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SOAH DOCKET NO. 473-24-13232

PROJECT NO. 56211

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

**SOUTH-CENTRAL PARTNERSHIP FOR ENERGY EFFICIENCY AS A RESOURCE'S
STATEMENT OF POSITION**

COMES NOW the South-central Partnership for Energy Efficiency as a Resource (SPEER), and files its Statement of Position in the above-captioned docket. SPEER takes the position that regardless of what rates are approved in this proceeding, demand-side resource planning must play a pivotal role in addressing load growth in the CenterPoint Energy Houston Electric, LLC ("CenterPoint") service territory. It is SPEERs position that demand-side resources like distributed energy resources, energy efficiency, demand response, and the suite of behind-the-meter programs can assist with not only reducing stress to the grid, but also in deferring, or possibly outright negating, the need for some transmission and distribution infrastructure investment. This would mean rate adjustments may not be needed. SPEER applauds CenterPoint's efforts in both their energy efficiency programs and development of a transmission and distribution system resiliency plan published earlier in 2024 and believes more can be done to deploy demand-side resources. These resources will continue to impact future rate design in the territory for years to come and their impacts should be studied for consideration in future rate change requests as well as in transmission and distribution infrastructure planning and development.

SPEER will not file any direct testimony at this time. However, SPEER is currently reviewing the analyses of other parties in direct testimony, future rebuttal testimony, and other actions which may not have been filed at the time of this filing. SPEER intends to continue to actively monitor and participate in this docket.

Respectfully Submitted,

Noah Oaks

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