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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 SECOND REQUESTS FOR INFORMATION
AND SECOND REQUESTS FOR PRODUCTION TO CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

Environmental Defense Fund (EDF) files its Second Requests for Information (RFI) and Second 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

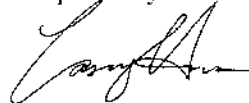
specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, 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: May 10th, 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, May 10th, 2024, a true copy of the Environmental Defense Fund's Second Requests for Information and Second Requests for Production was served on all parties of record via hand delivery, facsimile, United States First-Class Mail, or electronic mail.



Casey Horan

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EDF'S SECOND RFI TO CENTERPOINT

EDF 2-1 Refer to CenterPoint's Response to EDF RFI 1-1: "... CenterPoint Energy has invested in research studies and web based tools to anticipate EV conversion." Please explain how these studies inform CenterPoint's:

- a. Load forecasting;
- b. Distribution planning and/or distribution infrastructure deployment efforts.

EDF 2-2 Refer to CenterPoint's Response to EDF RFP01-01(a)-(c), at Bates pages 161-167 (depicting EPRI eRoadMAP tool screenshots). Please explain and provide any relevant documents as to how CenterPoint incorporates EPRI EV load projections into its:

- a. Load forecasting;
- b. Distribution planning and/or distribution infrastructure deployment efforts.

EDF 2-3 Refer to CenterPoint's Response to EDF RFI 1-2: "The Company is also working to leverage forecasts for the studies ... to determine areas that create potential constraints and implement proactive measures." Please explain what is meant by "proactive measures," including illustrative example(s) CenterPoint has implemented.

EDF 2-4 Refer to CenterPoint's Response to EDF RFI 1-5: "Currently, for the purpose of estimating EV load growth in the Distribution Development Plan, electrification impacts from EVs are only considered for commercial EV loads that have been submitted by customers as service additions or service expansions." Please reconcile this response with CenterPoint's Response to EDF RFI 1-2: "The Company is also working to leverage forecasts for the studies ... to determine areas that create potential constraints and implement proactive measures."

EDF 2-5 Refer to CenterPoint's Response to EDF RFP01-01(d), at Bates page 160: "... Equitable access to the benefits of electric transportation will only be achieved once all of the factors on page 19 are addressed. And because some of these accessibility issues are only loosely within CNP's control, **the importance of community partners participation is paramount.**" (Emphasis added.) With respect to its transportation electrification activities, including related distribution system planning and deployment, please explain how CenterPoint:

- a. Identifies community partners;
- b. Solicits community partner participation;
- c. Incorporates community partner input.

EDF 2-6 Refer to CenterPoint's Response to EDF RFI 1-6. Please explain how CenterPoint identifies projects as including MHDV chargers.

EDF 2-7 Refer to CenterPoint's Response to EDF RFI 1-9(b), "... Only one customer among the 15 **mentioned in that response** [EDF-RFI-01-08] had construction costs identified during year 2021 through 2023 that required the customer to be billed based on the Facility Extension Policy." (Emphasis added.) Please provide, for each calendar year 2021 through 2023:

- a. The number of customers not mentioned in CenterPoint's response to EDF-RFI-01-08 subject to charges based on the Facility Extension Policy, and the total amounts of such charges; and
- b. The number of customers not mentioned in CenterPoint's response to EDF-RFI-01-08 subject to such charges operating DERs, and the total amounts of such charges.

EDF'S SECOND RFP TO CENTERPOINT

RFP 2-1 Refer to CenterPoint's Response to EDF RFP01-01(d). Please provide the complete study excerpted in this response.