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

APPLICATION OF CENTERPOINT§BEFORE THE STATE OFFICEENERGY HOUSTON ELECTRIC, LLC§OFFOR AUTHORITY TO CHANGE RATES§ADMINISTRATIVE HEARINGS

June 7, 2024

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• Please note that the discovery responses were prepared under the direction of the sponsors.

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ENVIRONMENTAL DEFENSE FUND REQUEST NO.: EDF-RFI03-01

QUESTION:

Refer to CenterPoint's Response to EDF RFI 1-2: "... CenterPoint Houston's Distribution Planning department performs planning studies to determine any violations to the Company's distribution design criteria." Please provide the name(s) and version(s) of software tool(s) used to perform the planning studies.

ANSWER:

CenterPoint Energy use EATON CYME® and an additional tool developed in-house to gather the necessary information and perform planning studies.

SPONSOR:

Rina Harris / Eric Easton

RESPONSIVE DOCUMENTS: None

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

ENVIRONMENTAL DEFENSE FUND REQUEST NO.: EDF-RFI03-02

QUESTION:

Refer to CenterPoint's Response to EDF RFI 1-2: "... Any violations to the Company's distribution design criteria identified through planning studies are addressed through distribution system modifications or upgrades." Does CenterPoint allow the use of non-wires alternatives to address violations to the Company's distribution design criteria or other constraints on the distribution system? If no, please explain why not. If yes, please:

- a. Describe, and provide any supporting documents, CenterPoint's process and standards for considering, deploying, and operating such non-wires alternatives.
- b. Identify any such non-wires alternatives that CenterPoint has deployed or otherwise utilized since the effective date of rates established in its prior general rate proceeding at PUC docket no. 49421.
- c. Identify, with references to supporting schedules as applicable, any costs of such nonwires alternatives that CenterPoint has claimed in this proceeding.

ANSWER:

- a. CenterPoint Energy uses the Distribution Planning Criteria and Company Standards and Specifications to determine the cost-effective solution to mitigate design standard violations. Currently, there are no specific non-wire solutions pre-identified for general distribution planning and load addition studies. However, the company will continue to explore any long-term non-wire solutions that are cost-effective and operationally feasible for future applications. Refer to EDF-RFI01-10 for non-wire solutions being offered and utilized for DER interconnections.
- b. The only non-wire solutions the Company utilized were related to DER interconnections and the solutions were limited to changes or operational modifications to the customer facility. No nonwire solutions were directly deployed by the Company to its distribution system.
- c. CenterPoint energy has not incurred any costs associated with non-wire solutions to be claimed in this proceeding.

SPONSOR: Rina Harris / Eric Easton

RESPONSIVE DOCUMENTS: None

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

ENVIRONMENTAL DEFENSE FUND REQUEST NO.: EDF-RFI03-03

QUESTION:

Please summarize CenterPoint's efforts to develop a system, such as a hosting capacity map, to provide current and prospective customers with granular (e.g., distribution feeder-specific) data regarding the generation and/or load hosting capacity of CenterPoint's distribution assets. To the extent CenterPoint is not planning to deploy such a system, please explain why not. To the extent CenterPoint is planning to deploy (or has deployed) such a system, please identify (i) anticipated system deployment date; (ii) anticipated system functionalities, including level of data granularity and frequency of data updates; (iii) anticipated software and hardware requirements of such system; and (iv) anticipated system costs, including any such costs claimed in this proceeding.

ANSWER:

Currently, CenterPoint Energy is not actively pursuing development of a hosting capacity map. However, the Company does offer a pre-screen in lieu of a hosting capacity map to any prospective customers that would like to interconnect to the distribution system. This allows the Company to determine the relevant high-level details needed depending on the type of resource that is choosing to interconnect to perform targetted assessment. CenterPoint uses this method as a more accurate way of giving prospective customers the information they are seeking.

SPONSOR:

Rina Harris / Eric Easton

RESPONSIVE DOCUMENTS: None

CERTIFICATE OF SERVICE

I certify that on June 7, 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.

Jerence Glenn Russell