



Filing Receipt

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

e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper document is a separate document within the meaning of this term.

D. Pursuant to Tex. R. Civ. P. 196.4, GCCC specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-ROM in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. GCCC further requests that CenterPoint produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

E. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

F. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

G. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

H. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

I. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

J. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

K. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

L. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

M. Pursuant to 16 Tex. Admin. Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

N. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

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& TOWNSEND, P.C.**

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**ATTORNEYS FOR GULF COAST
COALITION OF CITIES**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on April 23, 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.


ROSLYN M. DUBBERSTEIN

GCCC'S FOURTH REI TO CENTERPOINT

- GCCC 4-1** Refer to Schedule II-H-3.1, Schedule II-H-4.1.3, WP H-1.2 and all other Schedules and Workpapers wherein the Company calculated the effects on base revenues of annualizing customer growth through the end of the test year.
- a. Provide a version of these Schedules and Workpapers to calculate the effects on base revenues of annualizing customer growth through March 2024 or explain why it cannot do so.
 - b. Confirm that only the Company has the data to provide a version of these Schedules and Workpapers with actual data for the three months after the end of the test year.
 - c. Confirm that customer growth and the effects of that growth on base revenues as requested in parts (a) and (b) of this question are known and measurable because they are based on actual customer metrics in the same manner as the Company's proposed adjustment to increase base revenues at the end of the test year is based on actual customer metrics. If this is not correct, then provide a corrected statement, identify and describe all differentiating factors as to why the Company's proposed adjustment is known and measurable, but adjustments to the March 31, 2024 date are not known and measurable, and provide all support relied on for your response.
- GCCC 4-2** Refer to Schedules II-H-3.1-3.
- a. Indicate if the actual booked customer counts shown for the months January 2023 through December 2023 are at the beginning or the end of each month.
 - b. If not already provided in response to GCCC 4-1(a), provide the actual booked customer counts in the same level of detail as shown on this schedule and in the same format for each month January 2024 through March 2024 if counts are at the end of the month or through April 2024 if the counts are at the beginning of the month.
- GCCC 4-3** Confirm that the Company annualized payroll expenses based on the last payrolls in December 2023 and then further annualized payroll expenses for estimated salaried payroll increases on or about January 1, 2024 and bargaining unit increases on or about April 1, 2024. If this is not correct, then provide a corrected statement and provide all support relied on for your response.