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

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

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
QUESTION NOS. STAFF 4-1 THROUGH 4-10**

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: March 21, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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/s/ Anthony Kanalas
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PUC DOCKET NO. 5

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 March 21, 2025, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Anthony Kanalas

Anthony Kanalas

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DEFINITIONS

- 1) "CenterPoint Energy Houston Electric, LLC" 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.

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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.

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- Staff 4-1** Please explain which parts of the electric system experience the most frequent damage during a major weather event. In your response, please first identify the types of major weather events that cause the most frequent damage to your system. Secondly, for each event type identified, please specify which group (such as transmission, distribution and/or substation) typically experiences the most damage. Lastly, please explain what specific equipment/part(s) from each group experience the most frequent damage for that specific major weather event type.
- Staff 4-2** Please explain which type of CenterPoint transmission structures (i.e. steel lattice, steel monopole, wood pole, etc.) experience the most frequent damage from major weather events. Also, please compare the vulnerability of tangent structures to angle type structures.
- Staff 4-3** For the purpose of responding to major weather events, please explain in detail any written working strategies or agreements with neighboring utilities to provide assistance in order to reduce the duration and severity of outages.
- Staff 4-4** Please explain in detail why CenterPoint is requesting to implement TripSaver components in their resiliency plan when these devices are a direct replacement of lateral fuses, which are typically part of a service quality (SAIDI, SAIFI) improvement plan. Also, please explain what benefit TripSaver will have during a major weather event if transmission and/or distribution circuits are inoperable.
- Staff 4-5** In reference to the Microgrid Pilot Project (PP-1), please answer the following question:
- a. Provide all the technical challenges CenterPoint can potentially have by implementing and connecting to a microgrid to its system.

- b. Has CenterPoint determined if the microgrid pilot will be overhead or underground or a combination of the two?
- c. What type of customers will benefit from these microgrids? Please explain if the customer base will be residential, commercial or some other type?
- d. At what voltage will they operate and what size loads will they serve?
- e. Provide the type of sources that will feed these microgrids?
- f. Please explain how CenterPoint intends to use these microgrids. Will they be used only during emergencies such a major weather event, load shedding events? Or as part of daily operations?

Staff 4-6 In reference to your MUG Reconductor Measure (RM-17) and with the notion that your three phase underground systems are fed by an overhead system, please answer the following questions:

- a. For all major weather events that affected CenterPoint's service territory in the past five years, please provide a list of all outages that occurred on the underground system only that did not affect the overhead source.
- b. In addition, what part of the underground system was affected (cable, connections and/or equipment)?

Staff 4-7 In Reference to your Emergency Operations Centers (RM-38) and Hardened Service Centers (RM-39), Please provide the following information:

- a. How many of each do you currently have within CenterPoint's service territory?
- b. If CenterPoint already has at least one of each or more, please explain in detail the added benefit of building more.
- c. Would these new assets be used only during major weather events or the entire year?

Staff 4-8 In reference to your Anti-Galloping Technologies (RM-14), please disclose the number of times galloping occurs a year in the transmission system and the number of times it occurs a year in the distribution system.

Staff 4-9 Going back 10 years, please provide the number of times galloping occurred in any part of CenterPoint's system.

Staff 4-10 Provide the number of miles of transmission and distribution that were affected by galloping during this 10-year period and provide the customer outage minutes per event or year.