

Control Number: 48629



Item Number: 288

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**SOAH DOCKET NO. 473-19-1857
PUC DOCKET NO. 48629**

2019 JAN 22 PM 2:56

**APPLICATION OF CENTERPOINT
ENERGY HOUSTON ELECTRIC, LLC
TO AMEND A CERTIFICATE OF
CONVENIENCE AND NECESSITY FOR
A 345-KV TRANSMISSION LINE IN
BRAZORIA, MATAGORDA, AND
WHARTON COUNTIES**

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**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-5**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Centerpoint Energy Houston Electric, LLC, by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.


Date: January 22, 2019

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF
TEXAS LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

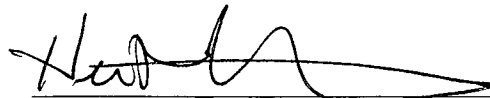
Karen S. Hubbard
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I certify that a copy of this document will be served on all parties of record on January 22, 2019 in accordance with 16 TAC § 22.74.



Heath D. Armstrong

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TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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DEFINITIONS

- A. "Centerpoint," "the Company" or "you" refers to Centerpoint Energy Houston Electric, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 2-1** In reviewing the application and link segments, Staff has noted that numerous segments contain multiple turns in proximity such that consecutive turning structures would be closer together than the span length of normal tangent structures. Staff is aware that turning and other specialty structures are noticeably more expensive than tangent structures. Please explain why this density of turning and specialty structures is appropriate for the link segments in this project. As an example please refer to the following links: AA, AP, BL, IO2, IX. Please note that this is not intended to be exhaustive.
- Staff 2-2** Please provide an explanation as to why route segments selected for this project do not generally parallel existing infrastructure except for short intervals given that the study area contains a wide variety of existing infrastructure moving towards the Jones Creek Substation parallel to the general direction of the transmission project.
- Staff 2-3** In the northern part of the study area there are no potential segments, yet there are roads, railroad, and transmission lines in the Lake Jackson/Clute area that appear to be possible corridors into Freeport. Please explain why large portions of the study area were not utilized to create additional routes.
- Staff 2-4** All routes converge onto two corridors into Freeport: the segments that parallel State Highway 36 or Segment JA paralleling an existing transmission line to the south. Segments along State Highway 36 utilize a large number of turning structures and are thus more expensive per mile than routes that instead use Segment JA. Segment JA, however, crosses the Justin Hurst Wildlife Management Area for 4.5 of its 5.9 miles and may not even be an option pending permission of Texas Parks and Wildlife. Please account for this bottleneck and why other options are not presented.
- Staff 2-5** The second least costly route, Route 16, is \$32.6 million more than the least costly route, Route 5. The third least costly route, Route 2, is \$35.5 million more than the second least costly route. Therefore 28 of the 30 routes are at least \$68 million dollars more than the cheapest route. Please account for why these two routes are such outliers and why more cost competitive routes were not presented.