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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 SECOND SET OF
REQUESTS FOR INFORMATION TO THE OFFICE OF PUBLIC UTILITY COUNSEL**

Pursuant to 16 Tex. Admin. Code (“TAC”) § 22.144, CenterPoint Energy Houston Electric, LLC (“CenterPoint Houston”) requests that the Office of Public Utility Counsel (“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 15, 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
OPUC-2-1 | Refer to the direct testimony of Ronald Keen at page 24, lines 1-4. Mr. Keen testifies that “there is a need for those who contribute to the decision to know the facts behind those decisions” Please state whether it is Mr. Keen’s position that he, as an outside consultant to the Office of Public Utility Counsel, must be among those entitled to know such facts before the Company’s application can meet the level of transparency required for the Public Utility Commission of Texas to properly approve the Company’s system resiliency plan. |
| CEHE
OPUC-2-2 | Refer to the direct testimony of Ronald Keen at page 22, lines 13-17. Is it Mr. Keen’s expert opinion that the Public Utility Commission of Texas, if provided with details of the Company’s cybersecurity resiliency measures, lacks the resources and expertise “to determine if the SRP is foundationally solid with a comprehensive baseline of all known threats, vulnerabilities, deficiencies, and measures which are sufficient to correct them?” |
| CEHE
OPUC-2-3 | In connection with preparing, and prior to filing, his direct testimony, did Mr. Keen review Public Utility Regulatory Act § 39.1516 (Cybersecurity Monitor)? |
| CEHE
OPUC-2-4 | In connection with preparing, and prior to filing, his direct testimony, did Mr. Keen review P.U.C. Subst. R. § 25.367 (Cybersecurity Monitor)? |
| CEHE
OPUC-2-5 | Did Mr. Keen and/or PMG Consulting apply for selection by the Public Utility Commission to act as the Commission’s cybersecurity monitor? |
| CEHE
OPUC-2-6 | Refer to the direct testimony of John Haselden at page 6, line 14, at which Mr. Haselden testifies, “A robust BCA is necessary to ensure expenditures will provide net benefits to customers.” Please provide a copy of the benefit/cost analysis (BCA) prepared by Mr. Haselden for each resiliency measure in the Company’s system resiliency plan for which Mr. Haselden prepared a BCA. |

- CEHE
OPUC-2-7** Refer to the direct testimony of John Haselden at page 6, line 14, at which Mr. Haselden testifies, “A robust BCA is necessary to ensure expenditures will provide net benefits to customers.” Please identify each proceeding listed in Attachment B to Mr. Haselden’s direct testimony in which Mr. Haselden prepared a BCA.
- CEHE
OPUC-2-8** Refer to the direct testimony of John Haselden at page 6, line 14, at which Mr. Haselden testifies, “A robust BCA is necessary to ensure expenditures will provide net benefits to customers.” For each proceeding identified in response to CEHE OPUC-2-7, provide either a copy of the BCA or a description of the BCA that describes the methodology used by Mr. Haselden to prepare the BCA.
- CEHE
OPUC-2-9** Refer to the direct testimony of John Haselden at page 7, lines 1-3, at which Mr. Haselden testifies that “the BCR for any given measure should be significantly above 1.0 to assure value to customers.”
- (a) What BCA value does Mr. Haselden consider to be “significantly above 1.0?”
 - (b) Please provide the analytical or other basis and supporting documentation for Mr. Haselden’s answer to subpart (a).
- CEHE
OPUC-2-10** Refer to the direct testimony of John Haselden at page 11, lines 9-11, at which Mr. Haselden describes the coastal upgrades resiliency measure (RM-9) as having a “weak correlation to resiliency.”
- (a) Please provide the basis and supporting documentation for Mr. Haselden’s assertion that the proposed coastal upgrades have a weak correlation to resiliency.
 - (b) Provide any examples known to Mr. Haselden of coastal resiliency measures implemented by a utility that he would describe as having a “strong correlation to resiliency.”
- CEHE
OPUC-2-11** Refer to the direct testimony of John Haselden at page 14, lines 5-7, at which Mr. Haselden asserts that “the likelihood of flooding is very low.” How many 500-year floods does Mr. Haselden believe have occurred in the Company’s service area since January 1, 2015?
- CEHE
OPUC-2-12** Refer to the direct testimony of John Haselden at page 15, lines 15-16, at which Mr. Haselden asserts that the major underground communications monitoring system (MUCAMS) measure (RM-12) “has a weak relation to the resiliency of CEHE’s system” Please provide the basis and supporting documentation for Mr. Haselden’s assertion that the proposed MUCAMS measure has a weak relation to the resiliency of CEHE’s system.
- CEHE
OPUC-2-13** Refer to the direct testimony of John Haselden at page 15, lines 15-16, at which Mr. Haselden asserts that the major underground communications monitoring system (MUCAMS) measure (RM-12) “has a weak relation to the resiliency of CEHE’s system” Please list the methods that Mr. Haselden believes a

CEHE
OPUC-2-14

utility's resiliency measures may properly utilize consistent with P.U.C. Subst. R. 25.62 (Transmission and Distribution System Resiliency Plans).

Refer to the direct testimony of John Haselden at page 19, lines 13-15, at which Mr. Haselden asserts that the Company's contamination mitigation measure (RM-19) "addresses reliability and has no relationship to resiliency."

- (a) Is it Mr. Haselden's position that reliability has no relationship to resiliency?
- (b) Please state, to the extent Mr. Haselden knows it, the title of Subchapter C of Chapter 25 of the Commission's substantive rules in which the Commission's resiliency rule appears.
- (c) Is it Mr. Haselden's position that resiliency measures that have both reliability benefits and resiliency benefits may not be included in a utility's resiliency plan?

CEHE
OPUC-2-15

Refer to the direct testimony of John Haselden at page 20, lines 6-8, at which Mr. Haselden asserts, with regard to the substation transformer fire protection barriers measure (RM-20), that "the Company has already been funding it, presumably through base rates." Please provide the basis and supporting documentation for Mr. Haselden's assertion that the Company's current base rates include recovery of *future* capital investments in substation transformer fire protection barriers?

CEHE
OPUC-2-16

Refer to the direct testimony of John Haselden at page 20, lines 13-14, at which Mr. Haselden asserts, with regard to the digital substation measure (RM-21), that it "has few system resiliency benefits." Please provide the basis and supporting documentation for Mr. Haselden's assertion that the digital substation measure has few resiliency benefits.