



Filing Receipt

Filing Date - 2025-04-23 11:40:16 AM

Control Number - 57579

Item Number - 195

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

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

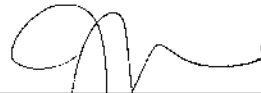
**GULF COAST COALITION OF CITIES' RESPONSE TO CENTERPOINT
HOUSTON ELECTRIC, LLC'S FIRST REQUEST FOR INFORMATION**

Gulf Coast Coalition of Cities (GCCC), files this Response to the First Request for Information (RFI) filed by CenterPoint Energy Houston Electric, LLC (CenterPoint). The discovery request was filed by CenterPoint on April 11, 2025, therefore, these responses are timely filed. Pursuant to 16 Texas Administrative Code (TAC) § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)




JAMIE L. MAULDIN
State Bar No. 24065694
jmauldin@lglawfirm.com

SAMANTHA N. MILLER
State Bar No. 24131515
smiller@lglawfirm.com

**ATTORNEYS FOR GULF COAST
COALITION OF CITIES**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on April 23, 2025, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

CEHE 1-1 For each witness that will provide testimony for Gulf Coast Coalition of Cities 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: Mr. Nalepa has submitted testimony in the following system resiliency plan filings before the Public Utility Commission of Texas:

<u>Docket No.</u>	<u>Utility</u>
57463	Southwestern Public Service Co.
57259	Southwestern Electric Power Co.
57057	AEP Texas, Inc.
56954	Texas-New Mexico Power Co.
56548	CenterPoint Energy Houston Electric
56545	Oncor Electric Delivery Co.

Prepared by: Karl J. Nalepa

Sponsored by: Karl J. Nalepa

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

CEHE 1-2 Pursuant to 16 TAC § 22.103(b), and to the extent not already identified in previous pleadings, please provide a list identifying each member of Gulf Coast Coalition of Cities that is represented by Gulf Coast Coalition of Cities in these proceedings.

RESPONSE: Please refer to the Gulf Coast Coalition of Cities' Motion to Intervene filed in this proceeding for a list of member cities in the coalition.

Prepared by: Counsel

Sponsored by: Counsel

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

CEHE 1-3 Admit or deny that under 16 TAC § 25.62, the Commission may approve an electric utility's system resiliency plan that includes measures that are similar to the electric utility's existing programs or measures. If your answer is anything other than an unqualified "admit," please explain the basis for your response, identify which section(s) of 16 TAC § 25.62 prohibit this, and provide all documents supporting your response.

RESPONSE: Deny. 16 TAC § 25.62(c)(2)(D) states:

"If a resiliency plan includes measures that are similar to other existing programs or measures, such as a storm hardening plan under §25.95 of this title (relating to Electric Utility Infrastructure Storm Hardening) or a vegetation management plan under §25.96 of this title (relating to Vegetation Management), or programs or measures otherwise required by law, *the electric utility must distinguish the measures in the resiliency plan from these programs and measures and, if appropriate, explain how the related items work in conjunction with one another.*" (emphasis added)

Thus, if a system resiliency plan includes measures that are similar to the electric utility's existing programs or measures, the Commission must evaluate how those programs and measures are distinguishable and how they work in conjunction with one another before approving the system resiliency plan. If the electric utility does not comply with this requirement, the Commission cannot approve the system resiliency plan to the extent it includes measures that are similar to the utility's existing programs or measures.

Prepared by: Karl J. Nalepa; Counsel

Sponsored by: Karl J. Nalepa

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

- CEHE 1-4** For each city that is participating in the intervention of Gulf Coast Coalition of Cities, please provide the following:
- a. any ordinance, resolution, agreement, or other document authorizing the city to intervene in this proceeding;
 - b. the name and title of each city official that reviewed CenterPoint Houston's System Resiliency Plan (SRP);
 - c. the name and title of each city official that reviewed the direct testimony of Mr. Nalepa in this proceeding.

RESPONSE: Gulf Coast Coalition of Cities has filed an objection to this request. Please refer to Gulf Coast Coalition of Cities' Objections to CenterPoint's First Request for Information filed on April 21, 2025.

Prepared by: Counsel

Sponsored by: Counsel

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

CEHE 1-5 With reference to the direct testimony of Mr. Nalepa in this docket, please describe Mr. Nalepa's specific experience with developing, implementing, and/or operating cybersecurity systems for electric utilities. Please include specific information as to the identity of the electric utility, the electric utility's service territory, and time frame for this experience.

RESPONSE: Mr. Nalepa did not address cybersecurity systems for electric utilities in his direct testimony. However, Mr. Nalepa does not have specific experience with developing, implementing, and/or operating cybersecurity systems for electric utilities.

Prepared by: Karl J. Nalepa

Sponsored by: Karl J. Nalepa

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

CEHE 1-6 With reference to the direct testimony of Mr. Nalepa in this docket, please describe Mr. Nalepa's specific experience with developing, implementing, and/or operating communications systems for electric utilities. Please include specific information as to the identity of the electric utility, the electric utility's service territory, and time frame for this experience.

RESPONSE: Mr. Nalepa did not address communications systems for electric utilities in his direct testimony. However, Mr. Nalepa does not have specific experience with developing, implementing, and/or operating communications systems for electric utilities.

Prepared by: Karl J. Nalepa

Sponsored by: Karl J. Nalepa

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

CEHE 1-7 With reference to the direct testimony of Mr. Nalepa in this docket, please describe Mr. Nalepa's specific experience with developing, implementing, and/or operating information technology assets for electric utilities. Please include specific information as to the identity of the electric utility, the electric utility's service territory, and time frame for this experience.

RESPONSE: Mr. Nalepa did not address information technology assets for electric utilities in his direct testimony. However, Mr. Nalepa does not have specific experience with developing, implementing, and/or operating information technology assets for electric utilities.

Prepared by: Karl J. Nalepa

Sponsored by: Karl J. Nalepa

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

CEHE 1-8 With reference to the direct testimony of Mr. Nalepa in this docket, please describe Mr. Nalepa's specific experience with developing, implementing, and/or operating operations technology assets for electric utilities, including transmission and distribution Supervisory Control and Data Acquisition, Distribution Automation, Advanced Metering System and mobile workforce assets or applications. Please include specific information as to the identity of the electric utility, the electric utility's service territory, and time frame for this experience.

RESPONSE: Mr. Nalepa did not address operations technology assets for electric utilities in his direct testimony. However, Mr. Nalepa does not have specific experience with developing, implementing, and/or operating operations technology assets for electric utilities.

Prepared by: Karl J. Nalepa

Sponsored by: Karl J. Nalepa

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

CEHE 1-9 With reference to the direct testimony of Mr. Nalepa in this docket, please identify each city official and any personnel from a city's office of emergency management or similar body (other than outside counsel representing a city) with whom Mr. Nalepa personally met, spoke, or otherwise communicated to discuss that city's views on CenterPoint Houston's SRP or appropriate resiliency measures for that city and provide the date of each such meeting, conversation, or communication.

RESPONSE: Gulf Coast Coalition of Cities has filed an objection to this request. Please refer to Gulf Coast Coalition of Cities' Objections to CenterPoint's First Request for Information filed on April 21, 2025.

Prepared by: Counsel

Sponsored by: Counsel

CITIES' RESPONSE TO CENTERPOINT'S FIRST RFI

CEHE 1-10 With reference to the direct testimony of Mr. Nalepa in this docket, please state whether Mr. Nalepa 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: The Commission has approved the SRPs of three utilities to date: Oncor Electric Delivery Co., Texas-New Mexico Power Co., and Entergy Texas, Inc. Mr. Nalepa has reviewed the SRP filings of Oncor Electric Delivery Co. and Texas-New Mexico Power Co.

Prepared by: Karl J. Nalepa

Sponsored by: Karl J. Nalepa