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

**APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC § OF
FOR AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

May 17, 2024

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 <ul style="list-style-type: none">• Please note that the discovery responses were prepared under the direction of the sponsors.	

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
SOAH DOCKET NO. 473-24-13232**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI04-01**

QUESTION:

Provide all cost analysis supporting the proposed Load Study Charge.

ANSWER:

The Company considered the following factors in determining the proposed Load Study Charge:

- CenterPoint Houston currently charges \$100,000 for a full interconnection study ("FIS"), which consists of four components: a steady-state study, a short-circuit study, a facility study, and a stability study. The stability study requires a similar amount of effort to the other three components combined. A Load Study is substantially the same as an FIS except that a stability study is often not required to be part of the Load Study. Thus, the Company set the charge for the Load Study at \$50,000 and proposes to charge an additional \$50,000 if a stability study is required.
- CenterPoint Houston further confirmed the reasonableness of its charges by reviewing bids from third-party consultants to assist the Company with preparing Full Interconnection Studies for generator interconnection requests and load interconnection studies. Copies of three of these bids are attached to this response as exhibits. Even with the use of a third-party consultant, CenterPoint will incur costs soliciting the requisite information from the customer, preparing data and models, interfacing with the third-party consultant, and performing all cost estimation work.

The attachments to this response are highly sensitive/protected material and are being provided pursuant to the Protective Order issued in Docket No. 56211.

SPONSOR:

Harris, Rina; Mercado, David L;

RESPONSIVE DOCUMENTS:

TIEC-RFI04-01 CenterPoint_Energy_Proposal_256967 (HSPM).pdf

TIEC-RFI04-01 PRP1341_MEPP1_Response_Tr_Plant_Studies_282992 (HSPM).pdf

TIEC-RFI04-01 Response-TransmissionPlanningStudies-RFQ-ZEG-R0 (HSPM).pdf

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI04-02**

QUESTION:

Please explain why CEHE's proposed Load Study Charge is different from the load study fees currently charged by ERCOT.

ANSWER:

Large customer load studies are performed by transmission service providers and not ERCOT, and the Load Study Charge is not a pass-through charge from ERCOT. Rather, CenterPoint Houston's proposed Load Study Charge is designed to compensate CenterPoint Houston for the reasonable expenses it incurs when preparing load studies for large customers.

SPONSOR:

Harris, Rina; Mercado, David L;

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI04-03**

QUESTION:

Please provide any examples of similar load and stability study fees currently charged by any utility in ERCOT.

ANSWER:

CenterPoint Houston does not have any information responsive to this request.

SPONSOR:

Rina Harris/David Mercado

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI04-04**

QUESTION:

Referring to page 28, line 2-4, the Load Study Charge would be for "new or added load of 10 MW or more." However, Exhibit JRD-08 Redlined Retail Delivery Service Tariff Sheet No. 6.5 states that "Company will waive this load study requirement and study fee for new loads and load additions of less than 10 MW, unless Company or ERCOT determines that a load study is required..." (emphasis added). Please explain how there is any MW limit to this Load Study Charge being assessed at CEHE's discretion when the criteria for the charge is CEHE's determination that a study is needed.

ANSWER:

The Company will charge retail customers taking service at transmission voltage a Customer Load Study Charge for new transmission-voltage interconnections and for load additions of 10 MW or more.

The Company will charge existing retail customers adding less than 10 MW of load a Customer Load Study Charge if either ERCOT or the Company determines a load study is required. The Company will make this determination based on the Company's judgment that the load addition might impact the reliability of the transmission system.

Finally, CenterPoint Houston intends to file an errata amending the referenced tariff language to be consistent with the above response.

SPONSOR:

Rina Harris/John Durland

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI04-05**

QUESTION:

Referring to page 28, line 7-10, please provide the 10 MW and greater customer load request data for 2019, 2020, 2021, 2022, and 2023. Each request should include name, location, MW, construction cost, projected ready-for-use date, and which Load Study Charges would have applied if this tariff was in place. For each year, categorize the project status into Requested, Under FEA Contract, In Active Construction, and Complete. If CEHE already has substantially similar categorizations for project tracking, then substitution of internal categories is acceptable.

ANSWER:

Reference attachment.

The below attachment is highly sensitive/protected material and is being provided pursuant to the Protective Order issued in Docket No. 56211

SPONSOR:

Harris, Rina; Mercado, David L;

RESPONSIVE DOCUMENTS:

TIEC-RFI04-05_Historical Load Study Data_050824 (HSPM).xlsx

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 56211
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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI04-06**

QUESTION:

Referring to page 28, line 12-16, according to Mr. Mercado's direct testimony on page 46, line 2 5, CEHE is "currently studying 29 new customer load projects, with an aggregate demand of approximately 9,899 MW, which is nearly twice the size " of the entire non-coincident peak transmission customer demand in Summer 2023. Please explain why charging a non refundable load study fee on new requests does not discriminate against new customer requests when it appears that CEHE is already successfully ramping and committed to supporting a major or load increase without this fee.

ANSWER:

In response to the increasing number of customer requests, the volume of customer requests, limited internal resources and the increasing complexity of study requests, the Company is considering the utilization of third-party contractors. Cost estimates received from such third-parties are in-line with the proposed load study fee. Moreover, the Company believes that utilization of third-party contractors may improve study turnaround time and enhance the customer experience.

SPONSOR:

Rina Harris/David Mercado

RESPONSIVE DOCUMENTS:

None

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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI04-07**

QUESTION:

Referring to page 28, line 14-16, did CEHE consider other methods for managing customer load requests other than a non-refundable fee so that CEHE can "weed out customers requesting a Load Study that do not have serious plans to start their project?" If so, please provide the other methods considered and the study between the methods that show this is best or only method that will accomplish the goal.

ANSWER:

Prior to implementation of a load study fee, another method employed by the Company was to only require customers to complete a load data request form in its entirety in order to initiate a load study. This had minimal impact on weeding out customers that were not serious about moving forward into the detailed design and construction phase once a study has been completed. Customers could request the Company to study multiple interconnection locations and varying levels of proposed load, which resulted in additional resources to perform analysis of the permutations.

Since implementing a load study fee, customers are encouraged to firm up their interconnection requests, leading to a reduction of study iterations and enabling the Company to complete studies in a more timely fashion.

SPONSOR:

Harris, Rina; Mercado, David L;

RESPONSIVE DOCUMENTS:

None

CERTIFICATE OF SERVICE

I certify that on May 17, 2024, this document was filed with the Public Utility Commission of Texas in Docket No. 56211, and a true and correct copy of it was served by electronic mail on all parties of record in this proceeding in accordance with the Second Order Suspending Rules issued in Project No. 50664.


