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December 30, 2008

David Featherston
Director of Infrastructure and Reliability Division
Public Utility Commission of Texas
1701 N. Congress Ave.
Austin, Texas 78701

RE: Project No. 32182 – *PUC Investigation of Methods to Improve Electric and Telecom Infrastructure that will Minimize Long Term Outages and Restoration Costs Associated with Gulf Coast Hurricanes* – Compliance Filing

Dear Mr. Featherston:

On October 15, 2008, you requested all electric utilities submitting inventories of transmission lines within fifty miles of the Texas coast also file by January 1, 2009, cost estimates for upgrading the infrastructure included in the coastal facilities inventory report. The cost estimates were for upgrading the facilities in the inventories to meet the current National Electrical Safety Code (“NESC”) wind-loading standards. CenterPoint Energy Houston Electric, LLC submits the following cost estimates for upgrading the transmission lines to meet the current NESC wind-loading standards in response to the request:

- Within 10 miles of the coast: \$124 million
- Within 10 to 50 miles of the coast: \$1.05 billion

The estimates provided are rough estimates based on engineering judgment and experience assuming the extreme wind loading requirements from Section 250(C) of the 2007 edition of the NESC were applied to existing transmission lines constructed within 50 miles of the Texas coast. No detailed engineering or structural modeling was done to prepare these estimates. The use of concrete or steel replacement structures was assumed to calculate the estimates.

If you need any further information, please contact me at 512-397-3032. Thank you for your attention to this matter.

Yours truly,

DeAnn T. Walker
Assistant General Counsel