



## **Filing Receipt**

**Filed Date - 2025-07-30 09:52:29 PM**

**Control Number - 57579**

**Item Number - 282**



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July 30, 2025

Chairman Thomas J. Gleeson  
Commission Kathleen Jackson  
Commissioner Courtney K. Hjaltman  
Public Utility Commission of Texas  
1701 North Congress Ave., 7th Floor  
Austin, Texas 78701

RE: Docket No. 57579, *Application of CenterPoint Energy Houston Electric, LLC for Approval of its 2026-2028 Transmission and Distribution System Resiliency Plan*

Dear Chairman and Commissioners:

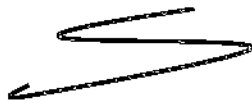
CenterPoint Energy Houston Electric, LLC (the Company) looks forward to the Public Utility Commission's consideration of its System Resiliency Plan (SRP) at the July 31st Open Meeting. Enclosed with this letter is a spreadsheet that provides a cost comparison of the Company's as-filed SRP with the settled-upon SRP that is currently before the Commissioners.

The following table summarizes the Resiliency Measures that were removed as part of the settled-upon SRP, the Resiliency Measures that have their costs reduced as part of the settled-upon SRP, and the Resiliency Measures where a portion of costs being recovered are being deferred into a fourth year as part of the settled-upon SRP.

	Resiliency Measure	Dollar Amount	Source
Removed	Transmission System Hardening (RM-6)	\$1.468 billion	Section C(6), Stipulation and Settlement Agreement; Pages 9-10, Testimony of Nathan Brownell in Support of the Stipulation and Settlement Agreement
	69 kV Conversion Projects (RM-7)	\$369.3 million	
	S90 Tower Replacements (RM-8)	\$118.4 million	
	Coastal Resiliency Projects (RM-9)	\$178.1 million	
	Substation Flood Control (RM-10)	\$43.8 million	
	Major Underground Control and Monitoring System (RM-12)	\$10.8 million	
	Mobile Substations (RM-13)	\$30 million	
	Wildfire Strategic Undergrounding (RM-23)	\$50 million	
	Microgrid Pilot Program (PP-1)	\$36.5 million	
	<b>Total</b>	<b>\$2.305 billion</b>	
Reduced	Distribution Circuit Resiliency (RM-1)	\$13.4 million	Section D(10), Stipulation and

	Strategic Undergrounding (RM-2)	\$23 million	Settlement Agreement; Page 11, Testimony of Nathan Brownell in Support of the Stipulation and Settlement Agreement
	Distribution Pole Replacement/Bracing Program (RM-4)	\$1.6 million	
	Vegetation Management (RM-5)	\$5.1 million	
	Distribution Capacity Enhancements/Substations (RM-16)	\$4.6 million	
	MUG Reconductor (RM-17)	\$120 million	
	URD Cable Modernization (RM-18)	\$53.4 million	
	Contamination Mitigation (RM-19)	\$50 million	
	<b>Total</b>	<b>\$271.1 million</b>	
Cost Recovery Deferral	Distribution Circuit Resiliency (RM-1)	\$50 million	Section F(17), Stipulation and Settlement Agreement; Page 12, Testimony of Nathan Brownell in Support of the Stipulation and Settlement Agreement
	Strategic Undergrounding (RM-2)	\$17 million	
	Distribution Pole Replacement/Bracing Program (RM-4)	\$40 million	
	Vegetation Management (RM-5)	\$25 million	
	Distribution Capacity Enhancements/Substations (RM-16)	\$85 million	
	MUG Reconductor (RM-17)	\$25 million	
	<b>Total</b>	<b>\$242 million</b>	

Thank you,



Sam Chang  
Enclosure

Docket 57579 - Application of CenterPoint Energy Houston Electric, LLC  
for Approval of its 2026 - 2028 Transmission and Distribution System Resiliency Plan  
As Filed vs Settlement Comparison by Resiliency Measure

RM #	Description	As Filed Total Cost (millions)	Settlement Years 1-3	Settlement Year 4	Settlement Total	Reduction/ Removal
1	Distribution Circuit Resiliency (RM-1)	513.4	450.0	50.0	500.0	13.4
2	Strategic Undergrounding (RM-2)	860.0	820.0	17.0	837.0	23.0
3	Restoration IGSD (RM-3)	107.8	107.8	-	107.8	-
4	Distribution Pole Replacement/Bracing Program (RM-4)	251.6	210.0	40.0	250.0	1.6
5	Vegetation Management (RM-5)	146.1	116.0	25.0	141.0	5.1
6	Transmission System Hardening (RM-6)	1,468.0	-	-	-	Removed
7	69 kV Conversion Projects (RM-7)	369.3	-	-	-	Removed
8	S90 Tower Replacements (RM-8)	118.4	-	-	-	Removed
9	Coastal Resiliency Projects (RM-9)	178.1	-	-	-	Removed
10	Substation Flood Control (RM-10)	43.8	-	-	-	Removed
11	Control Center Flood Control (RM-11)	7.0	7.0	-	7.0	-
12	Major Underground Control and Monitoring System (MUCAMS) (RM-12)	10.8	-	-	-	Removed
13	Mobile Substation (RM-13)	30.0	-	-	-	Removed
14	Anti-Galloping Technologies (RM-14)	15.0	15.0	-	15.0	-
15	Load Shed IGSD (RM-15)	4.6	4.6	-	4.6	-
PP-1	Microgrid Pilot Project (PP-1)	36.5	-	-	-	Removed
16	Distribution Capacity Enhancements/Substations (RM-16)	579.6	490.0	85.0	575.0	4.6
17	MUG Reconductor (RM-17)	245.0	100.0	25.0	125.0	120.0
18	URD Cable Modernization (RM-18)	128.4	75.0	-	75.0	53.4
19	Contamination Mitigation (RM-19)	150.0	100.0	-	100.0	50.0
20	Substation Fire Barriers (RM-20)	9.0	9.0	-	9.0	-
21	Digital Substation (RM-21)	31.8	31.8	-	31.8	-
22	Wildfire Advanced Analytics (RM-22)	0.9	0.9	-	0.9	-
23	Wildfire Strategic Undergrounding (RM-23)	50.0	-	-	-	Removed
24	Wildfire Vegetation Management (RM-24)	30.0	30.0	-	30.0	-
25	Wildfire IGSD (RM-25)	19.7	19.7	-	19.7	-
26	Substation Physical Security Fencing (RM-26)	18.0	18.0	-	18.0	-
27	Substation Security Upgrades (RM-27)	19.5	19.5	-	19.5	-
28	Spectrum Acquisition (RM-28)	42.0	42.0	-	42.0	-
29	Data Center Modernization (RM-29)	13.9	13.9	-	13.9	-
30	Network Security & Vulnerability Management (RM-30)	9.5	9.5	-	9.5	-
31	IT/OT Cybersecurity Monitoring (RM-31)	17.6	17.6	-	17.6	-
32	Cloud Security, Product Security & Risk Management (RM-32)	10.0	10.0	-	10.0	-
33	Advanced Aerial Imagery Platform/Digital Twin (RM-33)	20.4	20.4	-	20.4	-
34	Weather Stations (RM-34)	0.3	0.3	-	0.3	-
35	Wildfire Cameras (RM-35)	0.9	0.9	-	0.9	-
36	Voice & Mobile Data Radio System (RM-36)	20.9	20.9	-	20.9	-
37	Backhaul Microwave Communications (RM-37)	12.7	12.7	-	12.7	-
38	Emergency Operations Center (RM-38)	56.0	56.0	-	56.0	-
39	Hardened Service Centers (RM-39)	107.6	107.6	-	107.6	-
		\$ 5,754.1	\$ 2,936.1	\$ 242.0	\$ 3,178.1	\$ 2,576.0