



Filing Receipt

Filing Date - 2024-05-31 09:45:08 AM

Control Number - 56548

Item Number - 59

**SOAH DOCKET NO. 473-24-17310
PUC DOCKET NO. 56548**

APPLICATION OF CENTERPOINT	§	BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC	§	
FOR APPROVAL OF ITS	§	OF
TRANSMISSION AND DISTRIBUTION	§	
SYSTEM RESILIENCY PLAN	§	ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
QUESTION NOS. STAFF 7-1 THROUGH STAFF 7-3**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that CenterPoint Energy Houston Electric, LLC, by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: May 31, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

/s/ Anthony Kanalas
Anthony Kanalas
State Bar No. 24125640
Cheri Hasz
State Bar No. 24126575
Garrett Sharp
State Bar No. 24138026
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7459
(512) 936-7268 (facsimile)
Anthony.Kanalas@puc.texas.gov

**SOAH DOCKET NO. 473-24-17310
PUC DOCKET NO. 56548**

CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on May 31, 2024, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Anthony Kanalas
Anthony Kanalas

**SOAH DOCKET NO. 473-24-17310
PUC DOCKET NO. 56548**

**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
QUESTION NOS. STAFF 7-1 THROUGH STAFF 7-3**

DEFINITIONS

- 1) "CenterPoint Energy" or "you" refers to CenterPoint Energy Houston Electric, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

**SOAH DOCKET NO. 473-24-17310
PUC DOCKET NO. 56548**

**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
QUESTION NOS. STAFF 7-1 THROUGH STAFF 7-3**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

**SOAH DOCKET NO. 473-24-17310
PUC DOCKET NO. 56548**

**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
QUESTION NOS. STAFF 7-1 THROUGH STAFF 7-3**

- Staff 7-1** Refer to CenterPoint Energy - Transmission and Distribution System Resiliency Plan, page 89, footnote 10.
- a. Please provide the date when does CenterPoint Energy plan to start installing the next generation of advanced meters (AMS).
 - b. Please provide in table format CenterPoint Energy's next generation advanced meter deployment schedule showing the following:
 - i. Year of AMS installation;
 - ii. City (in Texas);
 - iii. Number of meters to be installed in the city;
 - iv. Total number of meters to be installed per year
- Staff 7-2** Refer to CenterPoint Energy - Transmission and Distribution System Resiliency Plan, page 89, Figure RP-42. Please provide a detailed breakdown of the estimated capital costs (focusing on the next generation advanced meter) of \$225.8 million from 2025 through 2027.
- Staff 7-3** Please explain in detail if and how CenterPoint Energy plans to educate customers about the next generation advanced meter.