



## **Filing Receipt**

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

<b>APPLICATION OF CENTERPOINT</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ENERGY HOUSTON ELECTRIC, LLC</b>	<b>§</b>	<b>OF</b>
<b>FOR AUTHORITY TO CHANGE RATES</b>	<b>§</b>	<b>TEXAS</b>

**ENVIRONMENTAL DEFENSE FUND’S RESPONSE TO CENTERPOINT’S FIRST  
REQUEST FOR INFORMATION**

**July 3, 2024**

Contact: Michael Zimmerman  
Environmental Defense Fund  
555 12<sup>th</sup> St. N.W., Suite 400  
Washington, D.C. 20004  
Telephone: (512) 691-3444

ENVIRONMENTAL DEFENSE FUND  
PUC DOCKET NO. 56211 SOAH DOCKET NO. 473-24-13232  
EDF RESPONSE TO CENTERPOINT RFI01

**QUESTION:**

**1-1** If not provided with your direct testimony in this case, please provide, in native format, all workpapers and documents supporting the testimony of each witness filing testimony on your behalf in this proceeding.

**ANSWER:**

N/A. See Direct Testimony and Exhibits of Yihao Xie and Chris Hickman.

**SPONSOR:**

Yihao Xie and Chris Hickman

**RESPONSIVE DOCUMENTS:**

None

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**QUESTION:**

**1-2** For each testifying expert that has provided testimony for you in this case, please provide (to the extent not provided earlier)

- a. A list of all cases in which the testifying expert has submitted testimony from 2019 to the present;
- b. Copies of all prior testimony, articles, speeches, published materials, and peer review materials written by the testifying expert from 2019 to the present;
- c. The testifying expert's billing rate for this proceeding; and
- d. All documents provided to, reviewed by, or prepared by or for the testifying expert in anticipation of the testifying expert filing testimony in this proceeding.

**ANSWER:**

With respect to Yihao Xie:

- a. N/A
- b. Below are links to prior articles and published materials written by Yihao Xie from 2019 to the present, in reverse chronological order:
  1. <https://theicct.org/publication/zero-emission-bus-and-truck-market-in-the-us-2022-2023-update-june24/>
  2. <https://theicct.org/publication/air-quality-benefits-of-an-accelerated-transition-to-nev-in-hainan-province-china-may24/>
  3. <https://theicct.org/battery-electric-trucks-us-northeast-electric-utilities-and-planning-for-tomorrow-may24/>
  4. <https://theicct.org/publication/rw-zet-port-tractor-trailers-and-concrete-mixer-trucks-in-hainan-province-china-apr24/>
  5. <https://theicct.org/front-of-the-meter-jobs-for-charging-infrastructure-should-be-front-of-mind-in-the-ev-transition-feb24/>
  6. <https://theicct.org/deploy-charging-infrastructure-in-no-regrets-freight-zones-and-corridors-to-keep-us-commercial-truck-electrification-aligned-with-climate-goals-dec23/>
  7. <https://theicct.org/us-and-eu-proposals-zev-truck-and-bus-fleets-sept23/>
  8. <https://theicct.org/china-is-propelling-its-electric-truck-market-aug23/>
  9. <https://theicct.org/publication/us-nox-standards-update-jul23/>
  10. <https://theicct.org/publication/heavy-vehicles-indonesia-electrification-june23/>
  11. <https://theicct.org/publication/fleets-accelerating-decarbonization-zevtc-may23/>
  12. <https://theicct.org/publication/cost-zero-emission-trucks-us-phase-3-mar23/>
  13. <https://theicct.org/publication/asia-pacific-hvs-guidelines-jakarta-bus-jan23/>
  14. <https://theicct.org/publication/africa-me-hvs-soot-south-africa-dec22/>
  15. <https://theicct.org/publication/china-vehicles-accelerating-hainan-nev-transition-sep22/>
  16. <https://theicct.org/publication/hdv-zevtc-global-may22/>
  17. <https://theicct.org/publication/mac-ghg-china-lvs-feb22/>
  18. <https://theicct.org/bus-fleets-targets-jan22/>
  19. <https://theicct.org/publication/zevtc-effective-policies-dec2021/>

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20. <https://theicct.org/publication/zero-emission-integration-in-heavy-duty-vehicle-regulations-a-global-review-and-lessons-for-china/>
21. <https://theicct.org/taking-the-global-pulse-on-soot-free-bus-progress-with-industry-partners/>
22. <https://theicct.org/publication/truck-eco-driving-programs-current-status-in-latin-america-and-international-best-practices/>
23. <https://theicct.org/transforming-transjakarta-first-steps-toward-electric-buses-for-the-worlds-largest-brt-fleet/>
24. <https://theicct.org/publication/the-retail-fuels-market-in-indonesia/>
25. <https://theicct.org/publication/a-review-of-motor-vehicle-fuel-demand-and-supply-in-indonesia/>
26. <https://theicct.org/matching-electric-buses-with-optimal-routes-a-new-tool-that-helps-make-good-decisions/>
27. <https://theicct.org/publication/diesel-sulfur-content-impacts-on-euro-vi-soot-free-vehicles-considerations-for-emerging-markets/>
- c. Upon discussion with the Company, EDF understands that this question has been withdrawn.
- d. Please refer to the response to RFI response 1-1.

With respect to Chris Hickman:

- a. N/A
- b. N/A
- c. Upon discussion with the Company, EDF understands that this question has been withdrawn.
- d. Please refer to RFI response 1-1.

**SPONSOR:**

Yihao Xie and Chris Hickman

**RESPONSIVE DOCUMENTS:**

None

ENVIRONMENTAL DEFENSE FUND  
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**QUESTION:**

**1-3** For each consulting expert whose mental impressions or opinions have been reviewed by one or more of your testifying experts in this case, please provide (to the extent not provided earlier):

- a. A list of all cases in which the consulting expert has submitted testimony from 2019 to the present;
- b. Copies of all prior testimony, articles, speeches, published materials, and peer review materials written by the consulting expert from 2019 to the present;
- c. The consulting expert's billing rate for this proceeding; and
- d. All documents provided to, reviewed by, or prepared by or for the consulting expert in anticipation of the testifying expert filing testimony in this proceeding.

**ANSWER:**

With respect to Charlie Allcock (Consulting Expert to the ICCT):

- a. N/A
- b. Below is a list of published materials authored by Mr. Allcock from 2019 through the present:
  1. ICCT: Powering Seattle fleets: A Charging Infrastructure Strategy for Battery-Electric Medium- and Heavy-duty Vehicles, May 2024. Authors include Hamilton Steimer, Charlie Allcock Ray Minjares, Jerold Brito and Claire Buysse, available at <https://theicct.org/publication/powering-seattle-fleets-charging-infrastructure-strategy-for-battery-electric-medium-and-heavy-duty-vehicles-may24/>
  2. ICCT: Near-term Infrastructure Deployment to Support Zero-Emission Medium- and Heavy-duty Vehicles in the United States, May 2023. Authors include Pierre-Louis Ramon, Sara Kelly, Nicole Egerstrom, Jerold Brito, Ben Sharpe, Charlie Allcock, Ray Minjares, and Felipe Rodriguez, available at <https://theicct.org/publication/infrastructure-deployment-mhdiv-may23/>
- c. Upon discussion with the Company, EDF understands that this question has been withdrawn.
- d. N/A

**SPONSOR:**

Yihao Xie, Charlie Allcock, and Chris Hickman

**RESPONSIVE DOCUMENTS:**

None

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**QUESTION:**

**1-4** Please separately state whether each witness is testifying as an expert witness.

**ANSWER:**

1. Yihao Xie is testifying as an expert witness.
2. Chris Hickman is testifying as an expert witness.

**SPONSOR:**

Yihao Xie and Chris Hickman

**RESPONSIVE DOCUMENTS:**

None

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**CERTIFICATE OF SERVICE**  
SOAH DOCKET NO. 473-24-13232  
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I certify that today, July 3<sup>rd</sup>, 2024, a true copy of the Environmental Defense Fund's Response to CenterPoint's First RFI was served on all parties of record via hand delivery, facsimile, United States First-Class Mail, or electronic mail.



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**Casey Horan**