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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

March 11, 2025

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**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-01**

QUESTION:

Please provide in "live" Excel format all Figures and Exhibits in the Application, Testimony, Resiliency Plan, and Guidehouse report, along with all supporting workpapers.

ANSWER:

Please see the response to TCUC 01-01.

SPONSOR:

Nathan Brownell, Eugene Shlatz, Joseph Baugh

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-02**

QUESTION:

Referring to the proposed utility-scale microgrid pilot program:

- a. Does CenterPoint consider the microgrid program a part of its System Resiliency Plan under 16 TAC § 25.62?
- b. Is CenterPoint intending to apply its proposed accounting language to the microgrid program?

ANSWER:

- a. Yes, the Company does consider the microgrid pilot program to be a part of its system resiliency plan under 16TAC 25.62, because it supports overall system resiliency by providing energy to these customers during resiliency events.
- b. Yes, CEHE does intend to apply the proposed accounting language to the microgrid pilot program.

SPONSOR:

Brad Tutunjian

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-03**

QUESTION:

Referring to various places that discuss flexibility (i.e., Application at page 20, SRP at page 34, and Direct Testimony of Eric D. Easton at page 16), please summarize and restate the flexibility approval that CenterPoint is seeking from the Commission in this filing.

ANSWER:

The Company has not undertaken a search for every use of the word “flexibility” in its filing. However, the Company has generally requested two types of flexibility: flexibility to immediately begin implementation of all or portions of the Company's System Resiliency Plan (SRP) and flexibility as it relates to implementation of Resiliency Measures on a specific portion or portions of the Company's transmission and distribution system or the Company's service area.

The reference to flexibility in the Company's Application at page 20 refers to the former—flexibility to immediately begin implementation of all or portions of the Company's SRP. Depending on when the Company's SRP is approved by the Commission, there is a possibility that implementation of some Resiliency Measures could begin in 2025, as labor and material allow.

The references to flexibility in the SRP at page 34 and Direct Testimony of Eric D. Easton at page 16 refer to the second type of flexibility—flexibility as it relates to implementation of Resiliency Measures on a specific portion or portions of the Company's transmission and distribution system or the Company's service area. As Mr. Easton explains in his testimony, “the Company's execution strategy requires flexibility to pivot within each Resiliency Measure, and from one Resiliency Measure to another as constraints are encountered so that program scope and activities pursued within each Resiliency Measure may be adjusted based on the needs of the Company's transmission and distribution system, as determined by the Company's analyses of the resiliency-related investment decisions.”

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-04**

QUESTION:

Referring to Figures APP-4 and APP-5, provide the same tables, but inclusive of 2024 cost.

ANSWER:

Please see the attached file "TIEC-RFI01-04 Attachment 1.xls".

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

TIEC-RFI01-04 Attachment 1.xls

TIEC RFI 1-4 - Figures APP-4 and APP-5, provide the same tables, but inclusive of 2024 cost

2020 - 2024 Resiliency-Related Projects (in millions)

Description	2020	2021	2022	2023	2024*	Total
IGSD Installation	1	5	12	13	17	\$ 48
Transmission System Hardening	12	159	274	166	65	\$ 676
Substation Flood Control	18	13	20	20	4	\$ 75
Distribution Pole Replacement/Bracing	29	30	61	52	78	\$ 250
Substation Physical Security	5	20	24	10	16	\$ 75
S90 Tower Replacements	3	20	55	14	10	\$ 102
69 kV Conversions	16	3	49	90	22	\$ 180
Distribution Circuit Resiliency	-	-	40	40	17	\$ 97
Distribution Resiliency - TripSaver	-	-	7	5	2	\$ 14
Total 2020 - 2024	\$ 84	\$ 250	\$ 542	\$ 410	\$ 231	\$ 1,517

*Note: The spend associated with major storms (Derecho, Beryl, etc) were deferred to a regulatory asset, and thus are excluded.

2020 - 2024 Vegetation Management Projects (in millions)

Description	2020	2021	2022	2023	2024	Total
Scheduled VM (Proactive Tree Trimming)	25.2	26.5	28.2	35.6	132.7	\$ 248.2
Unscheduled VM (Reactive Tree Trimming)	3.6	3.5	3.7	5.5	9.7	\$ 26.0
Tree Risk Management (Proactive Hazard Tree Removal)	0.1	0.2	0.9	3.7	2.8	\$ 7.6
Emergency and Post-Storm Activities	0.7	1.2	1.8	1.0	2.0	\$ 6.7
Total 2020 - 2024	\$ 29.6	\$ 31.4	\$ 34.6	\$ 45.8	\$ 147.2	\$ 288.6

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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-05**

QUESTION:

Referring to Figure APP-6, for each action in GHRI Phase One:

- a. State the transmission-related quantity and cost.
- b. State whether or not any portion of the action is included in this SRP.
- c. For each action which is included in this SRP per subpart (b), state the quantity and cost.

ANSWER:

- a. GHRI Phase One had \$0 transmission related costs.
- b. There are no activities from GHRI Phase One included in this SRP.
- c. Please see response to TIEC RFI1-5, b.

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

None

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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-06**

QUESTION:

Referring to Figure APP-7, for each action in GHRI Phase Two:

- a. State whether or not the action is on-track for completion by June 1, 2025.
- b. For each action that is not on-track in response to subpart (a), state the reason for the delay.
- c. State the transmission-related quantity and cost.
- d. State whether or not any portion of the action is included in this SRP.
- e. For each action which is included in this SRP per subpart (d), state the quantity and cost.

ANSWER:

- a. GHRI Phase Two is on track for completion by June 1, 2025.
- b. Please see response to TIEC RFI1-6, a.
- c. GHRI Phase Two has \$0 transmission related costs.
- d. There are no activities from GHRI Phase Two included in this SRP.
- e. Please see response to TIEC RFI1-6, d.

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-07**

QUESTION:

Referring to the Application at page 9, provide workpapers that support the statement that Phase One and Phase Two GHRI will lead to more than 125 million fewer customer outage minutes.

ANSWER:

Please see TIEC-RFI01-07 Attachment 1 - D56548 Estimated Per Unit Cost and Benefits_DRAFT.xls.

Using the estimated CMI savings for each resiliency measure in Docket 56548, a per unit annual CMI savings was calculated (Column L). That per unit value was then applied to the estimated GHRI Phase 2 anticipated units (Column N) for the following 4 measures: Distribution Pole Replacement, Trip Savers, IGSD Installations and Vegetation Management. That resulted in a calculation of approximately 136.3 million CMI saved. To be conservative, 136.3 million CMI saved was rounded down to 125 million CMI saved.

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

TIEC-RFI01-07 Attachment 1 - D56548 Estimated Per Unit Cost and Benefits_DRAFT.xls.

System Resiliency Plan Programs Measure	Docket 56548 2025 - 2027				Per Unit			Annual	Per Unit	GHRI Phase 2 Anticipated Units	Est Annual CMI Saved (million min)
	Qty/Unit	Capital	BCA	CMI	Capital	BCA	CMI	CMI 2028+	Annual CMI		
		\$ Million	Ratio	(million min)	\$ Million	Ratio	(million min)	(million min)	(million min)		
System Hardening											
Transmission System Hardening (miles)	50	376.00	6.0	206.0	7.52	0.12	4.120	87.6	1.752		
S90 Tower Replacements (towers)	30	103.80	4.9	41.7	3.46	0.16	1.390	16.4	0.547		
69 kV - 138 kV Conversion (miles)	108	268.40	1.9	46.8	2.49	0.02	0.433	20.0	0.185		
Coastal Resiliency Projects	NA	259.00	1.4	21.9	NA	NA	NA	21.9	NA		
Substation Transformer Fire Protection (barriers)	12	2.40	3.7	0.5	0.20	0.31	0.042	0.2	0.017		
Distribution Pole Replacement/Bracing (installations/bracings)	15,000	99.30	6.2	41.3	0.01	0.000	0.003	20.8	0.001	25,000	34.7
Distribution Resiliency - Circuit Rebuilds (circuits)	114	312.80	7.0	137.4	2.74	0.06	1.205	69.4	0.609		
Strategic Undergrounding/Freeway Crossings (crossings)	30	31.20	3.8	4.4	1.04	0.13	0.147	2.2	0.073		
System Hardening Total		\$ 1,452.90	4.5	500.0	\$ 17.46		7.340	238.5	3.184		
Grid Modernization											
TripSavers (installations)	7,500	58.90	61.3	240.3	0.01	0.01	0.032	122.2	0.016	4,500	73.3
IGSD Installation (devices)	450	53.80	15.7	58.1	0.12	0.03	0.129	27.7	0.062	350	21.5
Texas Medical Center Substation	NA	102.00	0.7	4.9	NA	NA	NA	4.9	NA		
Grid Modernization Total		\$ 214.70	21.1	303.3	\$ 0.13		0.161	154.8	0.078		
Flood Mitigation											
Substation Flood Control (substations)	9	30.60	7.5	14.2	3.40	0.83	1.578	6.7	0.744		
Control Center Facility Upgrade	NA	7.00	12.5	6.1	NA	NA	NA	2.5	NA		
Flood Mitigation Total		\$ 37.60	8.4	20.3	\$ 3.40		1.578	9.20	0.744		
Information Technology for Operations											
Advanced Aerial Imagery Platform/Digital Twin	NA	9.90	3.4	0.8	NA	NA	NA	0.3	NA		
Advanced Distribution Technology (meters)	1,365,000	225.80	4.8	61.1	0.00	0.00	0.000	40.6	0.000		
Digital Substation (substations)	15	25.00	1.9	1.3	1.67	0.13	0.087	0.8	0.053		
Information Technology for Operations Total		\$ 260.70	4.5	63.2	\$ 1.67		0.087	41.7	41.700		
Information Technology											
Voice & Mobile Data Radio System Refresh	NA	15.60	NA	NA	NA	NA	NA	NA	NA		
Data Center Hardware & Software Infrastructure	NA	2.90	NA	NA	NA	NA	NA	NA	NA		
Backhaul Microwave Communication	NA	12.10	NA	NA	NA	NA	NA	NA	NA		
Network Security & Vulnerability Management	NA	1.00	NA	NA	NA	NA	NA	NA	NA		
IT/OT Cybersecurity Monitoring	NA	22.50	NA	NA	NA	NA	NA	NA	NA		
Information Technology Total		\$ 54.10									
System Security											
Physical Security Fencing (substations)	15	15.00	15.6	14.7	1.00	1.04	0.980	7.3	0.487		
Physical Security Upgrades (substations)	36	19.50	19.9	25.1	0.54	0.55	0.697	12.5	0.347		
Physical Security Total		\$ 34.50	18.0	39.8	\$ 1.54		1.677	19.8	0.834		
Vegetation Management											
Targeted Incremental O&M (miles)	2,500	25.00	1.8	13.9	0.01	0.00	0.006	4.2	0.002	4,000	6.7
Wildfire Mitigation											
Wildfire Mitigation	NA	137.15	NA	NA	NA	NA	NA	NA	NA		
Resiliency Measures Total		\$ 2,216.65	6.6	940.5	\$ 24.20			468.2	46.542		136.3

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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-08**

QUESTION:

Does CenterPoint expect to incur any cost related to this SRP in 2025? If yes, please provide workpapers listing each measure and the estimated capital and O&M expense to be incurred in 2025.

ANSWER:

As part of its application, the Company requested that the Company be provided the flexibility to immediately begin implementation of all or portions of the Company's System Resiliency Plan (SRP). Depending on when the Company's SRP is approved by the Commission, there is a possibility that some Resiliency Measures could be implemented in 2025, as labor and material allow.

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

None

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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-09**

QUESTION:

Referring to the SRP at page 51, is CenterPoint seeking approval to spend more money than what is shown in Figure APP-1 on page 2 of the Application to accomplish the scope of the measures listed in Figure APP-1? If yes, please state the amount of additional spend. If no, please elaborate as to what "additional" means in this context.

ANSWER:

No, the comment on page 51 of the SRP is simply stating that some resiliency measures may require investment beyond 2028. For example, the Substation Flood Control resiliency measure proposes to elevate 12 substations during the 2026 - 2028 time period. There will likely need to be additional substations elevated beyond 2028, however the costs proposed in the SRP are only for those 12 substations. Therefore, as stated on SRP page 51, there may be additional capital costs and additional incremental O&M expenses beyond the three-year period. Commission approval for such capital costs and incremental O&M beyond 2028 could be sought in future SRP filings.

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-10**

QUESTION:

Referring to the Transmission System Hardening Resiliency Measure in the SRP at pages 88-92:

- a. State the quantity of 138 kV wooden structures being replaced.
- b. State the quantity of 345 kV wooden structures being replaced.
- c. Confirm that zero 69 kV wooden structures are proposed for replacement under this measure.
- d. Confirm that CenterPoint will have zero remaining 138 kV and 345 kV wooden structures if this measure is executed.
- e. State the current total quantity of legacy transmission steel towers in service, by vintage and by voltage.
- f. State the quantity of legacy transmission steel towers that have been replaced in the past 10 years due to a resiliency event, by year, by vintage, by voltage, and by resiliency event.
- g. State the quantity of legacy transmission steel towers that have been replaced in the past 10 years for reasons other than a resiliency event, by year, by vintage, and by voltage.
- h. State the criteria used to define a transmission steel tower as "legacy."
- i. Describe how CenterPoint determined to replace the 242 structures that are in this SRP out of the total quantity that meet its legacy criteria.
- j. Describe and provide an illustration or photograph that depicts a double circuit 345 kV tangent structure that is also considered a legacy transmission steel tower.
- k. Describe in more detail what "additional necessary structures" includes and excludes.
- l. State the costs to replace wooden structures and to replace legacy transmission steel structures. If this does not equal the total cost listed, explain the remaining cost as well.
- m. State the cost to replace "additional necessary structures."
- n. What is CenterPoint's historical failure rate for non-wood transmission structures exposed to wind speeds which exceeded the Company's at-the-time design criteria?
- o. What failure rate, or failure rate improvement, did CenterPoint assume for its new transmission structures in this SRP?
- p. Please discuss the alternatives that were considered for the legacy transmission steel towers.
- q. When did CenterPoint transition from an asset centric program-based approach?
- r. Is the transition away from an asset centric program-based approach

ANSWER:

- a. Approximately 651 structures.

- b. 2 structures.
- c. Confirmed.
- d. CenterPoint Energy will have 0 energized wood structures on our transmission system if this measure is executed. There will be remaining wood structures on de-energized lines, however, these lines would likely be rebuilt with concrete or steel structures in the event they need to be energized in any permanent configuration.
- e. There are currently 1267 total "Legacy Transmission Structures" identified in this resiliency measure (Internal Drawing Number 194-120-01) in service. All 1267 structures are on 345kV transmission circuits.

Breakdown by Vintage

1967 – 71
 1969 – 610
 1970 – 6
 1972 – 2
 1973 – 1
 1975 – 110
 1976 – 223
 1977 – 131
 1980 – 3
 1984 – 2
 1988 – 1
 1990 – 1
 1991 – 2
 1993 – 1
 1995 – 1
 1996 – 2
 1997 – 1
 1998 – 1
 1999 – 1
 2000 – 2
 2001 – 58
 2003 – 1
 2004 – 2
 2005 – 23
 2009 – 5
 2012 – 1
 2015 – 5

Please note that while the vast majority of "legacy transmission steel towers" indicated for replacement in this SRP filing were installed in 1969, 8 of the 242 have previously been replaced.

Breakdown of 242 legacy transmission structures to be replaced in this SRP filing by Vintage:

1969 - 234
 1991 – 1 (Due to road relocation conflict)
 1996 – 2 (Due to railroad conflict)
 2009 – 5 (Due to thermal uprate project involving additional clearance requirements)

- f. 17 legacy transmission steel towers were replaced due to damage sustained during the Derecho event in May 2024.

Breakdown by Year, Vintage, and Voltage is below:

Replacement	Year	Vintage	Voltage
1	2024	1975	345
2	2024	1975	345
3	2024	1975	345
4	2024	1975	345
5	2024	2005	345
6	2024	1967	345
7	2024	2005	345
8	2024	1967	345
9	2024	2005	345
10	2024	1967	345
11	2024	2005	345
12	2024	1967	345
13	2024	2005	345
14	2024	1967	345
15	2024	1967	345
16	2024	1967	345
17	2024	1975	345

- g. 5 total legacy steel towers were replaced in the past 10 years.
 - a. 2016 – 1 Due to Highway Relocation Project.
 - b. 2018 – 1 Due to new customer sub that required raising existing 345kV Circuit.
 - c. 2022 – 1 Due to Relocation necessary for River Erosion.
 - d. 2024 – 2 Due to clearance conflicts identified under NESC review.
- h. “Legacy Transmission Steel Towers” identified in this resiliency measure have a specific Internal Drawing Number (194-120-01). These towers were modeled utilizing PLS-CADD line design software using 2023 NESC wind loading criteria (which was the current standard at the time of modeling) after the company experienced failures during the May 2024 Derecho event.
- i. CenterPoint Energy made the decision to replace 242 of 1,267 “legacy transmission structures” in this SRP filing. The structures included in the filing were prioritized based on their proximity to the Gulf Coast and the expectation that additional transmission ROW would not be required. It was not feasible to replace all 1,267 legacy transmission towers in the timeline included in the

SRP filing (2026-2028). CenterPoint Energy intends to continue execution of this program in future resiliency plan filings.

- j. Responsive Document "TIEC 1-10 j. Legacy Transmission Structure Image.docx" shows a legacy Double Circuit 345kV Tangent Steel Lattice Tower. The tower is 115' tall with a 27' base extension bringing the total height to 142'. This structure is one of the 242 being replaced in this SRP installed in 1969.
- k. Included in "additional necessary structures" are required structure replacements to complete the scope of work on the identified projects. When replacing a transmission line structure(s), the new structure(s) must be designed to handle the necessary structural loads while maintaining the overall integrity of the line. However, if the new structure has significantly different mechanical properties, such as height, it can alter the structural load distribution along the line. This change can introduce higher forces or unbalanced tensions on adjacent structures, potentially requiring structure replacement. Detailed engineering design will determine the need to replace "additional necessary structures".
- l. The total estimated project costs included in the Transmission System Hardening resiliency measure are approximately \$1,468.0M.

The estimates for the projects to replace legacy transmission steel structures total approximately \$464.0M.

The Transmission System Hardening resiliency measure includes approximately \$585.6M in estimated project costs to replace wood transmission structures

The Transmission System Hardening resiliency measure also includes approximately \$418.4M in estimated costs associated with hardening projects to rebuild existing transmission infrastructure.

- m. The costs included in the System Resiliency Plan filing do not distinguish between costs for individual structures, but rather, total project estimates. Based on preliminary engineering analysis, 30 additional structures have been identified outside of the 242 legacy structures identified for the projects referenced here.
- n. CenterPoint Energy does not have the data to calculate the historical failure rate as requested.

CenterPoint Energy Houston Electric has experienced approximately 83 wood transmission structure failures and approximately 28 non-wood transmission structure failures due to resiliency events dating back to Hurricane Ike in September of 2008.
- o. CenterPoint Energy does not have the data to calculate the expected failure rate improvement. CenterPoint Energy has experienced no failures on transmission structures hardened in the last 10 years. For additional information regarding CenterPoint Energy hardening activities, see the storm hardening reports submitted by the Company in Project Nos. 38068 and 39339.
- p. An alternative to replacing legacy transmission steel towers considered by CenterPoint Energy was to relocate the transmission circuits in question underground. This option was rejected as cost-prohibitive.
- q. The transition from an asset centric program to project-based approach for use in developing its current System Resiliency Plan was adopted by CenterPoint Houston after the Company's System Resiliency Plan in Docket 56548 was filed in April 2024.
- r. This transition is limited to resiliency plans.

SPONSOR:
David Mercado

RESPONSIVE DOCUMENTS:

TIEC-RF11-10 j. Legacy Transmission Structure Image.pdf



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**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-11**

QUESTION:

Referring to the 69kV Conversion Projects Resiliency Measure in the SRP at pages 92-95:

- a. State the approximate circuit miles proposed for conversion.
- b. Are new 138 kV transformers required? If yes, state the quantity.
- c. State which of the proposed conversions are on circuits with NERC violations to be resolved.
- d. State the NERC requirements that require CenterPoint to have "greater switching options."
- e. Do the conversions allow CenterPoint to meet minimum NERC requirements, or do these options go above and beyond NERC requirements?
- f. State CenterPoint's total quantity of 69 kV wooden structures.
- g. State the quantity of 69 kV wooden structures that will be replaced with this measure.
- h. Is the high loading on existing 138 kV circuits a NERC violation?
- i. State the method in 16 TAC § 25.62 under which this measure is being implemented.
- j. Was hardening the 69 kV system in its current ROW considered as an alternative? If no, please explain why it was not considered. If yes, provide the cost to harden the circuits proposed for conversion in the SRP.

ANSWER:

- a. Approximately 100 circuit miles of existing 69kV will be converted to 138kv or de-energized. Approximately 55 circuits miles will be converted to 138kV and approximately 45 circuit miles will be de-energized.
- b. Yes, Qty. (14) 138kV Transformers are expected to be required.
- c. CenterPoint Energy recently completed the 2024 Annual Transmission Planning Assessment as required by TPL-001-5.1. The results show two concerns (one thermal loading issues on 69 kV HOC – Garden ckt 19 and low voltages at Dunlavy and Hyde Park 69 kV buses) during NERC P6 analysis. These are not to be considered violations because NERC P6 allows for consequential load loss which is the corrective action plan for these NERC P6 concerns. No other NERC Planning Events resulted in any of the 69 kV circuits to be converted to require a corrective action plan. The planned conversions will resolve the NERC P6 concerns identified in the 2024 Annual Transmission Planning Assessment.
- d. There are no NERC requirements that require CenterPoint Energy to have "greater switching options". The NERC TPL-001-5.1 standard requires transmission planners to develop corrective action plans for planning events where analysis indicates a potential inability of the transmission system to meet the performance requirements for the study base cases. The greater switching options comment is related to creating greater operational flexibility. Planning analyses are limited to limited operational scenarios; therefore, situations arise during real time operations where switching of loads from one distribution substation to another distribution substation could be limited by the limited available capacity on the 69 kV system serving those distribution

substations. After converting those distribution substations currently served by the 69 kV system to 138 kV, there should be significantly more transmission capacity to allow load switching.

- e. CenterPoint Energy will design the future system to meet NERC Reliability Standards, ERCOT Planning Criteria contained in ERCOT Planning Guide Section 4, and CenterPoint Energy Transmission Planning criteria. Several of the ERCOT Planning Criteria do 'raise the bar' in comparison to the NERC Reliability Standards. See Planning Guide Section 4 Table 1 ERCOT-specific Reliability Performance Criteria.
- f. Approximately 176 Structures.
- g. Approximately 176 Structures will be replaced or removed from the transmission system.
- h. CenterPoint Energy recently completed the 2024 Annual Transmission Planning Assessment as required by TPL-001-5.1. The results show thermal loading concerns on multiple 138 kV underground cables around the Downtown Houston area for multiple planning events. The corrective action plans for these loading concerns involve generation redispatch; therefore, it is not a NERC violation. The planned conversions in the Downtown Houston area are being designed to create two new west to east 138 kV paths that will ultimately resolve these power flow concerns in the Downtown Houston area.
- i. This measure is being implemented under methods (A) hardening electric transmission and distribution facilities; and (B) modernizing electric transmission and distribution facilities.
- j. Hardening of the existing 69kV system was not considered as an alternative. CenterPoint Energy's new transmission design standards are for the 138kV and 345kV voltage levels. Modernizing the 69kV system would require building to current 138kV transmission design specifications.

SPONSOR:
David Mercado

RESPONSIVE DOCUMENTS:
None

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SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-12**

QUESTION:

Referring to the S90 Tower Replacement Resiliency Measure in the SRP at pages 96-99.

- a. State the quantity of S90 towers to be replaced that directly support conductors that cross major highways.
- b. What is CenterPoint's historical failure rate for S90 towers exposed to wind speeds which exceeded the Company's at-the-time design criteria?
- c. State the quantity of S90 towers that have been replaced in the past 10 years due to a resiliency event, by year, by vintage, by voltage, and by resiliency event.
- d. State the quantity of S90 towers that have been replaced in the past 10 years for reasons other than a resiliency event, by year, by vintage, and by voltage.
- e. Provide the project number and/or other locations in which the alternative of building new lines to a higher capacity are being discussed by ERCOT and other TSPs.

ANSWER:

- a. No S90 towers directly support conductor that crosses a major highway.
- b. The only historical failure of an S90 tower occurred in 1969 while stringing conductor on the tower. CenterPoint Energy has not yet experienced a failure on an S90 tower due to a wind event.
- c. No S90 towers have been replaced as the results of a resiliency event in the last 10 years.
- d. 36 S90 towers have been replaced in the past 10 years, 8 additional S90 towers are expected to be replaced in 2025.

Replacement	Year	Vintage	Voltage
1	2016	1982	345
2	2020	1969	345
3	2021	1981	345
4	2021	1974	345
5	2022	1977	345
6	2022	1982	345
7	2022	1974	345

8	2022	1974	345
9	2022	1974	345
10	2022	1974	345
11	2022	1969	345
12	2022	1969	345
13	2022	1969	138
14	2022	1974	345
15	2022	1974	345
16	2022	1974	345
17	2022	1980	345
18	2022	1980	345
19	2022	1980	345
20	2022	1980	345
21	2022	1969	345
22	2023	1965	138
23	2023	1969	345
24	2023	1969	345
25	2023	1976	345
26	2023	1976	345
27	2023	1976	345
28	2023	1976	345
29	2023	1976	345
30	2023	1980	345
31	2023	1980	345
32	2023	1975	345

33	2023	1975	345
34	2023	1975	345
35	2023	1975	345
36	2024	1976	345
37	Expected 2025	1969	345
38	Expected 2025	1969	345
39	Expected 2025	1975	345
40	Expected 2025	1975	345
41	Expected 2025	1975	345
42	Expected 2025	1975	345
43	Expected 2025	1975	345
44	Expected 2025	1975	345

e. The following language was inadvertently included in the discussion of S90 Tower Replacement alternatives and does not represent a potential alternative solution to the S90 tower replacement resiliency measure: "Another alternative that CenterPoint Houston considered is constructing new transmission lines to operate at the same or higher voltage (along the same or new rights-of-way). These new lines would be built to a higher capacity line rating to meet future load growth. This alternative is being discussed but has not yet been adopted/accepted by ERCOT and other TSPs."

SPONSOR:
David Mercado

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-13**

QUESTION:

Referring the Coastal Resiliency Upgrades Resiliency Measure in the SRP at pages 99-102:

- a. State the reason that the 69 kV to 138 kV conversion in this measure was not included in the 69 kV Conversion Projects measure.
- b. Are there existing NERC violations to be resolved? If yes, provide the evidence supporting this.
- c. Does the measure allow CenterPoint to meet minimum NERC requirements, or does this measure go above and beyond NERC requirements?
- d. Provide the cost to execute the following projects in this measure: (1) 69 kV to 138 kV conversion; (2) Installation of new underwater cable; (3) Re-routing of transmission line; and (4) Construction of new transmission circuit. If the total of the projects does not equal the total for this measure, please state the remaining cost and its purpose.
- e. Has this project been proposed for ERCOT RTP? If yes, why is this project not moving forward there? If no, please explain the reason it has not been proposed.
- f. Referring to Exhibit ELS-2, page 108, this project is described as mitigating low voltages, overloads, and power quality concerns – as such, explain why CenterPoint does not consider this a reliability project.

ANSWER:

- a. The referenced circuit was constructed to 69kV design criteria. However, it is currently de-energized. Therefore, it was not included in the 69kV Conversion Projects Resiliency Measure.
- b. CenterPoint Energy recently completed the 2024 Annual Transmission Planning Assessment as required by TPL-001-5.1. The results show numerous thermal loading and low voltage concerns during NERC P6 analysis in the Galveston area. These are not to be considered violations because NERC P6 allows for consequential load loss which is the corrective action plan for these NERC P6 concerns.
- c. CenterPoint Energy will design the future system to meet NERC Reliability Standards, ERCOT Planning Criteria contained in ERCOT Planning Guide Section 4, and CenterPoint Energy Transmission Planning criteria. Several of the ERCOT Planning Criteria do 'raise the bar' in comparison to the NERC Reliability Standards. See Planning Guide Section 4 Table 1 ERCOT-specific Reliability Performance Criteria.
- d.
 1. 69kV to 138kV conversion – \$144.6M
 2. Installation of new underwater cable - \$24.5M
 3. Re-routing of transmission line; and 4) Construction of new transmission circuit combined \$9M in engineering and other preconstruction activities. This does not include construction activities which CenterPoint currently expects to begin in 2029 and be filed in a future resiliency plan.Total – \$178.1M
- e. No, ERCOT did not identify these projects as either a reliability or economic project in the 2024

RTP. ERCOT did not see the need for either project during RTP analysis.

- f. The Coastal Resiliency Measure projects mitigate potential low voltage, overload, and power quality concerns in the occurrence of a system outage due to a Resiliency Event. ERCOT did not identify these projects as either a reliability or economic project in the 2024 RTP.

SPONSOR:

David Mercado

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-14**

QUESTION:

Referring to the Mobile Substation Resiliency Measure in the SRP at pages 124-126:

- a. Provide a table in "live" Excel format that lists all mobile substations in CenterPoint's current inventory, along with the following information: MVA, input and output voltage configuration(s), asset age, and cost functionalization. If any are expected to be retired this year, please identify them.
- b. Provide a table in "live" Excel format that lists all mobile substations that are on-order or planned to be ordered in 2025 (excluding this SRP), along with the following information: MVA, input and output voltage configuration(s), and cost functionalization.
- c. Provide a table in "live" Excel format that lists the six mobile substations proposed in this SRP, along with the following information: MVA, input and output voltage configuration(s), and cost functionalization.
- d. In the past 10 years, state the maximum quantity of mobile substations that were simultaneously actively supplying customers during a resiliency event. How many of the quantity listed were deployed for reasons other than the resiliency event?
- e. For subpart (d), provide the date and resiliency event.
- f. In the past 10 years, has CenterPoint experienced a resiliency event situation in which all of its mobile substations were deployed and it would have benefitted from additional mobile substations? If yes, please describe the resiliency event and provide relevant information that substantiates that additional mobile substation(s) would have provided incremental benefit.
- g. Describe how CenterPoint will distinguish its SRP mobile substations from its current inventory.
- h. In determining the type and quantity of mobile substations necessary, did CenterPoint perform any benchmarking with other utilities? If yes, please provide the benchmarking analysis.

ANSWER:

- a. The company has 5 Mobile Substations. Please see TIEC RFI01-14a-b Attachment 1.
- b. The company has 2 mobile substations on order in 2025. Please see TIEC RFI01-14a-b Attachment 1.
- c. Please see attachment TIEC RFI01-14c Attachment 1.
- d. In the past ten years, the Company has not deployed more than one mobile substation simultaneously to respond to a resiliency event. The Company has used mobile substations to provide service to customers five times during a resiliency event. (See subpart (e), below.) In one of those five instances, the Sealy microburst in May 2017, the mobile substation was initially deployed not in response to the resiliency event (microburst) but to assist with loading concerns in the area while the Company completed planned work. Similarly, in September 2022, the Company used three mobile substations to provide service to customers while performing scheduled work that was undertaken during an extreme heat event.
- e. See resiliency events and dates, below.

- May 23, 2017 -- Sealy microburst
- August 25, 2017 -- Hurricane Harvey made landfall
- September 2022 – Extreme Heat
- August-September 2023 -- Extreme Heat
- June-July of 2024 – Extreme Heat

f. No

g. The Company will clearly identify the mobile substations ordered as part of the SRP with a unique identifier through the existing naming convention process used today.

h. Yes, the Company participates in the TXMAG group in which neighboring utilities in the state of Texas share industry best practices and processes to learn from each other in many different facets of an electric utility, up to and including mobile substation processes.

SPONSOR:

David Mercado

RESPONSIVE DOCUMENTS:

TIEC-RFI01-14a-b Attachment 1

TIEC-RFI01-14c Attachment 1

MOBILE SUBSTATION / TRANSFORMER						
MANUFACTURER	UNIT #	EQUIPMENT TYPE	VOLTAGE (kV)	MVA	NOTES	Cost Functionalization
DELTA STAR - microprocessor relays	7445 / 8448 / 7446	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub	100% Distribution
	7443	SWITCH TRAILER	141			
	7441	BREAKER TRAILER	37.5 x 12.5			
	7442	BREAKER TRAILER	37.5 x 12.5			
DELTA STAR	7252 / 8251 / 7253	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub	100% Distribution
	7254	SWITCH TRAILER	141			
	7251	BREAKER TRAILER	37.5 x 12.5			
DELTA STAR	7902 / 8901 / 7906	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub	100% Distribution
	7932	SWITCH TRAILER	141			
	7908	BREAKER TRAILER	37.5 x 12.5			
PAUWELS	7727 / 7726 / 7725	JEEP / TRANSFORMER / BOOSTER	141 X 36	50MVA	Mobile Sub	100% Distribution
	7728	CIRCUIT SWITCH TRAILER	141			
HK PORTER	8091	CIRCUIT SWITCH / TRANSFORMER	141 x 69 - 35 x 12	25MVA	Mobile Sub	100% Distribution
DELTA STAR - microprocessor relays	TBD	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub (On Order for 2025)	100% Distribution
	TBD	SWITCH TRAILER	141			
	TBD	BREAKER TRAILER	37.5 x 12.5			
	TBD	BREAKER TRAILER	37.5 x 12.5			
DELTA STAR - microprocessor relays	TBD	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub (On Order for 2025)	100% Distribution
	TBD	SWITCH TRAILER	141			
	TBD	BREAKER TRAILER	37.5 x 12.5			
	TBD	BREAKER TRAILER	37.5 x 12.5			

MOBILE SUBSTATION / TRANSFORMER					
MANUFACTURER	EQUIPMENT TYPE	VOLTAGE (kV)	MVA	NOTES	Cost Functionalization
TBD - Mobile Substation	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub	100% Distribution
	SWITCH TRAILER	141			
	BREAKER TRAILER	37.5 x 12.5			
	BREAKER TRAILER	37.5 x 12.5			
TBD - Mobile Substation	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub	100% Distribution
	SWITCH TRAILER	141			
	BREAKER TRAILER	37.5 x 12.5			
	BREAKER TRAILER	37.5 x 12.5			
TBD - Mobile Substation	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub	100% Distribution
	SWITCH TRAILER	141			
	BREAKER TRAILER	37.5 x 12.5			
	BREAKER TRAILER	37.5 x 12.5			
TBD - Mobile Substation	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub	100% Distribution
	SWITCH TRAILER	141			
	BREAKER TRAILER	37.5 x 12.5			
	BREAKER TRAILER	37.5 x 12.5			
TBD - Mobile Substation	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub	100% Distribution
	SWITCH TRAILER	141			
	BREAKER TRAILER	37.5 x 12.5			
	BREAKER TRAILER	37.5 x 12.5			
TBD - Mobile Substation	JEEP / TRANSFORMER / DOLLY	141 x 70.5 / 37.5 x 12.5	50MVA	Mobile Sub	100% Distribution
	SWITCH TRAILER	141			
	BREAKER TRAILER	37.5 x 12.5			
	BREAKER TRAILER	37.5 x 12.5			

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-15**

QUESTION:

Referring to the Digital Substation Measure in the SRP at pages 168-171:

- a. Does CenterPoint have any fully deployed digital substations? If yes, list each substation and the year of completion. If no, state the reason.
- b. If the answer to subpart (a) is yes, did CenterPoint rely upon its existing digital substations in determining the resiliency benefits?
- c. If the answer to subpart (a) is no, how did CenterPoint determine the resiliency benefits upon which it relied?

ANSWER:

- a. Yes. CenterPoint Houston has three (3) digitized substations whose digitalization was completed in 2020, 2022, and 2024, respectively.
- b. Yes, a review of the installation was performed which showed resiliency improvements that included reduced outage times and included an EMP hardened and modular solution (able to move from an existing installed substation to a more critical/damaged substation if the need arises in less time than a normal rebuild) and alternate sensitive settings that can also be leveraged within high fire risk areas.
- c. Please see subpart (b).

SPONSOR:
David Mercado

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-16**

QUESTION:

Referring to the Wildfire Strategic Undergrounding Measure in the SRP at 174-177:

- a. State the quantity of circuits, circuit miles of transmission line, and the voltages that would be converted to underground.
- b. Estimate the functionalized cost of this measure.
- c. Reconcile the benefit of undergrounding transmission lines in this measure with the statement in the Transmission Hardening, 69kV Conversion, and other transmission measures that undergrounding is “cost prohibitive” at “5 to 10 times more costly than overhead lines” at a cost of “\$20 million per mile.”
- d. Describe the alternatives considered for this measure.

ANSWER:

- a. CEHE has not identified any transmission lines that would be undergrounded as part of the Wildfire Strategic Undergrounding RM-23. There are five distribution circuits that were identified for RM-23. A total of approximately 8.4 miles of distribution would be converted to underground. Four circuits are 34.5kV and one is 12.47kV.
- b. Transmission \$0 – Distribution \$50M
- c. CEHE has not identified any transmission lines that would be undergrounded as part of the Wildfire Strategic Undergrounding RM-23.
- d. The Company has identified and is proposing four extreme temperature (drought) wildfire Resiliency Measures—each a recognized best practice within the utility industry—as measures most likely to be useful in mitigating the risk of wildfires in the Company’s service area and areas outside its service area in which it operates facilities. The Company will consider how all or some of the measures can work in combination to address most appropriately the specific service area risk confronting the Company. For description of alternatives considered related to mitigating wildfire risk to transmission lines see RM-22 and RM-24 in the SRP.

SPONSOR:

Eric Easton and David Mercado

RESPONSIVE DOCUMENTS:

None

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558

TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-17

QUESTION:

Referring to the Wildfire Vegetation Management Measure in the SRP at 177-179:

- a. State the quantity of circuits, circuit miles of transmission line, and voltages that would receive vegetation management for wildfire risk.
- b. Estimate the functionalized cost of this measure.
- c. Describe how fire-retardant material is considered vegetation management.
- d. Describe what it means for fire-retardant material to be "placed near" transmission tower structures and how that addresses wildfire risk.
- e. Describe how this measure is distinguished from normal vegetation management.
- f. Describe the alternatives considered for this measure.
- g. Do the transmission lines that CenterPoint proposes in this measure currently meet NERC requirements for vegetation management?
- h. How did CenterPoint decide which circuits to place in the Wildfire Strategic Underground Measure and which circuits to place in the Wildfire Vegetation Management Measure?

ANSWER:

- a. The reference on page 177 of the SRP in the description of the Wildfire Vegetation Management Resiliency Measure (RM-24), to placing fire retardant material near transmission tower structures was inadvertent and incorrect. The Company's focus for this Resiliency Measure is the distribution system. We currently have the high fire risk areas (HFRA) identified within our HFRA map (see Figure EE-13 within Eric Easton's Testimony) and have identified the number of distribution circuit miles associated with type of land use in the HFRA for distribution circuits (totaling approximately 550 miles). The voltage classes associated within the distribution system are 12.47 kV and 34.5 kV.
- b. The functionalized cost of this Resiliency Measure is \$30M Distribution and \$0 Transmission.
- c. See the response to subpart (a), above. Fire retardant material is not currently used within the distribution system.
- d. See the response to subpart (a), above. Though not included in RM-24, fire retardant material (powder) is spread near transmission towers within the HFRA to slow the rate of a fire that could be created by an ignition source on the transmission line.
- e. This measure is distinguished from normal vegetation management due to its timeframe for activation (wildfire risk "season" which is becoming a higher risk in Texas as seen by the Smokehouse Creek fires as well as the most recent wildfire in Brazoria County), its more extensive trim procedure (cut further from distribution wire to mitigate risk of ignition from distribution line sparks), and the specific targeted regions where the trim takes place (within the HFRA regions).
- f. Please see the Wildfire Vegetation Management Resiliency Measure Alternatives Considered

section on page 178 of the SRP.

- g. See the response to subpart (a), above. The Company's transmission lines currently meet NERC requirements for vegetation management, but this measure focuses only on the distribution system which is not required to comply with NERC standards.
- h. The Company's model evaluates all circuits within the HFRA to determine the circuit sections that would receive benefit from undergrounding (often circuit sections in difficult to access ROW areas with ignition fuels identified). Those with the highest benefit are strategically undergrounded to reduce wildfire risk. The remainder of circuits within the HFRA are then candidates for wildfire vegetation management.

SPONSOR:

Eric Easton

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-18**

QUESTION:

Referring to Appendix A, page 28, please provide a copy of the referenced PUC report or the location one can be obtained.

ANSWER:

Please see the Final Report ("Investigation of Emergency Preparedness and Response by Utilities in Houston and Surrounding Communities") filed on November 21, 2024 in PUCT Docket 56822, specifically page 46 (recommendations 6-8) and page 54 (recommendation 10).
https://interchange.puc.texas.gov/Documents/56822_198_1444252.PDF

SPONSOR:

Eric Easton

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-19**

QUESTION:

Referring to Appendix A, Figure AA-40, please elaborate on the benefit of LIDAR in analyzing for tree fall risk. For example, is the analysis done automatically or with AI? Does it enable remote identification compared to field surveys? How is the LIDAR data gathered?

ANSWER:

LiDAR (Light Detection and Ranging) is a highly accurate method of digitizing 3D objects. LiDAR data for the entire CenterPoint Energy Houston service territory is captured annually using a fixed wing aircraft with LiDAR sensors. The LiDAR data is used to create a virtual representation of the physical transmission and distribution system and its dynamic interactions with external factors. Applying clearance rules to the LiDAR scan, an AI tool reveals with great accuracy all vegetation encroachments and tree fall-in zones system-wide to help prioritize the areas with the highest risks. Using the tool to remotely identify tree encroachment and fall-in risks is much more efficient and less time consuming than sending crews to conduct field inspections. Additionally, the tool can be used to run scenarios with different wind direction and speeds to determine if a tree could damage lines if it were to fall a certain direction.

SPONSOR:

Eric Easton

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-20**

QUESTION:

Referring to Appendix B, page 13, does the reference to "Distribution Circuit Rebuilds" that includes transmission structures refer to a Resiliency Measure in the SRP? If yes, please elaborate on the measure being referenced and clarify if the measure being referenced includes transmission structure spend.

ANSWER:

Yes, Distribution Circuit Rebuilds is a typo and should read Distribution Circuit Resiliency (RM-1). This measure does not include transmission spend. The sentence in Appendix B, page 13 simply demonstrates the risk for both transmission and distribution structures near banks along waterways. The Distribution Circuit Resiliency measure only addresses distribution related risks.

SPONSOR:

Eric Easton

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-21**

QUESTION:

Referring to page 21, line 15, through page 22, line 2:

- a. Can a capital project provide benefits for more than one type of purpose? If anything other than yes, please explain in detail.
- b. Can a capital project have more than one purpose? If anything other than yes, please explain in detail.
- c. List all the purposes that the CenterPoint capital accounting system provides when categorizing capital projects, among which resiliency event mitigation would be one of the purposes.
- d. In assigning a purpose to a capital project, does CenterPoint have formalized definitions and a process? If yes, please provide this standard or manual that contains this information, along with descriptions of where to look for this information. If no, please describe the informal process that CenterPoint uses to assign a purpose to a capital project.
- e. Does the CenterPoint capital accounting system allow a capital project to be categorized under more than one purpose as listed in subpart (c)? If yes, please describe how cost is assigned to purposes in this case.
- f. Describe how CenterPoint determined that the purpose of the Resiliency Measures in this SRP was to mitigate resiliency events.
- g. Do the BCA calculations for any Resiliency Measure include more than a de minimis and/or ancillary amount of monetized non-resiliency benefit? If yes, state the percentage of non-resiliency benefit for each Resiliency Measure for which Guidehouse determined a BCA and provide supporting workpapers showing how the percentages were calculated.

ANSWER:

- a. Yes.
- b. Yes.
- c. Categorization of capital projects is based on FERC accounts. Please see the response to HCC RFI 02-10 for a description of how capital costs are allocated between transmission and distribution. Categorization by resiliency event mitigation is not an accounting process. The Company categorized types of work by resiliency event mitigation specifically for presentation purposes in the SRP.
- d. For presentation in the SRP, capital projects were grouped together based on the type of resiliency event the investment will mitigate most. As noted in Figuree SRP-17, resiliency measures have the potential to mitigate more that one risk.
- e. Please see the response to Part C.
- f. The Company determined the purpose of the resiliency measures in the SRP is to mitigate resiliency events based on Substantive Rule 25.62, specifically the definition of resiliency event in Section (b)(3) and the purpose of a resiliency plan outlined in Section (c).

- g. As stated in Exhibit ELS-2, Section 5.1.3.1, Guidehouse calculated BCA values based on quantitative resiliency benefits. Additional societal, environmental and other non-utility impacts were addressed qualitatively.

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-22**

QUESTION:

Referring to page 31, lines 11-14:

- a. List the Resiliency Measures referenced.
- b. For each Resiliency Measure in subpart (a), list the cost, quantity, and voltage of wooden transmission structures being replaced, the total cost of which should equal \$1.468 billion.

ANSWER:

- a. This is in reference to the Transmission System Hardening Resiliency Measure.
- b. See TIEC 1-10 I. for breakdown of costs within the Transmission System Hardening Resiliency Measure.

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-23**

QUESTION:

Referring to page 32, lines 2-4, please identify the responses in CenterPoint's first SRP that are being referenced here.

ANSWER:

The responses referred to by Mr. Brownell in his direct testimony at page 32, lines 2-4, were not formal written responses or testimony, but were instead oral responses conveyed to CenterPoint Houston personnel during informal discussions with parties.

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-24**

QUESTION:

Referring to page 35, lines 10-18:

- a. State the specific feedback that CenterPoint received from customers, communities, local officials, or state officials that was considered in CenterPoint's proposed transmission-related projects. Please provide detailed references and documentation and identify the specific Resiliency Measures.
- b. State the specific references in the Commission's report on Hurricane Beryl that were considered in CenterPoint's proposed transmission-related projects. Please provide detailed references and documentation and identify the specific Resiliency Measures.
- c. State the specific recommendations in PA Consulting's Hurricane Beryl after-action report that were considered in CenterPoint's proposed transmission-related projects. Please provide detailed references and documentation and identify the specific Resiliency Measures.

ANSWER:

- a. Please see response to HCC RFP01-11.
- b. In the Commission's report on Hurricane Beryl, recommendation #6 in the physical infrastructure sub-section, identified as "Utilities should assess poles constructed under prior NESC standards for replacement with poles that meet current extreme wind and ice design standards" was a consideration in two transmission-related Resiliency Measures: Transmission System Hardening and S90 Tower Replacements. Please refer to Exhibit NB-5.
- c. The specific recommendations in PA Consulting's Hurricane Beryl after-action report were not considered in The Company's proposed transmission-related projects in the transmission-related Resiliency Measures. Please refer to Exhibit NB-4.

SPONSOR:

Nathan Brownell

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-25**

QUESTION:

Referring to page 1:

- a. Provide a table in "live" Excel format that states the change in frequency and magnitude of extreme weather events, by type, and by year, from now and extending out to cover the time horizon used to calculate the benefits used to quantify the benefits in the BCA.
- b. For each Resiliency Measure, provide the BCA results if extreme weather events did not increase in frequency and magnitude, but instead were held flat to current levels.

ANSWER:

- a. The benefits for resiliency measures that Guidehouse quantified via BCA ratios were derived using extreme weather values for 2030. Please see attached TIEC RFI 01-25 Attachment 1.xls that Guidehouse used to derive wind speed, flood inundation, and temperature thresholds for year 2030.
- b. Guidehouse did not derive BCA ratios with extreme weather events held at current levels.

SPONSOR:
Eugene Shlatz

RESPONSIVE DOCUMENTS:
TIEC-RFI01-25 Attachment 1.xls

FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	FL_depth1	FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	Tidal_pctarea_mean
1.75	1.89	2	2.13	2.31		12.61	13.77	15.34	16.58	17.75		19.38	
1.74	1.87	1.99	2.11	2.27		12.61	13.75	15.27	16.46	17.59		19.21	
1.74	1.87	1.98	2.1	2.26		12.6	13.72	15.25	16.42	17.57		19.2	
1.73	1.87	1.98	2.1	2.26		12.58	13.71	15.22	16.37	17.53		19.14	
1.73	1.86	1.97	2.09	2.25		12.59	13.71	15.23	16.38	17.53		19.15	
1.73	1.86	1.97	2.08	2.24		12.6	13.72	15.24	16.4	17.56		19.19	
1.73	1.86	1.96	2.08	2.23		12.61	13.74	15.27	16.43	17.6		19.2	
1.73	1.85	1.96	2.07	2.22		12.62	13.75	15.28	16.45	17.62		19.22	
1.69	1.81	1.91	2.02	2.17		12.36	13.46	14.94	16.1	17.28		18.85	
1.7	1.82	1.92	2.04	2.19		12.46	13.56	15.09	16.27	17.45		19.06	
1.71	1.84	1.94	2.05	2.21		12.53	13.65	15.18	16.37	17.53		19.15	
1.72	1.85	1.96	2.08	2.23		12.58	13.71	15.24	16.41	17.57		19.2	
1.73	1.87	1.98	2.09	2.25		12.64	13.77	15.28	16.45	17.61		19.23	
1.74	1.88	1.98	2.11	2.26		12.69	13.83	15.35	16.54	17.66		19.3	
1.75	1.88	1.99	2.12	2.27		12.74	13.88	15.41	16.62	17.72		19.32	
1.79	1.93	2.05	2.18	2.36		12.88	14.07	15.68	16.91	18.07		19.75	
1.77	1.91	2.03	2.16	2.33		12.85	14.03	15.62	16.86	18		19.68	
1.76	1.9	2.01	2.14	2.3		12.82	13.98	15.55	16.79	17.92		19.6	
1.75	1.89	2	2.12	2.27		12.78	13.94	15.5	16.72	17.83		19.52	
1.74	1.88	1.98	2.1	2.25		12.76	13.92	15.46	16.68	17.79		19.45	
1.74	1.87	1.97	2.09	2.23		12.75	13.91	15.43	16.66	17.76		19.4	
1.73	1.86	1.96	2.07	2.22		12.74	13.89	15.41	16.6	17.74		19.34	
1	1.26	1.63	2.21	3.55	0.37	32.27	36.93	43.27	51.37	58.48	68.62	0.14	
1.03	1.35	1.73	2.33	3.71	0.39	33.02	37.28	45.63	52.34	58.86	69.2	0.36	
1.04	1.36	1.76	2.36	3.76	0.39	33.34	37.4	45.78	52.52	59.32	69.42	0.45	
1.05	1.38	1.79	2.39	3.8	0.39	33.53	37.52	45.95	52.67	59.47	69.66	0.54	
1.06	1.4	1.82	2.43	3.84	0.39	33.66	37.63	46.17	52.87	59.6	69.87	0.66	
1.07	1.41	1.83	2.46	3.87	0.39	33.78	37.73	46.42	53.06	59.72	70.04	0.82	
1.09	1.44	1.84	2.48	3.92	0.39	33.93	38.31	46.67	53.18	59.77	70.3	1.01	
1.1	1.47	1.87	2.53	3.97	0.38	34.04	38.45	46.84	53.36	59.94	70.74	1.28	
1.01	1.29	1.71	2.33	3.7	0.39	32.77	36.71	43.65	51.45	57.58	68.33	0.36	
1.02	1.31	1.74	2.36	3.75	0.39	33.13	36.89	43.9	51.81	58.23	68.68	0.44	
1.03	1.33	1.77	2.39	3.79	0.39	33.32	37.05	44.14	52.05	58.44	68.98	0.54	
1.05	1.38	1.8	2.43	3.84	0.39	33.45	37.2	45.53	52.33	58.64	69.25	0.66	
1.06	1.41	1.82	2.47	3.88	0.39	33.57	37.34	45.84	52.59	58.83	69.47	0.82	
1.08	1.44	1.84	2.5	3.93	0.39	33.73	37.95	46.15	52.8	58.95	69.78	1.04	
1.1	1.47	1.87	2.55	3.99	0.38	33.85	38.12	46.78	53.04	59.18	70.28	1.36	
1.02	1.33	1.72	2.35	3.72	0.39	32.89	36.94	44.67	51.91	57.93	68.55	0.36	
1.03	1.35	1.76	2.37	3.76	0.39	33.29	37.15	44.95	52.2	58.56	68.95	0.46	
1.05	1.37	1.79	2.4	3.8	0.39	33.52	37.35	45.34	52.45	58.84	69.33	0.56	
1.06	1.4	1.82	2.44	3.85	0.39	33.71	37.56	45.99	52.82	59.17	69.7	0.71	
1.08	1.42	1.84	2.48	3.88	0.39	33.91	38.19	46.47	53.1	59.5	70.03	0.93	
1.1	1.46	1.86	2.51	3.94	0.38	34.1	38.46	46.79	53.34	59.7	70.44	1.25	
1.12	1.49	1.9	2.57	4	0.33	34.27	38.7	47.49	53.6	60.01	71.02	2.05	
1.06	1.63	2.34	3.34	5.33	0.58	47.3	51.02	56.34	61.59	68.6	82.98	4.14	
1.17	1.77	2.5	3.47	5.48	0.71	47.89	50.83	56.68	61.51	69.35	83.96	5.07	

FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	FL_depth1	FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	Tidal_pct	area_mean
1.2	1.81	2.54	3.52	5.54	0.73	48.1	50.98	56.93	61.91	69.71	84.33	5.26		
1.23	1.85	2.58	3.56	5.6	0.75	48.3	51.16	57.17	62.31	70.1	84.83	5.49		
1.26	1.88	2.61	3.61	5.64	0.77	48.44	51.41	57.44	62.74	70.43	85.16	5.74		
1.29	1.91	2.65	3.64	5.71	0.79	48.6	51.77	57.65	63.16	70.65	85.63	6.03		
1.32	1.96	2.66	3.7	5.76	0.8	48.75	52.03	57.95	63.53	71.04	85.93	6.36		
1.34	1.99	2.7	3.74	5.81	0.76	48.92	52.33	58.18	63.81	71.32	86.18	7.22		
1.16	1.77	2.5	3.47	5.47	0.7	48.01	51.38	57.09	61.94	69.81	84.25	5.06		
1.19	1.81	2.54	3.51	5.53	0.73	48.23	51.52	57.32	62.32	70.14	84.61	5.25		
1.22	1.84	2.58	3.55	5.59	0.75	48.42	51.66	57.53	62.66	70.48	85.05	5.46		
1.25	1.88	2.61	3.61	5.64	0.77	48.54	51.84	57.76	63.05	70.76	85.34	5.72		
1.29	1.91	2.65	3.63	5.71	0.79	48.67	52.05	57.89	63.4	70.92	85.78	6.03		
1.32	1.96	2.67	3.7	5.76	0.8	48.81	52.23	58.15	63.63	71.28	86.08	6.42		
1.35	2	2.71	3.75	5.82	0.73	48.96	52.46	58.33	63.96	71.53	86.32	7.71		
1.17	1.77	2.49	3.47	5.47	0.71	48.22	51.56	57.21	62.32	69.79	84.24	5.07		
1.2	1.81	2.53	3.51	5.54	0.73	48.44	51.72	57.47	62.73	70.17	84.62	5.28		
1.23	1.85	2.57	3.56	5.6	0.76	48.65	51.89	57.72	63.13	70.56	85.09	5.52		
1.27	1.9	2.61	3.62	5.65	0.78	48.83	52.12	57.98	63.62	70.89	85.45	5.84		
1.31	1.93	2.66	3.65	5.73	0.8	48.99	52.36	58.16	63.98	71.14	85.92	6.23		
1.35	1.99	2.69	3.72	5.79	0.76	49.18	52.64	58.51	64.17	71.56	86.29	7.31		
1.39	2.04	2.74	3.78	5.86	0.69	49.38	52.93	58.77	64.43	71.87	86.59	9.12		
1.33	1.48	1.6	1.74	1.93		13.84	15.54	17.69	19.34	20.99	23.24			
1.33	1.46	1.57	1.69	1.86		13.83	15.4	17.35	18.76	20.19	22.11			
1.33	1.46	1.57	1.69	1.86		13.86	15.43	17.4	18.81	20.26	22.19			
1.33	1.46	1.58	1.7	1.87		13.88	15.45	17.42	18.84	20.3	22.23			
1.33	1.47	1.58	1.7	1.87		13.92	15.5	17.48	18.9	20.36	22.32			
1.33	1.47	1.58	1.7	1.87		13.97	15.55	17.54	18.98	20.44	22.43			
1.33	1.47	1.58	1.7	1.87		14.02	15.61	17.61	19.06	20.52	22.51			
1.33	1.47	1.58	1.71	1.88		14.05	15.63	17.65	19.11	20.57	22.58			
1.3	1.42	1.53	1.65	1.81		13.62	15.19	17.19	18.64	20.09	22.08			
1.3	1.43	1.54	1.66	1.83		13.74	15.32	17.34	18.8	20.26	22.27			
1.31	1.44	1.56	1.68	1.85		13.83	15.42	17.43	18.9	20.36	22.37			
1.32	1.46	1.57	1.7	1.87		13.89	15.48	17.49	18.95	20.43	22.43			
1.33	1.47	1.59	1.71	1.89		13.96	15.56	17.56	19.02	20.51	22.51			
1.34	1.48	1.6	1.73	1.91		14.05	15.64	17.64	19.08	20.58	22.59			
1.35	1.49	1.62	1.74	1.92		14.12	15.71	17.71	19.16	20.66	22.64			
1.32	1.45	1.56	1.68	1.85		13.9	15.54	17.55	19.07	20.6	22.66			
1.33	1.46	1.57	1.69	1.86		13.96	15.58	17.61	19.11	20.64	22.71			
1.33	1.47	1.58	1.71	1.88		14	15.62	17.64	19.14	20.66	22.73			
1.34	1.48	1.59	1.72	1.89		14.06	15.67	17.69	19.18	20.69	22.76			
1.34	1.48	1.6	1.73	1.9		14.12	15.73	17.74	19.24	20.74	22.8			
1.35	1.49	1.61	1.74	1.91		14.18	15.79	17.81	19.28	20.79	22.85			
1.35	1.5	1.62	1.75	1.93		14.23	15.84	17.85	19.31	20.82	22.86			
0.95	1.07	1.28	1.45	1.72		20.45	23.6	28.09	32.42	35.41	39.55			
0.94	1.13	1.28	1.45	1.72		20.61	23.82	29.27	32.54	35.43	39.41			
0.94	1.13	1.27	1.44	1.71		20.65	23.85	29.27	32.55	35.42	39.39			
0.94	1.13	1.27	1.44	1.7		20.7	23.89	29.29	32.52	35.39	39.37			

FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	FL_depth1	FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	Tidal_pctarea_mean
0.94	1.13	1.26	1.43	1.69		20.74	23.92	29.28	32.51	35.36	39.35		
0.94	1.12	1.26	1.42	1.68		20.78	23.95	29.28	32.49	35.34	39.32		
0.94	1.12	1.26	1.42	1.67		20.82	23.99	29.28	32.48	35.32	39.29		
0.94	1.05	1.25	1.41	1.66		20.86	24.01	28.36	32.46	35.29	39.26		
0.91	1.01	1.19	1.33	1.55		20.21	23.17	27.36	31.35	34.31	37.96		
0.92	1.02	1.21	1.36	1.58		20.39	23.38	27.63	31.68	34.59	38.38		
0.92	1.03	1.22	1.38	1.62		20.53	23.56	27.87	31.93	34.8	38.8		
0.93	1.04	1.24	1.4	1.65		20.63	23.72	28.04	32.13	34.98	38.94		
0.94	1.12	1.25	1.42	1.67		20.73	23.88	29.16	32.33	35.12	39.05		
0.94	1.13	1.27	1.43	1.69		20.84	24.04	29.35	32.5	35.26	39.13		
0.94	1.14	1.28	1.45	1.71		20.94	24.19	29.52	32.64	35.38	39.2		
0.96	1.16	1.31	1.48	1.76		20.82	24.12	29.6	32.75	35.58	39.35		
0.95	1.15	1.3	1.47	1.74		20.87	24.12	29.56	32.71	35.5	39.35		
0.95	1.14	1.29	1.45	1.72		20.92	24.14	29.53	32.67	35.43	39.33		
0.95	1.14	1.28	1.44	1.7		20.96	24.17	29.52	32.64	35.41	39.32		
0.95	1.13	1.27	1.43	1.68		21	24.22	29.5	32.64	35.4	39.33		
0.94	1.13	1.26	1.42	1.67		21.06	24.26	29.51	32.63	35.39	39.32		
0.94	1.13	1.26	1.42	1.66		21.11	24.3	29.51	32.64	35.38	39.3		
1.16	1.79	2.51	3.71	6.48	0.45	46.21	50.9	59	66.27	85.51	97.17	2.87	
1.29	1.93	2.67	3.89	6.7	0.52	47.86	52.03	60.13	76.16	86.63	97.77	4.86	
1.33	1.97	2.7	3.94	6.79	0.53	48.2	52.4	60.5	76.77	86.99	97.93	5.4	
1.36	2	2.74	3.99	6.88	0.54	48.51	52.75	60.82	77.21	87.35	98.07	5.98	
1.39	2.04	2.79	4.05	6.96	0.54	48.81	53.17	61.17	77.66	87.71	98.18	6.7	
1.42	2.07	2.83	4.1	7.05	0.54	49.14	53.58	61.43	78	88.12	98.27	7.61	
1.45	2.11	2.86	4.13	7.12	0.53	49.44	54.02	61.72	78.35	88.27	98.37	8.79	
1.48	2.14	2.89	4.18	7.19	0.48	49.73	54.35	62	78.61	88.61	98.48	11.45	
1.29	1.93	2.66	3.88	6.69	0.52	47.83	51.95	59.96	76.06	86.54	97.75	4.83	
1.32	1.96	2.7	3.93	6.79	0.53	48.14	52.3	60.31	76.45	86.89	97.92	5.36	
1.35	1.99	2.74	3.98	6.88	0.54	48.45	52.62	60.61	77.08	87.25	98.07	5.92	
1.38	2.03	2.78	4.04	6.96	0.54	48.75	53.07	60.96	77.55	87.62	98.18	6.66	
1.41	2.06	2.83	4.1	7.05	0.54	49.09	53.49	61.25	77.91	88.05	98.27	7.62	
1.45	2.11	2.87	4.14	7.12	0.53	49.42	53.97	61.58	78.29	88.24	98.38	9.03	
1.48	2.15	2.9	4.19	7.2	0.46	49.73	54.34	61.93	78.6	88.64	98.5	12.63	
1.29	1.93	2.66	3.88	6.7	0.52	47.75	51.87	59.84	76	86.5	97.76	4.87	
1.33	1.97	2.7	3.94	6.79	0.53	48.16	52.34	60.31	76.67	86.9	97.93	5.44	
1.36	2	2.75	3.99	6.89	0.54	48.56	52.77	60.73	77.16	87.31	98.08	6.08	
1.4	2.05	2.8	4.06	6.98	0.54	48.97	53.34	61.21	77.73	87.76	98.2	7.01	
1.43	2.09	2.85	4.12	7.08	0.53	49.41	53.89	61.61	78.19	88.28	98.32	8.3	
1.48	2.14	2.9	4.17	7.17	0.47	49.85	54.48	62.04	78.68	88.56	98.44	11.56	
1.52	2.18	2.94	4.23	7.26	0.37	50.27	54.98	62.62	79.07	89.11	98.57	20.18	
0.88	0.96	1.05	1.23	1.72	0.47	16.07	18.17	21.31	24.19	27.76	35.04	0.25	
0.87	0.95	1.04	1.23	1.75	0.54	16.32	18.38	21.48	24.28	27.68	34.9	0.36	
0.87	0.95	1.04	1.24	1.77	0.56	16.36	18.48	21.61	24.41	27.84	35.14	0.39	
0.87	0.95	1.05	1.25	1.79	0.59	16.42	18.57	21.72	24.55	28.02	35.39	0.41	
0.87	0.95	1.05	1.26	1.8	0.6	16.47	18.63	21.79	24.65	28.11	35.57	0.43	
0.87	0.95	1.06	1.26	1.82	0.62	16.52	18.68	21.87	24.74	28.22	35.75	0.46	

FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	FL_depth1	FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	Tidal_pct	area_mean
0.87	0.95	1.06	1.27	1.83	0.64	16.57	18.74	21.96	24.82	28.31	35.88		0.48	
0.87	0.96	1.07	1.27	1.85	0.66	16.62	18.81	22.03	24.94	28.39	36.12		0.5	
0.87	0.95	1.05	1.24	1.76	0.54	16.34	18.44	21.63	24.5	27.99	35.39		0.36	
0.87	0.95	1.05	1.25	1.77	0.56	16.43	18.54	21.75	24.62	28.13	35.59		0.39	
0.87	0.95	1.06	1.26	1.79	0.58	16.49	18.63	21.86	24.75	28.29	35.8		0.41	
0.87	0.96	1.06	1.26	1.81	0.6	16.52	18.71	21.95	24.86	28.4	35.98		0.43	
0.87	0.96	1.07	1.27	1.83	0.62	16.57	18.79	22.05	24.97	28.52	36.14		0.46	
0.87	0.96	1.07	1.28	1.83	0.64	16.63	18.86	22.13	25.06	28.6	36.26		0.49	
0.88	0.96	1.07	1.28	1.86	0.67	16.68	18.93	22.22	25.18	28.67	36.47		0.51	
0.89	0.97	1.07	1.26	1.78	0.55	16.51	18.68	21.91	24.84	28.31	35.55		0.36	
0.89	0.97	1.07	1.27	1.79	0.56	16.57	18.75	22	24.92	28.41	35.74		0.39	
0.88	0.97	1.07	1.27	1.81	0.59	16.62	18.82	22.07	24.99	28.52	35.93		0.41	
0.88	0.97	1.07	1.28	1.82	0.61	16.66	18.88	22.14	25.08	28.61	36.12		0.44	
0.88	0.97	1.07	1.28	1.83	0.63	16.73	18.95	22.22	25.17	28.7	36.3		0.48	
0.88	0.96	1.07	1.28	1.84	0.66	16.79	19.03	22.31	25.23	28.76	36.43		0.51	
0.88	0.96	1.08	1.28	1.86	0.69	16.83	19.1	22.4	25.33	28.81	36.66		0.54	
1.19	1.34	1.47	1.6	1.86		28.69	32.87	37.65	41.02	44.42	49			
1.19	1.33	1.45	1.58	1.84	0.22	28.78	32.8	37.37	40.59	43.73	48.24		0	
1.19	1.33	1.45	1.58	1.84	0.26	28.83	32.82	37.4	40.6	43.75	48.26		0	
1.19	1.34	1.46	1.58	1.85	0.31	28.91	32.87	37.43	40.7	43.78	48.3		0	
1.2	1.34	1.46	1.58	1.85	0.36	28.98	32.91	37.46	40.72	43.79	48.32		0	
1.2	1.34	1.46	1.58	1.86	0.41	29.05	32.96	37.49	40.74	43.81	48.36		0	
1.2	1.34	1.46	1.58	1.87	0.34	29.09	33	37.52	40.76	43.83	48.39		0	
1.2	1.34	1.46	1.58	1.87	0.28	29.15	33.05	37.54	40.78	43.86	48.42		0	
1.19	1.34	1.47	1.6	1.87	0.21	28.93	33.14	37.89	41.27	44.61	49.11		0	
1.19	1.34	1.47	1.6	1.87	0.26	29.02	33.2	37.92	41.33	44.58	49.12		0	
1.19	1.34	1.47	1.6	1.88	0.31	29.11	33.22	37.92	41.32	44.54	49.07		0	
1.2	1.35	1.47	1.6	1.88	0.36	29.14	33.21	37.91	41.29	44.49	49.04		0	
1.2	1.35	1.47	1.6	1.89	0.41	29.19	33.23	37.9	41.26	44.46	49.03		0	
1.2	1.35	1.47	1.6	1.89	0.35	29.22	33.24	37.89	41.24	44.42	49		0	
1.21	1.35	1.47	1.6	1.89	0.29	29.25	33.25	37.88	41.22	44.38	48.96		0	
1.21	1.36	1.48	1.61	1.87	0.22	29.19	33.31	37.92	41.26	44.46	48.93		0	
1.21	1.36	1.48	1.61	1.87	0.27	29.29	33.38	37.95	41.28	44.46	48.92		0	
1.21	1.36	1.48	1.61	1.87	0.32	29.37	33.4	37.96	41.28	44.44	48.91		0	
1.21	1.36	1.48	1.6	1.87	0.38	29.41	33.41	37.96	41.26	44.41	48.89		0	
1.21	1.35	1.47	1.6	1.88	0.44	29.44	33.41	37.96	41.24	44.38	48.87		0	
1.21	1.35	1.47	1.59	1.88	0.28	29.46	33.4	37.93	41.2	44.31	48.83		0	
1.21	1.35	1.46	1.58	1.87	0.32	29.45	33.38	37.9	41.14	44.24	48.76		0	
0.99	1.16	1.34	1.58	2.01	0.25	31.05	35.61	41.92	47.93	53.44	59.78		0.94	
0.99	1.19	1.37	1.62	2.06	0.37	31.31	36.06	42.08	48.63	53.62	59.97		2.67	
1	1.19	1.38	1.63	2.08	0.41	31.7	36.21	42.25	48.79	53.81	60.11		2.86	
1	1.2	1.39	1.63	2.09	0.44	31.89	36.36	42.4	48.91	53.89	60.16		3.06	
1.01	1.21	1.4	1.65	2.09	0.48	32.07	36.51	42.57	49.05	53.98	60.22		3.26	
1.02	1.22	1.41	1.66	2.11	0.52	32.26	36.68	42.75	49.17	54.06	60.32		3.46	
1.03	1.23	1.41	1.67	2.12	0.55	32.44	36.87	42.96	49.25	54.15	60.33		3.69	
1.03	1.24	1.43	1.69	2.13	0.58	32.6	37.01	43.14	49.39	54.21	60.38		3.94	

FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	FL_depth1	FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	Tidal_pct	area_mean
0.97	1.16	1.33	1.58	2.02	0.36	30.99	35.56	41.22	47.22	52.33	58.57	2.66		
0.98	1.17	1.35	1.59	2.03	0.4	31.45	35.76	41.5	47.85	52.63	58.86	2.84		
0.99	1.18	1.37	1.6	2.05	0.44	31.66	35.92	41.68	48.06	52.77	58.98	3.04		
1	1.19	1.38	1.62	2.06	0.48	31.83	36.08	41.88	48.25	52.92	59.08	3.25		
1.01	1.21	1.39	1.64	2.08	0.52	32.03	36.27	42.09	48.43	53.1	59.28	3.47		
1.02	1.22	1.4	1.66	2.1	0.55	32.2	36.45	42.36	48.56	53.27	59.42	3.73		
1.04	1.23	1.42	1.68	2.12	0.58	32.37	36.61	42.58	48.77	53.43	59.53	4.01		
0.98	1.17	1.34	1.58	2.02	0.37	31.09	35.66	41.37	47.73	52.5	58.7	2.67		
0.99	1.18	1.36	1.6	2.04	0.41	31.59	35.91	41.7	48.07	52.87	59.08	2.87		
1	1.19	1.38	1.61	2.06	0.45	31.84	36.15	41.97	48.35	53.12	59.32	3.08		
1.01	1.2	1.4	1.64	2.07	0.49	32.09	36.4	42.28	48.63	53.38	59.56	3.33		
1.02	1.22	1.41	1.66	2.1	0.53	32.32	36.66	42.59	48.88	53.65	59.87	3.59		
1.04	1.23	1.42	1.67	2.12	0.57	32.57	36.92	42.98	49.15	53.98	60.16	3.92		
1.05	1.25	1.44	1.7	2.14	0.61	32.8	37.16	43.29	49.46	54.28	60.41	4.28		
1.46	1.58	1.67	1.75	1.88		13.67	14.71	16.11	17.17	18.29	19.74			
1.45	1.55	1.64	1.72	1.83		13.74	14.75	16.15	17.17	18.19	19.56			
1.45	1.55	1.63	1.72	1.83		13.74	14.75	16.16	17.19	18.21	19.58			
1.45	1.55	1.63	1.71	1.83		13.75	14.76	16.18	17.21	18.23	19.59			
1.45	1.55	1.63	1.71	1.82		13.77	14.78	16.19	17.21	18.23	19.59			
1.45	1.55	1.63	1.71	1.82		13.79	14.8	16.2	17.21	18.23	19.59			
1.45	1.55	1.63	1.7	1.81		13.81	14.82	16.21	17.22	18.23	19.58			
1.45	1.55	1.62	1.7	1.81		13.82	14.83	16.21	17.22	18.23	19.57			
1.44	1.55	1.64	1.72	1.84		13.72	14.74	16.16	17.21	18.3	19.73			
1.44	1.55	1.64	1.72	1.84		13.76	14.79	16.21	17.26	18.34	19.77			
1.45	1.56	1.64	1.73	1.85		13.79	14.83	16.24	17.3	18.37	19.8			
1.45	1.56	1.64	1.73	1.84		13.8	14.84	16.28	17.34	18.4	19.83			
1.46	1.56	1.64	1.73	1.84		13.81	14.86	16.31	17.38	18.43	19.86			
1.46	1.56	1.64	1.73	1.84		13.83	14.89	16.34	17.41	18.46	19.88			
1.46	1.56	1.64	1.73	1.84		13.85	14.91	16.37	17.43	18.48	19.89			
1.5	1.62	1.71	1.81	1.94		13.95	15.02	16.52	17.61	18.72	20.19			
1.49	1.61	1.7	1.79	1.92		13.95	15.02	16.5	17.57	18.67	20.12			
1.49	1.6	1.69	1.77	1.9		13.94	15.01	16.47	17.54	18.62	20.06			
1.48	1.59	1.67	1.76	1.88		13.93	14.99	16.45	17.51	18.58	20			
1.47	1.58	1.66	1.74	1.86		13.92	14.97	16.42	17.47	18.53	19.94			
1.46	1.56	1.64	1.73	1.84		13.91	14.96	16.39	17.44	18.49	19.88			
1.45	1.55	1.63	1.71	1.82		13.9	14.94	16.36	17.41	18.44	19.82			
1.72	1.87	2	2.15	2.41		14.03	16	18.64	20.59	22.53	24.67			
1.73	1.89	2.01	2.16	2.4		14.01	15.89	18.23	20.21	22.09	24.21			
1.73	1.89	2.01	2.15	2.39		14.01	15.89	18.26	20.21	22.08	24.21			
1.72	1.88	2.01	2.15	2.39		14.02	15.9	18.28	20.21	22.08	24.18			
1.72	1.88	2	2.14	2.37		14.05	15.93	18.32	20.22	22.09	24.19			
1.72	1.87	1.99	2.13	2.36		14.08	15.97	18.36	20.25	22.1	24.2			
1.71	1.86	1.99	2.12	2.35		14.11	16	18.39	20.27	22.13	24.22			
1.71	1.86	1.98	2.11	2.34		14.13	16.02	18.42	20.29	22.14	24.23			
1.65	1.8	1.9	2.04	2.26		13.72	15.59	17.92	19.94	21.73	23.94			
1.67	1.82	1.93	2.06	2.28		13.84	15.73	18.11	20.09	21.93	24.11			

FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	FL_depth1	FL_depth2	FL_depth5	FL_depth1	FL_depth2	FL_depth5	FL_depthT	Tidal_pctarea_mean
1.68	1.83	1.95	2.08	2.31		13.94	15.83	18.28	20.21	22.05		24.2	
1.7	1.85	1.97	2.11	2.34		14.01	15.89	18.35	20.25	22.11		24.25	
1.72	1.86	1.99	2.13	2.36		14.08	15.97	18.43	20.33	22.19		24.29	
1.73	1.88	2	2.14	2.38		14.16	16.06	18.51	20.41	22.26		24.34	
1.74	1.89	2.01	2.16	2.39		14.23	16.12	18.57	20.49	22.33		24.38	
1.77	1.92	2.06	2.21	2.48		14.53	16.39	19.03	20.96	22.85		24.86	
1.76	1.9	2.04	2.18	2.44		14.39	16.31	18.94	20.83	22.72		24.74	
1.74	1.89	2.02	2.16	2.4		14.34	16.26	18.82	20.7	22.58		24.64	
1.73	1.87	2	2.14	2.37		14.28	16.2	18.73	20.57	22.44		24.52	
1.72	1.86	1.99	2.12	2.35		14.25	16.16	18.66	20.48	22.32		24.42	
1.71	1.85	1.97	2.11	2.32		14.23	16.14	18.6	20.41	22.23		24.34	
1.71	1.85	1.96	2.09	2.3		14.21	16.1	18.53	20.35	22.15		24.26	
0.92	1.01	1.09	1.18	1.33		18.78	21.6	25.53	28.65	31.81		35.85	
0.9	0.98	1.06	1.14	1.28		18.5	21.13	24.85	27.78	30.69		34.36	
0.91	0.99	1.06	1.15	1.29		18.58	21.21	24.93	27.86	30.77		34.43	
0.91	0.99	1.06	1.15	1.29		18.63	21.27	24.99	27.94	30.82		34.48	
0.91	0.99	1.07	1.16	1.29		18.7	21.35	25.07	28.01	30.88		34.55	
0.91	0.99	1.07	1.16	1.3		18.78	21.43	25.16	28.1	30.96		34.63	
0.91	0.99	1.07	1.16	1.3		18.85	21.52	25.24	28.17	31.02		34.67	
0.91	1	1.07	1.16	1.3		18.89	21.57	25.28	28.23	31.05		34.71	
0.89	0.97	1.04	1.12	1.25		18.3	20.85	24.42	27.19	30.04		33.68	
0.9	0.97	1.04	1.13	1.26		18.42	20.99	24.61	27.39	30.22		33.84	
0.9	0.98	1.05	1.14	1.27		18.5	21.09	24.71	27.54	30.32		33.91	
0.9	0.98	1.06	1.15	1.28		18.56	21.16	24.79	27.63	30.38		33.95	
0.91	0.99	1.06	1.15	1.29		18.64	21.25	24.9	27.74	30.46		34	
0.91	0.99	1.07	1.16	1.3		18.72	21.32	24.96	27.81	30.52		34.02	
0.91	1	1.08	1.17	1.31		18.78	21.39	25.04	27.86	30.54		34.03	
0.91	0.99	1.06	1.14	1.27		18.55	21.17	24.81	27.65	30.55		34.21	
0.91	0.99	1.06	1.15	1.28		18.65	21.28	24.92	27.8	30.68		34.33	
0.91	0.99	1.06	1.15	1.29		18.73	21.37	25.02	27.91	30.76		34.4	
0.91	1	1.07	1.16	1.29		18.82	21.46	25.12	28.01	30.84		34.47	
0.91	1	1.07	1.16	1.3		18.89	21.55	25.23	28.13	30.92		34.55	
0.92	1	1.08	1.17	1.31		18.97	21.63	25.32	28.23	31.01		34.62	
0.92	1	1.08	1.18	1.31		19.03	21.69	25.39	28.27	31.05		34.64	

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-26**

QUESTION:

Referring to page 2:

- a. State the confidence interval for each measure that the BCA results will outweigh the costs over the life of the measure.
- b. State the life used for each individual measure.
- c. State the BCA formula and describe the calculation in detail.
- d. State the formula to convert CMI to dollars and describe the calculation in detail.
- e. In applying VOLL, was a single number used for all measures, customers, and event types? If no, provide all VOLLs used and describe how and where they were applied.

ANSWER:

- a. Guidehouse did not develop confidence intervals for CenterPoint Houston's proposed resiliency measures.
- b. Except for Vegetation Management, Guidehouse did not determine the expected life of each measure. Guidehouse's calculations for measures where BCA ratios were derived projected benefits over 20 years. For the Vegetation Management resiliency measure, a 3-year cycle was applied to derive benefits, with a residual decline in CMI reduction over the next seven years.
- c. Refer to confidential Excel spreadsheet provided in response to RFI TCUC 1-1 which includes formulae and calculations Guidehouse used to derive BCA ratios.
- d. Refer to Part C above for the calculation Guidehouse applied to derive CMIs for the years 2026 through 2028 for resiliency measures for which BCA ratios were derived.
- e. Guidehouse applied a Value of Lost Load (VoLL) of \$35,000 per MWhr for all resiliency measures for which BCA ratios were derived. The VoLL of \$35,000 per MWhr is the metric recommended by Commission Chair Thomas Gleeson in its August 28, 2024 Memorandum and approved for use by the Commission on August 29, 2024. The VoLL is escalated 2% annually and applied to the expected reduction in CMI for each resiliency measure where BCA ratios were derived.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-27**

QUESTION:

Referring to page 3:

- a. Provide an illustrative example calculation that demonstrates how to derive the benefit cost of each Resiliency Measure listed in the table using the capital cost, O&M cost, and BCA results. If the example calculation does not represent all Resiliency Measures in the table, please provide a calculation for each Resiliency Measure.
- b. Provide an illustrative example calculation that demonstrates how to derive the CMI dollar benefits and System Restoration Cost benefits that totalize to the benefit cost calculated in subpart (a). If the example calculation does not represent all Resiliency Measures in the table, please provide a calculation for each Resiliency Measure.

ANSWER:

- a. Refer to TIEC 1-26 c. for calculations for each resiliency measure that appears in Table 1-1 and Table 5-1 of Exhibit ELS-2.
- b. Refer to TIEC 1-27 a.

SPONSOR:
Eugene Shlatz

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-28**

QUESTION:

Referring to page 12, please confirm that the Circuit Level Analysis was not applied to the transmission system. If not confirmed, please point to the information that explains how this analysis was applied to the transmission system.

ANSWER:

Confirmed.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-29**

QUESTION:

Referring to page 22, in your opinion, does Good Utility Practice favor a project with a higher net customer benefit as compared to a project with a lower net customer benefit (all other considerations being equal)?

ANSWER:

All resiliency measures proposed by CenterPoint Houston are consistent with Good Utility Practices. Guidehouse did not derive BCA ratios based solely on net customer benefits.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-30**

QUESTION:

Referring to page 30, footnote 15, please elaborate on how the focus on costs and outage reduction measures over the three-year plan changes the results of the quantified net benefits compared to not having this focus.

ANSWER:

Guidehouse did not derive resiliency measure benefits or assess resiliency measures for costs (e.g., investments) that CenterPoint Houston may propose beyond 2028.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-31**

QUESTION:

Referring to page 31, for each qualitative benefit listed, explain how the VOLL utilized by Guidehouse does not already take the qualitative benefit into consideration.

ANSWER:

Guidehouse's evaluation of qualitative impacts focused on societal benefits such as the impact of outages on services provided by state and local agencies, widespread economic impact above and beyond direct impact to customers as measured by VoLL, and emergency response provided by federal and state agencies.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-32**

QUESTION:

Referring to page 34, please provide the unredacted version of the survey.

ANSWER:

Please see the response to HCC RFP 01-01 and specifically HCC RFP 01-01 Attachment 3 CONFIDENTIAL.pdf.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-33**

QUESTION:

Please provide a corrected copy of the testimony that resolves the portions which state "Error! Reference source not found."

ANSWER:

On testimony page 34 of 64, the "Error! Reference source not found" refers to Figure ELS-1 on page 34 of 64.

On testimony page 35 of 64, the "Error! Reference source not found" refers to Figure ELS-2 on page 35 of 64.

On testimony page 36 of 64, the "Error! Reference source not found" refers to Figure ELS-3 on page 36 of 64.

On testimony page 40 of 64, the "Error! Reference source not found" refers to Figure ELS-4 on page 40 of 64.

On testimony page 41 of 64, the "Error! Reference source not found" refers to Figure ELS-1 on page 34 of 64.

On testimony page 45 of 64, the "Error! Reference source not found" refers to Figure ELS-1 on page 34 of 64.

On testimony page 47 of 64, the "Error! Reference source not found" refers to Figure ELS-1 on page 34 of 64.

On testimony page 50 of 64, the "Error! Reference source not found" refers to Figure ELS-6 on page 50 of 64.

On testimony page 51 of 64, the "Error! Reference source not found" refers to Figure ELS-1 on page 34 of 64.

On testimony page 54 of 64, the "Error! Reference source not found" refers to Figure ELS-1 on page 34 of 64.

On testimony page 57 of 64, the "Error! Reference source not found" refers to Figure ELS-1 on page 34 of 64.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-34**

QUESTION:

Referring to page 50:

- a. Provide a copy of Figure ELS-6 in "live" Excel format inclusive of the raw data.
- b. State the year that historical data ends and projected data begins.
- c. Provide the source and link to the historical data used.
- d. Does the historical data utilize any data smoothing, or is each year unadjusted?
- e. Was this same data source relied upon to calculate BCAs?

ANSWER:

- a. Please refer to TIEC 01-25 Attachment 01.xls which includes aggregated extreme weather forecast at the county level. This was used to create Figure ELS-6 (i.e., column F "HT_daysExceeding38C_mean").
- b. The extreme weather forecast that Guidehouse used from Jupiter Intelligence utilizes historical weather station data along with machine learning and various high geospatial resolution datasets as part of the process of spatially downscaling the data. Please refer to the attached raw data file in TIEC 1-34a.
- c. Please refer to the response to TIEC 1-34a, b.
- d. Yes, Jupiter Intelligence utilizes data smoothing.
- e. Yes, Guidehouse's evaluation of programs included in the Temperature (Freeze Event) category was based on the knowledge that temperatures in CenterPoint Houston's service territory are expected to increase over time.

SPONSOR:
Eugene Shlatz

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-35**

QUESTION:

Referring to Exhibit ELS-2, page 24, state whether the data in Figure 2-1 relied upon to inform the modeling of increased severity and frequency of extreme weather events that, in turn, was used in calculating the BCAs? If yes, please describe where and how it was used.

ANSWER:

Guidehouse did not directly rely on data contained in Figure 2-1. As noted in Guidehouse's response to TIEC 1-25, BCA ratios were derived for many resiliency measures using the forecast for specific resiliency events such as extreme wind and flooding forecasts.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-36**

QUESTION:

Referring to Exhibit ELS-2, page 59:

- a. Is the reference to using RCP8.5 referring to the Scenarios in Table 4-1? If not, please elaborate on what RCP8.5 means and the source of this information.
- b. Does RCP8.5 result in the highest FWI results of the Scenarios in Table 4-1?
- c. Why did Guidehouse choose this Scenario over other Scenarios in developing its FWI as illustrated in Figures 4-26 and 4-27?

ANSWER:

- a. Yes, scenario RCP 8.5 in Exhibit ELS-2, page 59 is about the scenario described in Table 4-1 and the overall assumptions in section 4.1.2.
- b. Yes, the analysis performed for the projected fire weather index (FWI) was done utilizing data from the Argonne National Laboratory RCP 8.5 scenario and it is the same scenario referenced in table 4.1.
- c. Given the increase in wildfire risk across the country and to perform the analysis with the worst-case scenario (RCP 8.5), Guidehouse chose scenario RCP 8.5 for the analysis as shown in section 4.2.4 and figures 4-26 and 4-27. In addition, at the time of this analysis, Argonne National Lab didn't have FWI projections available for RCP 4.5.

SPONSOR:
Eugene Shlatz

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-37**

QUESTION:

Referring to Exhibit ELS-2, page 69:

- a. In applying VOLL to calculate BCAs for Resiliency Measures, was VOLL modified or adjusted from \$35,000 per MWh to account for differences such as Resiliency Measures, customer types and quantities by circuit, resiliency event types, regional cost-of-living, and resiliency event duration? If yes, provide all VOLLs used and describe how and where they were applied.
- b. Describe how load growth was incorporated into the BCA analysis and used to calculate BCAs.
- c. Provide the derivation of the 6 kW average customer load.

ANSWER:

- a. No, A VoLL of \$35,000 per MWhr was applied to all resiliency measures where BCA ratios were derived.
- b. An annual load growth of 2% was applied to all resiliency measures where BCA ratios were derived.
- c. The 6kW was derived by dividing CenterPoint Houston's peak demand by the total number of retail customers served.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-38**

QUESTION:

Referring to Exhibit ELS-2, page 100:

- a. Provide an illustrative example of how a severe wind event would translate into a 345 kV tower failure and then into BCA results including the use of the failure percentages.
- b. Provide the derivation of 729 MW of load at risk and average restoration time of 72 hours

ANSWER:

- a. The derivation of a severe wind event for Transmission Hardening (345kV) is based on the probability that wind speed will exceed the design threshold for existing wood pole structures. From Section 4.2, the probability wind speed will exceed the design threshold is .002 or .02%. The likelihood failure will result in an interruption of load is estimated at 25%. The load at risk is 729 MW, which is based on the average load interruptions on the 345kV grid. The average time to repair/replace the damaged pole is 72 hours. The multiplication of the values produces an annual expected unserved energy of 26.2 MWhrs. Multiplying the 26.2 MWhr by \$35,000 per MWhr VoLL produces an annual value of approximately \$919,000 for each 345kV structure that fails.
- b. In working with the independent consultant, we settled on 729 MW as an appropriately conservative estimate of load at risk. Based on CenterPoint Energy's Transmission Planning department 2025 load at risk analysis, CenterPoint Energy's average 345kV circuit has approximately 454MW of load at risk. For a double circuit failure this represents a potential 908MW of load at risk (454MW x 2). A 72-hour restoration time provides time for damage assessment, engineering analysis, and new structure installation. The restoration time may vary depending on several factors including (but not limited to) area accessibility, cascading (multiple structure) failures, material availability, and crew availability.

SPONSOR:

David Mercado and Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-39**

QUESTION:

Referring to Exhibit ELS-2, page 105, state the quantity of S90 towers that are wooden.

ANSWER:

None of the S90 towers are wooden.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-40**

QUESTION:

Referring to Exhibit ELS-2, page 107:

- a. Provide the derivation of the 75% likelihood of load loss for a common mode, double contingency (N-2) failure on a tower line. Additionally, describe why this failure mode was selected.
- b. Provide the derivation of 729 MW of load at risk and average restoration time of 60 hours.
- c. Does this failure mode require two separate circuits to fail at the same time?
- d. Provide the past 10 years history of this failure mode for S90 towers during extreme weather, categorized by extreme weather event.

ANSWER:

- a. For purposes of the Guidehouse study and the derivation of BCA ratios, a common mode failure of S90 towers assumes that an extreme wind resiliency event will cause two S90 towers located within the same right-of-way to fail. A value of 75% accounts for the likelihood that only one of two towers will fail during some extreme wind events.
- b. In working with the independent consultant, we settled on 729 MW as an appropriately conservative estimate of load at risk. Based on CenterPoint Energy's Transmission Planning department 2025 load at risk analysis, CenterPoint Energy's average 345kV circuit has approximately 454MW of load at risk. For a double circuit failure this represents a potential 908MW of load at risk ($454\text{MW} \times 2$). A 60-hour restoration time provides time for damage assessment, engineering analysis, and new structure installation. The restoration time may vary depending on several factors including (but not limited to) area accessibility, cascading (multiple structure) failures, material availability, and crew availability.
- c. Yes
- d. Please see response to TIEC 1-12 b.

SPONSOR:

David Mercado and Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-41**

QUESTION:

Referring to Exhibit ELS-2, page 236, explain why there appears to be a significant change in wind speed along a single vertical and horizontal line at roughly 30 degrees north and 95 degrees west.

ANSWER:

Regional differences in the wind speed visualization are an artifact of the downscaling approach and the resolution of the underlying wind speed climate data applied by Jupiter Intelligence. The Jupiter Intelligence wind data is derived from the lower resolution output of the ERA5 global climate reanalysis model (ERA5 hourly data on single levels from 1940 to present).

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-42**

QUESTION:

Referring to Exhibit ELS-2, page 270-271, identify the locations of the 11 utilities who responded to the survey. Additionally, identify the locations of the 9 utilities in Figure A-2.

ANSWER:

Please see the response to HCC RFP 01-01 and specifically HCC RFP 01-01 Attachment 3 CONFIDENTIAL.pdf.

SPONSOR:

Eugene Shlatz

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-43**

QUESTION:

Referring to the Direct Testimony of Eric D. Easton at page 19, lines 12-21:

- a. Confirm that the model referenced was developed by CenterPoint employees and is fully CenterPoint owned. If anything other than yes, please describe the development and ownership in more detail.
- b. Provide a copy of the model and a narrative of how to run and adjust the model.
- c. For each variable input, list the variable name along with a description, the range of potential values, the value or values that CenterPoint used in modeling the data for this SRP, and evidence supporting the value or values selected.
- d. For each fixed variable, list the variable name along with a description, the range of potential values, the value CenterPoint used in modeling the data for this SRP, and evidence supporting the value selected.
- e. For each formula used in the model that uses a combination of fixed and variable inputs to calculate outputs, list the formula, describe how it is applied, and provide the equation.
- f. For each formula used outside the model and which either calculates an input variable or adjusts an output from the model, list the formula, describe how the formula is applied, and provide the equation.
- g. Provide a flowchart along with description that illustrates the model, and sub-models, and which illustrates the various functions and components, as well as how the various inputs and models are integrated to arrive at the outputs.

ANSWER:

a - g. On March 3rd, representatives from CenterPoint had a call with representatives from TIEC to provide a response to this request. CenterPoint is authorized to represent that TIEC was satisfied with the information provided.

SPONSOR:

Eric Easton

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-44**

QUESTION:

Referring to the Direct Testimony of Ronald W. Bahr at page 12, lines 1-3:

- a. State the basis in the SRP Rule that supports the inclusion of investments to "maintain" resiliency.
- b. State the investment cost, by Resiliency Measure, that was included in the SRP in order to "maintain" CenterPoint's system.

ANSWER:

- a. The SRP Rule expressly provides for the inclusion of operations and maintenance expenses. See 16 Tex. Admin Code Secs. 62(c)(2)(E) (expressly contemplating that a system resiliency plan will include "estimated operations and maintenance expenses"), 62(g)(1)(A) (expressly requiring annual reports to include "operations and maintenance expenses incurred in the prior year"), and 62(g)(1)(B) (expressly requiring annual reports to include an estimate of "operations and maintenance expenses" scheduled for completion in the upcoming year). Moreover, "maintaining" technology operations and infrastructure often involves obtaining and implementing the latest upgrades to hardware and software, much the way upgrades to a personal cell phone or computer--a typical maintenance practice--can improve the performance and security of the device or software.
- b. All of the costs for each Resiliency Measure in CenterPoint Houston's system resiliency plan are eligible costs under the Commission's SRP Rule, as they all "enhance the resiliency" of CenterPoint Houston's transmission and distribution system. The Company has not endeavored to delineate specific costs as having been incurred solely to "improve," "modernize," or "maintain" the Company's technology operations infrastructure, as most incurred costs will provide some combination of those benefits, each of which is encompassed in the concept of "enhancing resiliency."

SPONSOR:

Ron Bahr

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-45**

QUESTION:

Referring to the Direct Testimony of Muss Akram at page 12, line 11, through page 14, line 6:

- a. Provide the documentation supporting the claimed investment made by Florida Power & Light (FPL).
- b. Provide the claimed FPL investment data, but split between transmission and distribution.
- c. Does Figure MA-8 represent FPL's estimate of storm recovery savings or CenterPoint's estimate of FPL's storm recovery savings? If it represents CenterPoint's estimate, please explain why FPL's estimate of storm recovery savings was not used.

ANSWER:

- a. Please see TIEC RFI01-45 Attachment 1 - FPL investment.xls for sources and calculations regarding the claimed FPL resiliency investments.
- b. Please see TIEC RFI01-45 Attachment 1 - FPL investment.xls for sources and calculations regarding the claimed FPL resiliency investments broken out by various resiliency measures.
- c. Figure MA-8 applies the rate of savings claimed by FPL for Hurricane Irma to FPL's claimed storm recovery costs for Hurricanes Ian, Nicole, Idalia, Debby, Helene, and Milton. To my knowledge, FPL has not at the time of this filing provided their own estimate for storm recovery cost savings for storms after Hurricane Irma.

SPONSOR:
Muss Akram

RESPONSIVE DOCUMENTS:
TIEC-RFI01-45 Attachment 1 - FPL investment.xls

	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>
CPI	201.558	207.344	215.254	214.565	218.076	224.923	229.586	232.952	236.715	237.002	240.005	245.121	251.1	255.653	258.846	270.966	292.621	304.701	313.3350909
CPI in 2024 dollars	1.554565	1.511185	1.455653	1.460327	1.436816	1.393077	1.364783	1.345063	1.323681	1.322078	1.305536	1.278287	1.247849824	1.225626497	1.210507757	1.156363126	1.070788122	1.028336274	1
In millions USD																			
FPL Nominal spend	29.6	84	117.5	144.5	124.3	140.6	151.1	215	305.5	364.2	516.7	569.9	\$ 794.60	\$ 794.60	\$ 1,037.20	\$ 1,245.80	\$ 1,292.40	\$ 1,374.60	\$ 1,540.50
FPL spend in 2024 dollars	46.01514	126.9395	171.0392	211.0173	178.5962	195.8666	206.2187	289.1885	404.3845	481.5007	674.5703	728.496	991.5414705	973.8828147	1255.538646	1440.597183	1383.886568	1413.551042	1540.5
Select Sums												3713.833							8999.497724

SPP Annual status report sources

2023A and 2024F [2023 Florida Power & Light Company SPP Annual Status](#) Page 10 of the pdf
 2022A [2022 Florida Power and Light Company SPP Annual Stat](#) Page 10 of the pdf
 2021A [2021 Florida Power and Light Company SPP Annual Stat](#) Pages 16 and 17 of the pdf
 2020A [2020 Florida Power and Light Company SPP Annual Stat](#) Page 14 of the pdf

SOAH DOCKET NO. 473-25-11558
 PUC Docket No. 57579
 TIEC RFI01-45 Attachment 1 - FPL investments
 Page 2 of 5

2020 SPP Source [FPL Petition, Testimony, Exhibit MJ-1 \(SPP\) - Dkt 202000](#) Pages 51, 55, 61, 65, 69, 75, and 80 of the pdf

Source Document:	Historical		2020 SPP			Referenced "SPP Annual Status Report"				
Category (\$ Millions)	2017	2017 - 2019 annual	2018 - 2019 annual	2018E	2019E	2020A	2021A	2022A	2023A	2024F
Distribution Inspection	51.8	\$ 51.0		\$ 50.6	\$ 50.6	\$ 38.5	\$ 66.9	\$ 39.4	\$ 36.4	\$ 41.5
Transmission Inspection	40.2	\$ 43.0		\$ 44.4	\$ 44.4	\$ 28.4	\$ 36.4	\$ 43.3	\$ 55.7	\$ 52.0
Distribution Feeder Hardening	420	\$ 497.0		\$ 535.5	\$ 535.5	\$ 681.7	\$ 714.6	\$ 706.5	\$ 646.2	\$ 680.6
Distribution Lateral Hardening (undergrounding)	4.1	\$ -	\$ 38.0	\$ 38.0	\$ 38.0	\$ 129.3	\$ 248.1	\$ 355.2	\$ 486.1	\$ 602.6
Transmission Hardening (structures)	53.8	\$ 54.0		\$ 54.1	\$ 54.1	\$ 86.0	\$ 93.5	\$ 56.5	\$ 42.4	\$ 25.5
Distribution Vegetation Management		\$ 63.0		\$ 63.0	\$ 63.0	\$ 60.7	\$ 67.6	\$ 71.0	\$ 86.8	\$ 117.8
Transmission Vegetation Management		\$ 9.0		\$ 9.0	\$ 9.0	\$ 9.4	\$ 10.9	\$ 15.8	\$ 14.5	\$ 12.5
Substation Storm Surge / Flood Mitigation		\$ -		\$ -	\$ -	\$ 3.2	\$ 7.8	\$ 4.7	\$ 6.5	\$ 8.0
Total	569.9	\$ 717.00		\$ 794.60	\$ 794.60	\$ 1,037.20	\$ 1,245.80	\$ 1,292.40	\$ 1,374.60	\$ 1,540.50

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	
<u>Distribution</u>													
Feeders	17	26.8	54.6	80.2	45.4	43	50.5	105.6	154.9	201	362.9	420	
Storm Surge/Flooding	0	0	0	0	0	0	0	0	1.4	2.6	0.1	0	
Total Distribution	17	26.8	54.6	80.2	45.4	43	50.5	105.6	156.3	203.6	363	420	
<u>Transmission</u>													
Replacing CPOCs	0	6.5	5.9	4	0.7	0.9	1.2	4.9	2.9	0.7	0	0	
Replacing Wood Structures	0	0	0	0	0	0	0	0	41.4	49	55.4	53.8	
Storm Surge/Flooding	0	0	0	0	0	0	0	1.1	1	0	0	0	
Total Transmission	0	6.5	5.9	4	0.7	0.9	1.2	6	45.3	49.7	55.4	53.8	
OH/UG Conversions	0	0	0.8	6.8	3.9	5.2	4.4	2.7	2.6	1.7	1	4.1	
<u>Inspections</u>													
Distribution Pole Inspections	11.1	35.5	39.9	36	50	67	67.5	69.7	70.1	73	61.9	51.8	
Transmission Inspections	1.5	15.2	16.3	17.5	24.3	24.5	27.5	31	31.2	36.2	35.4	40.2	
Total Inspections	12.6	50.7	56.2	53.5	74.3	91.5	95	100.7	101.3	109.2	97.3	92	
Grand Total	29.6	84	117.5	144.5	124.3	140.6	151.1	215	305.5	364.2	516.7	569.9	
Cap	23.7	71.1	97.9	124.9	108.5	120.4	130.9	190.4	298	351	501.1	559.1	2577
O&M	5.9	12.9	19.6	19.6	15.8	20.2	20.2	24.6	7.5	13.2	15.6	10.8	185.9

CPIAUCSL Consumer Price Index for All Urban Consumers: All Items in U.S. City Average, Index 1982-1984=100, Annual, Seasonally Adjusted Data Updated: 2024-12-11

Observation	CPIAUCSL
1947-01-01	22.332
1948-01-01	24.045
1949-01-01	23.809
1950-01-01	24.063
1951-01-01	25.973
1952-01-01	26.567
1953-01-01	26.768
1954-01-01	26.865
1955-01-01	26.796
1956-01-01	27.191
1957-01-01	28.113
1958-01-01	28.881
1959-01-01	29.150
1960-01-01	29.585
1961-01-01	29.902
1962-01-01	30.253
1963-01-01	30.633
1964-01-01	31.038
1965-01-01	31.528
1966-01-01	32.471
1967-01-01	33.375
1968-01-01	34.792
1969-01-01	36.683
1970-01-01	38.842
1971-01-01	40.483
1972-01-01	41.808
1973-01-01	44.425
1974-01-01	49.317
1975-01-01	53.825
1976-01-01	56.933
1977-01-01	60.617
1978-01-01	65.242
1979-01-01	72.583
1980-01-01	82.383
1981-01-01	90.933
1982-01-01	96.533
1983-01-01	99.583
1984-01-01	103.933
1985-01-01	107.600
1986-01-01	109.692
1987-01-01	113.617
1988-01-01	118.275
1989-01-01	123.942
1990-01-01	130.658
1991-01-01	136.167
1992-01-01	140.308
1993-01-01	144.475
1994-01-01	148.225
1995-01-01	152.383
1996-01-01	156.858
1997-01-01	160.525
1998-01-01	163.008
1999-01-01	166.583
2000-01-01	172.192
2001-01-01	177.042
2002-01-01	179.867
2003-01-01	184.000
2004-01-01	188.908
2005-01-01	195.267
2006-01-01	201.558
2007-01-01	207.344
2008-01-01	215.254
2009-01-01	214.565
2010-01-01	218.076
2011-01-01	224.923
2012-01-01	229.586
2013-01-01	232.952
2014-01-01	236.715
2015-01-01	237.002
2016-01-01	240.005
2017-01-01	245.121
2018-01-01	251.100
2019-01-01	255.653
2020-01-01	258.846
2021-01-01	270.966
2022-01-01	292.621
2023-01-01	304.701
2024-01-01	

FRED Graph Observations
Federal Reserve Economic Data, Federal Reserve Bank of St. Louis
Link: <https://fred.stlouisfed.org>
Help: <https://fredhelp.stlouisfed.org>
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PUC Docket No. 57579
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CPIAUCSL Consumer Price Index for All Urban Consumers: All Items in U.S. City Average, Index 1982-1984=100, Monthly, Seasonally Adjusted Data Updated: 2024-12-11

observation_date	CPIAUCSL
2024-01-01	309.685
2024-02-01	311.054
2024-03-01	312.230
2024-04-01	313.207
2024-05-01	313.225
2024-06-01	313.049
2024-07-01	313.534
2024-08-01	314.121
2024-09-01	314.686
2024-10-01	315.454
2024-11-01	316.441

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 57579
SOAH DOCKET NO. 473-25-11558**

**TEXAS INDUSTRIAL ENERGY CONSUMERS
REQUEST NO.: TIEC-RFI01-46**

QUESTION:

Referring the Direct Testimony of Jeff W. Garmon at page 8, provide Figure JG-1 and Figure JG-2 in "live" Excel format with further expansion to show functionalized capital and O&M expense by each of the 39 Resiliency Measures and 1 microgrid project.

ANSWER:

The data presented in Figures JG-1 and Figure JG-2 in the direct testimony of Jeff Garmon can be found in TCUC 01-01 Attachment 1 - 2026-2028 Resiliency Plan MASTER.xls, specifically columns I - L.

SPONSOR:

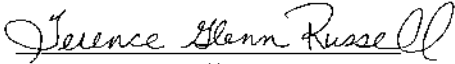
Jeff Garmon

RESPONSIVE DOCUMENTS:

None

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 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

The following files are not convertible:

TIEC-RFI01-04 Attachment 1.xlsx
TIEC-RFI01-07 Attachment 1 -D56548 -
Estimated Per Unit Cost and Benefits_DRAFT.xlsx
TIEC-RFI01-14a_b Attachment 1.xlsx
TIEC-RFI01-14c Attachment 1.xlsx
TIEC-RFI01-25 Attachment 01.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.