



## **Filing Receipt**

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**IBEW LU 66**  
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<b>APPLICATION OF CENTERPOINT</b>	<b>§</b>	<b>BEFORE THE</b>
<b>ENERGY HOUSTON ELECTRIC LLC</b>	<b>§</b>	
<b>FOR APPROVAL OF ITS 2026-2028</b>	<b>§</b>	<b>STATE OFFICE OF</b>
<b>TRANSMISSION AND</b>	<b>§</b>	
<b>DISTRIBUTION SYSTEM</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>RESILIENCY PLAN</b>	<b>§</b>	

**DIRECT TESTIMONY OF ED ALLEN**

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**IBEW LOCAL UNION 66**

1 **Q. Please introduce yourself and state your address.**

2 A. My name is Ed Allen. My business address is 4345 Allen Genoa Road, Pasadena, Texas  
3 77504.

4 **Q. On whose behalf are you testifying?**

5 A. I am testifying for the International Brotherhood of Electrical Workers Local Union 66  
6 (IBEW LU 66). I am the Business Manager of the Local and have been since November of  
7 2021 and a staff member since 2017. Before that I was the President of Local 66.

8 **Q. Is IBEW Local Union 66 an intervenor in the PUC's case considering the application**  
9 **of CenterPoint for approval of its proposed system resiliency plan (SPR)?**

10 A. Yes.

11 **Q. What is your educational and work background?**

12 A. I have a High School level education but more importantly I have more than 43 years in the  
13 industry with more than 35 years of field experience working for CenterPoint and traveling  
14 across the country on storm restoration for many other utilities.

15 **Q. Are you familiar with the CenterPoint service territory in Houston?**

16 A. Yes I worked as a Lineman for CenterPoint for 35 years.

17 **Q. Please describe IBEW LU 66's involvement in the CenterPoint SRP case.**

18 A. We started participating in CenterPoint's PUC proceedings last year. We've been involved  
19 in the rate case, the May storms case, and this one. Our attorney or I participated in several  
20 settlement calls and supported the settlements in the recent rate case and the May storms  
21 case. He and we monitor filings in the case. If there are filings one of us thinks the other  
22 should see, we share them with each other. Our attorney talks with CenterPoint's attorneys  
23 and other parties. We are ready to participate in the settlement discussions here.

24 IBEW LU 66 supports the legislative initiatives to improve utilities' system  
25 resiliency plans. The process to review those plans allows input from parties representing  
26 the public interest, consumers (residential, small commercial and industrial), cities, and us.

1 I like knowing more about the regulatory issues affecting a large employer of our members  
2 and staying involved in the PUC's process.

3 **Q. Does IBEW LU 66 support CenterPoint's SRP application?**

4 A. Mostly, yes, but we have concerns about CenterPoint's proposal to include \$43 million to  
5 raise 12 substations.

6 **Q. Please discuss your areas of concern with the substation raising proposal.**

7 A. I understand none of these substations they want to spend ratepayer money to raise flooded  
8 during Hurricane Harvey. If the substations did not flood during Hurricane Harvey, I'm  
9 not convinced ratepayers should spend money to protect against a 500-year flood.  
10 Hurricane Harvey was devastating; if these substations that did not flood during Hurricane  
11 Harvey flood now, I question whether there will be anything nearby to serve power to.  
12 We believe this is not a prudent expense for ratepayers.

13 **Q. Have you talked with CenterPoint about your concerns?**

14 A. Yes, I have. They explained there are some substations that may experience storm surges  
15 that were not present in Hurricane Harvey and actually could flood sooner. Or, others are  
16 in a 500-year floodplain and that justifies raising them now. They also stressed that, in some  
17 locations, the entire substation will not be raised and they will just raise some equipment  
18 above this mystical flood line.

19 **Q. Did those discussions change your mind?**

20 A. No. I'm happy they wanted to talk with me about it, but they didn't convince me.

21 **Q. Why do you oppose the proposal to raise substations being included in the SRP?**

22 A. Many of our members are CenterPoint's customers. Raising these substations does not  
23 seem to be a good value proposition, so we're opposed to approving the money CenterPoint  
24 asks for raising those substations.

1 **Q. Do you suggest the Public Utility Commission of Texas should deny the projected**  
2 **costs for raising substations from the SRP application?**

3 A. Yes. I think either CenterPoint should remove those proposed costs from the SRP or the  
4 Commission should reject them. If CenterPoint really thinks these substations should be  
5 raised, it can spend its own profits to do that.

6 **Q. Do you have other concerns with the SRP application?**

7 A. At this point, no, but we continue to listen to the other parties' concerns to see if there are  
8 things we should consider opposing.

9 **Q. Would IBEW LU 66 support the SRP application if the costs for raising substations**  
10 **were removed?**

11 A. Removal of the substation costs would go a long way to getting us to support the SRP.  
12 I'm considerate of the other parties' positions and want to be sure we understand them  
13 before committing to approving the SRP.

14 **Q. Will IBEW LU 66 continue to participate in the case, including the proposed**  
15 **settlement discussions and mediation?**

16 A. Yes.

17 **Q. Was this testimony prepared by you or someone under your direction?**

18 A. Yes.

19 **Q. Is this testimony and any exhibits offered with it true and correct?**

20 A. Yes.

21 **Q. Do you intend for this written testimony be received as an exhibit and incorporated**  
22 **into the record at the hearing on the merits?**

23 A. Yes.

24 **Q. Do you stipulate that all parties may treat this testimony as if it were filed under oath?**

25 A. Yes.

1   **Q.**    **If identified for cross-examination at the hearing on the merits, do you expect to be**  
2           **available to submit to cross-examination, clarifying questions, redirect examination,**  
3           **and recross-examination?**

4    A.    Yes.

5   **Q.**    **Does this conclude your direct testimony?**

6    A.    Yes.