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

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

**IBEW LU 66'S RESPONSES
TO CEHE'S FIRST REQUESTS FOR INFORMATION**

NOW COMES, International Brotherhood of Electrical Workers Local Union 66 (IBEW LU 66) to timely file responses to CenterPoint Energy Houston Electric, LLC's (CEHE or CenterPoint) First Requests for Information (RFIs) to IBEW LU 66 and shows:

I. Written Responses

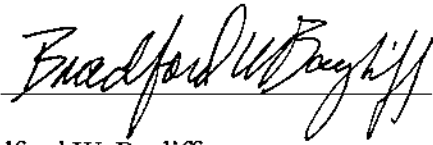
Attached are IBEW LU 66's written responses to CenterPoint's requests for information. Each response is set forth on a separate page on which the request has been restated. All responses are made without waiver of IBEW LU 66's right to contest the admissibility of any response at hearing. IBEW LU 66 stipulates all parties may treat its responses as if they were filed under oath.

Respectfully submitted,

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IBEW LU 66

CERTIFICATE OF SERVICE

A copy of this document is being filed in the Public Utility Commission's Interchange system and served on all parties of record as required by the orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020 in Project No. 50664.

/s/ Bradford W. Bayliff

**IBEW LU 66'S RESPONSE TO
CEHE'S REQUEST FOR INFORMATION No. 1-1**

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.

Response to CEHE-IBEW 1-1:

Ed Allen is the sole witness for IBEW LU 66. He has not presented testimony on the topic he addressed in his direct testimony.

Responsible witness: Ed Allen

**IBEW LU 66'S RESPONSE TO
CEHE'S REQUEST FOR INFORMATION No. 1-2**

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.

Response to CEHE-IBEW 1-2:

Mr. Allen understands a 500-year flood event is based on probability of a 1-in-500 (0.2 percent) chance a flood will occur in an area in any given year. Mr. Allen understands the Houston area saw 500-year floods on Memorial Day weekend in 2015 and another in April 2016. Hurricane Harvey in August 2017 was the third 500-year flood event since January 1, 2015. Mr. Allen experienced a second flood at his residence in 2016 but does not know if that was another 500-year flood event.

Responsible witness: Ed Allen