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**APPLICATION OF CENTERPOINT
ENERGY HOUSTON ELECTRIC, LLC
FOR APPROVAL OF ITS 2026-2028
TRANSMISSION AND DISTRIBUTION
SYSTEM RESILIENCY PLAN**

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**BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS**

**HUNT ENERGY NETWORK LLC'S
FIRST SET OF REQUESTS FOR INFORMATION TO
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Hunt Energy Network L.L.C. (“HEN”) requests that CenterPoint Energy Houston Electric, LLC (“CenterPoint”) fully respond to the attached set of requests for information (“RFIs”) within fifteen (15) working days pursuant to the Agreed Proposed Procedural Schedule filed by CenterPoint on February 24, 2025.

Responses to these RFIs shall conform in all respects to the Public Utility Commission of Texas’s rules, including the requirement in 16 TAC § 22.144(c)(2)(F) that they be made under oath. Responses shall identify the preparer or person under whose direct supervision each response was prepared, and the sponsoring witness, if any. Each request shall be answered separately; responses shall be preceded by the request to which the answer pertains.

Any information responsive to and any questions regarding these requests should be directed to the undersigned.

Respectfully Submitted,

By /s/ Marty Hopkins

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**ATTORNEY FOR HUNT ENERGY NETWORK,
L.L.C**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been forwarded to all parties of record in this proceeding via electronic mail on this 27th day of February, 2025, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Melvena Rhetta-Fair

HEN'S FIRST REQUEST FOR INFORMATION TO CENTERPOINT

General Instructions

1. In responding to each request, please provide information available from all corporate and individual files, as well as from all past and present employees, officers, and board members and all predecessors and affiliates, as defined below.
2. These requests are continuing in nature and require supplemental responses in accordance with 16 TAC § 22.144(i).
3. If any information is not available in the exact form requested, provide whatever information or documents that best respond to the request.
4. If the requested information or data is available for only part of the period requested or otherwise incomplete, please provide available information or data.
5. If any request appears unclear or ambiguous, please contact counsel for HEN as soon as possible to obtain clarification.
6. Each document of more than one page should be stapled or otherwise bound, and the individual pages numbered consecutively.
7. If, in the case of any request seeking documents, there are no responsive documents, so state and provide a narrative answer to the request.
8. The terms “and” and “or” should be construed either disjunctively or conjunctively whenever appropriate to bring within the scope of each RFI information or documents which might otherwise be considered to be beyond its scope.
9. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate, to bring within the scope of each RFI information or documents that might otherwise be considered to be beyond its scope.
10. When the recipient of the RFI is requested to provide a study, schedule, or analysis, it should also provide the workpapers, underlying facts, inferences, suppositions, estimates, and conclusions necessary to support each study, schedule, or analysis.
11. If the actual data is unavailable, but estimates or approximations are available, provide the estimates or approximations that are the best available information and explain the procedure for developing the information supplied.
12. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, HEN specifically request that any electronic or magnetic information (which is included in the definition of

HEN'S FIRST REQUEST FOR INFORMATION TO CENTERPOINT

“document”) that is responsive to a request herein be produced in a format that is compatible with Adobe Acrobat, Microsoft, and/or Macintosh and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable pdf copy of the entire email string. Attachments to emails should be provided with the email in searchable pdf form, unless it is stored in a different format, in which case the attachment should be produced in its native format.

HEN'S FIRST REQUEST FOR INFORMATION TO CENTERPOINT

HEN 1-1.

Please refer to PDF page 167 of the System Resiliency Plan. Please explain what technology and infrastructure are included in a “utility scale microgrid.”

HEN 1-2.

Please refer to PDF page 170 of the System Resiliency Plan. How will microgrids address load rotation challenges?

HEN 1-3.

Please refer to PDF page 176 of the System Resiliency Plan. What “external stakeholders” will be involved in the Microgrid Pilot Program design?

HEN 1-4.

Please refer to PDF page 176 of the System Resiliency Plan. What specifically will enable the Microgrid Pilot to “leverage the creation of an island to serve localized customers from an independent generator?”

HEN 1-5

Please refer to PDF page 177 of the System Resiliency Plan. Please identify and explain the “third-party interest and support” that CenterPoint has received in the development of utility-scale microgrids.

HEN 1-6

Regarding the Microgrid Pilot Program process: How would independent distributed generation resources bid for interconnection to a microgrid? May independent distributed generation resources submit RFPs for inclusion in the Study, Design and Engineering phase—or other phase—of the Microgrid Pilot Program?

HEN 1-7

Please refer to Figure SRP-83 Microgrid Pilot Program (PP-1). Please provide a detailed breakdown of expenses included in and workpapers associated with the estimated capital costs of \$35.0 million.

HEN'S FIRST REQUEST FOR INFORMATION TO CENTERPOINT

HEN 1-8

Please refer to Figure SRP-83 Microgrid Pilot Program (PP-1). Please provide a detailed breakdown of expenses included in and workpapers associated with the estimated O&M expense of \$1.5 million.