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

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC PRIVILEGE LOG TO
GULF COAST COALITION OF CITIES' FIRST REQUEST FOR INFORMATION**

On May 2, 2019, CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston” or the “Company”) filed objections to the First Request for Information (“RFI”) propounded by the Gulf Coast Coalition of Cities (“GCCC”). CenterPoint Houston objects to GCCC RFI 1-14 to the extent that documents responsive to the requests are protected from discovery due to the work product or attorney client privileges.¹ In accordance with Commission Procedural Rule 22.144(d)(2), CenterPoint Houston timely files the attached index of privileged documents two working days after submission of its objections as Exhibit A.

CenterPoint Houston is continuing to exercise due diligence to review materials responsive to GCCC’s First RFI. As the Company reviews responsive materials in preparation for its response to RFI 1-14, the Company will supplement the index of privileged documents. The Company understands that it is under a continuing obligation to supplement discovery responses.² If CenterPoint Houston identifies any additional privileged documents, it will provide a supplemental privilege index at that time.

¹ A full and complete explanation of the claimed privileges is provided in the CenterPoint Houston’s objections filed on May 2, 2019. See 16 Tex. Admin. Code § 22.144(d)(2) (TAC).

² 16 TAC § 22.144(i).

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Respectfully submitted,

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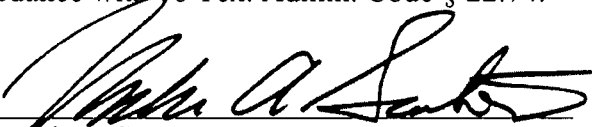


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**COUNSEL FOR CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May 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

Document # 1	
Date:	June 1, 2018
Title:	Project Pacer/Vectren Antitrust Filing
Preparer/Custodian:	Monica Karuturi
To:	Project Pacer Team - Distribution
From:	Monica Karuturi
Privileges:	Attorney Client Communication
Explanation:	This document is a confidential email thread between employees of CenterPoint and inside counsel in which professional legal services were rendered.

Document # 2	
Date:	April 14, 2018
Title:	Privileged and Confidential: Project Pacer Merger Agreement
Preparer/Custodian:	Monica X. Karuturi
To:	Carla Kneipp; Robert McCrae; Erik Hitchcock; Brett Jerasa; Sue Ortenstone; Lynne Harkel-Rumford; Lin-Abney Champion; Bill Rogers; Raymond Ehmer; Eddy Blanton Jr.; Conor Burns; James Dolezal; Joseph Vortherms; Rebecca Demarr; Scott Doyle; Tracy Bridge; Kenneth Mercado; Thomas Stevens; Brian Fields; James Vacek; Jami Lamele; Bertha Villatoro; Charles Prinlge; Richard Bye; Karen Moore; Valencia Amenson; Kristie Colvin.
CC:	Dana O'Brien; Jason Ryan.
From:	Monica X. Karuturi
Privileges:	Attorney Client Communication
Explanation:	This document is a confidential email thread between employees of CenterPoint and inside counsel in which professional legal services were rendered.