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February 3, 2025

Public Utility Commission of Texas
1701 North Congress Avenue
Austin, Texas 78701

RE: Docket No. 57579, *Application of CenterPoint Energy Houston Electric, LLC for Approval of its 2026-2028 Transmission and Distribution System Resiliency Plan*

Public Utility Commission of Texas:

To assist with customer, community, and stakeholder review of CenterPoint Energy Houston Electric, LLC's (the Company) System Resiliency Plan (SRP) filed in the above-referenced docket, the Company has established the following website:

<https://www.centerpointenergy.com/en-us/corporate/about-us/system-wide-resiliency-plan>

The website provides information on the Company's SRP and includes the enclosed SRP overview and SRP fact sheet.

Thank you,

A handwritten signature in black ink, appearing to be "S Chang", written in a cursive style.

Sam Chang
Enclosures

Systemwide Resiliency Plan Overview

Our Path to Becoming the Most Resilient Coastal Grid in the Country

CenterPoint Energy is pleased to present the following 2026-2028 Systemwide Resiliency Plan, detailing our efforts to build the most resilient coastal grid in the country.

CenterPoint's daily responsibility is to provide reliable and resilient energy to more than 2.8 million residential, commercial and industrial customers across the 12-county Greater Houston area, including over 5,000 square miles and the largest city in Texas, the fourth-largest city in the country, and the world's energy capital. We help deliver energy to one of the fastest growing population centers in the nation, as well as some of the largest medical and petrochemical complexes in the world, two international airports and one of the nation's largest container ports. All these factors demand an electric system that is stronger, self-healing and more resilient against the challenges of the future.



A map of CenterPoint Energy's 12-county Greater Houston service area.

CenterPoint Energy Houston Electric's 2026-2028 Systemwide Resiliency Plan is designed to help the Greater Houston area to prepare for and mitigate the impacts of extreme weather such as more powerful storms, hurricanes, wind events, like derechos, flooding, extreme temperatures, tornadoes, wildfires and winter storms. Because each of these weather hazards can affect our customers, our infrastructure and our economy in different ways, our Resiliency Plan includes a wide range of specific actions to address the variety of threats and impacts facing the electric grid and the communities it serves.

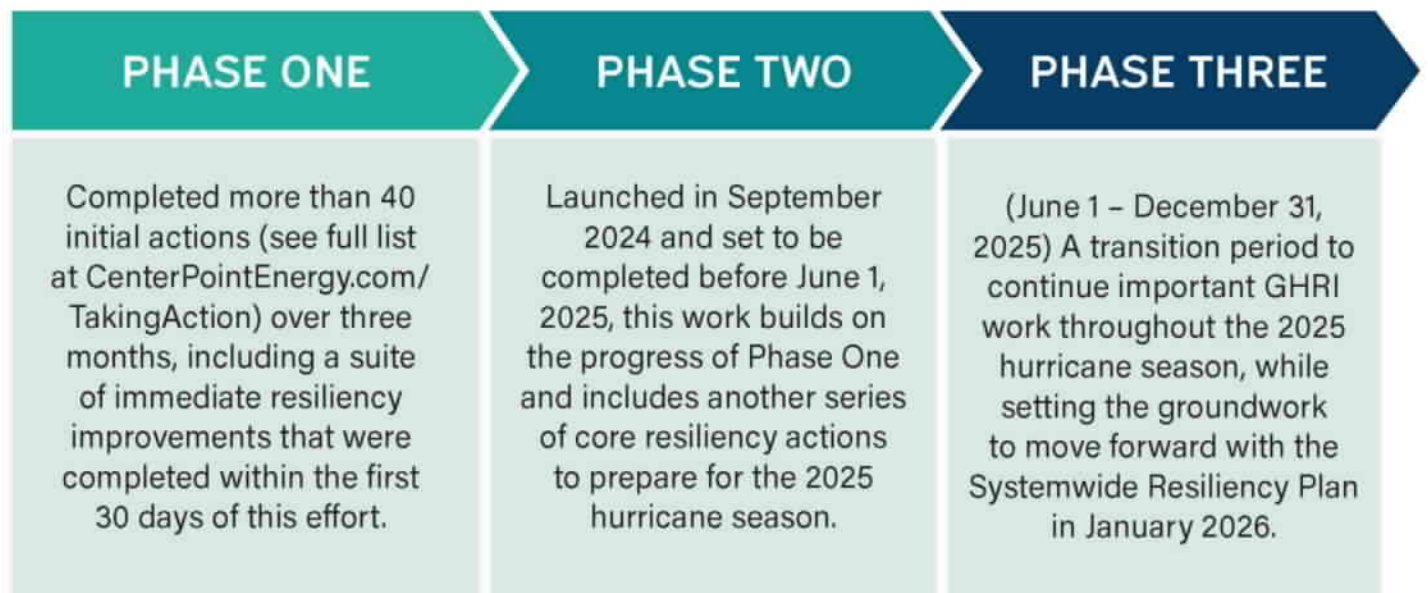
As the population, economy and energy needs of our region change and grow, so do the challenges we face from a range of extreme weather threats of the future. For example, data from the National Oceanic and Atmospheric Administration and the Federal Emergency Management Agency (FEMA) show that the Greater Houston area faces the highest weather and climate hazard risk of any major metro area in the country. In addition, there are more FEMA-designated "disaster resilience zones" across Harris County than any other county in the United States.

These realities represent the driving force behind our proposed 2026-2028 Systemwide Resiliency Plan. To effectively prepare for these evolving weather risks and mitigate future impacts on our customers and communities, it is clearer than ever before that it is vital to act now to strengthen and enhance the overall resiliency of the electric system and reduce the impacts of outages for our customers.

Building a Stronger, More Resilient, Self-Healing Grid of the Future

As the energy capital of the world, our customers deserve an energy system that is safe, reliable, cost-effective and resilient when they need it most. Our enhanced Systemwide Resiliency Plan will build upon the progress made through the Greater Houston Resiliency Initiative (GHRI).

Launched in August 2024, GHRI comprises a series of resiliency actions across three critical phases:



As of January 2025, CenterPoint’s ongoing GHRI initiative has:

- Installed more than 10,600 stronger, more storm-resilient poles designed to withstand extreme winds;
- Cleared more than 3,400 miles of hazardous vegetation near power lines to improve reliability;
- Installed more than 370 self-healing automation devices to minimize the duration and impact of outages and help improve overall restoration times; and
- Undergrounded nearly 200 miles of power lines.

These targeted efforts have already made our company, the grid and our communities better prepared for winter storms and the next hurricane season. Our entire CenterPoint team will continue working every day to provide the service our customers expect and deserve when extreme weather strikes.

About Our Enhanced Systemwide Resiliency Plan

Building upon the first three phases of GHRI, CenterPoint's long-term **Systemwide Resiliency Plan (SRP)** includes a series of long-term actions to be completed between 2026-2028 to address the growing and evolving series of extreme weather and other threats facing the Greater Houston area. The plan is designed to build the resilient electrical grid of the future that can better withstand more powerful storms, high wind events and extreme weather. To meet the extreme weather challenges of the future, the proposed \$5.75 billion SRP represents the largest single grid resiliency investment in CenterPoint's history. Once completed, **the wide range of resiliency measures outlined in the SRP are expected to provide a series of important customer benefits**, including:

Reducing Outage Impacts

Reducing power outages following storms or extreme weather by **1.3 billion minutes into 2029**

Strengthening Overall Resiliency:

Improving systemwide resiliency by 30% for all our customers

Meeting Future Energy Demand: Expanding the capacity of our system to meet our region's population growth and rising energy demand

Reducing Costs: Saving on storm-related costs of approximately \$50 million per year

Improving Major Storm Resiliency: Avoiding outages for more than 500,000 customers in the event of another Beryl-like storm

Given the threat posed by future extreme weather across the Greater Houston area, the 2026-2028 Systemwide Resiliency Plan is designed to help prepare for and mitigate the grid impacts of a broad series of extreme weather events, including more powerful storms, hurricanes, wind events, like derechos, flooding, extreme temperatures, tornadoes, wildfires and winter storms.

The bold actions outlined in CenterPoint's SRP are designed to benefit customers across the entire service area, with a specific focus on customers in higher-risk areas. When complete, this suite of resiliency actions, combined with CenterPoint's normal operations, are expected to achieve the following improvements:



Automation Devices: 100% of lines that provide power to most of our customers will include devices capable of self-healing to reduce the impact of outages



Secure Substations: 99% of substations will be elevated above the 500-year flood plain



Stronger Distribution Poles: 130,000 stronger, more storm-resilient poles (rated to 110 mph and 132 mph) will be installed new, or replaced or braced to withstand stronger storms



Undergrounding: More than 50% of the system will be undergrounded to improve resiliency



Vegetation Management: Deploying an industry-leading, three-year vegetation management cycle, with 100% of power lines cleared of hazardous vegetation every three years



Stronger Transmission Towers: 2,200+ transmission structures will be rebuilt or upgraded to be able to better withstand extreme weather while improving overall reliability



Modernized Cables: 34,500 spans of underground cables will be modernized to reduce the frequency and impact of outages

Key Resiliency Actions and Improvements

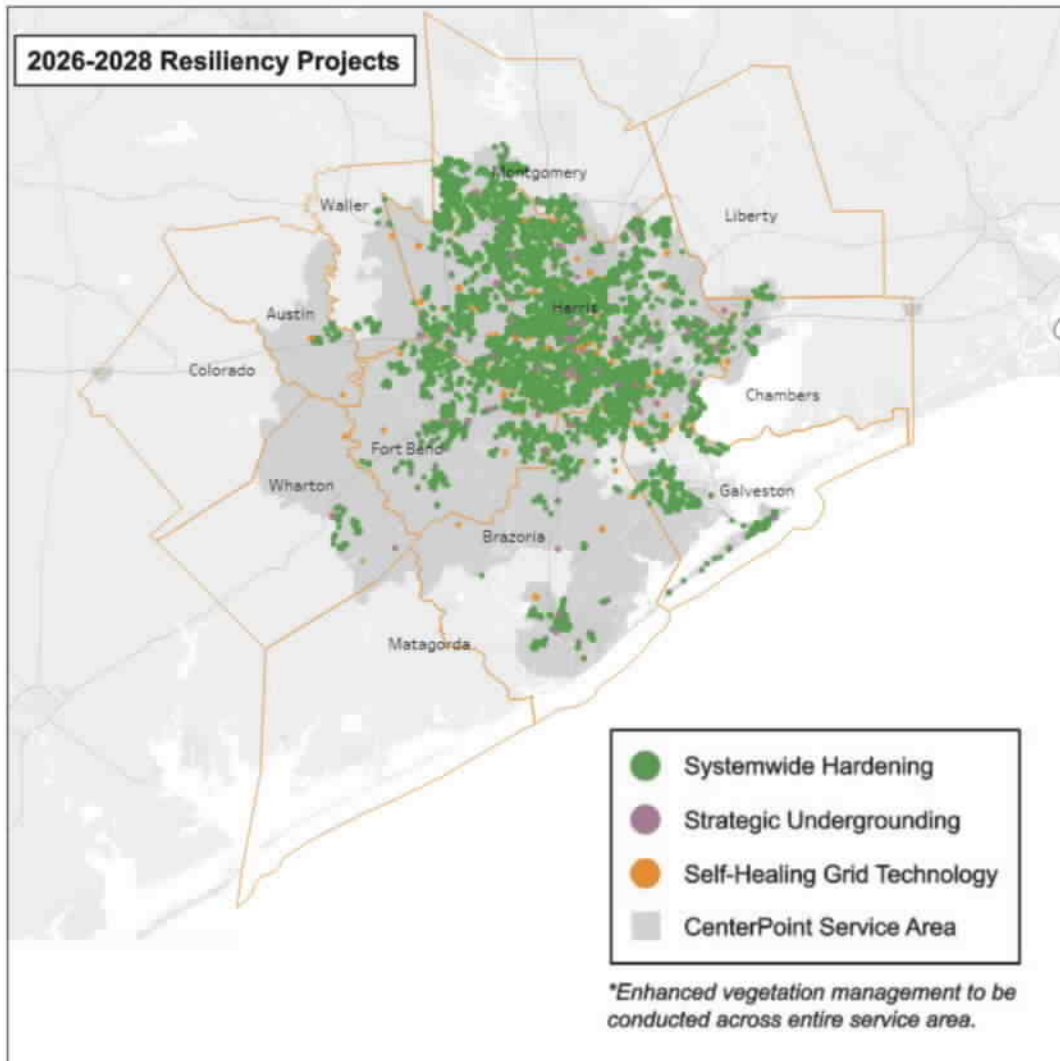
Some of the additional key actions and resiliency measures CenterPoint is proposing to harden the electric system, modernize the grid and make other critical improvements to the resiliency of the system for our customers are detailed below. From inner city to rural, suburban and all corners in between, each of these resiliency actions outlined in the SRP are expected to have clear and specific benefits for our 2.8 million customers and will help build the more resilient transmission and distribution system that will prove vital to meeting the extreme weather challenges of the future.

Category	Resiliency Action	Improvements and Benefits
Systemwide Hardening	Rebuild and upgrade approximately 25,000 poles and crossarms	<ul style="list-style-type: none"> ▪ Improve structural integrity and wind-loading capability ▪ Reduce the frequency, customer impact and duration of outages
	Replace or brace approximately 30,000 wooden distribution poles	<ul style="list-style-type: none"> ▪ Improve structural integrity and wind-loading capability ▪ Reduce the frequency, customer impact and duration of outages
	Replace or upgrade 1,715 wooden transmission structures with steel or concrete structures	<ul style="list-style-type: none"> ▪ Improve structural integrity and wind-loading capability ▪ Reduce the frequency, customer impact and duration of outages
	Rebuild 462 transmission structures to handle an increase in electricity	<ul style="list-style-type: none"> ▪ Create additional capacity during extreme weather
	Build additional transmission circuits and underwater cables in coastal areas	<ul style="list-style-type: none"> ▪ Mitigate loss of transmission during extreme weather
	Elevate 12 substations	<ul style="list-style-type: none"> ▪ Mitigate flood risk
	Install additional substations and distribution capacity	<ul style="list-style-type: none"> ▪ Improve restoration times ▪ Reduce the customer impact and duration of outages
Strategic Undergrounding	Install 111 miles of underground lines to replace overhead lines at freeway crossings and in hard-to-access areas	<ul style="list-style-type: none"> ▪ Improve structural integrity ▪ Reduce frequency, customer impact and duration of outages
Self-Healing Grid Technology	Install approximately 900 devices that utilize automation to respond to outages faster	<ul style="list-style-type: none"> ▪ Improve restoration times ▪ Reduce customer impact of outages
Vegetation Management	Transition from five-year to three-year trim cycle across 11,700 miles of distribution circuits	<ul style="list-style-type: none"> ▪ Reduce frequency, customer impact and duration of outages ▪ Reduce system restoration costs
Systemwide Modernization	Modernize 34,500 spans of underground cables	<ul style="list-style-type: none"> ▪ Reduce frequency, customer impact and duration of outages
	Enhance existing IT systems and move customer-facing websites from on-premise to cloud-based hosting	<ul style="list-style-type: none"> ▪ Maintain communications during restoration efforts ▪ Improve capabilities for high customer service call volumes

Where Customers Will See These Projects

The resiliency actions outlined in CenterPoint's SRP are designed to benefit customers across the Greater Houston service area, with a specific focus on customers in higher-risk areas.

The following map details the scope of proposed resiliency actions including systemwide hardening of transmission and distribution lines, strategic undergrounding and installation of automation devices capable of self-healing:



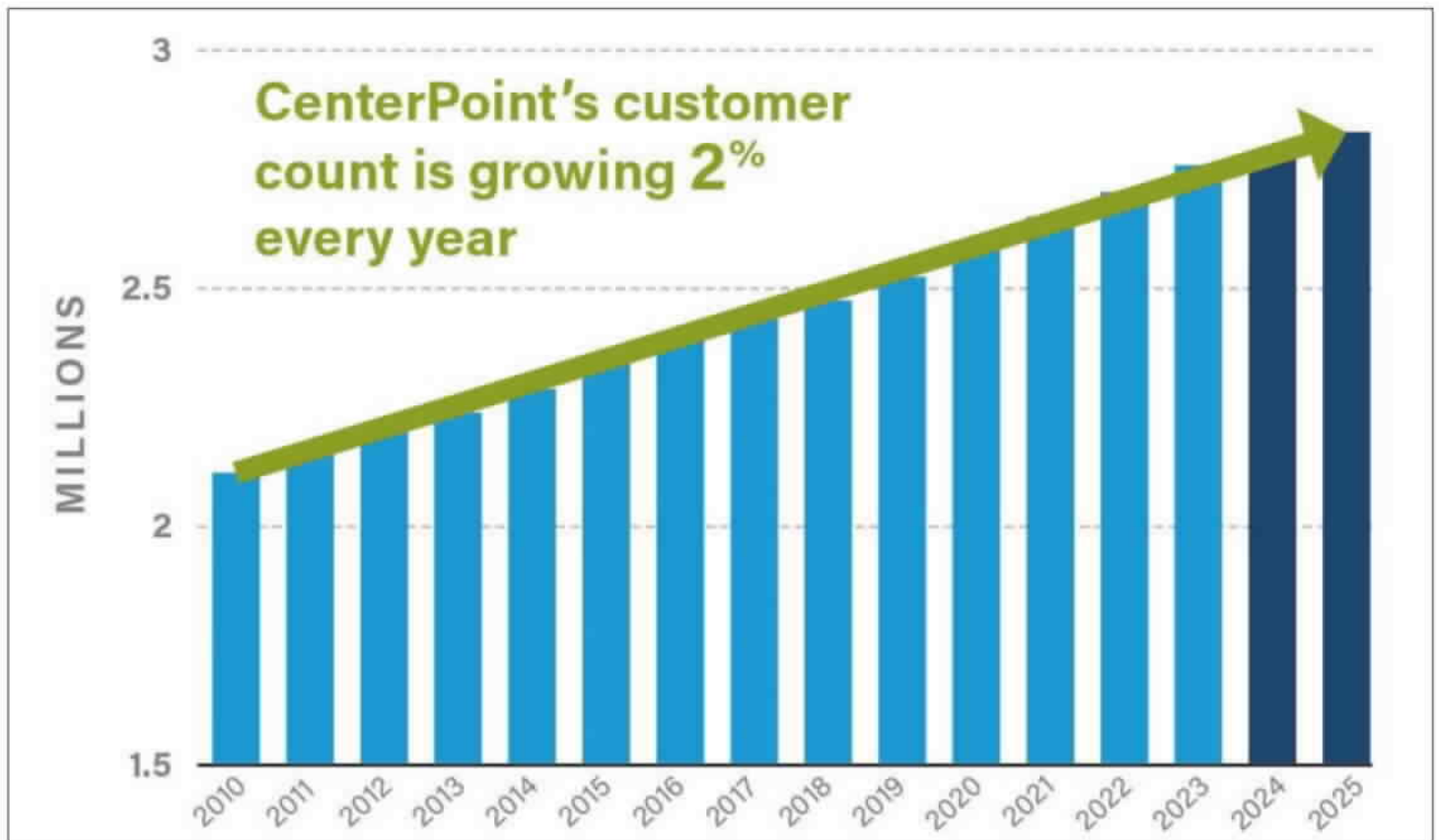
A map showing the locations of planned 2026-2028 resiliency plan actions.

A More Resilient Grid for a Fast-Growing Region

While the Greater Houston area may comprise just 2% of the geographic area of Texas, CenterPoint Energy's metered customers account for approximately 25% of the total electric load in the Electric Reliability Council of Texas (ERCOT) region. The number of customers in our service area is expected to continue growing by 2% annually for the foreseeable future — the equivalent of adding a city the size of Waco, Texas, every year.

At the same time, extreme weather events in our region are becoming more frequent and destructive. Since 1980, the Greater Houston counties that we serve have been impacted by 19 major windstorms and flood disasters that caused at least \$1 billion in damage each — nearly half of which (9) have occurred since 2015. These storms have also become more destructive over time: Between 1980-2000, the average economic damage was \$2.8 billion per storm; since 2000, the average is \$24.9 billion per storm.

Since 1980, the Greater Houston counties that we serve have been impacted by **19 major windstorms and flood disasters that caused at least \$1 billion in damage each** — nearly half of which (9) have occurred since 2015.



CenterPoint Energy serves more than 2.8 million residential, commercial and industrial customers across the Greater Houston area. The number of customers in CenterPoint's service area is expected to continue growing by 2% annually for the foreseeable future, the equivalent of adding a city the size of Waco, Texas, every year.

Working Together to Build a More Resilient Energy Future

CenterPoint's proposed SRP has been developed with input from local and state officials and emergency management offices, a comprehensive Hurricane Beryl after-action review, the Public Utility Commission of Texas and the independent, third-party expert Guidehouse. The resiliency action steps we've outlined in this plan also reflect important input from our customers, community leaders and other stakeholders.

Since August 2024, we have held dozens of community open houses, customer meetings and other opportunities to hear directly from our customers about their energy needs and priorities. Through these events, we've heard loud and clear the importance of building the grid of the future in order to better withstand increasingly extreme weather our region will face. Additionally, over the last three months, CenterPoint has conducted 30 meetings and listening sessions with elected leaders, emergency management agencies and independent experts and solicited their feedback on our plan during the draft stages.

As we advance and refine the proposed investments included in our 2026-2028 Systemwide Resiliency Plan, CenterPoint remains committed to continue working closely to identify specific community needs, prioritize projects and meet the future energy needs of customers. As part of this cooperative effort, we remain committed to long-term customer affordability and ensuring that every action included in this plan provides clear resiliency benefits for all our Greater Houston customers. For CenterPoint, we believe that by prioritizing customer affordability, while investing in long-term resiliency measures that reduce the future repair and restoration costs for our communities, we can provide the greatest value to our customers, now and in the future.

Taken together, the size and scope of the resiliency measures outlined in this plan, along with the near-term improvements we are completing through the multiple phases of GHRI, represent a major step toward achieving our goal — a goal shared by our customers — of building the most resilient coastal grid in the country.






2026-2028 Systemwide Resiliency Plan



CenterPoint Energy's 2026-2028 Systemwide Resiliency Plan details our efforts to build the most resilient coastal grid in the country. The plan is designed to help the Greater Houston area prepare for and mitigate the impacts of extreme weather and storms, as well as expand its capacity to meet future energy demands.








Focusing on our customers

The wide range of resiliency measures CenterPoint is proposing is expected to provide these benefits:

-  Reducing outages by **1.3B minutes** into 2029
-  Strengthening overall resiliency by **30%**
-  Saving **~\$50M** per year in storm-related costs
-  Expanding the capacity of our system
-  Avoiding **500K+** outages during a Beryl-like storm

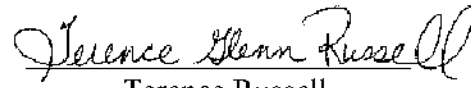
Building the grid of the future

The actions in the plan, combined with CenterPoint's normal operations, will achieve the following:

 Automation Devices	100% of lines serving the most customers will include devices capable of self-healing to reduce the impact of outages
 Secure Substations	99% of substations will be raised above the 500-year flood plain to mitigate flood risk
 Undergrounding	50+% of the electric system will be undergrounded to improve resiliency
 Stronger Distribution Poles	130,000 stronger, storm-resilient poles will be installed new, or replaced or braced existing to withstand stronger storms
 Vegetation Management	100% of power lines will be cleared of hazardous vegetation every three years to reduce storm-related outages
 Stronger Transmission Towers	2,200+ transmission structures will be rebuilt or upgraded to be able to withstand extreme weather while improving overall reliability
 Modernized Cables	34,500 spans of underground cables will be modernized to reduce the frequency and impact of outages

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2025, notice of the filing of this document was provided to all parties of record via electronic mail in accordance with the Second Order Suspending Rules, filed in Project No. 50664.


Terence Russell