



Control Number: 49421



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**SOAH DOCKET NO. 473-19-3864  
PUC DOCKET NO. 49421**

<b>APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES</b>	§ § § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**SOLAR ENERGY INDUSTRIES ASSOCIATION'S  
FIRST SET OF REQUESTS FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Solar Energy Industries Association ("SEIA") requests that CenterPoint Energy Houston Electric, LLC ("CenterPoint") provide the information requested in Exhibit "A" within the period specified in the procedural schedule in this proceeding.

Pursuant to P.U.C. Proc. R. 22.144(c)(2), SEIA further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (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 vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to P.U.C. Proc. R. 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. SEIA further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested. If any RFI appears confusing, please request clarification from the undersigned counsel.

All information responsive to the requests on the attached Exhibit "A" should be sent to the following person on a piecemeal basis as individual items become available:

Mr. Michael J. Jewell  
Jewell & Associates, PLLC  
4304 Balcones Drive  
Austin, TX 78731  
(512) 423-4065  
(512) 236-5170 (FAX)  
[michael@jewellandassociates.com](mailto:michael@jewellandassociates.com)

## **DEFINITIONS AND INSTRUCTIONS**

A. "CenterPoint", "the Company", "you", "yours", and "your" refer to CenterPoint Energy Houston Electric, LLC, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, directors, officers, attorneys, agents, advisors, investigators, representatives, consultants, employees or other persons.

B. "Applicant" refers to CenterPoint Energy Houston Electric, LLC, and its affiliates, subsidiaries, and any person acting or purporting to act on its behalf, as it relates to this and related appeals, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

C. The terms "document" or "documents" are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced, reproduced or stored by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mails, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. The definition includes electronic information that has been deleted. "Document" or "documents" shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

D. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, SEIA specifically requests that any electronic or magnetic information (which is included in the definition of "document") that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Adobe Acrobat and/or Microsoft Office and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable .pdf copy of the entire email string. Attachments to emails should be provided with the email in searchable .pdf form, unless it is stored in a different format, in which the attachment should be produced in its native format and provided on CD-Rom.

E. The terms "and" and "or" shall be construed both disjunctively and conjunctively is necessary to make the request inclusive rather than exclusive.

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

G. "Any" shall be construed to include "all" and "all" shall be construed to include "any".

H. The term "concerning," or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

I. The term "including," or one of its inflections, means and refers to "including but not limited to."

J. 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.

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

L. 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 of copies, subject matter of the document, and the basis upon which such privilege is claimed.

M. Pursuant to P.U.C. Proc. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

N. If the information requested is included in previously furnished exhibits, workpapers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

O. The term "emails" includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph "D." regarding specific instructions for producing such items.

P. "Communications" refers to correspondence of any kind, including emails.

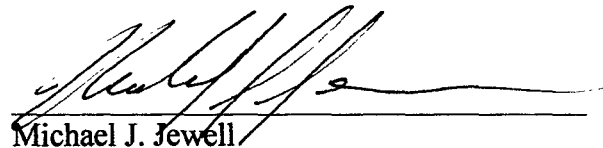
Q. "Identify" and "describe" shall have the meaning set forth below according to the context in which the term is used:

i. When used in reference to an individual, shall mean to state his or her full

name, present or last known residence address, business affiliation and business address, and residence and business telephone number;

- ii. When used in reference to a corporation, shall mean to state its full name, its state of incorporation, its address and its principal place of business;
- iii. When used in reference to any entity other than an individual or corporation, shall mean to state its official name, its organizational form and its address;
- iv. When used in reference to a document, shall mean to state the type of document, date, author, addressee, title, its present location, the name and address of its custodian, and the substance of the contents thereof. In lieu of identifying any document, copies thereof may be furnished; and
- v. When used in reference to a communication, shall mean to state the form of the communication (e.g., telephone conversation, letter, telegram, teletype, telecopy, written memorandum, face to face conversation, or any other form), the date of the communication or the dates on which the communication was sent and/or received if not the same, the parties to the communication, the party who initiated it, the substance of the communication, and the present location and the name and address of the custodian if the communication was non-verbal and/or of any written memorialization of the communication.

Respectfully submitted,

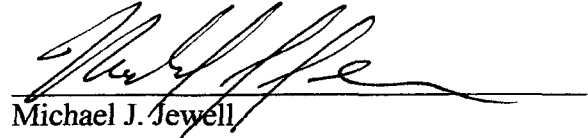


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ATTORNEY FOR THE SOLAR ENERGY  
INDUSTRIES ASSOCIATION

### **CERTIFICATE OF SERVICE**

I, Michael J. Jewell, Attorney and Representative for the Solar Energy Industries Association, certify that a copy of this document was served on all parties of record in this proceeding on the 21<sup>st</sup> day of May, 2019 in accordance with PUC Proc. R. 22.74.



Michael J. Jewell

## **EXHIBIT A**

### **SOLAR ENERGY INDUSTRIES ASSOCIATION'S FIRST SET OF REQUESTS FOR INFORMATION TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

- SEIA 1-1 Please provide links the Company's publicly accessible interconnection documentation, including procedures, manuals, and other information that developers can access through the Company's website.
- SEIA 1-2 Please provide all materials related to the interconnection process that are not publicly posted but that may be sent to developers in the course of analyzing an interconnection request. These may include, for instance, letters indicating that additional studies or analyses are needed to analyze a particular request. Please note this request is not seeking personally identifiable or confidential information.
- SEIA 1-3 Please refer to Sugarek Direct at 16-20.
- a. What analyses did the Company perform during the interconnection application process for the 5 MW solar farm referenced on page 16 line 10?
  - b. Please provide any reports or summaries that were produced during this interconnection application.
  - c. Were any required upgrades to the Company's system identified as part of the interconnection application process for this 5 MW solar farm? If so, please identify them and indicate what party paid for the upgrades.
  - d. Was the 4 MW pumping load discussed on page 16 line 13 already connected to the Company's system at the time the interconnection application for the 5 MW solar farm was being analyzed?
  - e. How often do voltage issues occur for the 4 MW of pumping load that are outside of the Company's system-wide reliability standards?
  - f. Has the owner(s) of the pumping load complained to the Company about the voltage regulation issues? If not, how did the Company become aware of these issues?
  - g. Has the Company communicated with the owner(s) of the 4 MW pumping load regarding the voltage issues? If so, please provide all communications.
  - h. Has the Company communicated with the owner(s) of the 5 MW solar farm regarding the voltage issues? If so, please provide all communications.
  - i. Did the Company perform any analyses related to the interaction of the 4 MW pumping load and the 5 MW solar farm during the interconnection application process? If so, please provide the analyses and a narrative

summary of the results. If not, please explain why the Company did not perform this analysis.

- j. What is the installation cost of the express distribution circuit discussed on page 17 line 10? What would the annual revenue requirement of this asset be?
- k. Did the Company perform the same analyses on the 5 new solar facilities that are currently under development discussed on page 17 line 21 as it did on the 5 MW project already in service? If so, please provide the data requested in b) and c) above for each project. If not, please explain why.
- l. Is the statement on page 18 line 1-2 that “Each of the facilities is expected to create voltage regulation issues” based on these analyses? If not, please provide the basis for this statement, including any analyses that was performed to support it.
- m. For each of the 5 new solar farms discussed, identify and provide the cost estimate of the least-cost solution to the voltage regulation issues that the Company expects to be caused by the new solar farms.
- n. If the Company identifies a required upgrade to safely and reliably interconnect a new solar facility to its grid, who typically pays for this upgrade? Please identify the authority for this answer (e.g. state interconnection regulations or statutes). Please identify any exceptions to this rule (such as one based on system size or customer class).
- o. Identify at what point in the interconnection application process a required upgrade is i) identified, ii) its cost is determined, and iii) this cost estimate is provided to the developer.
- p. Why did the Company not anticipate the voltage issues affecting the 4 MW of pumping load that were caused from the 5 MW solar project? Is this a type of an issue that should have been identified in the interconnection application process? If not, please explain why it should not have been anticipated.
- q. If the voltage issues affecting the 4 MW of pumping load were identified during the interconnection application process, would this have triggered a requirement for more detailed analyses for the 5 MW solar farm under the Company’s interconnection application process?
- r. If the cost associated with the upgrade to resolve the voltage issues were the responsibility of the solar developer, and if these costs turned out to be prohibitive for the solar developer and therefor the solar developer did not pursue the project, confirm that all else equal the Company would not now be in a position where 4 MW of pumping load is affected by voltage issues. If deny, please explain.



- SEIA 1-4      What is the size and capacity (in MW and MWh) of the battery system the Company proposes to install?
- SEIA 1-5      Does the Company believe that smart inverters or other power electronics installed on future solar farms can provide a solution to address the voltage regulation issues it identified? If not, please provide the basis for this answer.
- SEIA 1-6      Has the Company identified any instances in which variability of a customer's demand has caused voltage issues for that customer or any other customer? If so, please explain instances in which this has been identified and solutions the Company has implemented to address those issues.
- SEIA 1-7      Please identify the testimony CenterPoint filed in its application to support the proposed changes to its pre-interconnection study fee schedule.
- SEIA 1-8      Please provide all studies or other information the Company relies on to support the changes to its pre-interconnection study fee schedule.
- SEIA 1-9      Refer to Exhibit MAT-8 page 232-233.
- a.      The value for the pre-interconnection study fee for the 10+ to 500 kW, non-exporting, not pre-certified on network value (\$1,4331,150) appears to contain a typographical error. Please confirm the correct value for this entry.
  - b.      Please explain in detail what analyses are required for the analysis of exporting systems that are not required for the analysis of non-exporting systems.
  - c.      Provide by year the total number of interconnection requests that the Company received in 2016, 2017, and 2018 based on the export / non-export and size categories listed in this table
  - d.      For systems identified in c above, provide how many systems were exempt from pre-interconnection study fees based on the export or potential short circuit current exemption criteria.
- SEIA 1-10      Refer to Troxle Direct at 47. Does the Company consider analyses associated with the interconnection of distributed generation systems as a "discretionary service"?
- SEIA 1-11      Please provide a definition of "exporting" and "non-exporting" systems and what system and customer load characteristics are used to determine the type of system.
- SEIA 1-12      Please explain in detail what impacts and costs a non-exporting distributed generation system can impose on CenterPoint's distribution grid.