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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

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.’S FIRST SET OF REQUESTS
FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Electric Reliability Council of Texas, Inc. (ERCOT) serves this First Set of Requests for Information (“RFT”) on CenterPoint Energy Houston Electric, LLC (CEHE). Under 16 Tex. Admin. Code § 22.144, responses to ERCOT’s First Set of RFIs are due within the time frame specified by the procedural schedule set in this proceeding.

DEFINITIONS

The following definitions apply to each of the RFIs, instructions, and definition set forth in this document:

1. The term “ERCOT” shall mean Electric Reliability Council of Texas, Inc.
2. The term “Commission” shall mean the Public Utility Commission of Texas.
3. “CEHE” or “Company” refers to CenterPoint Energy Houston Electric, LLC.
4. “Documents” refers to all writings and records of every type, including e-mails or other electronic media, in the possession, control, or custody of CEHE, whether produced or stored by any process, including magnetically or electronically. “Documents” shall also refer to copies of documents, even though the originals of those documents are not in the possession, custody, or control of CEHE, every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy, and all attachments to any documents.
5. “Regional Planning Group” or “RPG” refers to the ERCOT group tasked with issues related to planning the ERCOT system for reliable and efficient operation.
6. “System Resiliency Plan” refers to the 2026-2028 Transmission and Distribution System Resiliency Plan proposed in CEHE’s application in this docket.

7. “Qualified Change” refers to the term as described in FAC-002-4 R6 and ERCOT Planning Guide Section 5.2.1(1)(c).
8. Any term not specifically defined herein shall have the meaning set forth in Section 2 of the ERCOT Protocols.
9. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, ERCOT specifically requests production of electronic or magnetic data (included in the definition of document) that is responsive to a request be produced on CD-ROM, DVD, or USB in a format that is compatible with Adobe Acrobat, Microsoft Word, or Microsoft Excel. If a particular type of data cannot be made compatible with these formats, please confer with the attorney(s) listed in the General Instructions to determine a mutually agreeable format.
10. The term “concerning” includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

GENERAL INSTRUCTIONS

The following General Instructions apply to each of the RFIs by ERCOT:

1. Please provide all narrative responses in hard copy, on separate pages for each response, with the question restated at the top of the page. Where possible, please also provide responses via e-mail including all exhibits that are electronically available.
2. For each responsive answer, please identify the individual(s) responsible for its preparation, and the witness sponsoring the answer provided.
3. If a data request can be answered in whole or in part by reference to the response to a preceding or subsequent data request, including data requests of Commission Staff and other parties, so indicate. Specify the preceding or subsequent data request by participant or party and by number, and state whether it is claimed that the response to the preceding or subsequent data request is a full response to the instant data request. If not, furnish the

balance of the response needed to complete a full reply.

4. In the event any document requested in this request is unavailable, describe in detail the reasons the document is unavailable.
5. When an RFI requests copies of previously filed testimony, please provide either: (a) an electronic or paper copy of the testimony itself; or (b) sufficient information for ERCOT to retrieve the testimony from a publicly available source, including: (i) the jurisdiction in which the testimony was filed; (ii) the docket number of the proceeding in which the testimony was filed; (iii) the date the testimony was filed; and (iv) if available, an electronic link to the testimony itself, rather than just a link to the jurisdiction's website.
6. When producing documents pursuant to these RFIs, designate on the document or group of documents the RFI(s) in response to which the document(s) are produced.
7. These data requests are continuing in nature and require supplemental responses when further or different information with respect to any of them is obtained.
8. Use of the singular or plural word form in a data request is not to be interpreted to exclude information or documents from the scope or intent of the specific request.
9. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these requests any information or documents which might otherwise be considered to be beyond their scope.
10. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:
 - (a) the reason for withholding;
 - (b) the date of the document;
 - (c) a brief description of the document;
 - (d) the name of each author or preparer;
 - (e) the name of each person who received the document; and
 - (f) a statement constituting the basis for withholding the document.
11. If CEHE declines to respond to any request for information or data on the basis of privilege, please state as to each such request an explanation for the refusal. Identify those

documents and communications that are withheld from the response to each specific data request. The identification shall be served within the time specified by the presiding examiner for this proceeding and in accordance with the Rules of the Commission, and shall:

- (a) specify the date of the document, its author(s) (with title and designation if an attorney), and recipients (with title and designation if an attorney);
- (b) contain a brief summary of the subject matter of the document; and
- (c) contain a brief statement of the reason that, in your opinion, the assertion of privilege is justified.

12. Please provide data responses as they become available.

Dated: February 25, 2025

Respectfully submitted,

/s/ Katherine Gross

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ATTORNEYS FOR ELECTRIC
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INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record to this proceeding on February 25, 2025, by email, in accordance with the Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/ Katherine Gross

Katherine Gross

ERCOT'S FIRST SET OF REQUESTS FOR INFORMATION TO CEHE

ERCOT 1-1:

Please state whether CEHE intends to fully comply with the ERCOT Protocols, including Outage Coordination requirements, with respect to the resiliency measures identified in CEHE's Resiliency Plan. If so, please describe the steps CEHE intends to take to do so.

ERCOT 1-2:

Please state whether CEHE intends to fully comply with the ERCOT Protocols and Planning Guide, including Regional Planning Group (RPG) requirements, with respect to the resiliency measures identified in CEHE's Resiliency Plan. If so, please describe the steps CEHE intends to take to do so.

ERCOT 1-3:

Please state whether CEHE expects any of the transmission changes identified in CEHE's Resiliency Plan to constitute "qualified changes" under North American Electric Reliability Council (NERC) Reliability Standard FAC-002-4. If so, please describe the steps CEHE intends to take to coordinate and cooperate on studies as required by FAC-002-4 and as detailed in the ERCOT Protocols and Planning Guide, including specifically RPG requirements.

ERCOT 1-4:

Please state whether CEHE intends to fully comply with the ERCOT Protocols and Planning Guide requirements concerning the submission of all future transmission projects in ERCOT planning and operations models. If so, please describe the steps CEHE intends to take to do so.