



Control Number: 49421



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APPLICATION OF CENTERPOINT	§	BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC	§	FILING CLERK
FOR AUTHORITY TO CHANGE RATES	§	OF
		ADMINISTRATIVE HEARINGS

**TEXAS INDUSTRIAL ENERGY CONSUMERS' NOTICE OF CONFIDENTIAL
FILING AND DESIGNATION OF INFORMATION AS HIGHLY SENSITIVE
PROTECTIVE MATERIALS**

Texas Industrial Energy Consumers (TIEC) submit this statement, pursuant to paragraph 4 of the Protective Order in this case, explaining that limited portions of TIEC's Responses to CenterPoint Energy Houston Electric, LLC's (CEHE) First Set of Requests for Information (RFIs) contain Highly Sensitive Protective Materials (HSPM). TIEC's Responses to CEHE's First Set of RFIs will be submitted properly under P.U.C. Proc. R. 22.71(d) and a redacted version of the testimony will be filed electronically.

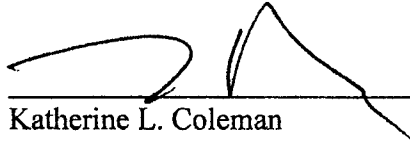
The redacted portions of the discovery responses contain information regarding "business operations or financial information that is commercially sensitive."¹ Specifically, the responses contain confidential pricing information for TIEC's consultants that is proprietary and commercially sensitive. This information is exempted from disclosure under the Texas Public Information Act, Tex. Gov't Code § 552.110(b), because its release would cause competitive harm to TIEC's consultants in the competitive market.

TIEC's counsel has reviewed the information sufficiently and hereby states in good faith that the information is exempt from public disclosure under the Public Information Act and merits Highly Sensitive Protected Materials designation.

¹ Protective Order, Paragraph 6 (April 5, 2019).

Respectfully submitted,

THOMPSON & KNIGHT LLP



Katherine L. Coleman
State Bar No. 24059596

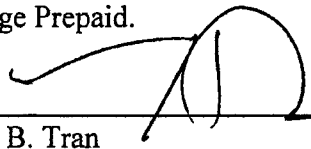
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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, Diane B. Tran, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 10th day of June, 2019 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.



Diane B. Tran