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

**TEXAS INDUSTRIAL ENERGY CONSUMERS OBJECTION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S
FIRST SET OF REQUESTS FOR INFORMATION**

Texas Industrial Energy Consumers ("TIEC") files the following objections to the First Requests for Information ("RFT") to TIEC filed by CenterPoint Energy Houston Electric, LLC ("CEHE"), which was received on April 11, 2025. Pursuant to 16 Tex. Admin. Code § 22.144(d), these objections are timely filed.

OBJECTIONS

CEHE-TIEC 1-3. With reference to the direct testimony of Mr. McGlothlin, please identify each officer or employee of a TIEC member company (other than outside counsel representing TIEC) with whom Mr. McGlothlin personally met, spoke, or otherwise communicated to discuss that member company's views on CenterPoint Houston's system resiliency plan (SRP) or appropriate resiliency measures for that member's business and provide the date of each such meeting, conversation, or communication.

TIEC objects to this request because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.¹ The purpose of this proceeding is for the Commission to evaluate CEHE's resiliency plan, and information relating to whether particular officers or employees of a TIEC member company met with Mr. McGlothlin to discuss CEHE's resiliency plan has no impact on the merits of CEHE's filing. Neither TIEC nor its members are applicants in this case, and information about the involvement of specific individuals of TIEC's member companies has no bearing on whether CEHE's application should be approved. Accordingly, this RFI has no tendency to make any fact of consequence to the

¹ TEX. R. CIV. P. 192.3(a).

Commission's determination on CEHE's application more or less probable than it would be without the information sought,² and are not relevant to this proceeding.

For the foregoing reasons, TIEC respectfully requests that the ALJs sustain this objection and grant TIEC all other relief to which it is entitled.

Respectfully submitted,

O'MELVENY & MYERS LLP

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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, John R. Hubbard, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 21st day of April, 2025 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ John R. Hubbard

John R. Hubbard

² TEX.R. EVID. 403.