

STA REQUEST – NARRATIVE STATEMENT

CenterPoint Energy, Inc. (“CenterPoint”) hereby requests special temporary authority (“STA”) to test, evaluate and demonstrate its broadband over power line (“BPL”) equipment (the “Equipment”) in the Houston, Texas area. The information below is provided pursuant to Part 15 of the rules of the Federal Communications Commission.

I. Need for Expedited STA

CenterPoint respectfully requests expedited review of the STA request so that it immediately may commence test of the BPL Equipment at the sites specified herein. CenterPoint needs to construct and operate a BPL trial network in order to fully test and evaluate the viability of the Equipment. These tests will be used, in part, to further develop utility applications to be used for CenterPoint Energy internal requirements.

CenterPoint Energy provides electric transmission and distribution service in the Houston metropolitan area and provides gas service in Arkansas, Louisiana, Minnesota, Mississippi, Oklahoma and Texas to combined total of 5 million customers. CenterPoint plans to deploy BPL to pass 45,000 electric customers and to 20,000 gas customers. The BPL systems will be used to test utility applications, such as automated meter reading services as well as other utility power applications. CenterPoint Energy will also be testing the scalability of BPL technology, which will determine the extent to which CenterPoint deploys BPL further.

II. Overview of Proposed Operation

Through these tests, CenterPoint will test multiple aspects of the Equipment, including its performance, capacity, signal quality, data rates, interference potential and user acceptability.

III. Details of Proposed Operation

Details regarding the technical parameters of the proposed operation are provided below:

Time Period

Six months: February 15, 2007 – August 15, 2007

Location(s)/ Geographic Area

Houston, TX (Harris County), location of equipment is at the corner of 1111 Louisiana with a radius of 100 kilometers. The zip code of operation is 77002

Equipment

The Equipment will include 200 overhead node equipment devices.

Manufacturer: Corinex

Model #: CXP-MVA-GNR-AB

FCC Type Acceptance: FCC testing to begin 2007

Emission Designator: OFDM with 1536 carriers

Frequency Range

2 MHz to 34 MHz

Maximum ERP or EIRP, if applicable

Tests will comply with Part 15 emissions limits

IV. Certifications

CenterPoint certifies as follows regarding the proposed operations:

- (i) It will not market, sell or lease equipment to end users;
- (ii) It will not charge fees for use of equipment;
- (iii) At the conclusion of the testing period, it will recall and recover all devices that do not comply with FCC regulations;
- (iv) It understands that operation of unapproved devices must not cause interference and will takes steps to resolve any interference, including discontinuance of operation;

Granting the STA request would serve the public interest in BPL deployment, and is consistent with Section 7 of the Communications Act¹ by encouraging the development of new technologies and services to the public. These tests would also promote the public interest in energy efficiency and reliability.² CenterPoint Energy has committed significant resources towards these tests, and delaying testing would impose enormous costs that would cause undue harm. For all these reasons, CenterPoint Energy respectfully requests that the Commission grant special temporary authority in order to test BPL equipment.

¹ 47 U.S.C. §157.

² See e.g. Energy Policy Act of 2006 (requiring utilities to implement advanced metering and meet service reliability standards).