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FILING CLERK

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

TOM HOLCOMB'S SECOND REQUESTS FOR INFORMATION
FROM CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

Pursuant to PUC Procedural Rule 22.141 and 22.144, Intervenor Tom Holcomb requests that CenterPoint Energy Houston Electric, LLC ("CenterPoint") provide responses to the following Requests for Information ("RFI" or "RFIs").

Please answer the attached questions in accordance with the procedural schedule and orders issued in this case, the Commission's Procedural Rules, the Texas Rules of Civil Procedure, and other applicable law. Please copy the question immediately above the answer to each question. Please state the name of the witness or witnesses in this case who will sponsor the answer to the question at the hearing and can vouch for the truth of the answer. The answer should be filed under oath, or the response should stipulate in writing that the answer can be treated by all parties as if filed under oath.

The questions should be answered in sufficient detail to fully present all of the relevant facts. In answering this request, CenterPoint is requested to furnish such information as is available to CenterPoint, including information CenterPoint is able to obtain by due diligence from CenterPoint's present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on CenterPoint's behalf.

If the items requested to be produced herein have already been provided in other discovery answers to any party, it shall not be necessary to duplicate such production. It shall be sufficient that the answer containing the requested information is clearly identified. Where only a portion of the requested information has been previously provided, this shall be disclosed and all information necessary to fully and completely answer this discovery request shall be provided in your answer.

If there is a relevant change in CenterPoint's answer after it is submitted such that it is no longer complete or accurate, please submit an amended answer, under oath, as a supplement to the original answer within five (5) working days of CenterPoint's discovery of the need for such amendment.

Please provide CenterPoint's response to the undersigned counsel at the address listed below and submit an original and the required number of copies of CenterPoint's answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, Austin, Texas 78701.

DEFINITIONS

1. "CenterPoint" 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.
2. "You" and "your" refers to the party to which the RFI is directed.
3. "Application" means the Application by CenterPoint to Amend its Certificate of Convenience and Necessity for a Transmission Line in Brazoria, Matagorda and Wharton Counties.

4. "Communication" means any oral, written, or electronic statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, or symposium of which CenterPoint has knowledge, information or belief.

5. "Concerning" means, in whole or in part, directly or indirectly, referring to, relating to, being connected with, commenting on, responding to, showing, describing, analyzing, reflecting embodying, mentioning, or constituting the subject matter identified in the request.

6. "Date" means the exact day, month, and year, if ascertainable or, if not, the best approximation.

7. "Describe" or "identify" when used in reference to a document, means you must state, to the fullest extent possible, the following:

- a. The nature (e.g. letter, handwritten note) of the document;
- b. The title or heading that appears on the document;
- c. The date of the document and the date of each addendum, supplement, or other addition or change;
- d. The identity of the author of the document; any signatory or signatories of the document; and the person on whose behalf or at whose request or direction the document was prepared or delivered; and
- e. The present location of the document, and the name, address, position or title, and telephone number(s) of the person(s) having custody of the document.

8. The terms "document" or "documents" are used in their broadest sense to include, but not be limited to, all written or graphic matter of every kind and description whether printed, produced, or reproduced, by any process whether visually, magnetically, mechanically, electronically, or by hand, whether final or draft, original or reproduction whether privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody or control. These shall also be construed to include every copy of a document where there copy contains any commentary or notation of any kinds that does not appear on the original or any other copy.

9. The words "link" or "links" reference the individually numbered/lettered portions of the preferred and alternative routes described in the Application.

10. Words used in the plural shall also be taken to mean and to include the singular. Words used in the singular shall also be taken to mean and include the plural.

11. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

12. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each".

13. The term "including" means "including, but not limited to".

INSTRUCTIONS

1. As to any request for information to which you are unable to respond to in whole or in part for any reason, please state the grounds for inability respond. When you believe that a complete answer to a particular request for information or part thereof is not possible, please answer each request for information to the extent possible and furnish a

statement explaining: (a) the reason for your inability to respond further; and (b) whatever information or knowledge you have concerning the non-responsive portion.

2. For each document or other requested information that you assert is privileged, please comply with the requirements of Rule 193.3 of the Texas Rules of Civil Procedure and P.U.C. Proc. R. 22.144.

3. For every document that no longer exists or cannot be located; identify the document; state how and when the document passed out of existence, or when it could no longer be located; and state the reason(s) for the disappearance; identify each person having knowledge about the disposition or loss of the document; and identify each document evidencing the existence or nonexistence of each document that cannot be located.

4. It is requested that all documents that might impact on the subject matter of the Application be preserved and that any ongoing process of document destruction involving such documents cease.

5. Furnish all requested documents available to you and known by you, or in your possession, custody, or control or that of your agents and attorneys.

6. In those instances where you choose to answer a request for information by referring to a specific document or record, it is requested that the specification be in sufficient detail to permit the requestor to locate and identify the record(s) and/or document(s) from which the answer is to be ascertained, as readily as you can.

7. In those instances when requested information or documents are stored only on software, computer based information, or other data compilations, you should either produce the raw data along with all codes and programs for translating it into usable form,

or produce the information or documents in a finished usable form that includes all necessary glossaries, keys, indices for interpretation of the material.

8. Please respond to each request for information and indicate clearly the request for information to which each response is responsive. When requests for information contain subparts, indicate in your answer the subpart to which each particular part of your response is in response.

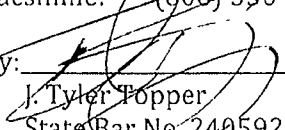
9. You are under a duty to supplement your responses to these requests for information that are incomplete or incorrect when made. Furthermore, you are under a duty to timely supplement and/or amend your responses if you receive, obtain, or generate information within the scope of any request for information between the time of the original responses and the conclusion of this proceeding.

10. Unless otherwise indicated, the discovery requested in these requests is for information related to the time period from July, 2014 through and including the present. All requested documents, data compilations, and recordings whenever actually prepared or generated that related to this time period are to be produced.

Respectfully submitted,

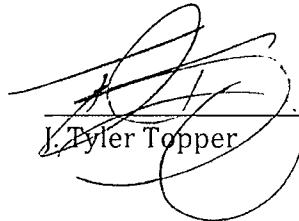
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By: _____


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ATTORNEY FOR INTERVENOR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served on all parties of record in this proceeding in compliance with PROC. R. 22.74 and Order No. 1 on this 13th day of March, 2019.



J. Tyler Topper

**TOM HOLCOMB'S SECOND SET OF REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Holcomb RFI No. 2-1. Please consider a modification of Segment Z on Tom Holcomb's property, as depicted on Exhibits "A" and "B" attached hereto, that runs parallel to Mr. Holcomb's north and east property lines rather than running along Mr. Holcomb's frontage along Pan American Road and bisecting his property when Segment Z turns east on the property.

1. Please provide your best available estimates of the segment evaluation criteria for this modified segment ("Modified Segment Z") in the same format as Table 4-1, Environmental and Land Use Data for the Proposed Transmission Line Segments, which is contained in Application Attachment 1, Environmental Assessment and Alternative Route Analysis.
2. Please provide your best available cost estimate for Modified Segment Z compared to your best available cost estimate for Segment Z.
3. If you are not willing to construct the proposed transmission line on Modified Segment Z, please explain in detail why not.

Holcomb RFI No. 2-2. Please consider a modification of Segment Z on Tom Holcomb's property, as depicted on Exhibits "A" and "B" attached hereto, that runs parallel to Mr. Holcomb's north and east property lines rather than running along Mr. Holcomb's frontage along Pan American Road and bisecting his property when Segment Z turns east on the property.

1. Please provide your best available estimates of the route evaluation criteria for all routes which would utilize Modified Segment Z in the same format as Table 4-2, Environmental and Land Use Data for the Proposed Alternative Routes, which is contained in Application Attachment 1, Environmental Assessment and Alternative Route Analysis.

2. Please provide your best available cost estimate for all routes which would utilize Modified Segment Z in the same format as the cost estimates provided in Application Attachment 7, Cost Estimates for Proposed Alternative Routes.
3. If you are not willing to construct the proposed transmission line on any of the routes utilizing Modified Segment Z, please explain in detail why not.

Holcomb RFI No. 2-3. In the event you are unwilling to construct the proposed transmission line using Modified Segment Z as it is currently proposed, what additional modifications, revisions or other actions could be made/taken such that you would then be willing to construct the proposed transmission line on Modified Segment Z (or in the approximate location of Modified Segment Z)?

Holcomb RFI No. 2-4. In the event additional modifications, revisions or other actions are required before you are willing to construct the proposed transmission line on Modified Segment Z (or in the approximate location of Modified Segment Z), please answer each question posed in Holcomb RFI Nos. 2-1 and 2-2 assuming the additional modifications, revisions or actions are complete.

EXHIBIT "A"



EXHIBIT "B"

KEY

Property boundaries:	Yellow line
Segment Z:	Red line
Modified Segment Z:	Blue line



Position 29° 03' 59" N 95° 40' 00" W

267ft

Source: NASA, NGA, USGS

esri