



## **Filing Receipt**

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

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

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC’S SECOND 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 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**

**SOAH DOCKET NO. 473-25-11558  
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**CEHE**                With reference to the direct testimony of Mr. Ivey at page 1, line 20-page 2, line  
**HCC-2-1**                8, please admit or deny that Mr. Ivey's experience does not include having  
developed and/or implemented a utility-wide resiliency plan akin to those  
required under PURA. If your answer is anything other than an unqualified  
"admit," please identify the utility, the name of the plan, the regulatory body  
evaluating such a plan and any related docket numbers.

**CEHE**                Please refer to the direct testimony of Mr. Ivey, page 7, lines 20-23, stating  
**HCC-2-2**                "There are no industry standard metrics for resiliency. However, my experience  
has been that resiliency is directly linked to the concept of reliability. A system  
cannot be resilient if it is not already reliable. Thus, it is important to evaluate  
the results of projects first by reliability and then resiliency can be evaluated  
after major events."

- (a) Is it Mr. Ivey's position that reliability is a necessary precondition of resiliency? If your answer is anything other than an unqualified "yes," please explain the basis for your response.
- (b) Is it Mr. Ivey's position that a utility should not implement any resiliency measures until it is perfectly reliable? If your answer is anything other than an unqualified "yes," please explain the basis for your response.
- (c) Please identify specific utilities that Mr. Ivey believes have reached a sufficient level of reliability to justify investments in resiliency.
- (d) Considering Mr. Ivey's recommendation to "evaluate the results of projects first by reliability and then resiliency can be evaluated after major events," does HCC agree that a single project can provide reliability benefits and resiliency during major events? If your answer is anything other than an unqualified "yes," please explain the basis for your response.

**CEHE**                With reference to the direct testimony of Mr. Ivey, page 25, line 18, has Mr.  
**HCC-2-3**                Ivey ever encountered a conductor replacement project that is not a capacity  
increase?

- CEHE**  
**HCC-2-4** With reference to the direct testimony of Mr. Ivey, page 27 line 18-page 28, line 2, please identify the ways in which IGSD devices “can also be used for issues that are mostly resiliency related” and “could possibly provide resiliency benefits.”
- CEHE**  
**HCC-2-5** Please refer to the direct testimony of Mr. Ivey, page 37, lines 4-5, the statement “I can prove there is practically no delay in time with other techniques but will forgo discussing these in an open format.” Please provide the referenced proof and any supporting documentation pursuant to the protective order in this docket.
- CEHE**  
**HCC-2-6** Please refer to the direct testimony of Mr. Mara, page 11, lines 13-18, at which Mr. Mara states, “Conduit systems in downtown networks, dense urban areas, and some industrial sites are often encased in concrete.”
- (a) Please state Mr. Mara’s understanding of what portion of CenterPoint Houston’s service territory contains “downtown networks,” “urban areas,” or “industrial sites.”
  - (b) Please state Mr. Mara’s understanding of what portion of the encased conduit in the Company’s system resiliency plan is planned to be located in downtown networks, urban areas or industrial sites.
- CEHE**  
**HCC-2-7** Please refer to the direct testimony of Mr. Mara, page 25, lines 1-2. Please provide the calculations and any documentation reviewed by Mr. Mara prior to filing his testimony that supports Mr. Mara’s estimate that “286 structures will cost in the range of \$15 to \$22 million.”