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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 17, 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-RFI04-01

QUESTION:

Refer to CenterPoint's Response to EDF RFP 02-01, Bates no. 28, recommending (among other things) that CenterPoint "Continually assess the impacts of near and long-term EV adoption on distribution, substation, and transmission assets. Plan for significant incremental capital spend to increase capacity and improve resilience." Has CenterPoint adopted this recommendation? To the extent CenterPoint has adopted this recommendation, please explain how, and include citations to supporting testimony and/or exhibits in this proceeding. To the extent CenterPoint has not adopted this recommendation, please explain how, and include citations to supporting testimony and/or exhibits in this proceeding. To the extent CenterPoint has not adopted this recommendation, please explain why not.

ANSWER:

We have not seen significant growth in EV adoption to require investments at this time. We are working on other efforts be able to forecast EV growth, understand its impacts on capacity and asset health, and develop proposed mitigations when needed. Additionally, this report did not assess alternative fuel vehicles outside of EVs, and the push for hydrogen in addition to broad trends of PHEV (plug-in hybrid EVs) increasing in sales over BEV (battery EVs), CenterPoint will likely need to revisit the recommendations in light of the evolving EV landscape.

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-RFI04-02

QUESTION:

Refer to CenterPoint's Response to EDF RFP 02-01, Bates no. 13: "CNP has worked with internal and external teams on a Transportation Electrification Study to identify where on the system EV load may appear over time to plan for related impacts on capacity, reliability, resilience, and energy equity. This study data was used to forecast recommended capital investment. CNP expects EV growth to require system capacity upgrades and investment to maintain resiliency [sic] for all customers. This requires [sic] internal CNP teams to leverage EV load forecasts for system planning." Please identify this recommended capital investment and specify where it is reflected in CenterPoint's claim in this proceeding. To the extent this recommended capital investment is not reflected in CenterPoint's claim in this proceeding, please explain why not.

ANSWER:

Only investments related to new load requests are included in the current filing. We have not begun to translate prior EV load forecasts into capital investments at this time. CenterPoint is currently working with EPRI and monitoring the changes in the market due to evolving EV adoption rates as well as broad trends regarding PHEVs and alternative fuel sources.

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-RFI04-03

QUESTION:

Refer to CenterPoint's Response to EDF RFP 02-01. To the extent not already addressed above, please:

- a. Identify any recommendations in this report CenterPoint accepted, and specify where the same is/are reflected in CenterPoint's claim in this proceeding.
- b. Identify any recommendations in this report CenterPoint did not accept, and explain why it did not accept them

ANSWER:

- a. As noted in the response to EDF RFI 04-02, the current filing does not include capital investments resulting from the recommendations in the report included in EDF RFP 02-01.
- b. Consistent with the report recommendations, we continue to prepare for increased levels of EV charging by engaging customers, educating staff internally across departments, collaborating with partners (see response to EDF RFI 01-01), and enhancing regulatory positions as the opportunities arise.

SPONSOR:

Rina Harris / Eric Easton

RESPONSIVE DOCUMENTS:

None

CERTIFICATE OF SERVICE

I certify that on June 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.

Jerence Glenn Russell