



## **Filing Receipt**

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**SOAH DOCKET NO. 473-25-11558  
PUC DOCKET NO. 57579**

<b>APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR APPROVAL OF ITS 2026-2028 TRANSMISSION AND DISTRIBUTION SYSTEM RESILIENCY PLAN</b>	§ § § § §	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**March 18, 2025**

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**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**  
**PUC DOCKET NO. 57579**  
**SOAH DOCKET NO. 473-25-11558**

**OFFICE OF PUBLIC UTILITY COUNSEL**  
**REQUEST NO.: OPUC-RFI01-01**

**QUESTION:**

Please refer to Exhibit ELS-2, pages 101-102 (bates pages 1256-1257) concerning the 69 Kilovolt ("kV") - 138 kV Conversion Measure RM-7, and answer the following questions:

- a. How many of the 14 targeted circuits are currently de-energized;
- b. How many 69 kV circuits have been converted to 138 kV;
- c. How many 69 kV circuits will need to be converted after the 14 targeted circuits are converted;  
and
- d. Which of the 14 targeted circuits are high loading and directed toward downtown Houston?

**ANSWER:**

- a. None of the 14 circuits referenced are currently de-energized. While de-energized circuits may be utilized in the final 138kV circuit configuration, the 14 circuits referenced reflect existing energized 69kV circuits which will either be converted to 138kV in the existing or new configuration.
- b. CenterPoint Houston has been gradually reducing or converting portions of its 69 kV system for over 20 years. CenterPoint Houston made a commitment to replace our remaining aging 69kV transmission system and upgrade it to a modern 138kV system beginning in 2021. At year-end 2020 we had 30 energized 69kV circuits on our transmission system. Currently we have 16 energized 69kV circuits on our transmission system.
- c. One 69kV circuit is currently expected to remain at EOY 2028. This circuit is currently targeted to be de-energized in 2029.
- d. The high loading concerns in downtown Houston are for 138kV circuits rather than 69kV circuits. The gradual conversion of load served at 69kV has resulted in less loading on the 69kV circuits. CenterPoint has proposed projects to address any 69kV loading concerns that were seen in previous analysis. The conversion of several of the 69kV circuits will provide more paths into the downtown Houston area and will help relieve the loading concerns seen on 138kV circuits. The specific 69kV circuits being converted are: 40A, 32A, 19A, and 12A.

**SPONSOR:**

Eric Easton and David Mercado

**RESPONSIVE DOCUMENTS:**

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 57579  
SOAH DOCKET NO. 473-25-11558**

**OFFICE OF PUBLIC UTILITY COUNSEL  
REQUEST NO.: OPUC-RFI01-02**

**QUESTION:**

Please refer to Exhibit ELS-2, pages 116-118 (bates pages 1271-1273) concerning the Control Center ("AOC") Flood Control Measure RM-11, and answer the following questions:

- a. Please provide the October 2019 engineering report prepared for CenterPoint concerning this proposed project;
- b. Please provide the relative location of the dam to the AOC;
- c. What is the reservoir's impoundment volume;
- d. Is the dam equipped with an emergency spillway;
- e. Has CenterPoint reviewed inspection reports for the dam;
- f. Has CenterPoint or engineers acting on its behalf inspected the dam;
- g. Please list all instances of the dam being overtopped;
- h. Please list all instances and nature of repairs to the dam in the past 10 years;
- i. Please state the entity or entities that own and maintain the dam;
- j. Does CenterPoint have any concern with the dam's integrity other than its age;
- k. Did CenterPoint investigate remedial or improvement works to the dam such as:
  1. Remedial repairs to the dam;
  2. Raising the height of the dam;
  3. Reconfiguring or adding emergency spillways; and
- l. What is the likelihood of a dam breach and who made this assessment?

**ANSWER:**

- a. See attached file entitled OPUC RFI 01 02 Confidential Addicks Reservoir Report Revised Set FINAL.pdf
- b. The reservoir is located adjacent to the AOC facility.
- c. The reservoir's impoundment volume is not officially known to the Company., however a Google search shows the reservoir's impoundment rate is 204,500 acre feet.
- d. Yes, the dam is equipped with an emergency spillway.
- e. The Company does not believe it has seen any inspection reports for the dam.
- f. CenterPoint is not the owner of the dam and therefore is not permitted to inspect the dam.
- g. The Company is unaware of any instances of the dam being overtopped.

- h. CenterPoint is not the owner of the dam and therefore is unaware of repairs to the dam in the previous 10 years.
- i. The entity that owns and maintains the dam is the US Army Corps of Engineers.
- j. The Company does have concerns as Hurricane Harvey raised questions and concerns. A nearby reservoir had controlled releases by the US Army Corps of Engineers that flooded nearby structures.
- k. The Company is not the owner of the dam and therefore has not investigated remedial or improvement works to the dam. This action would have been performed by the US Army Corps of Engineers (they own and maintain). The Company is also unaware of any pending improvements.
  - 1. See response to K.
  - 2. See response to K.
  - 3. See response to K.
- l. The attached report provided by Hutchison and Associates indicates that a controlled release from the Addicks Reservoir could result in 6.6 ft of water in the AOC facility. The attached report expands upon the likelihood of the dam breaching or a controlled release from the dam. For the Guidehouse analysis, a dam failure was estimated as a once in 50 year event.

**SPONSOR:**

Eric Easton

**RESPONSIVE DOCUMENTS:**

OPUC RFI 01 02 Confidential Addicks Reservoir Report Revised Set FINAL.pdf

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**  
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**OFFICE OF PUBLIC UTILITY COUNSEL**  
**REQUEST NO.: OPUC-RFI01-03**

**QUESTION:**

Please refer to Exhibit ELS-2, pages 134-137 (bates pages 1289-1292) concerning the Distribution Capacity Enhancement/Substations Measure RM-16, and answer the following questions:

- a. Please provide a breakdown of the costs for:
  1. New distribution substations;
  2. Substation capacity enhancements;
  3. New distribution circuits;
  4. Distribution circuit conversions from 12.47 kV to 34.5 kV; and
- b. Do any of these projects serve the Texas Medical Center?

**ANSWER:**

- a.
  1. The new distribution substations account for approximately 67.7% of the total estimated cost of this resiliency measure. The costs for new distribution substations also include some costs associated with extensions of new 12/35 kV feeders.
  2. Substation capacity enhancements account for approximately 13.4% of the total estimated cost of this resiliency measure. The costs for substation capacity enhancements (projects focused on adding new substation transformers or upgrading existing substation transformers) also include costs associated with the extension of new 12/35 kV feeders.
  3. There is only one project currently identified as a "new distribution circuit" within the resiliency measure and this accounted for approximately 0.2% of the total estimated cost of this resiliency measure.
  4. The distribution circuit conversions account for approximately 18.7% of the total estimated cost of this resiliency measure. The costs for distribution circuit conversions also include costs associated with the extension of new 12/35 kV feeders.
- b. There are no projects proposed within this resiliency measure that are associated with the Texas Medical Center.

**SPONSOR:**  
Eric Easton

**RESPONSIVE DOCUMENTS:**  
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
PUC DOCKET NO. 57579  
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**OFFICE OF PUBLIC UTILITY COUNSEL  
REQUEST NO.: OPUC-RFI01-05**

**QUESTION:**

Please refer to Exhibit ELS-2, pages 121-124 (bates pages 1276-1279) concerning the Mobile Substation Measure RM-13, and answer the following questions:

- a. How many mobile substations does CenterPoint currently own or operate;
- b. How many substations did CenterPoint deploy due to Hurricane Beryl; and
- c. Please explain how CenterPoint determined that it needed specifically six additional mobile substations?

**ANSWER:**

- a. Please see response to TIEC RFI1-14, subpart a.
- b. The Company did not deploy mobile substations due to Hurricane Beryl.
- c. Acquiring 6 mobile substations will allow The Company the flexibility to deploy our existing fleet for load support and maintenance projects, while keeping sufficient mobile substations in reserve for resiliency events. Three additional mobile substations are needed to support resiliency efforts by providing an alternate source while substation resiliency measures such as 69kv to 138kV conversions are underway. An additional three mobile substations are needed to provide back-up for resiliency events causing a substation outage. The three mobile substations providing back up supply for resiliency events will be located in areas of CenterPoint Houston's service territory to provide fast and ready access to the Company's distribution substations.

**SPONSOR:**

Eric Easton and David Mercado

**RESPONSIVE DOCUMENTS:**

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**  
**PUC DOCKET NO. 57579**  
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**OFFICE OF PUBLIC UTILITY COUNSEL**  
**REQUEST NO.: OPUC-RFI01-06**

**QUESTION:**

Please refer to Exhibit ELS-2, pages 228-229 (bates pages 1383-1384) concerning the Hardened Service Centers Measure RM-39, and answer the following questions:

- a. Please confirm or deny that the four proposed service centers are at locations other than the locations of existing service centers;
- b. Please describe what facilities and functions will be located at the proposed service centers;
- c. What is CenterPoint's planned usage and disposition of the existing service centers, if any;
- d. How many existing service center locations does CenterPoint currently operate; and
- e. What aspects of the existing service centers cannot be upgraded or hardened?

**ANSWER:**

- a. The Company confirms three of the four service centers to be hardened are at locations other than the locations of existing service centers. One of the four will be constructed at the same location as the existing service center to be hardened.
- b. Facilities included in these proposed hardened service centers, include, but are not limited to: an office building, indoor warehouse, garage, truck wash station, outside material laydown yards, covered outside equipment storage, and fuel stations. Each service center will be majority Distribution Operations, with some supporting functions present, including but not limited to: Logistics personnel, Fleet personnel, Metering personnel, and Major Underground personnel.
- c. The Company currently plans to sell one property location and utilize one property to expand an existing substation. One of the locations isn't replacing an existing service center, therefore there is nothing to dispose of, and one will be built where the current service center sits.
- d. CEHE currently operates 13 service centers.
- e. The feasibility of bringing existing service centers up to the level of the 4 hardened service centers cannot be determined without an engineering study of each site to assess building structure, roof construction, etc. In most cases, the cost would be high and current operations would be affected.

**SPONSOR:**

Nathan Brownell

**RESPONSIVE DOCUMENTS:**

None



**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
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**OFFICE OF PUBLIC UTILITY COUNSEL  
REQUEST NO.: OPUC-RFI01-07**

**QUESTION:**

Please refer to the Direct Testimony of Mr. Jeff W. Garmon at 10:9-12:21 (bates pages 898-900), and answer the following questions:

- a. Other than what is allowed under PURA § 38.078, please explain why CenterPoint is seeking to defer Vegetation Management-related operation and maintenance ("O&M") costs associated with its System Resiliency Plan ("SRP") for recovery as a regulatory asset as opposed to using the Resiliency Cost Recovery Rider ("RCRR") option;
- b. Is it more or less profitable to CenterPoint to defer Vegetation Management-related O&M costs associated with its SRP for recovery as a regulatory asset as opposed to using the RCRR option;
  1. If it would be more profitable, please explain why, and by what amount;
  2. If it would be less profitable, please explain why, and by what amount?

**ANSWER:**

- a. The Company's requested accounting authority for deferral of amounts to a regulatory asset is simply based on the statutory authority under the Public Utility Regulatory Act (PURA), specifically PURA § 38.078(k).
- b. The requested analysis has not been performed.

**SPONSOR:**  
Jeff Garmon

**RESPONSIVE DOCUMENTS:**  
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
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**OFFICE OF PUBLIC UTILITY COUNSEL  
REQUEST NO.: OPUC-RFI01-08**

**QUESTION:**

Please identify any other sources of funding, including federal grants, that CenterPoint has pursued to finance any resiliency measures identified in this application and identify for each source:

- a. The date of the application;
- b. Whether the funding was approved or denied;
- c. The amount of funding requested;
- d. The amount of funding approved; and
- e. The date funding was or will be available?

**ANSWER:**

Please see below for the federal grants that the Company pursued for resiliency measures identified in this application:

DOE GRIP Round #1 (Grid Resilience And Innovation Partnerships) -- DE-FOA-0002740

1. CEHE applying independently to fund distribution circuit resiliency and substation flood control
  - a. 4/5/2023
  - b. Denied
  - c. \$100M
2. PUCT led consortium, including CEHE to fund coastal resiliency project
  - a. 5/18/2023
  - b. Denied
  - c. \$90M (Total project cost \$180M, and it was a 50/50 DOE match. We believe that the amount requested by the PUCT in their DOE application was for \$90M, but we never saw the final application submitted by the PUCT to DOE.)

DOE GRIP Round #2 -- DE-FOA-0003195

1. CEHE applying independently to fund distribution circuit resiliency, digital substation, and substation flood control
  - a. 4/17/2024
  - b. Denied
  - c. \$100M

Texas Division of Emergency Management (TDEM) – DOE Grid Resiliency Grants

1. CEHE applying independently to fund wildfire advanced analytics and wildfire cameras
  - a. 6/28/2024
  - b. Approved
  - c. \$16M
  - d. Estimated total grant amount: \$13.5M, Initial grant amount: \$4.5M

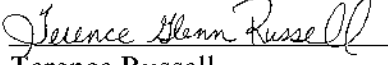
e. TDEM unable to provide timeline due to administration change

**SPONSOR:**  
Nathan Brownell

**RESPONSIVE DOCUMENTS:**  
None

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 18, 2025, notice of the filing of this document was provided to all parties of record via electronic mail in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

  
Terence Russell