



## **Filing Receipt**

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PUC DOCKET NO. 57579

|                           |   |                         |
|---------------------------|---|-------------------------|
| APPLICATION OF            | § |                         |
| CENTERPOINT ENERGY        | § | BEFORE THE              |
| HOUSTON ELECTRIC, LLC     | § |                         |
| FOR APPROVAL OF ITS 2026- | § | STATE OFFICE OF         |
| 2028 TRANSMISSION AND     | § |                         |
| DISTRIBUTION SYSTEM       | § | ADMINISTRATIVE HEARINGS |
| RESILIENCY PLAN           | § |                         |

**FIRST REQUESTS FOR INFORMATION  
TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

COMES NOW, International Brotherhood of Electrical Workers Local Union 66 (IBEW LU 66) to submit the following First Requests for Information (RFIs or Requests) under 16 Texas Administrative Code (TAC) §§ 22.141 and 22.144 to CenterPoint Energy Houston Electric, LLC (CEHE) through its counsel of record:

James H. Barkley  
Baker Botts, LLP  
910 Louisiana Street  
Houston, Texas 77002

Under the procedural schedule and order for this proceeding, you must respond to these Requests within fifteen (15) days of receipt of the Requests. If any RFI seems ambiguous, please contact counsel for IBEW LU 66 to obtain clarification.

**I. INSTRUCTIONS**

1. Under 16 TAC § 22.144(i), the respondent to these Requests must supplement within five days of the discovery of new information any response that newly-discovered information modifies or makes incomplete a response already supplied.
2. Under 16 TAC § 22.144(c)(2), IBEW LU 66 requests you answer these Requests under oath or stipulate in writing your responses can be treated exactly as if the responses were filed under oath. Each answer should identify the person or people responsible for preparing the response and the name of the witness in this proceeding who will sponsor the answer.
3. In producing documents under these RFIs, number each document and indicate the question(s) or Request(s) in response to which the document is being produced. If any document falls within multiple requests, multiple productions are not contemplated; one production referencing the multiple requests will be sufficient.

4. When a Request asks for the production of a study, report, or supporting inputs for assumptions, such data should be in a Microsoft Office, Adobe Acrobat, or other useable PC-based native electronic format, when available, on CD-ROM and be produced with your response to these Requests.

5. For any information you claim is unavailable, state why it is unavailable. If you cannot respond to the Request precisely as it is stated, provide any information that is available that would respond to the Request at a level of detail different from that specified.

6. A request for “documents, “all documents,” or “any documents”” contemplates a complete production of materials relating to the referenced subject but is not intended to seek a duplicative or cumulative production of documents. If the production of one set of documents responds to the information requested, IBEW LU 66 does not seek (and you need not produce) duplicate sets of hard-copy documents that also address the same matters. This instruction does not excuse you of your duty to produce documents in both written and electronic format where available, under Instruction # 4.

7. If the information requested is in previously-furnished exhibits, work papers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please provide references thereto, including Bates Stamp page citations and detailed cross-references.

8. When the RFI requests a study, report, schedule, or analysis, the response should also provide the work papers, underlying facts, inferences, suppositions, estimates, and conclusions to support each study, report, schedule, or analysis.

9. Please produce the requested documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business, and organize and label them to correspond to the categories in this Request. If any part of a document responds to any Request, the whole document is to be produced. If there has been any alteration, change or addition to a document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists, drafts or revisions, each such alteration, change or addition is to be considered as a separate document and it must be produced.

10. These Requests are directed to all documents and information in your custody or control. A document is considered in your custody or control if you have the document or may secure the document from another person having possession. If you cannot produce a document or information based on a claim the document is not in your custody or control, state the location of the document or information when it was last in your possession, custody or control, and describe the reason the document is no longer in your possession, custody or control, and the way it was removed from your possession, custody or control.

11. In responding to each Request, provide information available from all of your corporate and individual files, and from past and present employees, officers, directors, and board members.

12. The singular form of a word shall be interpreted to mean and include the plural. Words used in the plural form of a word shall be interpreted mean and include the singular.

13. The past tense of a word shall be interpreted to include the present tense and the present tense shall be construed to include the past tense.

14. If any document is withheld under any claim of privilege, provide a list identifying each document for which a privilege is claimed, with the following information: date, sender, recipients of copies, subject matter of the document, and the basis on which privilege is claimed.

15. Under 16 TAC § 22.144(h)(4), if the response to any Request is voluminous, provide a detailed index of the voluminous material.

16. If you contend a Response has materials that qualify as Protected Materials or Highly Sensitive Protected Materials under the Protective Order in this proceeding, you must comply with the Protective Order and permit access to those materials to Reviewing Representatives who have signed the Protective Order Certification Form or the Highly Sensitive Protected Material certification.

17. (IBEW LU 66 requests each item of information be made available as it is completed, instead of upon completion of all information requested.

18. Please serve your Responses electronically or in person to:

Bradford W. Bayliff  
Bayliff Law Firm PLLC  
420 Crosswind Drive  
Blanco, Texas 78606  
Brad@Bayliff.Law

## II. DEFINITIONS

For these discovery Requests, the terms set forth below have these meanings:

1. The terms “**CEHE**” or “**you**” means the applicant in this proceeding and its parent, subsidiaries, affiliates, past or present; all employees, officers, directors, agents, consultants, investigators, attorneys, and all people acting under contractual obligations with or acting or purporting to act for you for this proceeding.

2. The terms “**and**” and “**or**” as used shall be construed as either conjunctive or disjunctive to make the Request inclusive rather than exclusive.

3. The term “**any**” shall be construed to include “**all**” and “**all**” shall be construed to include “**any**.”

4. The term “**each**” shall be construed to include the word “**every**” and “**every**” shall be construed to include the word “**each**.”

5. The term “**concerning**” includes these meanings: relating to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; comprising; supporting; contradicting; legally, logically, or factually connected with the matter to which the

term refers; or having a tendency to prove or disprove the matter to which the term refers.

6. The term “**including**” means and refers to “including but not limited to.”

7. The term “**communication**” includes, but is not limited to, all forms of communication, whether written, printed, oral, pictorial, or otherwise, including, but not limited to, testimony or sworn statements, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, and symposia. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio or computer.

8. The terms “**document**” or “**documents**” are used in their broadest sense in Tex. R. CIV. P. 192.3(b) and, as described in Rule 196.4 include electronic or magnetic data (included in the definition of “document”). These words mean and include any written, printed, typed, recorded or graphic matter of every kind or description, both original and copies, and all attachments and appendices. Without limiting the foregoing, the terms “**document**” and “**documents**” shall include all analyses, agreements, contracts, communications, correspondence, drawings, letters, opinion letters, telegrams, faxes, messages, e-mails, memoranda, records, reports, books, studies, summaries or other records of telephone conversations or interviews, summaries or other records of personal conversations or interviews, minutes, summaries or other records of meetings or conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, press releases, forecasts, progress reports, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, charts, tables, accounts, analytical records, consultants’ and expert reports, appraisals, bulletins, notes, meeting notes, telephone conversation notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and spending, invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disc recordings, sound recordings, video recordings, film, tape, photographs, programs, data, and data compilations from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, magnetically stored, optically-stored, or electronically stored matter, however produced, prepared, reproduced, distributed, or made, on any medium of any description in your actual or constructive possession, custody or control, or of which you have knowledge, on which intelligence or information is recorded from or from which intelligence or information can be retrieved; and every copy of the writing or record where the original is not in your possession, custody, or control. The words “**document**” and “**documents**” also include all copies of documents by whatever means made, except that where a document is produced, identical copies with no markings, additions, or deletions different from the original need not be separately produced.

9. **“Identify,”** when used in connection with an act, shall mean to state a description of the act, including the place, date, and time of its occurrence, and the identity of the person, people, or entities that engaged in or saw the act.

10. **“Identify,”** when used regarding a “document,” shall mean to state the type of document (e.g., book, magazine, article, circular, ledger, letter, memoranda, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author/addresser (including all people who participated in the writing of the document), addressee, indicated or blind copies, subject matter, volume and page number or other means of general identification, approximate size and number of pages, any attachments or appendices, and the date on which it was made or prepared. Identification of the document includes identifying all documents known or believed to exist, whether or not in the custody of its attorneys or other representatives. The final version and each draft of each document should be identified and produced separately. If a document is no longer in your possession or control, state what disposition was made of it. A document need not be identified if it is produced.

11. **“Identify,”** when used regarding a natural person shall mean to state the person’s first and last names, title, employer and business address.

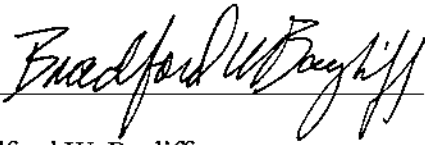
12. **“Person”** means any natural person, firm, corporation, association, partnership, or other organization or form of legal entity.

13. **“PUC”** and **“Commission”** refer to the Public Utility Commission of Texas.

14. **“Relate, refer, mention or pertain”** means documents containing, showing, relating, mentioning, referring or pertaining , directly, or indirectly to, or in legal, logical or factual way or connection with, a document request, and includes documents underlying, supporting, now or previously attached or added to, or used in preparing any document called for by the Request.

Respectfully submitted,

**BAYLIFF LAW FIRM PLLC**  
420 Crosswind Drive  
Blanco, Texas 78606

By: 

Bradford W. Bayliff  
State Bar No. 24012260  
(512) 225-0027 (telephone)  
Brad@Bayliff.Law

Attorney for  
**INTERNATIONAL BROTHERHOOD  
OF ELECTRICAL WORKERS  
LOCAL UNION 66**

**CERTIFICATE OF SERVICE**

A copy of this document is being filed in the Public Utility Commission's Interchange system and served on all parties of record as required by the orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020 in Project No. 50664.

/s/ Bradford W. Bayliff

### **IBEW LU 66-CEHE 1-1**

Identify the name, address, and title of each witness you intend to sponsor at the hearing on the merits and summarize the testimony s/he will present.

### **IBEW LU 66-CEHE 1-2**

Identify and provide any documents your witnesses will introduce, sponsor, or rely on.

### **IBEW LU 66-CEHE 1-3**

Identify each expert you expect to call to testify at the hearing on the merits. For each testifying expert provide:

- a. the expert's name, address, and telephone number;
- b. the subject matter(s) on which the expert will testify;
- c. the facts known by the expert that relate to or form the basis of the expert's mental impressions and opinions formed or made in connection with this case;
- d. the expert's mental impressions and opinions formed or made in connection with the case, and any methods used to derive them;
- e. any bias of the witness;
- f. all documents, tangible things, reports, models, or data compilations provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
- g. the expert's current resume and bibliography.

### **IBEW LU 66-CEHE 1-4**

Identify each consulting expert whose mental impressions or opinions have been reviewed by an expert you expect to call to testify at the hearing on the merits. For any consulting expert provide:

- a. the expert's name, address, and telephone number;
- b. the facts known by the expert that relate to or establish the expert's mental impressions and opinions formed or made in connection with this case;
- c. the expert's mental impressions and opinions formed or made in connection with the case, and any methods used to derive them;
- d. any bias of the witness;
- e. all documents, tangible things, reports, models, or data compilations provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
- f. the expert's current resume and bibliography.



**IBEW LU 66-CEHE 1-5**

Have you identified any errors in your public notice or your application?

**IBEW LU 66-CEHE 1-6**

For any errors identified in your response to the previous Request, describe how you discovered or learned of the error and identify the source of the corrected information.

**IBEW LU 66-CEHE 1-7**

Since filing your application, have you learned of or identified any information, circumstances, inputs, or factors that would prevent any proposed projects in your system resiliency plan from being constructed to the extent you would object to the Commission approving them? If so, identify the project(s) and describe the information, circumstances, inputs, or factors that would cause you to object to the Commission approving it or them.

**IBEW LU 66-CEHE 1-8**

Please admit or deny the following statement. If you deny the statement, please identify the correct response and your basis for the response.

The twelve substations identified in your system resiliency plan (SRP) for expenditures to raise the substation or substation equipment are:

- Liverpool
- PHR 138kV
- North Belt 138kV
- Hockley
- Cedar Bayou Plant
- Odin
- PHR 345kV
- North Belt 345kV
- Thompsons
- PHR 35kV
- Kemah
- Webster

**IBEW LU 66-CEHE 1-9**

Please admit or deny the following statement. If you deny the statement, please identify the correct response and your basis for the response.

The twelve substations identified in IBEW LU 66-CEHE 1-8 were either a) located in the 100 yr floodplain; b) located in the 500 year floodplain;

3) located in an area identified as storm surge; or 4) previously experienced flooding.

**IBEW LU 66-CEHE 1-10**

For each substation you included in your response to IBEW LU 66-CEHE 1-8, identify which substation(s) were located in which category of RFI 1-9(a)-(d).

**IBEW LU 66-CEHE 1-11**

Did any of the substations identified in IBEW LU 66-CEHE 1-8 flood during Hurricane Harvey? If so, please identify which of these substations flooded during Hurricane Harvey and the extent of flooding and resulting outage(s) in each substation.

**IBEW LU 66-CEHE 1-12**

Will you raise the substations in inland flood mitigation projects using only raising the control cubicle, pull boxes, and equipment cabinets in the substation yard? If your response is anything but an unequivocal “Yes,” please identify what inland flood mitigation projects will utilize different options than raising the control cubicle, pull boxes, and equipment cabinets in the substation yard.

**IBEW LU 66-CEHE 1-13**

Please identify the substations in coastal areas where you will raise the substation as part of your system resiliency plan. Will you raise everything in the substation for flood mitigation projects in coastal areas? Please identify and describe what “everything” is and if “everything” will be the identical process for each of the substations in coastal areas.