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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 INTERNATIONAL BROTHERHOOD OF ELECTRICAL
WORKERS LOCAL UNION 66**

Pursuant to 16 Tex. Admin. Code ("TAC") § 22.144, CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston") requests that International Brotherhood of Electrical Workers Local Union 66 ("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

Patrick H. Peters, III
State Bar No. 24046622
Vice President, Associate General Counsel
CenterPoint Energy Service Company, LLC
1005 Congress Avenue, Suite 650
Austin, Texas 78701
Telephone: 512.397.3032
Facsimile: 512.379.3050
Email: patrick.peters@centerpointenergy.com

Sam Chang
State Bar No. 24078333
Director, Associate General Counsel
CenterPoint Energy Service Company, LLC
1005 Congress Avenue, Suite 650
Austin, Texas 78701
Telephone: 512.397.3005
Facsimile: 512.379.3050
Email: se.chang@centerpointenergy.com

James H. Barkley
State Bar No. 00787037
Baker Botts, LLP
910 Louisiana Street
Houston, Texas 77002
Telephone: 713.229.1234
Facsimile: 512.322.1522
Email: james.barkley@bakerbotts.com

**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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| CEHE
IBEW-1-1 | For each witness that will provide testimony for International Brotherhood of Electrical Workers Local Union 66 in this case, please provide, for the period since January 1, 2020, a complete copy of all prior testimonies submitted or testified to at a hearing by the witness relating to the topic(s) the witness will address in this docket. For testimony that is available from a 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
IBEW-1-2 | With reference to the direct testimony of Mr. Allen, please identify each 500-year flood event of which Mr. Allen is aware that has occurred in CenterPoint Houston's service area since January 1, 2015. |