

January 9, 2007

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Mr. Robert Herz Chairman Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

LETTER OF COMMENT NO. 400

Dear Mr. Herz:

CenterPoint Energy, Inc (CNP) joins with many others in urging the Financial Accounting Standards Board to delay the effective date of FASB Interpretation No. 48, Accounting for Uncertainty in Income Taxes (FIN 48).

CNP is a domestic energy delivery company that includes electric transmission and distribution, natural gas distribution, competitive natural gas sales and services, and pipeline and field services operations. We serve more than five million metered customers primarily in Arkansas, Louisiana, Minnesota, Mississippi, Oklahoma, and Texas. Assets total approximately \$17 billion.

It is clear that a significant number of fundamental implementation issues have arisen since FIN 48 was issued in July 2006. I believe that the significant unanswered questions, both from preparers of financial statements and our independent outside auditors, present a real risk that implementation of FIN 48 on the current schedule may produce more diversity in reporting and the potential for inadvertent errors in applying FIN 48 for calendar year-end companies. Accordingly, CNP strongly recommends that the effective date of FIN 48 be deferred for one year.

CNP also supports the positions taken in letters on this issue from the Tax Executives Institute, Inc. dated December 12, 2006, the Edison Electric Institute dated December 20, 2006, the Manufacturers Alliance/MAPI dated, December 21, 2006 and the American Gas Association dated December 29, 2006 and refers you to remarks made by Mr. Scott Taub, Deputy Chief Accountant of the Securities and Exchange Commission at the 2006 AICPA National Conference on December 11, 2006.

CNP appreciates the opportunity to comment on this interpretation and your consideration of our views. en de la composition La composition de la

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