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**SOAH DOCKET NO. 473-25-11558
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APPLICATION OF CENTERPOINT	§	BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC	§	
FOR APPROVAL OF ITS 2026-2028	§	OF
TRANSMISSION AND DISTRIBUTION	§	
SYSTEM RESILIENCY PLAN	§	ADMINISTRATIVE HEARINGS

**HOUSTON COALITION OF CITIES’ THIRD REQUESTS FOR INFORMATION
AND THIRD 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.
 8. The term “IGSD” refers to Intelligent Grid Switching Devices.

Respectfully submitted,

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

**COUNSEL FOR HOUSTON COALITION OF
CITIES**

CERTIFICATE OF SERVICE

I hereby certify that on this 25th 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' THIRD REQUESTS FOR PRODUCTION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

- 3-1. Please provide documentation, presentation, or analysis supporting the need for the following projects:
 - a) RM-24 IGSD for wildfire mitigation;
 - b) RM-23 Wildfire Strategic Undergrounding;
 - c) RM-22;
 - d) RM-19;
 - e) RM-20 Substation Fire Barrier;
 - f) RM-21.
- 3-2. Please provide all documents regarding the need for aged cable replacement from 2010 to present.
- 3-3. Please provide any documentation, presentation or analysis of any pilot program/study implemented by CEHE for the following:
 - a) RM-22;
 - b) Use of IMCORP's Factory Grade Cable assessment;
 - c) Use of sensors described in RM-19.
- 3-4. Please provide documents, presentation or other investigation analyzing the use of flowable-fill to extend the life of the URD cables. Please also provide the estimated cost for flowable fill for URD cost and estimate cost per foot for cable replacement.
- 3-5. Provide evidence of competitive bids that resulted in the use of IMCORP's Factory Grade cable assessment technology.
- 3-6. Provide a copy of the manufacturer's warranty to perform the original manufacturer's standard for IMCORP's Factory Grade cable assessment.
- 3-7. Regarding RM-22 page 173 of the T&D System Resiliency Plan, CEHE states "With wildfires beginning to be a larger issue in Texas, the Company made a decision to add wildfire measures within the SRP." Please provide all reports, documents, presentations that support this decision.
- 3.8. Provide documentation evidencing competitive bidding for the sensors in RM-19.

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

- 3-1. Regarding RM-24, for a typical feeder not in a wildfire risk zone please provide the protocol and standard for installing IGSD for feeder.
- 3-2. Regarding IGSD utilized on CEHE's system please provide:
 - a) The type[s] of devices (reclose, GOAB, etc.);
 - b) Communication means for each type of device;
 - c) Total number of each type of device currently in service;
 - d) Number of devices CEHE installed between 2020 and 2024;
 - e) The protocol for deploying these devices between 2020 and 2024.
- 3-3. Regarding RM-17, please explain how replacing an existing underground cable improves resiliency for:
 - a) Tornado;
 - b) Microburst;
 - c) Highwind;
 - d) Derecho;
 - e) Hurricane;
 - f) Extreme Ambient Temperature- Heat;
 - g) Extreme Ambient Temperature- Freeze.
- 3-4. The IGSD separates a feeder or circuit in sections to allow for de-energization or re-energization of a portion of a circuit.
 - a) Describe the level of detail by area for PSPS
 - i. Substation area
 - ii. Zip code area
 - iii. Street level
 - b) How will the IGSD be used for a PSPS?
 - c) What is the expected frequency of switching IGSD for wildfire mitigation?
- 3-5. Regarding RM-22, provide line-item details for the capital costs, including, but not limited to software, hardware, and sensors.
- 3-6. Provide a list of undergrounded projects for wildfire mitigation (RM-23):
 - a) Provide street level maps of the overhead system to be undergrounded;
 - b) Provide analysis reports, documents to prioritize the specific project for undergrounding;
 - c) Provide the cost for each section of line to be undergrounded.
- 3.7 Please provide the protocol used to:
 - a) Determine a cable is in need for replacement;
 - b) Install the sensors in RM-19;
 - c) Determine the relay type used to replace a failure analog, copper-based protective relay prior to RM-21.

- 3-8. Provide the design standard for fire barriers:
 - a) Thermal withstand;
 - b) Dynamic strength.
- 3-9. Provide the total number of analog, copper-based protective relays purchased by CEHE in the last 5 years, including, the model number and unit costs.
- 3-10. Regarding RM-17, provide CEHE's budget and actual costs for the replacement of aged cable at risk of failure.
- 3-11. Provide a detailed list of field-testing methods used by CEHE to determine when to replace aged cable.
- 3-12. Are any of the cable sections in RM-17 to be replaced a strict radial feed with no alternative feed?
 - a) Provide maps for each such cable section;
 - b) Provide the justification for the cable replaced:
 - i. Provide evidence of the cable age;
 - ii. Provide evidence of the cable failure rates;
 - iii. Provide evidence of the cable testing results.
- 3-13. CEHE states on page 160 that the performance improvement on the URD loops assessed and repaired is approximately 65%. Explain how a performance of 65% is an accessible performance level and if the IMCORP's Factory Grade cable assessment technology is providing a warranty for the cable why is the performance not 100%?
- 3-14. As described in RM-17, has CEHE included any work on cable replacement in prior rate cases? If so, provide the annual costs from 2015 to present that was included in those rate cases.
- 3-15. Provide priorities to determine which RUD systems are tested for possible replacement and provide details of the prioritization of cable loops.
- 3-16. Provide manufacturer's details of the sensors to be installed in RM-19 and the unit cost for the sensors.
- 3-17. Provide details costs for the total capital budget of \$144.0 million in RM-19, including, but not limited to the number of sensors, cost per sensors, and communication costs.

- 3-18. Provide a 10-year history of outages due to salt contamination flashovers which RM-19 proposes to mitigate and the projected reduction in flashes with the installation of sensors.
- 3-19. Provide the cost for power washing insulators, including,
 - a) Actual unit cost each of the last 5 years;
 - b) Actual annual expenditure for each of the last 5 years;
 - c) Actual number of units washed (Insulators, mile of line or similar units);
 - d) Estimated unit cost for 2026-2028;
 - e) Estimated annual expenditure for 2026-2028;
 - f) Projected number of units washed for 2026-2028.
- 3-20. Provide standards for new substation construction which demonstrate the protocol for installing fire barriers in new substations.
- 3-21. Regarding Substation Fire Barriers:
 - a) Provide a list of all substations with fire barriers currently installed;
 - b) Provide the total number of substations in service on CEHE's system.
- 3-22. Provide a list of substations from 2015 to the present:
 - a) For each provide the duration that the substation was out of service;
 - b) Provide the CI and CMI for each event.
- 3-23. Regarding RM-20 fire barriers, provide priority ranks of substation that are proposed to be modified with fire barriers and describe the protocol for the fire barrier.
- 3-24. Provide CEHE's actual costs for relay replacements for the years 2015 through 2024 and confirm these costs were included in the base rates.
- 3-25. For the substation slated for relay upgrades (RM-21), please provide the year the substation was originally constructed, the age of the power transformer, and high-side breaker.
- 3-26. Page 173 of the T&D System Resiliency Plan, CEHE states, "The Company has identified and is proposing four extreme temperature (drought) wildfire Resiliency Measures:"
 - a) Provide details of each measure;
 - b) Provide annual capital cost for each measure;
 - c) Provide documentation on the use of these measures in other jurisdictions.
- 3-27. Please provide the protocols used in CEHE's Public Safety Power Shutoff (PSPS) program, including, but limited to documentation regarding each occurrence when a PSPS has been used including date and duration of outage and number of customers affected.

- 3-28. Page 179 of the T&D System Resiliency Plan CEHE states “The Company will implement the Wildfire IGSD Installation Resiliency Measure if, under Good Utility Practice and in the Company’s engineering and operational judgment.”
- a) Describe Good Utility Practice as used in the deployment of IGSD for wildfire mitigation
 - b) Provide documentation, training materials, or other guidance provided to CEHE’s engineering staff or contractors with regard to engineering and operational judgement for the deployment of IGDS.