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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

**THE REP COALITION’S FIRST REQUEST FOR INFORMATION TO
ACCLAIM ENERGY LTD**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the REP Coalition, comprised of the Texas Energy Association for Marketers (TEAM) and the Alliance for Retail Markets (ARM) requests Acclaim Energy Ltd (Acclaim), as defined in this First Request for Information (RFI), to respond to the questions and sub-questions in this RFI under oath, and in accordance with the definitions, explanatory notes, and instructions provided in these Requests. Please answer the questions and sub-questions in the order in which they are submitted and include sufficient detail to provide a complete and accurate response. Also, please state the name of the witness who will sponsor the response to each question and sub-question and who can vouch for the truth of the response.

DEFINITIONS, EXPLANATORY NOTES, AND INSTRUCTIONS

1. “Acclaim” or “Company” refers to Acclaim Energy Ltd.
2. “CenterPoint” refers to CenterPoint Energy Houston Electric, LLC.
3. “CenterPoint Energy” refers to CenterPoint Energy, Inc., CenterPoint Energy Houston Electric, LLC’s ultimate parent company.
4. The term “identify,” “identity,” or “identification” when used in reference to an individual person, means to state that person’s full name and business address, including zip code, telephone number, and present or last-known business position and duties.
5. The term “identify,” “identity,” or “identification” when used in reference to a business organization, means to state the corporate, partnership, or proprietorship legal name or

names, and locations, full addresses and telephone numbers of its principal place of business, and all other business locations that should be denoted for a full and complete response to an inquiry, interrogatory, or request for information.

6. The term “identify,” “identity,” or “identification” when used in reference to a document or study, means to state the type of document or the study format (e.g., book, magazine article, circular, ledger, letter, memorandum, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author, volume and page number or other means of general identification, its approximate size and number of pages, and the date on which it was made, prepared, or taken. If any such document was, but is no longer, in your possession or subject to your control, describe the disposition.
7. The term “identify,” “identity,” or “identification” when used in reference to anything other than a person, business organization, document, or study means to state the nature and present location of the item, a description of its form, the name or title by which the item is commonly known, and the person or business organization that has possession of, custody of, control over, and/or responsibility to maintain the item.
8. The term “study” or “studies” means any analysis, investigation, summary of data, listing, or report, the results of which were made known, formally or informally, where the author thereof reached an objective or subjective conclusion or presented information upon which others could or did reach an objective or subjective conclusion.
9. The terms “document” and “documents” are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms “document” and “documents” shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, e-mails, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants’ reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made. The terms “document” and “documents” also include all copies of

documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.

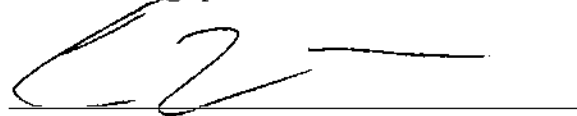
10. When a request calls for the identification of a “document” or “documents,” the identification should include the following:
 - (a) the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
 - (b) the date of the document;
 - (c) the title or “re:” line, and the subject of the document;
 - (d) the subject matter of the document;
 - (e) the full name and address of the recipient and every person who received copies of the document;
 - (f) the full name and address of the person who has possession, custody, or control of the document, or who is in charge of maintaining the document; and
 - (g) if the document has been lost, shredded, or destroyed (whether intentionally or unintentionally), an explanation of the reasons for and causes of such loss, shredding or destruction.
11. If any requested information or document cannot be provided in its entirety, it shall be provided to the greatest extent possible, with an indication of the portion of the information or document that cannot be provided and the reason it cannot be provided.
12. The respondent to requests for information must provide not only the information or documents in its physical possession, custody, or control, but all information and documents in the physical possession, custody, or control of any other person acting or purporting to act on behalf of the respondent, including, but not limited to, agents, contractors, attorneys, consultants, and witnesses.
13. The term “communication” shall mean any transmission of information by oral, graphic, written, pictorial, or other means, including, but not limited to, telephone, conversations, letters, telegrams, e-mails, text messages, and personal conversations.
14. “To each” means to identify separately information, facts, data, and documents for each of the individual items or things designated as the subject of the specific inquiry or request.
15. Terms expressed in the masculine gender shall be regarded as including the feminine or neuter; terms expressed in the singular shall be regarded as being expressed in the plural, and vice versa; terms expressed in the past tense shall be regarded as being expressed in

the present tense, and vice versa; and the term “and” shall be regarded as the term “or,” and vice versa, so as to not limit the scope of any request.

16. In answering each request, please restate the request prior to providing the response. Each request and its response should begin on a separate page. Where there are subparts to a request, the answer to each subpart should be separately labeled.
17. If any question appears confusing or the scope of the question is unclear, please request clarification from the undersigned counsel. Similarly, if you consider any question 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 in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions, please call the undersigned counsel as soon as possible.
18. If any of the information requested is claimed to be privileged or proprietary, then the response should identify such information, identify all persons who participated in the preparation of the information or who received a copy, read, or examined the information or knows of its substance, state the present location of the information and all copies of it, and identify each person having custody or control of the information or any of the copies.
19. If any requested information is not available in the form requested, provide the information in the form that it currently exists, explain why the data cannot be provided in the form requested, and describe the work or process needed to provide the information in the form requested.
20. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
21. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.

Respectfully submitted,

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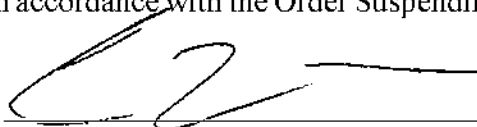
**ATTORNEYS FOR TEXAS ENERGY
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**COUNSEL FOR ALLIANCE FOR RETAIL
MARKETS**

CERTIFICATE OF SERVICE

I hereby certify that notice of the filing of this document was provided to all parties of record via electronic mail on April 16, 2025 in accordance with the Order Suspending Rules, issued in Project No. 50664.



Creighton R. McMurray

- REP COALITION 1-1.** Please describe the generation source, megawatts, number of customers, and customer classes of all microgrids in CenterPoint's service territory that Acclaim has operated, owned, has consulted on, or is affiliated with.
- REP COALITION 1-2.** Please reference the Direct Testimony of John Elder, page 3, lines 5-6 where he states, "This approach lowers costs for ratepayers while improving overall system performance during critical events." Please provide all documentation demonstrating the cost savings previously provided to rate payers by the kind of microgrids contemplated in this matter in CenterPoint's service territory.
- REP COALITION 1-3.** Please reference the Direct Testimony of John Elder, page 3, lines 5-6 where he states, "This approach lowers costs for ratepayers while improving overall system performance during critical events." Please provide all documentation demonstrating overall system performance improvements previously provided by the kind of microgrids contemplated in this matter in CenterPoint's service territory.
- REP COALITION 1-4.** Please reference the Direct Testimony of John Elder, page 3, lines 12-13 where he states, "These upgrades must integrate seamlessly with the TDUs' existing technology platform, ensuring visibility and control for all stakeholders involved in operating the system response." Please provide all documentation showing how the type of microgrids being considered in this matter will seamlessly integrate with CenterPoint's existing technology platform.
- REP COALITION 1-5.** Please provide any modelling or forecasting of microgrids in CenterPoint's service area undertaken by Acclaim or a third party.
- REP COALITION 1-6.** Please provide any communications or documents between Acclaim and any third-party entities in the study, design, implementation, or operation of microgrids in CenterPoint's service territory.
- REP COALITION 1-7.** What data is collected to track and monitor microgrid deployment events? Please provide any data previously collected on microgrid performance in CenterPoint's service territory during critical weather events.
- REP COALITION 1-8.** What communication mechanisms between the microgrid owner, the retail electric provider, and CenterPoint will be used to deploy microgrids under this resiliency plan?

- REP COALITION 1-9.** Please refer to the Direct Testimony of John Elder, page 2, lines 12-23, where he states, “A USM is a localized energy system that uses distributed or co-located generation assets to form an “island’ within the distribution grid.” Please describe how the USM operator addresses having customers with different retail electric providers within the island within the distribution grid.
- REP COALITION 1-10.** Please admit or deny that each customer within a microgrid “island” will be able to choose their own retail electric provider.
- REP COALITION 1-11.** Please refer to the Direct Testimony of John Elder, page 2, lines 22-23, where he states that a utility-scale microgrid “strengthens ERCOT's ability to manage demand and maintain system stability under both normal and extreme conditions.” Please provide all data and documentation of utility-scale microgrids improving ERCOT’s system stability during extreme weather events.
- REP COALITION 1-12.** Please document any quantifiable improvements in customer minutes interrupted provided by utility-scale microgrids in ERCOT.