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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

**OFFICE OF PUBLIC UTILITY COUNSEL’S RESPONSE
TO CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC’S
FIRST REQUEST FOR INFORMATION**

The Office of Public Utility Counsel (“OPUC”) submits this Response to CenterPoint Energy Houston, LLC’s (“CEHE”) First Request for Information (“RFT”) that was received on April 11, 2025. Pursuant to State Office of Administrative Hearings Order No. 2, OPUC’s response is timely filed within 8 working days of receipt of CEHE’s discovery request. OPUC stipulates that all parties may treat this response as if it were filed under oath.

Date: April 23, 2025

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First Request for Information

CEHE OPUC 1-1. For each witness that will provide testimony for Office of Public Utility Counsel 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: For Mr. Keen:
Docket Nos. 56954 and 56548.

For Mr. Haselden:
Docket Nos. 57463, 57259, 57057, 56954, 56735, and 56548.

Prepared by: Ronald L. Keen and John E. Haselden

Sponsored by: Counsel

CEHE OPUC 1-2. Admit or deny that a measure can provide both resiliency and reliability benefits. If your answer is anything other than an unqualified "admit," please explain the basis for your response, and provide all documents supporting your response

RESPONSE: Admit

Prepared by: Ronald L. Keen and John E. Haselden

Sponsored by: Counsel

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CEHE OPUC 1-3. Referring to the direct testimony of Mr. Keen, did OPUC or Mr. Keen make any investigation or inquiry into CenterPoint Houston's existing physical security practices, policies, or processes outside of those relevant to and discussed in CenterPoint Houston's system resiliency plan (SRP)? If so, please describe any such investigation or inquiry performed by Mr. Keen or OPUC and provide any supporting documents.

RESPONSE: Please reference Mr. Keen's participation as an expert on behalf of OPUC in Docket No. 56548, as well as the original Third and Fourth RFIs submitted by OPUC to CenterPoint in Docket No. 57579 prior to the modifications requested and made by CenterPoint arising from the March 13, 2025 Cybersecurity Discussion between CenterPoint and OPUC.

Prepared by: Ronald L. Keen

Sponsored by: Counsel

CEHE OPUC 1-4. Referring generally to the direct testimony of Mr. Keen regarding cybersecurity, did OPUC or Mr. Keen make any investigation or inquiry into CenterPoint Houston's existing cyber security practices, policies, or processes outside of those relevant to and discussed in CenterPoint Houston's SRP? If so, please describe any such investigation or inquiry performed by Mr. Keen or OPUC and provide any supporting documents.

RESPONSE: Please reference Mr. Keen's participation as an expert on behalf of OPUC in Docket No. 56548, as well as the original Third and Fourth RFIs submitted by OPUC to CenterPoint in Docket No. 57579 prior to the modifications requested and made by CenterPoint arising from the March 13, 2025 Cybersecurity Discussion between CenterPoint and OPUC.

Prepared by: Ronald L. Keen

Sponsored by: Counsel

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CEHE OPUC 1-5. With reference to the direct testimony of Mr. Keen in this docket, please state whether Mr. Keen reviewed, prior to filing his testimony, the SRP any other Texas electric utility that had been previously approved by the Public Utility Commission of Texas and, if so, which utilities' approved SRPs he reviewed.

RESPONSE: Mr. Keen was retained to review the cybersecurity aspects of the proposed SRP in Docket No. 57579. Mr. Keen has also reviewed the cybersecurity aspects contained within the filing in each of the following Docket Nos: 55991, 56548, 56954, and 57463.

Prepared by: Ronald L. Keen

Sponsored by: Counsel

CEHE OPUC 1-6. With reference to the direct testimony of Mr. Haselden, please identify each 500-year flood event of which Mr. Haselden is aware that has occurred in CenterPoint Houston's service area since January 1, 2015.

RESPONSE: Mr. Haselden is aware of three events determined to be 500-year floods since 2015:

1. Flooding associated with Hurricane Harvey;
2. Flooding associated with Hurricane Imelda; and
3. "Tax Day" storm of 2015.

Prepared by: John E. Haselden

Sponsored by: Counsel

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CEHE OPUC 1-7. With reference to the direct testimony of Mr. Haselden in this docket, please state whether Mr. Haselden reviewed, prior to filing his testimony, the SRP of any other Texas electric utility that had been previously approved by the Public Utility Commission of Texas and, if so, which utilities' approved SRPs he reviewed.

RESPONSE: Mr. Haselden reviewed the following SRPs that have been approved by the Commission: Docket Nos. 56735 and 56954.

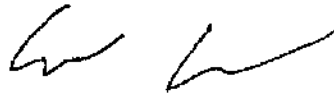
Prepared by: John E. Haselden

Sponsored by: Counsel

Date: April 23, 2025

Respectfully submitted,

Benjamin Barkley
Chief Executive and Public Counsel
State Bar No. 24092083

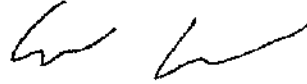


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**ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL**

CERTIFICATE OF SERVICE
SOAH DOCKET NO. 473-25-11558
PUC DOCKET NO. 57579

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 23rd day of April 2025 by facsimile, electronic mail, and/or first class, U.S. Mail.



Connor Drysdale