



## **Filing Receipt**

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**Item Number - 22**

**DOCKET NO. 57579**

<b>APPLICATION OF CENTERPOINT</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ENERGY HOUSTON ELECTRIC, LLC</b>	<b>§</b>	
<b>FOR APPROVAL OF ITS 2026-2028</b>	<b>§</b>	<b>OF TEXAS</b>
<b>TRANSMISSION AND DISTRIBUTION</b>	<b>§</b>	
<b>SYSTEM RESILIENCY PLAN</b>	<b>§</b>	

**COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-47**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission’s Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that CenterPoint Energy Houston Electric, LLC by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission’s website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: February 11, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Marisa Lopez Wagley  
Division Director

John York Harrison  
Senior Managing Attorney

/s/ Anthony Kanalas  
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**DOCKET NO. 5**

**CERTIFICATE OF SERVICE**

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on February 11, 2025, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Anthony Kanalas  
Anthony Kanalas

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-47**

**DEFINITIONS**

- 1) "CenterPoint Energy Houston Electric, LLC" or "you" refers to CenterPoint Energy Houston Electric, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
  
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-47**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-47**

- Staff 1-1** What is the total estimated cost per month for the average residential Customer if all the proposed resiliency measures are approved? Show the calculation for this estimate.
- Staff 1-2** Provide the estimated cost per month for the average residential customer separately for each measure proposed. Show the calculation for these estimates.
- Staff 1-3** Please describe any measures that have some portion that are not paid for by the rate payers. Contributions to the cost could come from private investment at customer sites, tax credits and federal grants.
- Staff 1-4** Please provide the company's current Storm Hardening Plan in its entirety as provided by 16 TAC §25.95(d).
- Staff 1-5** Please provide company's current Vegetation Management Plan in its entirety as provided by 16 TAC §25.96(e).
- Staff 1-6** Please prioritize the resiliency measures in this proceeding in order of most critical for implementation. Does the order of prioritization follow the BAC values? If not, please explain why not. Please provide all available documentation supporting your response.
- Staff 1-7** Were there any resiliency measures that the company decided not to pursue?

**For each Specific Resiliency Program**

- Staff 1-8** Please provide all calculations used to determine the Capital and O&M cost estimates for the Distribution Circuit Resiliency (RM-1).
- Staff 1-9** Please provide all calculations used to determine the Capital and O&M cost estimates for the Strategic Undergrounding (RM-2).

- Staff 1-10** Please provide all calculations used to determine the Capital and O&M cost estimates for the Restoration IGSD (RM-3).
- Staff 1-11** Please provide all calculations used to determine the Capital and O&M cost estimates for the Distribution Pole Replacement/Bracing Program (RM-4).
- Staff 1-12** Please provide all calculations used to determine the Capital and O&M cost estimates for the Vegetation Management (RM-5).
- Staff 1-13** Please provide all calculations used to determine the Capital and O&M cost estimates for the Transmission System Hardening (RM-6).
- Staff 1-14** Please provide all calculations used to determine the Capital and O&M cost estimates for the 69kV Conversion Projects (RM-7).
- Staff 1-15** Please provide all calculations used to determine the Capital and O&M cost estimates for the S90 Tower Replacements (RM-8).
- Staff 1-16** Please provide all calculations used to determine the Capital and O&M cost estimates for the Coastal Resiliency Projects (RM-9).
- Staff 1-17** Please provide all calculations used to determine the Capital and O&M cost estimates for the Substation Flood Control (RM-10).
- Staff 1-18** Please provide all calculations used to determine the Capital and O&M cost estimates for the Control Center Flood Control (RM-11).
- Staff 1-19** Please provide all calculations used to determine the Capital and O&M cost estimates for the Major Underground Control and Monitoring System (RM-12).
- Staff 1-20** Please provide all calculations used to determine the Capital and O&M cost estimates for the Mobile Substation (RM-13).

- Staff 1-21** Please provide all calculations used to determine the Capital and O&M cost estimates for the Anti-Galloping Technologies (RM-14).
- Staff 1-22** Please provide all calculations used to determine the Capital and O&M cost estimates for the Load Shed IGSD (RM-15).
- Staff 1-23** Please provide all calculations used to determine the Capital and O&M cost estimates for the Microgrid Pilot Project (PP-1).
- Staff 1-24** Please provide all calculations used to determine the Capital and O&M cost estimates for the Distribution Capacity Enhancements/Substations (RM- 16).
- Staff 1-25** Please provide all calculations used to determine the Capital and O&M cost estimates for the MUG Reconductor (RM-17).
- Staff 1-26** Please provide all calculations used to determine the Capital and O&M cost estimates for the URD Cable Modernization (RM-18).
- Staff 1-27** Please provide all calculations used to determine the Capital and O&M cost estimates for the Contamination Mitigation (RM-19).
- Staff 1-28** Please provide all calculations used to determine the Capital and O&M cost estimates for the Substation Fire Barriers (RM-20).
- Staff 1-29** Please provide all calculations used to determine the Capital and O&M cost estimates for the Digital Substation (RM-21).
- Staff 1-30** Please provide all calculations used to determine the Capital and O&M cost estimates for the Wildfire Advanced Analytics (RM-22).
- Staff 1-31** Please provide all calculations used to determine the Capital and O&M cost estimates for the Wildfire Strategic Undergrounding (RM-23).
- Staff 1-32** Please provide all calculations used to determine the Capital and O&M cost estimates for the Wildfire Vegetation Management (RM-24).



- Staff 1-33** Please provide all calculations used to determine the Capital and O&M cost estimates for the Wildfire IGSD (RM-25).
- Staff 1-34** Please provide all calculations used to determine the Capital and O&M cost estimates for the Substation Physical Security Fencing (RM-26).
- Staff 1-35** Please provide all calculations used to determine the Capital and O&M cost estimates for the Substation Security Upgrades (RM-27).
- Staff 1-36** Please provide all calculations used to determine the Capital and O&M cost estimates for the Spectrum Acquisition (RM-28).
- Staff 1-37** Please provide all calculations used to determine the Capital and O&M cost estimates for the Data Center Modernization (RM-29).
- Staff 1-38** Please provide all calculations used to determine the Capital and O&M cost estimates for the Network Security & Vulnerability Management (RM-30).
- Staff 1-39** Please provide all calculations used to determine the Capital and O&M cost estimates for the IT/OT Cybersecurity Monitoring (RM-31).
- Staff 1-40** Please provide all calculations used to determine the Capital and O&M cost estimates for the Cloud Security, Product Security & Risk Management (RM-32).
- Staff 1-41** Please provide all calculations used to determine the Capital and O&M cost estimates for the Advanced Aerial Imagery Platform / Digital Twin (RM- 33).
- Staff 1-42** Please provide all calculations used to determine the Capital and O&M cost estimates for the Weather Stations (RM-34).
- Staff 1-43** Please provide all calculations used to determine the Capital and O&M cost estimates for the Wildfire Cameras (RM-35).

**Staff 1-44** Please provide all calculations used to determine the Capital and O&M cost estimates for the Voice and Mobile Data Radio System (RM-36).

**Staff 1-45** Please provide all calculations used to determine the Capital and O&M cost estimates for the Backhaul Microwave Communication (RM-37).

**Staff 1-46** Please provide all calculations used to determine the Capital and O&M cost estimates for the Emergency Operations Center (RM-38).

**Staff 1-47** Please provide all calculations used to determine the Capital and O&M cost estimates for the Hardened Service Centers (RM-39).