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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	§	
FOR APPROVAL OF ITS 2026-2028	§	OF
TRANSMISSION AND DISTRIBUTION	§	
SYSTEM RESILIENCY PLAN	§	ADMINISTRATIVE HEARINGS

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S FIRST SET OF REQUESTS
FOR INFORMATION TO HOUSTON COALITION OF CITIES**

Pursuant to 16 Tex. Admin. Code ("TAC") § 22.144, CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston") requests that Houston Coalition of Cities ("Respondent"), by and through its attorneys of record, provide all of the information requested in the attached Exhibit A. Pursuant to 16 TAC § 22.144(c)(2), CenterPoint Houston further requests that answers to the requests for information be made under oath. The question(s) shall be answered in sufficient detail to fully present all the relevant facts. Exhibit A is attached hereto and incorporated herein for all purposes.

I. Definitions

1. "Document" and "documents" are used in their broadest sense to include, by way of illustration and not limitation, any and all written, recorded, filmed, or graphic matter of every kind and description, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether printed, produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but no limited to, memoranda, notes, emails, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, surveys, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form. "Document" or "documents" shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

2. "Communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters, emails and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of respondent.
3. "Identification" of a document includes stating (a) the nature of the document (*e.g.*, letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of respondent or in the custody of its attorneys or other representatives or agents.
4. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
5. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.

II. Instructions

1. If any request appears confusing, please promptly request clarification from the undersigned counsel.

2. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
3. As part of the response to each question, please state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer.
4. If Respondent considers any request to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible to discuss the situation and to try to resolve the problem. Likewise, if Respondent objects to any of the questions on the grounds that the question seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
5. These requests shall be deemed continuing in nature to require further and supplemental responses if Respondent receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.
6. All information responsive to the requests in the attached Exhibit A should be sent to the undersigned via email.

Respectfully submitted,

BAKER BOTTS, LLP

By: /s/ James H. Barkley

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**COUNSEL FOR CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

CERTIFICATE OF SERVICE

I certify that on April 11, 2025, a true and correct copy of this document was served via electronic mail on all parties of record in this proceeding, in accordance with the *Second Order Suspending Rules* issued in Project No. 50664.

/s/ James H. Barkley

EXHIBIT A

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**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S FIRST SET OF REQUESTS
FOR INFORMATION TO HOUSTON COALITION OF CITIES**

CEHE HCC 1-1 For each witness that will provide testimony for Houston Coalition of Cities in this case, please provide, for the period since January 1, 2020, a complete copy of all prior testimonies submitted or testified to at hearing by the witness relating to the topic(s) the witness will address in this docket. For testimony that is available from the Commission docket, simply list the docket number, and for documents that are otherwise publicly available online, a link to access the online document may be provided instead of a copy.

CEHE HCC 1-2 Pursuant to 16 TAC § 22.103(b), and to the extent not already identified in previous pleadings, please provide a list identifying each member of Houston Coalition of Cities that is represented by Houston Coalition of Cities in these proceedings. For each such member, please provide the basis for that member's interest in the outcome of this proceeding.

CEHE HCC 1-3 Admit or deny that under 16 TAC § 25.62, the Commission may approve an electric utility's system resiliency plan (SRP) that includes measures that are similar to the electric utility's existing programs or measures. If your answer is anything other than an unqualified "admit," please explain the basis for your response, identify which section(s) of 16 TAC § 25.62 prohibit this, and provide all documents supporting your response.

CEHE HCC 1-4 Admit or deny that a measure can provide both resiliency and reliability benefits. If your answer is anything other than an unqualified "admit," please explain the basis for your response, and provide all documents supporting your response.

CEHE HCC 1-5 Admit or deny that under 16 TAC § 25.62, the Commission may approve an electric utility's system resiliency plan measure that provides both resiliency and reliability benefits. If your answer is anything other than an unqualified "admit," please explain the basis for your response, identify which section(s) of 16 TAC § 25.62 prohibit this, and provide all documents supporting your response.

CEHE HCC 1-6 For each city that is participating in the intervention of Houston Coalition of Cities, please provide the following:

- a. any ordinance, resolution, agreement, or other document authorizing the city to intervene in this proceeding;
- b. the name and title of each city official that reviewed CenterPoint Houston's SRP;
- c. the name and title of each city official that reviewed the direct testimony of Mr. Ivey in this proceeding; and
- d. the name and title of each city official that reviewed the direct testimony of Mr. Mara in this proceeding.

CEHE HCC 1-7 With reference to the direct testimony of Mr. Ivey and Mr. Mara, please identify each city official and any personnel from a city's office of emergency management or similar body (other than outside counsel representing a city) with whom Mr. Ivey and/or Mr. Mara personally met, spoke, or otherwise communicated to discuss that city's views on CenterPoint Houston's SRP or appropriate resiliency measures for that city and provide the date of each such meeting, conversation, or communication.

CEHE HCC 1-8 With reference to the direct testimony of Mr. Ivey and Mr. Mara in this docket, please state whether Mr. Ivey and Mr. Mara reviewed, prior to filing his testimony, the SRP of any other Texas electric utility that had been previously approved by the Public Utility Commission of Texas and, if so, which electric utilities' approved SRPs he reviewed.

CEHE HCC 1-9 With reference to the direct testimony of Mr. Ivey, please explain how Mr. Ivey distinguishes between "updating obsolete . . . equipment" (see page 15, lines 15-18 for example) and "modernizing electric transmission and distribution facilities" as permitted under 16 Tex. Admin. Code § 25.62(c)(1)(B).