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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 Gulf Coast Coalition of Cities (“GCCC”), Houston Coalition of Cities (“HCC”), International Brotherhood of Electrical Workers Local 66 (“IBEW”), Public Utility Commission of Texas Staff, and Texas Consumer Association (“TCA”) 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
GCCC-RFI02-13U	CONF	Commercial or financial information that would cause substantial competitive harm if publicly disclosed.	Tex. Gov’t Code § 552.110(c).
HCC-RFI02-11U	CONF	Commercial or financial information that would cause substantial competitive harm if publicly disclosed.	Tex. Gov’t Code § 552.110(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
PUC-RFI04-22U	CONF	Commercial or financial information that would cause substantial competitive harm if publicly disclosed.	Tex. Gov't Code § 552.110(c).
PUC-RFI04-31U	CONF	Commercial or financial information that would cause substantial competitive harm if publicly disclosed.	Tex. Gov't Code § 552.110(c).
IBEW-RFI01-03S	CONF	Trade secrets and commercial or financial information that would cause substantial competitive harm if publicly disclosed.	Tex. Gov't Code § 552.110.
TCA-RFI02-01	CONF	Trade secrets; commercial or financial information that would cause substantial competitive harm if publicly disclosed; information considered confidential by other law (information relating to critical infrastructure).	Tex. Gov't Code §§ 418.181, 552.101, .110(c).
TCA-RFI02-02	CONF	Trade secrets; commercial or financial information that would cause substantial competitive harm if publicly disclosed; information considered confidential by other law (information relating to critical infrastructure).	Tex. Gov't Code §§ 418.181, 552.101, .110(c).
TCA-RFI02-03	CONF	Trade secrets; commercial or financial information that would cause substantial competitive harm if publicly disclosed; information considered confidential by other law (information relating to critical infrastructure).	Tex. Gov't Code §§ 418.181, 552.101, .110(c).
TCA-RFI02-04	CONF	Trade secrets; commercial or financial information that would cause substantial competitive harm if publicly disclosed; information considered confidential by other law (information relating to critical infrastructure).	Tex. Gov't Code §§ 418.181, 552.101, .110(c).

Additionally, in CenterPoint Houston's Errata 3 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;

³ CenterPoint Energy Houston Electric, LLC's Errata 3 Filing (Jun. 14, 2024); CenterPoint Energy Houston Electric, LLC's Errata 3 Filing - CONFIDENTIAL (Jun. 14, 2024).

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

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).

Respectfully submitted,



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

CERTIFICATE OF SERVICE

I certify that on June 20, 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 in black ink.

Andrea Moore Stover