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

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

**OFFICE OF PUBLIC UTILITY COUNSEL’S
THIRD 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 Third 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.

SOAH Docket No. 473-25-11558
PUC Docket No. 57579
OPUC's Third Request for Information to
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- 3-1.** Please explain whether the Company believes that the physical security of cyber components is more, less, or equally important to cyber security in regards to protecting the cyber architecture.
- a.** How do the modernizations and improvements to cybersecurity account for the physical security of those components?
 - b.** Has the company conducted a comprehensive cybersecurity assessment of all systems and operations for both its business and energy operations? If so, please explain when each assessment was conducted, and please provide a copy of the results of each assessment. If not, please explain why not.
- 3-2.** In the context of resiliency, does the company examine all risks which can potentially impact its business and operations or only selected risks? If the latter, explain why the company has chosen to examine a limited number of risks and clarify what are the Company's selected risks.
- 3-3.** Admit or deny, if "resiliency" is defined as the ability "to prevent, withstand, mitigate, or promptly recover from the risks posed" and the company examines all risks which can potentially impact the company's business and operations, then the company should develop a Rumsfeld Matrix to determine all risks within each quadrant. If deny, please explain.
- 3-4.** Was a comprehensive cyber risk analysis conducted for existing data centers to determine the existing vulnerabilities and risks posed by the current configuration? If so, please explain when each assessment was conducted and provide a copy of the results of the respective assessment. If not, please explain why not.
- 3-5.** Was a Rumsfeld Matrix or equivalent risk matrix developed to account for existing cyber vulnerabilities and risks as well as anticipated vulnerabilities and risks as a result of technology advancement, including AI, to determine the most efficient and effective modernization measures to negate or mitigate current and future risk and vulnerability to the data centers? If so, when was the risk matrix accomplished? Please provide a copy of the results. If not, why not?
- 3-6.** What types of cyber-attacks were factored into the development of the resiliency plan?
- 3-7.** How often does the company accomplish red team penetration drills?
- a.** Are the exercises accomplished by in-house personnel? If so, why?

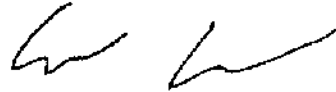
SOAH Docket No. 473-25-11558
PUC Docket No. 57579
OPUC's Third Request for Information to
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- 3-8.** Please explain whether the Company has a fully developed Cyber Architecture Map.
- a.** If so, please provide a copy of the Cyber Architecture Map. If the Cyber Architecture Map cannot be made available, please explain why not.
 - b.** If the company does not have a fully developed Cyber Architecture Map, please explain why.
- 3-9.** Please explain whether the Company conducts comprehensive and regularly scheduled cybersecurity training for each employee.
- 3-10.** Please explain whether the Company has cybersecurity requirements for third party vendors before they have permission to access company systems and operations.
- 3-11.** Please explain whether the Company has regularly scheduled meetings with local law enforcement, state or Federal Homeland Security, or other similar bodies regarding threat assessments for potential physical and cybersecurity threats.
- 3-12.** Please explain whether the Company has a software bill of materials ("SBOM") for each cyber component. If so, please provide a sampling of SBOMs. If not, please explain why not.

Date: March 10, 2025

Respectfully submitted,

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

CERTIFICATE OF SERVICE
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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 10th day of March 2025 by facsimile, electronic mail, and/or first class, U.S. Mail.



Connor Drysdale