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**SOAH DOCKET NO. 473-24-13232
PUC DOCKET NO. 56211**

APPLICATION OF CENTERPOINT	§	PUBLIC UTILITY COMMISSION
ENERGY HOUSTON ELECTRIC, LLC	§	OF
FOR AUTHORITY TO CHANGE RATES	§	TEXAS

**ENVIRONMENTAL DEFENSE FUND’S FIRST REQUESTS FOR INFORMATION
AND FIRST REQUESTS FOR PRODUCTION TO CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

Environmental Defense Fund (EDF) files its First Requests for Information (RFI) and First Requests for Production (RFP) to CenterPoint Energy Houston Electric, LLC (CenterPoint) in the above referenced proceeding. CenterPoint is hereby requested to furnish one copy of all items of information enumerated in the attached document directly to the undersigned attorneys via email within fifteen (15) calendar days. These requests shall be deemed continuing as to require further and supplemental responses if CenterPoint receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in Excel format with all formulas intact.

DEFINITIONS & INSTRUCTIONS

- A. “CenterPoint” or “Company” or “CEHE” refers to CenterPoint Energy Houston Electric, LLC.
- B. “EDF” refers to Environmental Defense Fund.
- C. The term "document" shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations,

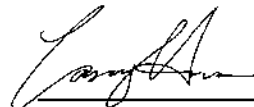
questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper document is a separate document within the meaning of this term.

- D. Pursuant to Tex. R. Civ. P. 196.4, EDF specifically requests that any electronic or magnetic data (which is included in the definition of "document") that is responsive to a request herein be produced in electronic format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. EDF further requests that CenterPoint produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.
- E. The terms "and" and "or" shall be construed both disjunctively and conjunctively as 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. The term "light-duty vehicle" generally refers to passenger vehicles, i.e., vehicles that weigh less than 8,500 lbs.
- K. The term "medium- and heavy-duty vehicle" generally refers to vehicles categorized as vans, trucks, or buses, i.e., vehicles that weigh more than 8,500 lbs.
- L. The term "MHDV" refers to medium- and heavy-duty vehicle(s).
- M. 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.
- N. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- O. 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.
- P. Pursuant to 16 Tex. Admin. Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- Q. If the information requested is included in previously furnished exhibits, workpapers, 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.

Dated: April 19th, 2024

Respectfully submitted,



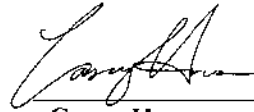
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**ATTORNEYS FOR
ENVIRONMENTAL DEFENSE
FUND**

CERTIFICATE OF SERVICE
SOAH DOCKET NO. 473-24-13232
PUC DOCKET NO. 56211

I certify that today, April 19th, 2024, a true copy of the Environmental Defense Fund's First Requests for Information and First Requests for Production was served on all parties of record via hand delivery, facsimile, United States First-Class Mail, or electronic mail.

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

Casey Horan

**SOAH DOCKET NO. 473-24-13232
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EDF'S FIRST RFI TO CENTERPOINT

EEDF 1-1 Refer to the direct testimony of Rina Harris (page 9, lines 3-4): “The Electrification group works closely with commercial customers that have displayed interest in electrifying their fleet.” What initiatives does the Company take to better understand the overall market needs and interests of other commercial fleets of medium- and heavy-duty (MHDV) fleets, beyond those customers that have reached out to the utility?

EDF 1-2 Refer to the direct testimony of Rina Harris (page 10, lines 15-18): “As the charging infrastructure continues to grow and, in some cases, begins to cluster in certain areas, the Company may begin to realize grid constraints that make it costly to upgrade service to the customers.” Please explain how the Company:

- a. Identifies such clusters of charging infrastructure;
- b. Determines the grid constraints attributable to such clusters;
- c. Develops measures to address such grid constraints.

EDF 1-3 Refer to the direct testimony of Eric Easton (page 8, lines 8-10). To the extent the Company publishes such list of projects identified by Distribution Plan and High Voltage Planning needed to support growth and interconnections expected in the upcoming years, or such list is otherwise readily available, please provide such list. Please include the following information for each project:

- a. Project name, size, and cost;
- b. The extent to which the project is intended to serve electric MHDV loads;

EDF 1-4 Refer to the direct testimony of Eric Easton (page 8, lines 10-13). Please explain how stakeholder input influences project prioritization, including:

- a. The Company’s process for engaging with stakeholders;
- b. How the Company incorporates engagement into its distribution planning and deployment.

EDF 1-5 Refer to the direct testimony of Eric Easton (page 10, lines 11-14 and lines 16-19). Please describe and provide the methods, data, and assumptions used to estimate load growth from MHDV electrification in the Distribution Development Plan, DDP.

EDF 1-6 Refer to the direct testimony of Eric Easton (page 28 lines 14-16, and 13-14): “New system engineering and planning processes had to be developed to support changing customer expectations,” and “Load forecasts need to account for this increased penetration of distributed energy resources (DERs) and EVs.” Please describe:

- a. The new system engineering and planning processes that were developed;
- b. For each year 2020 through 2029, the results from load forecast attributable to each:
 - i. Projected penetration of DERs
 - ii. Projected penetration of EVs
 - iii. Projected penetration of electric MHDVs.

EDF 1-7 Refer to the direct testimony of Eric Easton (page 44, line 11 through page 45, line 11). Please provide, for each year 2020 through 2029:

- a. A breakdown of actual or projected (as applicable) distribution load growth by customer type (residential, commercial, industrial, etc.);
- b. The amount of actual or projected (as applicable) distribution load growth attributable to EVs;
- c. The amount of actual or projected (as applicable) distribution load growth attributable to electric MHDVs.

EDF 1-8 Refer to the direct testimony of John Durland (page 54-58, line 12, through page 58, line 18) with respect to Premium Service (PS). Please provide, for each calendar year 2021 through 2023:

- a. The number of customers billed on Rate PS;
- b. The number of customers billed on Rate PS operating DERs;
- c. The total costs of the Company’s facilities for which the customers billed on Rate PS were held responsible pursuant to Rule 6.1.2.3.3.

EDF 1-9 Refer to direct testimony of John Durland (page 54, line 12, through page 58, line 18) with respect to Premium Service (PS). Does the Company use any methods other than Rate PS to charge customers for the costs of additional Company equipment needed to serve the customer's service requirements? If so, please provide, for each calendar year 2021 through 2023:

- a. The tariff provision(s) under which the Company issued such charges;
- b. The number of customers subject to such charges;
- c. The number of customers subject to such charges operating DERs;
- d. The total amounts of such charges.

EDF 1-10 Refer to direct testimony of John Durland (page 54, line 12, through page 58, line 18) with respect to Premium Service (PS). Where a customer's operation of a DER would trigger a need for modification or construction of Company facilities, what option(s) does the Company provide the customer to avoid or mitigate the need for such facility modifications or construction? For example, under what circumstances does the Company allow customers to use DER software (such as inverter or EV charger settings) as an alternative to modification or construction of Company facilities? Please provide any relevant rules, procedures, standards, or other related documents.

EDF 1-11 Please provide service application form(s) applicable to current or prospective customers seeking to:

- a. Energize electric MHDVs that will not inject electricity into the Company's distribution system;
- b. Energize and interconnect electric MHDVs that, either alone or in conjunction with other behind-the-meter equipment, may inject electricity into the Company's distribution system.

EDF 1-12 Please describe the Company's service application process for current or prospective customers seeking to:

- a. Energize electric MHDVs that will not inject electricity into the Company's distribution system;

- b. Energize and interconnect electric MHDVs that, either alone or in conjunction with other behind-the-meter equipment, may inject electricity into the Company's distribution system.

EDF 1-13 Please provide, to the extent available, for each month during the period 2020 through 2023:

- a. The number of customers with pending service energization requests;
- b. The number of customers with pending service energization requests seeking to operate electric MHDVs.

EDF 1-14 Please provide, to the extent available, for each year 2020 through 2023:

- a. The average elapsed time between service application and energization/interconnection for distribution customers;
- b. The average elapsed time between service application and energization/interconnection for distribution customers operating electric MHDVs that will not inject electricity into the Company's distribution system;
- c. The average elapsed time between service application and energization/interconnection for distribution customers operating electric MHDVs that, either alone or in conjunction with other behind-the-meter equipment, may inject electricity into the Company's distribution system.

EDF 1-15 Refer to direct testimony of Eric Easton page 51, lines 2-5 ("The Company expects total hydrogen demand to increase fivefold between now and 2050.") To the extent available, please provide the Company's projections of:

- a. Electric loads related to hydrogen production, transportation, and storage.
- b. The proportion of hydrogen demand attributable to hydrogen-fueled vehicles.

EDF's FIRST RFP CENTERPOINT

RFP 1-1 Refer to RFI EDF 1-2 and direct testimony of Rina Harris (page 10, lines 15-18) (“As the charging infrastructure continues to grow and, in some cases, begins to cluster in certain areas, the Company may begin to realize grid constraints that make it costly to upgrade service to the customers.”). Please provide any studies, analyses, or other relevant documents (internal or external) that identify:

- a. Where such clustering may occur;
- b. The magnitude of such clustering (as measured by, as available, MW of load, number of customers, and number of vehicles);
- c. The timing when such clustering may occur;
- d. Any other relevant findings related to electric load growth related to EV clustering.