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SECTION VII:
REVISED STATEMENT OF CONFIDENTIALITY

CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston” or the “Company”) has designated as Protected Material or Highly Sensitive Protected Material certain documents in its Statement of Intent and Application for Authority to Change Rates. The Company considers the information identified below to be competitively-sensitive commercial or financial information that is confidential and exempted from disclosure under the Public Information Act. Tex. Gov’t Code §§ 552.101 and 552.110. Additionally, some of the information identified below is confidential under Tex. Util. Code § 32.10(c). This Revised Statement of Confidentiality sets forth the reasons why each document is designated confidential and replaces the version included in the Statement of Intent and Application for Authority to Change Rates at Bates Pages 4397-4404.

I. DESCRIPTION OF CONFIDENTIAL MATERIAL

A. Testimony Exhibits & Other Documents Referenced in Testimony

i. Workpapers to the Direct Testimony of Jason M. Ryan

The following workpaper is designated as Protected Material because it is proprietary and contains confidential third-party information:

WP JMR-02 Pct Equity Analysis (CONFIDENTIAL).xlsx

ii. Exhibits to the Direct Testimony of Kristie L. Colvin

The following exhibits are designated as Protected Material because they contain competitively-sensitive commercial or financial information: Exhibit KLC-08 (Workers’ Compensation Reserve Study) and Exhibit KLC-09 (Auto and General Insurance Reserve Study).

iii. Workpapers to the Direct Testimony of Myles F. Reynolds

Engagement letters, billing rates listing, and guidelines shared between the Company and outside counsel and consultants that are referenced in the Direct Testimony of Myles F. Reynolds

are designated as Protected Material because they contain information that is competitively sensitive.

iv. Exhibits and Workpapers to the Direct Testimony of Bertha R. Villatoro

The following exhibits are designated as Protected Material because they contain confidential and proprietary third-party material: Exhibit BRV-2 Willis Towers Watson 2023 General Rate Case Study, Exhibit BRV-3 2023 Compensation Surveys, Exhibit BRV-4 2022-2023 WorldatWork Salary Budget Survey, Exhibit BRV-7 Meridian Compensation Partners Incentive Plan Analysis, Exhibit BRV-9 Willis Towers Watson Benefits Data Source, and Exhibit BRV-10 AON Utility Benchmarking Reports.

Workpaper BRV-5 IBEW 66, Workpaper BRV-6 Local 12, and Workpaper BRV-7 IBEW 66 Package Proposal contain contracts that are designated as Protected Material because they contain confidential third-party contractual information, competitively-sensitive financial information, or confidential employee information.

The following exhibits are designated as Protected Material because they contain competitively-sensitive business operations information, commercial information, or financial information, or confidential employee information: Exhibit BRV-8 2020-2023 Long-term Incentive Plan Goals.

v. Exhibits to the Testimony of Jacqueline M. Richert

The following exhibits are designated as Protected Material because they are proprietary and contain confidential third-party information:

Exhibit JRichert-1 (CONF) *Moody's Investors Service, CenterPoint Energy Houston Electric, LLC; Update following downgrade to Baa1 (Mar. 6, 2020) (Confidential)*

Exhibit JRichert-3 (CONF) *S&P Global Ratings Research, Taxes Under The Inflation Reduction Act May Increase The Amount Non-Financial Corporates Pay, With Limited Credit*

	<i>Impact</i> (Aug. 30 2022) (Confidential)
Exhibit JRichert-4 (CONF)	Moody's Investors Service, <i>Inflation Reduction Act will build economic resilience, but its costs and benefits vary by sector</i> (Aug. 10, 2022) (Confidential)
Exhibit JRichert-5 (CONF)	Moody's Investors Service, <i>Rating Action: Moody's downgrades CenterPoint Energy Houston Electric to Baa1 from A3; outlook is stable</i> (Mar. 4, 2020) (Confidential)
Exhibit JRichert-6 (CONF)	Moody's Investors Service, <i>CenterPoint Energy Houston Electric, LLC; Update to credit analysis</i> (Jan. 11, 2024) (Confidential)

vi. Workpapers to the Testimony of Ann E. Bulkley

The following workpapers are designated as Protected Material because they are proprietary and contain confidential third-party information as well as competitively-sensitive financial and commercial information:

WP AEB-7 (Risk Premium Analysis) (CONFIDENTIAL).xlsx

WP AEB-8 (Moody's Credit_Opinion-CEHE-11Jan2024) (CONFIDENTIAL).pdf

WP AEB-9 (S&P RatingsDirect - 11-10-23) (CONFIDENTIAL).pdf

WP AEB-10 (RRA 07.18.2022) (CONFIDENTIAL).pdf

WP AEB-11 (Capital Structure Analysis - 2-1-2024) (CONFIDENTIAL).xlsx

WP AEB-13 (Figure 2) (CONFIDENTIAL).xlsx

WP AEB-18 (Figures AEB-9, AEB-10) (CONFIDENTIAL).xlsx

B. Schedules

i. Schedules Sponsored by Kristie L. Colvin and Lynnae Wilson

The following schedules are designated as Protected Material because they contain competitively-sensitive commercial or financial information: Schedule II-C-2.7, Schedule II-C-2.7a (Capital Requirements and Acquisition Plan).

ii. Schedules Sponsored by Jacqueline M. Richert

Schedule II-C-2.10 (Rating Agency Reports) contains attachments that are designated as Protected Material because they are proprietary and contain third-party information as well as competitively-sensitive commercial or financial information.

iii. Schedules Sponsored by Stephanie Bundage Juvane

Item 1 of Schedule II-C-3 is designated as Protected Material because the audit was performed at the request of legal counsel and is privileged.

Item 6 of Schedule II-C-3 is designated as Protected Material because the audit was performed at the request of legal counsel and is privileged.

Item 8 of Schedule II-C-3 is designated as Protected Material because the audit was performed at the request of legal counsel and is privileged.

Item 10 of Schedule II-C-3 is designated as Protected Material the audit was performed at the request of legal counsel and is privileged.

Item 14 of Schedule II-C-3 is designated as Protected Material the audit was performed at the request of legal counsel and is privileged.

iv. Schedules Sponsored by M. Shane Kimzey

Schedule II-C-4 (Board of Directors Meetings) contains information and agenda materials related to meetings of the Company's board of directors. This information is designated as Highly Sensitive and Confidential Material because it is competitively-sensitive business operations information, commercial information, or financial information.

v. Schedules Sponsored by Kristie L. Colvin

Schedule II-D-2.9.2 (Rents and Leases) requires a copy of all leases and rentals be attached to the schedule. The rates within the attached leases are designated as Protected Material because those lease terms constitute competitively-sensitive commercial or financial information.

vi. Schedules Sponsored by Kristie L. Colvin and Bertha R. Villatoro

The following schedules are designated as Protected Material because they contain competitively-sensitive business-operations information, commercial information, or financial information: Schedule II-D-3.6.1a (STI Goals and Objectives) and Schedule II-D-3.10.1 (Administrative Fees).

The following schedules contain attachments that are designated as Highly Sensitive Protected Material because they contain competitively-sensitive financial information and confidential employee information: Schedule II-D-3.8.1 (Actuarial Reports - Pension and BRP) and Schedule II-D-3.9.1 (Actuarial Reports - Postretirement and Postemployment).

Schedule II-D-3.7.3.1 (Health and Welfare Contracts) and Schedule II-D-3.10.2 (Administrative Fees Contracts) contain contracts that are designated as Protected Material because they contain confidential third-party material or competitively-sensitive commercial or financial information.

vii. Schedules Sponsored by Jennifer K. Story

The following schedules are designated as Protected Material because they contain competitively-sensitive commercial or financial information:

Schedule II-E-3.1 (2022 Tax Return data)
Schedule II-E-3.4 (Consolidation/Inter-Corporate Tax Allocation)
Schedule II-E-3.23 (Tax Elections, IRS Audit Status and Private Letter Rulings).

The following schedules contain attachments that are designated as Protected Material because they contain competitively-sensitive commercial or financial information:

Schedule II-E-3.4 (CNP Intercompany Tax Policy)
Schedule II-E-3.21 (2022 Consolidated Tax Return as Filed)
Schedule II-E-3.23 (Private Letter Rulings).

viii. Schedules Sponsored by L. Darren Storey

Schedule V-K-9.1 - Corporate Services SKFs contains competitively-sensitive commercial and financial information related to individual entities other than the electric utility and is designated as Protected Material on that basis.

The following schedules are designated as Protected Material because they contain confidential third-party material or competitively-sensitive commercial or financial information:

Schedule V-K-12-2.1 - Amounts Billed to Each Affiliate
Schedule V-K-12-2.2 - Percent Billed to Each Affiliate

ix. Schedules Sponsored by Eric Easton

Schedule VI-M-2.1.1 has been designated Highly Sensitive Protected Material because it contains customer specific information.

C. Schedule Workpapers

i. Workpapers to Schedules Sponsored by Kristie L. Colvin and Lynnae K. Wilson

The following workpapers are designated as Protected Material because they contain competitively-sensitive commercial or financial information:

WP/II-C-2.7.1
WP/II-C-2.7.2
WP/II-C-2.7.3
WP/II-C-2.7.4
WP/II-C-2.7.5
WP/II-C-2.7.6
WP/II-C-2.7.7
WP/II-C-2.7.8
WP/II-C-2.7.9
WP/II-C-2.7.10
WP/II-C-2.7.11

ii. Workpapers to Schedules Sponsored by Kristie L. Colvin and Bertha R. Villatoro

The following workpapers are designated as Protected Material because they contain competitively-sensitive financial information and confidential employee information:

WP/II-D-3.6.1a
WP/II-D-3.7
WP/II-D-3.10

iii. Workpapers to Schedules Sponsored by Jennifer K. Story

The following workpapers are designated as Protected Material because they contain competitively-sensitive commercial or financial information:

WP/II-E-3.1
WP/II-E-3.1a

iv. Workpapers to Schedules Sponsored by Kristie L. Colvin

The following workpapers contain actuarial data and information related to employee salaries. This information is designated as Protected Material because it is confidential and competitively sensitive.

WP/II-B-11 Adj 8
WP/II-D-3 Adj 2
WP/II-D-3 Adj 2.1
WP/II-E-2a
WP CEHE Wage Adjustment - Direct

v. Workpapers to Schedules Sponsored by John R. Durland

The following workpapers are designated as Highly Sensitive Protected Material because they contain customer information that is confidential under Tex. Util. Code § 32.10(c):

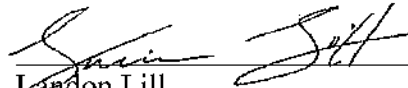
WP – Confidential Report DSC Billings with GL Check Figure 012023-122023
WP – Bad Debt by Rate Class (CONFIDENTIAL)

II. STATEMENT OF COUNSEL

The undersigned counsel for CenterPoint Houston has reviewed the foregoing material sufficiently to state in good faith that the information contained therein is confidential for at least the reasons stated above.

III. PROTECTIVE ORDER

CenterPoint Houston has included herein a proposed protective order. The proposed protective order is the Commission protective order and has been approved in each of the Company's recent rate-related proceedings.



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