



## **Filing Receipt**

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

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

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**BEFORE THE STATE OFFICE  
  
OF  
  
ADMINISTRATIVE HEARINGS**

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

Hunt Energy Network L.L.C. (“HEN”) requests that CenterPoint Energy Houston Electric, LLC (“CenterPoint”) fully respond to the attached set of requests for information (“RFIs”) within fifteen (15) calendar days pursuant to SOAH Order No. 2.

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

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

Respectfully Submitted,

By /s/ Marty Hopkins

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

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been forwarded to all parties of record in this proceeding via electronic mail on this 14th day of March, 2025 in accordance with the Order Suspending Rules issued in Project No. 50664.

By: /s/ Melvena Rhetta-Fair

## **HEN'S SECOND REQUEST FOR INFORMATION TO CENTERPOINT**

### **General Instructions**

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

## **HEN'S SECOND REQUEST FOR INFORMATION TO CENTERPOINT**

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

## **HEN'S SECOND REQUEST FOR INFORMATION TO CENTERPOINT**

### **HEN 2-1.**

Please identify which customer classes will be impacted by the proposed utility-scale Microgrid Pilot Program and describe how each will be impacted.

### **HEN 2-2.**

In reference to the proposed Microgrid Pilot Program, please respond to the following:

- a. Please confirm CenterPoint will not own any generating resources associated with the contemplated microgrid(s).
- b. What facilities will CenterPoint own and operate associated with the contemplated microgrid(s)?
- c. What facilities will CenterPoint operate but not own associated with the contemplated microgrid(s)?
- d. What facilities will CenterPoint own but not operate associated with the contemplated microgrid(s)?
- e. Please explain how investments in generating capacity for the microgrid pilot projects will be compensated and from whom.
- f. Please describe in detail the costs expected to be incurred under contracts with microgrid operators or developers that would be passed on to ratepayers and how such costs would be passed on to ratepayers.
- g. Please explain whether customers will contribute to the capital and operating costs of the proposed pilot microgrid projects for the microgrid(s) from which they will benefit.

### **HEN 2-3.**

Please provide all calculations and workpapers CenterPoint used to determine the Capital and O&M cost estimates for the Microgrid Pilot Program.

### **HEN 2-4.**

What is the statutory basis for the Microgrid Pilot Program?

### **HEN 2-5.**

Please identify all other utility-scale microgrids of which CenterPoint is aware, on other utility systems, where the utility is working to partner with a generator.

## **HEN'S SECOND REQUEST FOR INFORMATION TO CENTERPOINT**

### **HEN 2-6.**

Please explain the physical components of the utility-scale microgrid(s) as contemplated in the Microgrid Pilot Program and the licensing and registration requirements for each part of utility-scale microgrid(s). Please provide all available documentation supporting your response.

### **HEN 2-7.**

How does CenterPoint intend to identify and prioritize geographic areas or groups of customers in its service territory where resiliency would be improved by microgrids?

### **HEN 2-8.**

Please identify any other selection criteria not identified in response to HEN 2-7 that will be used to identify geographic areas or groups of customers for microgrid development?

### **HEN 2-9.**

Will only those customers who will receive energy from utility-scale microgrids pay for the investment associated with the applicable microgrid?

### **HEN 2-10.**

In the proposed Microgrid Pilot Program, who will the customer of the generator associated with the microgrid be?

### **HEN 2-11.**

In the proposed Microgrid Pilot Program, could CenterPoint be a customer of the microgrid?

### **HEN 2-12.**

In the proposed Microgrid Pilot Program, could CenterPoint be a customer of the generator associated with the microgrid?

### **HEN 2-13.**

In the proposed Microgrid Pilot Program, could retail customers be customers of the generator associated with the microgrid?

## **HEN'S SECOND REQUEST FOR INFORMATION TO CENTERPOINT**

### **HEN 2-14.**

In the proposed Microgrid Pilot Program, could retail customers be customers of the microgrid?

### **HEN 2-15.**

In the proposed Microgrid Pilot Program, will the CenterPoint distribution lines and equipment (used to transmit the energy generated by the microgrid generator) be located behind a single retail meter?

### **HEN 2-16.**

In the proposed Microgrid Pilot Program, how does CenterPoint anticipate the retail customers and their load-serving entities will be settled by ERCOT when the microgrid is in island mode?

### **HEN 2-17.**

In the proposed Microgrid Pilot Program, what is the anticipated metering design of the microgrid? For example, will there be more than one retail meter associated with a microgrid?

### **HEN 2-18.**

Does the Microgrid Pilot Program allow for the microgrid operator to own and operate the distribution lines and equipment within the microgrid?

### **HEN 2-19.**

Refer to the Direct Testimony of Brad Tutunjian on page 4, lines 17-21 regarding CenterPoint's definition of a utility-scale microgrid. Is there a minimum or maximum size of the load on the utility-scale microgrid?

### **HEN 2-20.**

What distinguishes the utility-scale microgrid described in the Direct Testimony of Brad Tutunjian on page 4, lines 17-21 from a utility distribution system with segmented feeders?

### **HEN 2-21.**

Can an existing privately-owned microgrid (e.g., generator, distribution facilities, and load) participate in the Microgrid Pilot Program?



## **HEN'S SECOND REQUEST FOR INFORMATION TO CENTERPOINT**

### **HEN 2-22.**

Please explain how customers that are not within the microgrid(s) contemplated by the Microgrid Pilot Program will benefit from the existence of the microgrid(s) and provide all available documentation supporting your response.

### **HEN 2-23.**

What distinguishes a utility-scale microgrid eligible for participation in the proposed Microgrid Pilot Program from existing privately-owned microgrids on CenterPoint's system now?

### **HEN 2-24.**

Refer to the Direct Testimony of Brad Tutunjian on page 7, lines 12-14 regarding the Request for Proposal ("RFP") process for the Microgrid Pilot Program.

- a. What types of entities does CenterPoint anticipate will respond to the RFP?
- b. Is the RFP directed to generation owners?
- c. Will CenterPoint make RFP selections based upon the type of generation technology proposed?
- d. Will the requirements for participation in the Microgrid Pilot Program through the RFP process be subject to Commission review and approval?
- e. Please explain the "financial requirements" needed to qualify for the Microgrid Pilot Program.
- f. Please explain the "technical requirements" needed to qualify for the Microgrid Pilot Program.
- g. Please explain the "operational requirements" needed to qualify for the Microgrid Pilot Program.

### **HEN 2-25.**

Refer to the Direct Testimony of Brad Tutunjian on page 10, lines 8-10. Please explain what type of vendors CenterPoint anticipates it will compensate as part of the Microgrid Pilot Program, and what such compensation would be in exchange for.

## **HEN'S SECOND REQUEST FOR INFORMATION TO CENTERPOINT**

### **HEN 2-26.**

Refer to the Direct Testimony of Brad Tutunjian on page 11, lines 1-3.

- a. Please explain how “the Company may incur charges associated with the operation of these generators, such as fuel, by vendors providing microgrid services to the Company.”
- b. What fuel does CenterPoint anticipate needing to operate generators associated with the microgrids?
- c. Why will CenterPoint pay for fuel expenses associated with the generation?
- d. What other charges does CenterPoint anticipate it would pay associated with deployment of the Microgrid Pilot Program?
- e. Will CenterPoint seek to recover these costs from its customers through rates?

### **HEN 2-27.**

Regarding the technical and operational requirements of the Microgrid Pilot Program set forth in the Direct Testimony of Brad Tutunjian at pages 7-8, does CenterPoint anticipate:

- a. a configuration that would allow the microgrid owner (or generation owner if different) to sell energy to the ERCOT market (in accordance with ERCOT Protocols) when it is not in island mode? If not, why not?
- b. a configuration that would allow the microgrid owner (or generation owner if different) to provide energy to the microgrid participating retail customers when it is not in island mode? If not, why not?

### **HEN 2-28.**

Will CenterPoint be responsible for deploying the microgrid(s) contemplated by the Microgrid Pilot Program? If so, what does deployment entail and under what circumstances will CenterPoint make the decision to deploy the microgrid?

### **HEN 2-29.**

To the extent the answer is different from CenterPoint’s response to HEN 2-28, will CenterPoint determine when the microgrid(s) will be placed into island mode? If yes, how will CenterPoint make this determination?

### **HEN 2-30.**

If deployment and operation of the microgrid are different, will CenterPoint be responsible for operating the microgrid? If yes, please explain how CenterPoint plans to operate the microgrid(s).

## **HEN'S SECOND REQUEST FOR INFORMATION TO CENTERPOINT**

### **HEN 2-31.**

Please produce all non-privileged communications with third parties (including potential customers, developers, vendors) regarding the Microgrid Pilot Program.