



## **Filing Receipt**

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**Item Number - 201**

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

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

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

Texas Industrial Energy Consumers ("TIEC") files the following responses to the First Requests for Information ("RFI") to TIEC filed CenterPoint Energy Houston Electric, LLC's ("CenterPoint"). The request was filed at the Commission and received by TIEC on April 11, 2025. Accordingly, pursuant to the procedural schedule entered in this case and the Commission's procedural rules, TIEC's response is timely filed. TIEC responses to specific questions are set forth as follows, in the order of the questions asked. Pursuant to P.U.C. Proc. R. 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

O'MELVENY & MYERS LLP

*/s/ Michael A. McMillin*

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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 24<sup>th</sup> day of April, 2025 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

*/s/ John R. Hubbard*

John R. Hubbard

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**CEHE-TIEC 1-1** For each witness that will provide testimony for Texas Industrial Energy Consumers 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:**

The requested information, including docket numbers and dates, was provided in Appendix B filed with Mr. McGlothlin's Direct Testimony on April 8, 2025. However, for additional convenience the following links are provided to the public testimonies filed by Mr. McGlothlin addressing the same topic(s) as in this proceeding:

- SPS – Docket No. 57463: [Direct T&E](#)
- AEP – Docket No. 57057 – [Direct T&E](#)
- TNMP – Docket No. 56954 – [Direct T&E](#)
- ETI – Docket No. 56735 – [Direct T&E](#)
- Oncor – Docket No. 56545 – [Direct T&E](#)
- CenterPoint – Docket No. 56548 – [Direct T&E](#)

**Preparer:** Shawn McGlothlin

**Sponsor:** Shawn McGlothlin

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

**CEHE-TIEC 1-2** Pursuant to 16 TAC § 22.103(b), and to the extent not already identified in your pleadings, please provide a list identifying each member of Texas Industrial Energy Consumers that is represented by Texas Industrial Energy Consumers in these proceedings.

**RESPONSE:**

Please see TIEC's List of Participating Members filed on April 24, 2025.

**Preparer:** Counsel

**Sponsor:** Counsel

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

**RESPONSE:**

TIEC has objected to this request.

**Preparer:**      Shawn McGlothlin

**Sponsor:**      Shawn McGlothlin

**SOAH DOCKET NO. 473-25-11558  
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<b>APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR APPROVAL OF ITS 2026-2028 TRANSMISSION AND DISTRIBUTION SYSTEM RESILIENCY PLAN</b>	<b>§ § § § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**TEXAS INDUSTRIAL ENERGY CONSUMERS' CORRECTED RESPONSE TO  
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**CEHE-TIEC 1-4** With reference to the direct testimony of Mr. McGlothlin in this docket, please state whether Mr. McGlothlin reviewed, prior to filing his testimony, the SRP of any other Texas utility that had been previously approved by the Public Utility Commission of Texas and, if so, which utilities' approved SRPs he reviewed.

**RESPONSE:**

Mr. McGlothlin was involved in and reviewed the following SRPs which have been approved:

- Docket No. 56954 – TNMP: An Order approving TNMP's SRP was issued on March 26, 2025;
- Docket No. 56735 – ETI: An Order approving ETI's SRP was issued on January 23, 2025; and
- Docket No. 56545 – Oncor: An Order approving Oncor's SRP was issued on November 21, 2024.

**Preparer:** Shawn McGlothlin

**Sponsor:** Shawn McGlothlin