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**SOAH DOCKET NO. 473-25-11558
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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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**HOUSTON COALITION OF CITIES’ FIRST REQUESTS FOR INFORMATION
AND FIRST REQUESTS FOR PRODUCTION TO CENTERPOINT ENERGY
HOUSTON ELECTRIC, LLC**

In connection with the Application of CenterPoint Energy Houston Electric, LLC (“the Company”) for Approval of its 2026-2028 Transmission and Distribution System Resiliency Plan, Houston Coalition of Cities (“HCC”) requests the following information within fifteen (15) days of receipt of these requests, unless shortened or extended by agreement of the parties.

It is further requested that the answers to the requests for information be made under oath and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by the Company, such changed answer should be submitted immediately as supplement to the Company’s original answer.

DEFINITIONS AND EXPLANATORY NOTES

1. When a request calls for identification of a “Person” or “Witness,” the identification shall include a name, employer name, job title, business address, and business telephone number.
2. The term “Document” is used in its broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms “document” and “documents” shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants’ reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms “non-privileged document” and “non-privileged documents” also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification of a “Document,” as defined herein, the identification should include the following:
 - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
 - b. the date of the document;
 - c. the title and/or ‘re’ of the document;
 - d. the subject matter of the document;
 - e. the full name and address of the recipient and every person who received copies of the document;

- f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
 - g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
5. The term “Studies” includes any Document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information with the subjects referred to in this proceeding.
6. The term “the Company” and “CEHE” includes CenterPoint Energy Houston Electric, LLC and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.
7. The term “Resiliency Plan” refers to the Transmission and Distribution System Resiliency Plan proposed in CenterPoint Energy Houston Electric, LLC’s application in this docket.

Respectfully submitted,

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By: /s/ Alton J. Hall, Jr.
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**COUNSEL FOR HOUSTON COALITION OF
CITIES**

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February 2025, a true and correct copy of the foregoing document was served upon on all parties of record by email, facsimile and/or First Class Mail in Docket 57579.

By: /s/ Alton J. Hall, Jr.
Alton J. Hall, Jr.

**HOUSTON COALITION OF CITIES' FIRST REQUESTS FOR PRODUCTION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

- 1-1. Provide the documents containing all reports, memos, and presentations containing, discussing, describing, and analyzing benchmarking studies, reports, presentations, etc., based on actual storm damage from 2020-2024 to validate the results of the modeling and analysis that help justify the different measures.

- 1-2. Provide, both separately by storm and in the aggregate of one or more storms to the extent maintained that way, the documents containing all reports, memos, and presentations containing, discussing, describing, and analyzing the benchmarking studies, reports, presentations, etc. on the performance of CEHE's system through the following events:
 - a. Hurricane Ike in 2008
 - b. The thunderstorm and wind event in 2013
 - c. The flooding in 2015
 - d. Hurricane Harvey in 2017
 - e. The microburst event in 2017
 - f. The ice storm in 2018
 - g. The tornadoes in 2019
 - h. Winter Storm Uri in 2021
 - i. Hurricane Nicholas in 2021
 - j. The tornado in 2022
 - k. The tornado in 2023
 - l. The microburst event in 2023.
 - m. The May 2024 Storms
 - n. Hurricane Beryl in 2024.

- 1-3. Provide, both separately by storm and in the aggregate of one or more storms to the extent maintained that way, the documents containing all reports, memos, and discussing, describing, and analyzing the CEHE post-storm forensic analyses through the following events:
 - a. Hurricane Ike in 2008
 - b. The thunderstorm and wind event in 2013
 - c. The flooding in 2015
 - d. Hurricane Harvey in 2017
 - e. The microburst event in 2017

- f. The ice storm in 2018
 - g. The tornadoes in 2019
 - h. Winter Storm Uri in 2021
 - i. Hurricane Nicholas in 2021
 - j. The tornado in 2022
 - k. The tornado in 2023
 - l. The microburst event in 2023
 - m. The May 2024 Storms
 - n. Hurricane Beryl in 2024.
- 1-4. Provide the documents containing all reports, memos, and presentations containing, discussing, describing, and analyzing the forensic analysis which indicated vegetation was the overwhelming primary cause for pole and wire failures and a significant cause of outages during Resiliency Events in the 2020-2024 period.
- 1-5. Provide the documents containing all reports, memos, and presentations containing, discussing, describing, and analyzing the need for flood control measures.
- 1-6. Provide the documents containing all reports, memos, and presentations containing, discussing, describing, and analyzing the need for wildfire control measures.
- 1-7. Provide the documents containing all reports, memos, and presentations containing, discussing, describing, and analyzing the need for substation physical security measures.
- 1-8. Provide the documents containing all reports, memos, and presentations containing, discussing, describing, and analyzing the need for cybersecurity measures.
- 1-9. Please provide copies of CEHE's right-of-way management plan for distribution lines and transmission lines.
- a. Provide budgeted costs for Right-of-Way Management for the last 10 years
 - b. Provide actual costs for Right-of-Way Management for the last 10 years
 - c. Provide budgeted costs for Right-of-Way Management for next 5 years with the Resiliency Plan
 - d. Provide budgeted costs for Right-of-Way Management for next 5 years without the Resiliency Plan.

- 1-10. Provide a list of industry standards and publications used to develop the Resiliency Plan.
- 1-11. Provide any presentations given to management or to the public concerning the Resiliency Plan development, implementation, and expectations.
- 1-12. Provide any presentations given to management concerning the different Resiliency Plan measures and recommendations.

**HOUSTON COALITION OF CITIES' FIRST REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

- 1-1. Identify the documents containing all reports, memos, and presentations memos, reports, presentations containing, discussing, describing, and analyzing the root cause analysis of any previously failed transmission poles that had previously been hardened. Additionally, please provide the following information related to the previously failed transmission poles:
 - a. Provide the date of the failures.
 - b. Provide the design criteria of those transmission poles that failed.
- 1-2. Please provide system SAIDI, SAIFI, and CAIDI values for the system over the last 10 years with the following details.
 - a. Non-major storm days
 - b. Major storm outages
 - c. Resiliency outages
 - d. Scheduled outages
 - e. Total outages
 - f. Peer comparisons.
- 1-3. Provide expected forecasts of system SAIDI, SAIFI, and CAIDI values for the next five years:
 - a. Show forecast without the Resiliency Plan investments
 - b. Show forecast with the Resiliency Plan investment.
- 1-4. Provide the expected impact of the Resiliency Plan on operations and maintenance expenses for each of the next five years
 - a. Totals by expenditure type
 - b. Increases by expenditure type
 - c. Decreases by expenditure type.