



Control Number: 49421



Item Number: 127

Addendum StartPage: 0

RECEIVED

2019 MAY -8 PM 12:09


APPLICATION OF CENTERPOINT §
ENERGY HOUSTON ELECTRIC, §
LLC FOR AUTHORITY TO CHANGE §
RATES §

BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS
FILING CLERK

**TEXAS COMPETITIVE POWER ADVOCATES
FIRST REQUESTS FOR INFORMATION TO CENTERPOINT ENERGY HOUSTON
ELECTRIC LLC**

Pursuant to 16 TAC §§ 22.141-145, Texas Competitive Power Advocates (TCPA) request that CenterPoint Energy Houston Electric, LLC (CenterPoint) by and through its attorney of record, provide the information requested in this document within twenty (20) working days of receipt thereof. It is further requested that the answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing it (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can attest to its accuracy. These requests are continuing in nature, and should there be a change in circumstances that would modify or change an answer supplied, such changed answer should be submitted immediately as a supplement to the original answer.

Respectfully submitted,



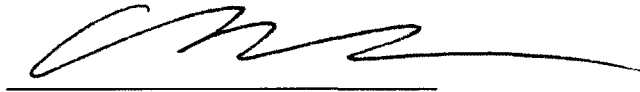
David Cabrales
Andres Medrano
FOLEY GARDERE
Foley & Lardner LLP
600 Congress Avenue
Suite 3000
Austin, Texas 78701-2978
(512) 542-7013
(877) 295-5128 (Fax)

127

**ATTORNEYS FOR TEXAS
COMPETITIVE POWER ADVOCATES**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served via facsimile or first-class mail to all parties of record in this proceeding on this 8th day of May, 2019.

A handwritten signature in black ink, appearing to read 'Andres Medrano', is written over a horizontal line.

Andres Medrano

**TEXAS COMPETITIVE POWER ADVOCATES
FIRST REQUESTS FOR INFORMATION TO CENTERPOINT ENERGY HOUSTON
ELECTRIC LLC**

Each of these Requests refer to Section VI of CenterPoint's Statement of Intent and Application to Change Rates and the Direct Testimony of Julienne P. Sugarek at pages 677-681 of the Application.

1-1. Please identify the provision of PURA, the Texas Administrative Code, or any other statute or legal authority that CenterPoint relies upon for the authority to own and operate voltage regulation battery technology.

1-2. Refer to the Direct Testimony of Julienne P. Sugarek at page 677, line 5-8. Would CenterPoint have sole discretion to determine the necessity and cost effectiveness of the installation of batteries for voltage regulation or does CenterPoint contemplate a process of review and approval of such need by the Commission or another authority?

1-3. Refer to the Direct Testimony of Julienne P. Sugarek at page 677, line 15-16. Describe the effect that the voltage deviations had on CenterPoint's equipment, ability to provide service, or other functions. Include in your description any identified costs incurred because of these deviations.

1-4. Refer to the Direct Testimony of Julienne P. Sugarek at page 677, line 19-23. Provide the studies conducted by CenterPoint identified in the testimony.

1-5. Refer to the Direct Testimony of Julienne P. Sugarek at page 677, line 23-24. Provide the studies of battery storage systems conducted by CenterPoint identified in the testimony.

1-6. Refer to the Direct Testimony of Julienne P. Sugarek at page 677-278, line 23-2. Provide the cost comparison study identified in the testimony.

1-7. Refer to the Direct Testimony of Julianne P. Sugarek at page 678, line 8-12. Provide any studies or analysis that support the assertion that each solar, wind, or distributed generation facility will present its own interconnection and voltage regulation issues.

1-8. Refer to the Direct Testimony of Julianne P. Sugarek at page 679, line 1-2. Provide any studies or analysis that support the assertion that each of the four solar facilities under development will present voltage regulation issues.

1-9. Refer to the Direct Testimony of Julianne P. Sugarek at page 679, line 21-22. Provide any studies or analysis that support the assertion that installation of voltage smoothing technology will bring more generation to market.

1-10. Admit or deny that solar, wind, and distributed generation facilities could provide their own storage systems to provide the voltage smoothing operations identified by CenterPoint in its Application and supporting testimony.

1-11. If you deny 1-10, explain why.

1-12. Admit or deny that voltage smoothing operations could be provided as competitively bid services when required for solar, wind, and distributed generation facilities.

1-13. If you deny 1-12, explain why.

1-14. Refer to the Direct Testimony of Julianne P. Sugarek at page 680, line 8-10. Explain why voltage regulation batteries would qualify as distribution assets under FERC and Commission rules.

1-15. Refer to the Direct Testimony of Julianne P. Sugarek at page 680, line 16-19. Explain the process by which CenterPoint would purchase the energy needed to charge the

batteries, from who the energy would be purchased, how it would be priced, and how the costs of purchase would be treated by CenterPoint for purposes of rate recovery.

1-16. Refer to the Direct Testimony of Julianne P. Sugarek at page 680, line 16-19. Please describe any technical reason why the batteries installed by CenterPoint could not be used to store and subsequently sell energy.

1-17. Describe the storage size, capacity, performance requirements, and other technical specifications of the battery systems that CenterPoint expects to own for voltage smoothing purposes.

1-18. Refer to the Direct Testimony of Julianne P. Sugarek at page 681, line 11-13. Provide the analysis that CenterPoint undertook to determine the estimate cost to acquire and operate the battery systems.

1-19. Describe CenterPoint's interconnection process for solar, wind, and distributed generation assets.

1-20. Refer to the Direct Testimony of Julianne P. Sugarek at page 679, line 18. Describe what CenterPoint envisions or anticipates as the "next generation of the utility electric grid."

1-21. Admit or deny that CenterPoint has solicited bids from competitive power generation companies for the provision of reactive support services from voltage smoothing battery systems.

1-22. If you deny 1-21, explain why.