, or prepared by or for the testifying expert in anticipation of the testifying expert filing testimony in this proceeding.

Answer:

Calpine did not file direct testimony in this proceeding.

Sponsor (Preparer): Diana Woodman Hammett

**RESPONSES OF CALPINE CORPORATION TO CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION**

- 1-3:** For each consulting expert whose mental impressions or opinions have been reviewed by one or more of your testifying experts in this case, please provide (to the extent not provided earlier):
- 1-3.1. A list of all cases in which the consulting expert has submitted testimony, from 2014 to the present;
 - 1-3.2. Copies of all prior testimony, articles, speeches, published materials and peer review materials written by the consulting expert, from 2005 to the present;
 - 1-3.3. The consulting expert's billing rate for this proceeding; and
 - 1-3.4. All documents provided to, reviewed by, or prepared by or for the consulting expert in anticipation of the testifying expert filing testimony in this proceeding.

Answer:

Calpine did not file direct testimony in this case and did not utilize consulting experts.

Sponsor (Preparer): Diana Woodman Hammett