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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**

2019 JUN 19 PM 2:01
PUBLIC HEARING
FILING DEADLINE

**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 its rebuttal testimony 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.¹ The reasons supporting the designations are outlined below.

Rebuttal Testimony of Julianne Sugarek

Portions of the Rebuttal Testimony of Julianne Sugarek are designated as Highly Sensitive Protected Materials because the information relates to electricity usage and outage information of a specific customer. Additionally, Exhibits HSPM R-JPS-2, HSPM R-JPS-3, HSPM R-JPS-4, HSPM R-JPS-5, HSPM R-JPS-6, HSPM R-JPS-7, HSPM R-JPS-8, HSPM R-JPS-9, HSPM R-JPS-10, HSPM R-JPS-11, HSPM R-JPS-12, HSPM R-JPS-13, HSPM R-JPS-14, and HSPM R-JPS-15 are designated as Highly Sensitive Protected Material because they contain information that CenterPoint Houston compiled about electricity usage and outage information of a specific customer as well as communications between CenterPoint Houston employees and a specific customer. This information should remain confidential and merits the Highly Sensitive designation because public disclosure of the information would expose CenterPoint Houston to an

¹ Tex. Gov’t Code §§ 552.101-552.353.

unreasonable risk of competitive harm. Namely, a competitor of CenterPoint Houston could use the information to their advantage and target their services to a specific customer and alleged service complications. Under Tex. Gov't Code § 552.110(b), this information is exempt from disclosure because it is commercial information that would cause substantial competitive harm to CenterPoint Houston. Certain information in the testimony and exhibits is also exempt from public disclosure under the Public Utility Regulatory Act ("PURA") because it is customer-specific information related to customer names, addresses, prices, and expected load and usage data that is protected by PURA § 32.101(c).

Rebuttal Testimony of Jeffrey S. Myerson

Portions of the Rebuttal Testimony of Jeffrey S. Myerson are designated as Highly Sensitive Protected Materials because the information is forward-looking financial and operational projections related to potential cost savings. Additionally, Exhibit R-JSM-2 is designated as Highly Sensitive Protected Material for the same reason. The information is speculative and much of it relates to employment projections that are sensitive. Forward-looking information of this type is commercially and competitively sensitive. For instance, a company could use this information to compete with CenterPoint Houston in the market for qualified employees. Under Tex. Gov't Code § 552.110(b), this information is exempt from disclosure because it is commercial information that would cause substantial competitive harm to CenterPoint Houston.

Rebuttal Testimony of Robert McRae

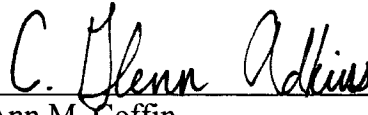
Portions of the Rebuttal Testimony of Robert McRae are designated as Protected Materials because the information is taken from reports and presentations made by the rating agencies, Moody's and S&P. Additionally, Exhibits R-RBM-1, R-RMB-2, R-RBM-3, and R-RBM-4 are designated as Protected Materials for the same reason. The rating agencies treat their information

and analysis as proprietary and CenterPoint Houston is obligated to take efforts to prevent the public disclosure of the information. If the information and analysis that the ratings agencies create becomes publicly available, the value of their service is reduced. Accordingly, the information is commercially and competitively sensitive. Under Tex. Gov't Code § 552.110(b), this information is exempt from disclosure because it is commercial information that would cause substantial competitive harm to CenterPoint Houston and the entities from whom the information was received.

Rebuttal Testimony of Ellen Lapson

Portions of the Rebuttal Testimony of Ellen Lapson are designated as Protected Material because that information was compiled and analyzed by the ratings agencies, Moody's, S&P, and Fitch. Additionally, Exhibit R-EL-5 is designated as protected material for the same reason. The rating agencies treat their information and analysis as proprietary and CenterPoint Houston is obligated to take efforts to prevent the public disclosure of the information. If the information and analysis that the ratings agencies create becomes publicly available, the value of their service is reduced. Accordingly, the information is commercially and competitively sensitive. Under Tex. Gov't Code § 552.110(b), this information is exempt from disclosure because it is commercial information that would cause substantial competitive harm to CenterPoint Houston and the entities from whom the information was received.

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

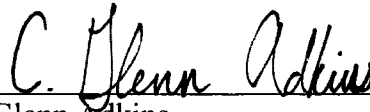
mark.santos@crtxlaw.com

glenn.adkins@crtxlaw.com

**COUNSEL FOR CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 19th 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.



C. Glenn Adkins