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

Workpapers to the Rebuttal Testimony of Robert B. McCrae

WP-R-RBM-1 is designated as Protected Material because the workpaper is comprised of credit ratings reports produced by Moody’s. Moody’s treats its 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.

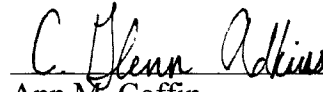
¹ Tex. Gov’t Code §§ 552.101-552.353.

Workpapers to the Rebuttal Testimony of Robert B. Hevert

WP R-RBH Blue Chip Dec 2018, WP R-RBH Blue Chip May 2019, and WP R-RBH Value Line Sheets are designated as Protected Material because the information is the proprietary material of investment research firms, Blue Chip and Value Line. These companies 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 companies produce 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.

WP R-RBH Index identifies the workpapers that are designated as Protected Materials. These workpapers are created with the proprietary information of various companies such as S&P Global Market Intelligence, Value Line, and Bloomberg Professional Services. CenterPoint Houston is obligated to take efforts to prevent the public disclosure of the information. If the information and analysis that the companies produce 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,



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CERTIFICATE OF SERVICE

I hereby certify that on this 20th 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