



## **Filing Receipt**

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**SOAH DOCKET NO. 473-25-11558  
PUC DOCKET NO. 57579**

<b>APPLICATION OF CENTERPOINT</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>ENERGY HOUSTON ELECTRIC, LLC</b>	<b>§</b>	
<b>FOR APPROVAL OF ITS 2026-2028</b>	<b>§</b>	<b>OF</b>
<b>TRANSMISSION AND DISTRIBUTION</b>	<b>§</b>	
<b>SYSTEM RESILIENCY PLAN</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**OFFICE OF PUBLIC UTILITY COUNSEL’S  
FIRST REQUEST FOR INFORMATION TO  
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this First Request for Information to CenterPoint Energy Houston Electric, LLC (“CenterPoint”). OPUC requests that CenterPoint provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that CenterPoint provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

**Definitions**

1. “CenterPoint,” the “Company,” “Applicant,” “You,” and “Your” refer to CenterPoint Energy Houston Electric, LLC and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
2. “Document” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial

practice manuals, reports, summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.

8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.
9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.

14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.
15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

#### **Claim of Privilege**

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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**OPUC's First Request for Information to**  
**CenterPoint Energy Houston Electric, LLC**

- OPUC 1-1** Please refer to Exhibit ELS-2, pages 101-102 (bates pages 1256-1257) concerning the 69 Kilovolt (“kV”) - 138 kV Conversion Measure RM-7, and answer the following questions:
- a. How many of the 14 targeted circuits are currently de-energized;
  - b. How many 69 kV circuits have been converted to 138 kV;
  - c. How many 69 kV circuits will need to be converted after the 14 targeted circuits are converted; and
  - d. Which of the 14 targeted circuits are high loading and directed toward downtown Houston?
- OPUC 1-2** Please refer to Exhibit ELS-2, pages 116-118 (bates pages 1271-1273) concerning the Control Center (“AOC”) Flood Control Measure RM-11, and answer the following questions:
- a. Please provide the October 2019 engineering report prepared for CenterPoint concerning this proposed project;
  - b. Please provide the relative location of the dam to the AOC;
  - c. What is the reservoir’s impoundment volume;
  - d. Is the dam equipped with an emergency spillway;
  - e. Has CenterPoint reviewed inspection reports for the dam;
  - f. Has CenterPoint or engineers acting on its behalf inspected the dam;
  - g. Please list all instances of the dam being overtopped;
  - h. Please list all instances and nature of repairs to the dam in the past 10 years;
  - i. Please state the entity or entities that own and maintain the dam;
  - j. Does CenterPoint have any concern with the dam’s integrity other than its age;
  - k. Did CenterPoint investigate remedial or improvement works to the dam such as:
    1. Remedial repairs to the dam;
    2. Raising the height of the dam;
    3. Reconfiguring or adding emergency spillways; and
  - l. What is the likelihood of a dam breach and who made this assessment?

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- OPUC 1-3** Please refer to Exhibit ELS-2, pages 134-137 (bates pages 1289-1292) concerning the Distribution Capacity Enhancement/Substations Measure RM-16, and answer the following questions:
- a. Please provide a breakdown of the costs for:
    1. New distribution substations;
    2. Substation capacity enhancements;
    3. New distribution circuits;
    4. Distribution circuit conversions from 12.47 kV to 34.5 kV; and
  - b. Do any of these projects serve the Texas Medical Center?
- OPUC 1-4** Please refer to Exhibit ELS-2, pages 145-147 (bates pages 1300-1302) concerning the Substation Transformer Fire Protection Barriers Measure RM-20, and answer the following questions:
- a. Please list the number and location of substation transformer fires incurred by CenterPoint since 2010;
  - b. Please explain whether any transformer fire protection barriers were present in any of the fires listed above, and, if so, identify which incidents; and
  - c. Please explain whether any of the transformer incidents listed above resulted in adjacent transformer fires? If so, please identify which incidents?
- OPUC 1-5** Please refer to Exhibit ELS-2, pages 121-124 (bates pages 1276-1279) concerning the Mobile Substation Measure RM-13, and answer the following questions:
- a. How many mobile substations does CenterPoint currently own or operate;
  - b. How many substations did CenterPoint deploy due to Hurricane Beryl; and
  - c. Please explain how CenterPoint determined that it needed specifically six additional mobile substations?
- OPUC 1-6** Please refer to Exhibit ELS-2, pages 228-229 (bates pages 1383-1384) concerning the Hardened Service Centers Measure RM-39, and answer the following questions:
- a. Please confirm or deny that the four proposed service centers are at locations other than the locations of existing service centers;

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- b. Please describe what facilities and functions will be located at the proposed service centers;
- c. What is CenterPoint's planned usage and disposition of the existing service centers, if any;
- d. How many existing service center locations does CenterPoint currently operate; and
- e. What aspects of the existing service centers cannot be upgraded or hardened?

**OPUC 1-7** Please refer to the Direct Testimony of Mr. Jeff W. Garmon at 10:9-12:21 (bates pages 898-900), and answer the following questions:

- a. Other than what is allowed under PURA § 38.078, please explain why CenterPoint is seeking to defer Vegetation Management-related operation and maintenance ("O&M") costs associated with its System Resiliency Plan ("SRP") for recovery as a regulatory asset as opposed to using the Resiliency Cost Recovery Rider ("RCRR") option;
- b. Is it more or less profitable to CenterPoint to defer Vegetation Management-related O&M costs associated with its SRP for recovery as a regulatory asset as opposed to using the RCRR option;
  - 1. If it would be more profitable, please explain why, and by what amount;
  - 2. If it would be less profitable, please explain why, and by what amount?

**OPUC 1-8** Please identify any other sources of funding, including federal grants, that CenterPoint has pursued to finance any resiliency measures identified in this application and identify for each source:

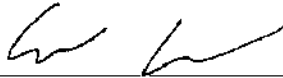
- a. The date of the application;
- b. Whether the funding was approved or denied;
- c. The amount of funding requested;
- d. The amount of funding approved; and
- e. The date funding was or will be available?



Date: March 3, 2025

Respectfully submitted,

Benjamin Barkley  
Chief Executive and Public Counsel  
State Bar No. 24092083



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Connor Drysdale  
Assistant Public Counsel  
State Bar No. 24143982

Sharbel A. Sfeir  
Assistant Public Counsel  
State Bar No. 24071204

Justin Swearingen  
Senior Assistant Public Counsel  
State Bar No. 24096794

Chris Ekoh  
Deputy Public Counsel  
State Bar No. 06507015

1701 N. Congress Avenue, Suite 9-180  
P.O. Box 12397

Austin, Texas 78711-2397

512-936-7500 (Telephone)

512-936-7525 (Facsimile)

connor.drysdale@opuc.texas.gov (Service)

sharbel.sfeir@opuc.texas.gov (Service)

justin.swearingen@opuc.texas.gov (Service)

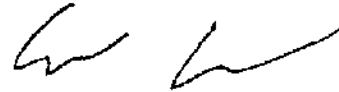
chris.ekoh@opuc.texas.gov (Service)

opuc\_eservice@opuc.texas.gov (Service)

**ATTORNEYS FOR THE  
OFFICE OF PUBLIC UTILITY COUNSEL**

**CERTIFICATE OF SERVICE**  
SOAH DOCKET NO. 473-25-11558  
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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 3<sup>rd</sup> day of March 2025 by facsimile, electronic mail, and/or first class, U.S. Mail.



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Connor Drysdale