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**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
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**TEXAS COAST UTILITIES COALITION'S
FIRST SET OF REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Texas Coast Utilities Coalition's ("TCUC") First Set of Requests for Information ("RFIs") to CenterPoint Energy Houston Electric, LLC ("CenterPoint") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at P.O. Box 302799, Austin, Texas, 78703, within twenty (20) calendar days of service hereof or no later than **March 3, 2025**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "CenterPoint," "CEHE," the "Company," and "Applicant" refer to CenterPoint Energy Houston Electric, LLC and its affiliates.
2. "You," "yours," and "your" refer to CenterPoint (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all

memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of CenterPoint.

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of CenterPoint or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If CenterPoint considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if CenterPoint objects to any of the RFIs on the grounds that the RFI seeks

proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if CenterPoint receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

P.O. Box 302799

Austin, Texas 78703

4400 Medical Pkwy

Austin, TX 78756

(512) 474-1492 (voice)

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By: /s/ Sergio E. Herrera

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**ATTORNEYS FOR TEXAS COAST
UTILITIES COALITION**

CERTIFICATE OF SERVICE

I hereby certify that on this the 11th day of February 2025, a true and correct copy of the *TCUC's First Set of RFIs to CEHE* was served upon all parties of record by electronic mail in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Mariann Wood

Mariann Wood

EXHIBIT A

SOAH DOCKET NO. 473-25-11558

PUC DOCKET NO. 57579

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 COAST UTILITIES COALITION'S
FIRST SET OF REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

TCUC RFI 1-1. Please provide electronic files supporting the exhibits, tables and testimony workpapers for each CEHE witness, including underlying calculations and assumptions.

TCUC RFI 1-2. Please provide the following information regarding other utilities reviewed by Guidehouse or CEHE who are implementing or have implemented resiliency plans:

- a. Utility
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- e. Annual kWh sales by class served by the utility
- f. Service area size of utility
- g. Utility distribution line miles
- h. Utility transmission line miles
- i. Total cost of resiliency plan as proposed by utility
- j. Total cost of each resiliency measure as proposed by utility
- k. Total approved cost of each resiliency measure as approved by the applicable regulatory commission
- l. Estimated reduction in customer minutes of interruption ("CMI") for each resiliency measure
- m. Estimated Benefit-Cost ("BCA") ratio for each resiliency measure
- n. Quantified BCA ratio of each resiliency measure proposed by utility

- o. Assumed value of lost load (“VoLL”) used for calculating BCA of proposed resiliency measures
- p. State whether VoLL was included as a benefit in BCA analysis or as a qualitative benefit in analysis of each proposed resilience measure
- q. Utility SAIDI including major storm events for last five years
- r. Utility SAIDI excluding major storm events for last five years
- s. Regulatory docket number and status of review of proposed resiliency plan
- t. Regulatory Commission order addressing the utility’s request for approval of proposed resiliency plan

TCUC RFI 1-3. Please provide the Guidehouse BCA analysis and underlying calculations and assumptions supporting each resiliency measure proposed in this proceeding as discussed in witness Shlatz’s direct testimony.

TCUC RFI 1-4. Please clarify whether the VoLL was included as a quantitative benefit in Guidehouse’s BCA analysis or as a qualitative benefit for each proposed resilience measure.

TCUC RFI 1-5. Reference page 21 of witness Shlatz’s direct testimony, please identify the information relied upon by Guidehouse and/or CEHE to conclude that each proposed resilience measure is engaged in or approved by a significant portion of the electric utility industry during the relevant period and therefore is consistent with good utility practice.

TCUC RFI 1-6. Please provided Guidehouse’s analysis and underlying calculations and assumptions supporting the forecasted CMI reduction for each resiliency measure proposed in this proceeding as discussed in witness Shlatz’s direct testimony.

TCUC RFI 1-7. Please provided Guidehouse’s BCA analysis and underlying calculations and assumptions, including but not limited to assumed VoLL and CMI Reduction, supporting each resiliency measure proposed in this proceeding as discussed in witness Shlatz’s direct testimony.

TCUC RFI 1-8. Please provide the Guidehouse BCA analysis and underlying calculations and assumptions, including but not limited to assumed VoLL and CMI Reduction, supporting each resiliency measure proposed in PUC Docket No. 56548.

TCUC RFI 1-9. Please explain in detail the specific reasons for increases in proposed spending for each proposed resiliency measure in this case when compared to spending proposed for the same or comparable resiliency measures in PUC Docket No. 56548.

TCUC RFI 1-10. Please provide the year-end customers and annual kWh usage for each CEHE customer class for each year since 2017.

TCUC RFI 1-11. Please provide CEHE's annual Distribution system SAIDI, SAIFI and CMI including extreme weather events for each year since 2017.

TCUC RFI 1-12. Please provide CEHE's annual Distribution system SAIDI, SAIFI and CMI excluding extreme weather events for each year since 2017.

TCUC RFI 1-13. Please provide CEHE's Transmission system SAIDI, SAIFI and CMI including extreme weather events for each year since 2017.

TCUC RFI 1-14. Please provide CEHE's Transmission system SAIDI, SAIFI and CMI excluding extreme weather events for each year since 2017.

TCUC RFI 1-15. Please provide CEHE's annual capital additions and O&M expenses for the following resilience measures for each year since 2017:

- a. Distribution circuit resiliency
- b. Strategic undergrounding
- c. Distribution pole replacement and bracing
- d. Transmission system hardening
- e. Vegetation management
- f. 69kV conversion projects
- g. S90 tower replacements
- h. Distribution capacity enhancements/substations
- i. Substation flood control

TCUC RFI 1-16. Please provide CEHE's total distribution system capital additions and O&M expenses for each year since 2017.

TCUC RFI 1-17. Please provide CEHE's total transmission system capital additions and O&M expenses for each year since 2017.

TCUC RFI 1-18. Reference Figure APP-15 on pages 16-18 of CEHE's Application, please indicate whether CEHE is willing to guarantee the level of assumed CMI savings for each proposed resiliency measure as presented in this figure. If not, explain why not.

TCUC RFI 1-19. Reference Figure APP-15 on pages 16-18 of CEHE's Application, please provide the total CMI for each year since 2017 related to:

- a. Distribution circuit resiliency
- b. Strategic undergrounding

- c. Distribution pole replacement and bracing
- d. Transmission system hardening
- e. Vegetation management
- f. 69kV conversion projects
- g. S90 tower replacements
- h. Distribution capacity enhancements/substations
- i. Substation flood control

TCUC RFI 1-20. Reference Figure APP-15 on pages 16-18 of CEHE's Application, please identify and provide the category (e.g., extreme wind, extreme temperature) and total CMI associated with each extreme weather event that has been experienced by the CEHE system for each year since 2010.

TCUC RFI 1-21. Reference Figure APP-15 on pages 16-18 of CEHE's Application, for each resiliency measure for which there is no estimated CMI savings, please provide the customer benefits that justify the proposed costs of each such measure.

TCUC RFI 1-22. Reference Figure APP-15 on pages 16-18 of CEHE's Application, please provide the forecasted annual revenue requirement for each proposed resiliency measure for each of the first ten years of operations.

TCUC RFI 1-23. Reference Figure APP-15 on pages 16-18 of CEHE's Application, please provide the forecasted annual revenue requirement for each proposed resiliency measure for each year included in Guidehouse's BCA.

TCUC RFI 1-24. Please provide information transmitted by CEHE to customers regarding the forecasted reliability benefits and cost of each proposed resiliency measure.

TCUC RFI 1-25. Please provide CEHE's projected total Distribution system CMI with and without each proposed resiliency measure for each of the next ten years.

TCUC RFI 1-26. Please provide CEHE's projected annual reduction in CMI for each proposed resiliency measure for each of the next five years for:

- a. Residential customers
- b. Commercial customers
- c. Industrial customers

TCUC RFI 1-27. Please provide CEHE's projected total Transmission system CMI with and without each proposed resiliency measure for each of the next ten years.

TCUC RFI 1-28. Please provide the estimated cost of each proposed resiliency measure that would be allocated to other wholesale transmission customers in ERCOT.

TCUC RFI 1-29. Please identify the portion of the total cost of each proposed resiliency measure that would be incurred for ERCOT planning purposes.

TCUC RFI 1-30. Reference page 21 of witness Shlatz's direct testimony, please provide the Commission Order that approved the estimated \$35,000 per MWh VoLL for use in planning studies.

TCUC RFI 1-31. Please provide the estimated VoLL used in Guidehouse's BCA along with supporting workpapers for:

- a. Residential customers
- b. Commercial customers
- c. Industrial customers

TCUC RFI 1-32. Please provide the percentage of total estimated VoLL associated with each proposed resiliency measure that will be reflected on CEHE's electric bills to:

- a. Residential customers
- b. Commercial customers
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TCUC RFI 1-33. Please provide the BCA for each proposed resiliency measure excluding the VoLL associated with forecasted CMI savings.

**SOAH DOCKET NO. 473-25-11558
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APPLICATION OF CENTERPOINT	§	
ENERGY HOUSTON ELECTRIC, LLC	§	BEFORE THE STATE OFFICE
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Respectfully submitted,

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P.O. Box 302799
Austin, Texas 78703
4400 Medical Pkwy
Austin, TX 78756
(512) 474-1492 (voice)
(512) 474-2507 (fax)

By: /s/ Sergio F. Herrera

Alfred R. Herrera
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Sergio E. Herrera
State Bar No. 24109999
sherrera@herrerlawpllc.com
service@herrerlawpllc.com

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UTILITIES COALITION**

CERTIFICATE OF SERVICE

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