



Filing Receipt

Filing Date - 2024-07-24 06:03:39 PM

Control Number - 56822

Item Number - 4



CITY OF HOUSTON

John Whitmire

Mayor

P.O. Box 1562
Houston, Texas 77251-1562

Telephone – Dial 311
www.houstontx.gov

July 25, 2024

Thomas J. Gleeson, Chair
Public Utility Commission of Texas
P.O. Box 13326
Austin, Texas 78711

RE: PUC Docket 56793 (Beryl Issues); 56822 (Beryl Investigation); 56548 (CenterPoint Resiliency Plan)

Dear Chairman Gleeson and Members of the Commission,

The City of Houston (Houston) appreciates the opportunity to submit comments to the Public Utility Commission (PUC) regarding Dockets 56793 (Beryl Issues), 56822 (Beryl Investigation), and 56548 (CenterPoint Resiliency Plan).

Houston thanks the Governor and PUC Chair for opening this critical investigation into CenterPoint's preparation and response to Hurricane Beryl and for committing to deliver a report by the end of the year. We also thank the SOAH for granting our motion to abate CenterPoint's Resiliency Plan application – a necessary step to ensure CenterPoint's application is sufficient to meet Houston's resiliency needs.

Hurricane Beryl was the second major weather event to impact electric utility service in Houston within just eight weeks. Houstonians are still recovering from Hurricane Beryl, and the long list of extreme weather events over the years has left a lasting impression on the residents and businesses in our city – as well as the rest of the nation and even the world. Despite several years and multiple intervening electricity rate increases that were purported to "harden" the transmission and distribution systems that serve our region, a Category 1 storm crippled these systems.

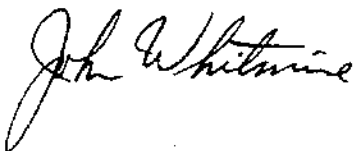
The residents and businesses of Houston deserve a reliable electricity transmission and distribution system designed to withstand hurricane force winds, thunderstorms, freezing temperatures, and extreme heat. The electric utilities that serve Houston were granted monopolies, a guaranteed rate of return on their investments, and expedited investment recovery mechanisms to ensure that

sufficient funding was available to provide that reliable electricity service. The increasingly frequent failure to do so requires scrutiny.

Houston is the nation's energy capital as well as the most populous city in Texas. The Houston metropolitan area accounts for **25% of the jobs in Texas and 30% of the state's total economic output**.¹ Given the significant impact of the Houston region on the state's economy and well-being, the City of Houston respectfully requests that the PUC and the Texas Legislature include the City of Houston – as well as all local governments impacted by the storm and the extended power outages – in this investigatory process. To that end, while we appreciate the PUC's July 22nd memorandum clarifying the scope of the investigation, Houston requests that the PUC include municipalities and critical facility operators in the upcoming Request for Information process, rather than just the specific entities named in the July 22nd memorandum.

These proceedings are critically important because the outcome of the PUC's investigation will inform whether, how, and to what extent *all* electric utilities in Texas will implement resilience and reliability measures for the regions they serve. The health and safety of our residents – as well as the viability of our businesses and the future of our local and state economy – are at stake. We look forward to fully supporting the PUC's efforts and will provide any information or perspective that may be helpful toward advancing the utility's corrective actions resulting from this investigation.

Sincerely,

A handwritten signature in black ink that reads "John Whitmire". The signature is written in a cursive, flowing style.

John Whitmire
Mayor

¹ Federal Reserve Bank of Dallas, Special Report, "At the Heart of Texas: Cities' Industry Clusters Drive Growth," www.dallasfed.org/research/heart/houston#.