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SOAH DOCKET NO. 473-24-13232
PUC DOCKET NO. 56211

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

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 confidentiality statement in accordance with section 4 of the Protective Order entered in this case.¹

I have reviewed the information produced by the Company in response to the below requests for information (“RFIs”) from the Public Utility Commission of Texas Staff, Texas Energy Association for Marketers and Alliance for Retail Markets (“REP Coalition”), and Texas Industrial Energy Consumers (“TIEC”) sufficiently to state in good faith that certain information contained in the attachments to the Company’s responses is exempt from public disclosure under the Texas Public Information Act (“TPIA”)² and merits the protected materials designation.

The following table lists (1) the request number in which the confidential information was produced as an attachment; (2) whether the information is protected material (“CONF”) or highly sensitive protected material (“HSPM”); (3) the reasons supporting that the responsive information is exempt from public disclosure under the TPIA and subject to treatment as protected material; and (4) the supporting authority:

Request No.	Designation	Reason	Citation
PUC-RFI04-24	CONF	Commercial or financial information that would cause substantial competitive harm if publicly disclosed.	Tex. Gov’t Code § 552.110(c).
TIEC-RFI04-01	HSPM	Contractual information pertaining to contracts that specify that their terms are confidential.	Tex. Gov’t Code § 552.110; Protective Order § 6(b).
TIEC-RFI04-05	HSPM	Customer-specific information protected by § 32.101(c) of the Public Utility Regulatory Act; business operations or	Tex. Gov’t Code §§ 552.101, .110; PURA § 32.101(c);

¹ Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates at 4405–4424 (Mar. 6, 2024) (Protective Order); SOAH Order No. 1 at 5 (Mar. 7, 2024) (adopting CenterPoint Houston’s proposed protective order).

² Tex. Gov’t Code §§ 552.001–.376.

Request No.	Designation	Reason	Citation
		financial information that is commercially sensitive.	Protective Order § 6(a), (d).
REP-RFI01-08	HSPM	Business operations or financial information that is commercially sensitive.	Tex. Gov't Code § 552.110; Protective Order § 6(d).

Additionally, in CenterPoint Houston's Errata 2 Filing,³ the Company marked certain information in the following schedules and workpapers as confidential:

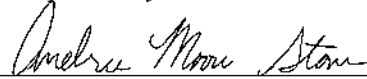
- Schedule II-C-2.7;
- Schedule II-C-2.7a;
- Schedule II-D-3.6.1a;
- Schedule II-D-3.7.3.1;l
- Schedule II-D-3.10.1;
- Schedule II-D-3.10.2;
- Schedule II-E-3.1;
- Schedule II-E-3.4;
- Schedule II-E-3.23;
- Workpaper WP II-B-11 Adj 8;
- Workpaper WP II-C-2.7.1;
- Workpaper WP II-C-2.7.2;
- Workpaper WP II-C-2.7.3;
- Workpaper WP II-C-2.7.4;
- Workpaper WP II-C-2.7.5;
- Workpaper WP II-C-2.7.6;
- Workpaper WP II-C-2.7.7;
- Workpaper WP II-C-2.7.8;
- Workpaper WP II-C-2.7.9;
- Workpaper WP II-C-2.7.10;
- Workpaper WP II-C-2.7.11;
- Workpaper WP II D-3 Adj 2;
- Workpaper WP II D-3 Adj 2.1;
- Workpaper WP II-D-3.6.1a;
- Workpaper WP II-D-3.7;
- Workpaper WP II-D-3.10;
- Workpaper WP II-E-3.1;
- Workpaper WP II-E-3.1a – '22 Tax.Ret. PBC; and
- Workpaper WP II-E-2a.

The confidential information contains trade secrets and commercial or financial information that would cause substantial competitive harm to CenterPoint Houston if publicly

³ CenterPoint Energy Houston Electric, LLC's Errata 2 Filing (May 22, 2024); CenterPoint Energy Houston Electric, LLC's Errata 2 Filing - CONFIDENTIAL (May 22, 2024).

disclosed.⁴ Accordingly, these materials are exempt from public disclosure under the TPIA⁵ and merit the protected materials designation.

Respectfully submitted,



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⁴ Tex. Gov't Code § 552.110.

⁵ Tex. Gov't Code § 552.110 (exempting trade secrets and certain commercial and financial information from public disclosure).

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**COUNSEL FOR CENTERPOINT ENERGY
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CERTIFICATE OF SERVICE

I certify that on May 24, 2024, this document was filed with the Public Utility Commission of Texas in Docket No. 56211, and a true and correct copy of it was served by email on all parties of record in this proceeding in accordance with the Second Order Suspending Rules issued in Project No. 50664 and SOAH Order No. 1 in this docket.

A handwritten signature in cursive script, reading "Andrea Moore Stover", written over a horizontal line.

Andrea Moore Stover