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DOCKET NO. 57579

APPLICATION OF CENTERPOINT	§	BEFORE THE
ENERGY HOUSTON ELECTRIC, LLC	§	
FOR APPROVAL OF ITS 2026-2028	§	PUBLIC UTILITY COMMISSION
TRANSMISSION AND DISTRIBUTION	§	
SYSTEM RESILIENCY PLAN	§	OF TEXAS

**GULF COAST COALITION OF CITIES' FIRST REQUEST
FOR INFORMATION TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Gulf Coast Coalition of Cities (GCCC), files its First Request for Information (RFI) to CenterPoint Energy Houston Electric, LLC (CenterPoint) in the above-styled docket. CenterPoint is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701 within fifteen (15) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if CenterPoint receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

DEFINITIONS AND INSTRUCTIONS

A. "CenterPoint" and the "Company" refers to the CenterPoint Energy Houston Electric, LLC and its affiliates.

B. The term "document" shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms,

electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper document is a separate document within the meaning of this term.

C. Pursuant to Tex. R. Civ. P. 196.4, CenterPoint specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-ROM in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. CenterPoint Houston further requests that CenterPoint produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way 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.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. 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.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. 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.

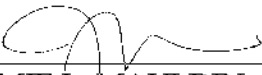
L. Pursuant to 16 Tex. Admin Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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**ATTORNEYS FOR GULF COAST
COALITION OF CITIES**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on March 20, 2025 in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN

GULF COAST COALITION OF CITIES' FIRST RFI TO CENTERPOINT

- CITIES 1-1** Please explain the major differences in CenterPoint's approach to this filing compared to the approach to the prior System Resiliency Plan (SRP) filing, Docket 56548.
- CITIES 1-2** Please describe the Greater Houston Resiliency Initiative (GHRI) and explain how the GHRI complements CenterPoint's current SRP. Are there GHRI costs in the current SRP, and if so, for which measures?
- CITIES 1-3** Please explain how the Company will ensure that the SRP costs are incremental to the resiliency measures currently in place and will not overlap.
- CITIES 1-4** Refer to Exhibit NB-6. Please discuss any changes in assumptions that caused the Benefit-Cost Analysis (BCA) and customer minutes of interruption (CMI) savings in the current SRP to be generally higher than the BCRs and CMI savings in the prior SRP for similar measures. Is it reasonable to compare the measures in the two SRPs and if not, why not?
- CITIES 1-5** Refer to Exhibit NB-6. Please discuss the basis for the significant increase in costs between the prior and current SRP filings related to:
- a. Strategic Undergrounding
 - b. Vegetation Management
 - c. Distribution Pole Replacement/Bracing
 - d. Transmission System Hardening
- CITIES 1-6** Refer to Exhibit NB-6. Please discuss the basis for the addition of the following programs not included in the prior SRP filing:
- a. Mobile Substations
 - b. Distribution Capacity Enhancements/Substations
 - c. MUG Reconductor
 - d. URD Cable Modernization
 - e. Contamination Mitigation
 - f. Spectrum Acquisition
 - g. Emergency Operations Center
 - h. Hardened Service Centers
- CITIES 1-7** Refer to the Transmission and Distribution System Resiliency Plan at 4, 5 and 31 (Bates 39, 40 and 66). CenterPoint is requesting to add 1,086 Intelligent Grid Switching Devices (IGSDs) at a capital cost of \$131.2 million over the next three years but has invested only \$31 million over the last four years to install IGSDs. Given the claimed customer benefits of the IGSDs, please explain why CenterPoint has installed so few of them prior to its request in the SRP.

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CITIES 1-8 Refer to the Transmission and Distribution System Resiliency Plan at 31 (Bates 66), Figure SRP-5. For each year, please provide:

- a. the number of IGSDs installed
- b. the miles of transmission lines hardened
- c. the number of substations elevated
- d. the number of distribution poles replaced/braced
- e. the number of substations secured
- f. the number of S90 towers replaced
- g. the miles of 69 kV to 138 kV conversions
- h. the miles of distribution circuits rebuilt
- i. the number of Tripsavers installed

CITIES 1-9 Refer to the Transmission and Distribution System Resiliency Plan at 35 (Bates 70). Please identify and explain what CenterPoint learned from the May 2024 Storms and Hurricane Beryl that it hadn't learned from all the previous storms that have impacted its service area.

CITIES 1-10 Refer to the Transmission and Distribution System Resiliency Plan at 192 (Bates 227). Please provide the incremental capital costs and O&M expense for each of the following components of the Data Center Modernization program, that total \$12.7 million capital costs and \$1.3 million O&M expense:

- a. Disaster Recovery Enterprise Toolset
- b. On-Premises Infrastructure Refresh
- c. SAN Fabric Redesign
- d. Data Protection Storage
- e. Active-Active Business Resiliency
- f. Smart Grid Data Resiliency

CITIES 1-11 Refer to the T&D System Resiliency Plan at 207 (Bates 242). Regarding RM-34, Weather Stations, CenterPoint asserts the weather data collected will enable more accurate weather risk modeling and will also be used for real time situational awareness. Please explain how real-time situational awareness will be achieved. Will someone be actively monitoring the weather stations, and if so, what data will they report and what will CenterPoint do with the data?

CITIES 1-12 Refer to the T&D System Resiliency Plan at 209 (Bates 244). Regarding RM-35, Wildfire Cameras:

- a. Please explain how CenterPoint will determine if the Wildfire Camera Monitoring Resiliency Measure will reduce the risk, mitigate the spread, or mitigate the impact of a wildfire on the Company's transmission and distribution system.

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- b. If the cameras are installed, please explain if someone will be actively monitoring the cameras, and if so, what data will they report and what will CenterPoint do with the data?