

Control Number: 49421



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SOAH DOCKET NO. 473-19-3864

PUC DOCKET NO. 49421

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

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S
NOTICE OF DEPOSITION TO CHARLES S. GRIFFEY
AND SUBPOENA DUCES TECUM**

To: Charles S. Griffey, by and through the attorneys of record for Texas Industrial Energy Consumers, Katherine L. Coleman, Michael McMillin, and, Diane B. Tran, Thompson & Knight LLP, 98 San Jacinto Blvd., Suite 1900, Austin, TX 78701.

Please take notice that pursuant to P.U.C. Procedural Rule 22.143, unless otherwise agreed by counsel, counsel for CenterPoint Energy Houston Electric, LLC will take the deposition of Charles S. Griffey on June 24, 2019, beginning at 3:00 pm CST regarding the topics addressed in Mr. Griffey's Direct Testimony and issues related to this proceeding. Unless otherwise agreed to by counsel, the deposition will be conducted at the offices of Baker Botts, LLP, 98 San Jacinto Blvd, 15th Floor, Austin, Texas 78701 before a person duly authorized by law to administer oaths and take depositions. The deposition will be recorded by stenographic means and may be recorded by sound and/or other visual means. In the event the deposition is not completed on the day indicated, it will continue from day to day until complete.

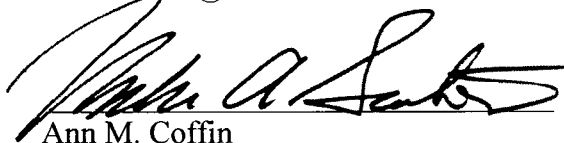
Under Texas Rule of Civil Procedure 199.2(b)(5), the deponent is also directed to bring to the deposition all documents listed on the attached Exhibit A for examination and copying.

Respectfully submitted,

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Associate General Counsel and
Director of Regulatory Affairs
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A handwritten signature in black ink, appearing to read "Ann M. Coffin", written over a horizontal line.

Ann M. Coffin
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Mark A. Santos
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**COUNSEL FOR CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of June 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.



Mark A. Santos

EXHIBIT A

Definitions and Instructions:

“Document” or “Documents” is used in the broadest sense possible and shall mean every writing or record of every type and description, such as drafts, corrections, memoranda, letters, tapes, stenographic or handwritten notes, studies, publications, work papers, books, pamphlets, diaries, desk calendars, interoffice communications, records, reports, analyses, bills, receipts, checks, check stubs, checkbooks, invoices, requisitions, papers and forms filed with a court or governmental body, notes, transportation and expense logs, work papers, contracts, statistical and financial statements, corporate records of any kind, charts, graphs, pictures, photographs, photocopies, films, voice recordings, and any other written, recorded or graphic material, however denominated, by whomever prepared, and to whomever addressed, which are in your possession, custody or control. The term “document” also includes all electronic and magnetic data, including e-mail. The term “document” includes all copies of every such writing or record that are not identical copies of the original or that contain any commentary, notes, or markings that do not appear on the original.

Instructions

1. Each request herein extends to any documents or information in your possession and the possession of any of the attorneys or law firms that purport to represent you in this case.
2. Each and every non-identical copy of a document, whether different from the original because of indications of the recipient(s), handwritten notes, marks, attachments, marginalia, or any other reason, is a separate document that must be produced.

DOCUMENTS REQUESTED

1. Pre-filed written testimony and exhibits of Charles S. Griffey in PUC Docket No. 49421, as well as all related work papers and source documents.
2. All documents reviewed and/or relied upon by Charles S. Griffey in preparation for this deposition.
3. To the extent not already provided, all documents reviewed or relied upon by Charles S. Griffey in preparation of his testimony in this case.