

Figure CAK-36 Beryl - Manvel ISD Staging Site Material Area



Q. WERE THERE ANY CHALLENGES THE COMPANY FACED REGARDING DISTRIBUTION OF MATERIALS DURING HURRICANE BERYL?

A. Generally, there were no major issues directly affecting the ability to distribute material to crews. However, immediately after Hurricane Beryl made landfall, the main challenge was street flooding, which temporarily delayed the delivery of materials to some of the Company's staging sites. Additionally, due to the breadth of the restoration efforts, there were occasions where the materials were not close to the restoration activities. When this occurred, the materials would be delivered, or the crews would pick up the materials to expedite restoration.

1 **Q. WHAT DID THE COMPANY DO TO RESTOCK MATERIALS THAT**
2 **WERE DEPLETED DURING THE HURRICANE BERYL RESTORATION**
3 **PROCESS?**

4 A. To restock materials used in restoration efforts, CenterPoint Houston's Materials
5 Management team immediately placed "storm orders," which are material orders
6 that suppliers will prioritize. Additionally, a member of the Company's
7 Engineering Standards team, the function that reviews and approves materials to be
8 used on CenterPoint Houston's operating system, was onsite to work with the
9 Materials Management team. Their responsibility was to approve additional
10 manufacturers or substitute materials that work with the Company's distribution
11 system but were not previously approved manufacturers.

12 **Figure CAK-37 Beryl – Materials Storm Replacement Order**



1 **Q. DID THE COMPANY’S POLE LAYDOWN YARDS HELP FACILITATE**
2 **THE DELIVERY OF POLES IN HURRICANE BERYL RESTORATION**
3 **EFFORTS?**

4 A. Yes. Pole laydown yards were positioned around the service territory to expedite
5 a crew’s ability to pick poles up and get them close to the locations where they
6 needed to be installed. Additionally, contract pole trucks were brought on site to
7 help with movement of poles across the service territory, ensuring that the correct
8 poles were available to crews as needed. As needs shifted from primary distribution
9 poles to secondary distribution poles, the Company’s contract pole trucks shifted
10 poles around the Company’s service territory to ensure that crews had the proper
11 size and/or pole material type for the work they were assigned as restoration
12 activities shifted from primary circuits to secondary circuits. This approach is
13 consistent with the Company’s response to the recent May 2024 EOP Storms.

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Figure CAK-38 Beryl - BASF Staging Site Material Area with Poles



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Figure CAK-39 Beryl - Pole Delivery



1 **Q. HOW WERE TRANSFORMERS DELIVERED TO NECESSARY**
2 **LOCATIONS IN SUPPORT OF HURRICANE BERYL RESTORATION?**

3 A. Overhead and underground transformers were strategically located at staging sites
4 for Hurricane Beryl. By having the transformers at the primary material staging
5 sites, they were readily available for crews. This approach was consistent with the
6 approach for the May 2024 EOP Storms.

7 **Figure CAK-40 Beryl - Manvel ISD Staging Site Material Area Overhead**
8 **Transformers**



9 **Q. DID THE COMPANY UTILIZE ANY CONTRACT RESOURCES TO**
10 **HELP WITH MATERIAL LOGISTICS IN SUPPORT OF HURRICANE**
11 **BERYL RESTORATION?**

12 A. Yes. For Hurricane Beryl, the primary material delivery contractor was Ardmore
13 Logistics. In addition, Front-Line Power was utilized to transfer poles to the

1 appropriate locations. This approach was consistent with the approach for the May
2 2024 EOP Storms.

3 **Q. WHAT WAS THE PROCESS FOR CREWS TO RETURN UNUSED**
4 **MATERIALS WHEN THE STAGING SITE WAS SCHEDULED TO BE**
5 **CLOSED?**

6 A. For Hurricane Beryl, material was kept available for use by contractors while a
7 staging site was active. Contractors were asked to return all unused materials once
8 they received notice the staging site was being demobilized. Crates were set up to
9 receive material returned from crews. Upon demobilization, the materials were
10 palletized, wrapped and prepared for safe transport back to the Company's
11 warehouses. This approach was consistent with the approach for the May 2024
12 EOP Storms.

13 **Q. WERE COSTS FOR ANY OF THE UNUSED MATERIALS CHARGED**
14 **AGAINST EOP WORK ORDERS FOR HURRICANE BERYL?**

15 A. No, all unused material was counted and returned to inventory as part of the
16 demobilization process after Hurricane Beryl.

17 **Q. DID THE COMPANY UTILIZE CONTRACTORS TO PICK UP UNUSED**
18 **MATERIALS THAT WERE REMAINING AT STAGING SITES AND**
19 **LAYDOWN YARDS AFTER SERVICE RESTORATION WAS**
20 **COMPLETE FOR HURRICANE BERYL?**

21 A. Yes, material was loaded by CenterPoint Houston material handlers onto Ardmore
22 Logistics trucks and returned to the assigned warehouses. Front-Line Power trucks
23 were used to haul poles from pole laydown yards back to CenterPoint Houston

1 locations. This approach was consistent with the approach for the May 2024 EOP
2 Storms.

3 **3. Logistics Procurement Unit**

4 **Q. DESCRIBE THE APPROACH TO PROVIDE FOOD AND BEVERAGES**
5 **TO EMPLOYEES AND THIRD-PARTY RESOURCES ENGAGED IN THE**
6 **HURRICANE BERYL RESTORATION EFFORT.**

7 A. The Logistics Procurement Unit supplied food and beverages for those supporting
8 Hurricane Beryl restoration efforts. For staging sites, the Company employed turn-
9 key providers to supply the catering provisions for a served hot breakfast and hot
10 dinner while lunch was provided in a boxed lunch to be picked up by the crews,
11 typically at breakfast. Turn-key providers, or in some cases the Logistics
12 Procurement Unit, supplied snacks, water, ice, and energy drinks to ensure
13 hydration.

1 **Figure CAK-41 Beryl – Fort Bend County Fairground HVAC Food Tent**



2 **Figure CAK-42 Beryl – Fort Bend County Fairground HVAC Food Tent**



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Figure CAK-43 Beryl - Berry Center Food Service

2 For service centers and other CNP work locations that participated in restoration
3 efforts, the Company utilizes turn-key providers, catering companies, and/or local
4 restaurants to provide meals consisting of a hot breakfast, boxed lunches, and hot
5 dinners that were provided daily. Turn-key providers, or in some cases the
6 Logistics Procurement Unit, supplied snacks, water, ice, and energy drinks to
7 ensure hydration. This approach was consistent with the approach for the May
8 2024 EOP Storms.

Figure CAK-44 Beryl - Central Hydration Supply



Q. WHAT STEPS DID THE COMPANY TAKE TO SECURE FOOD AND BEVERAGES IN ADVANCE OF HURRICANE BERYL?

A. The Company was able to arrange catering needs prior to Hurricane Beryl's landfall through contracts with its turn-key suppliers. Additionally, the Company maintains connections with local catering companies to address any arising needs. This approach was consistent with the approach for the May 2024 EOP Storms.

Q. HOW WERE TURN-KEY PROVIDERS ABLE TO QUICKLY AND EFFICIENTLY MOBILIZE STAGING SITES IN SUPPORT OF HURRICANE BERYL?

A. Turn-key providers were able to quickly mobilize staging sites because the Logistics Procurement Unit negotiated and established multi-year agreements as part of general emergency preparedness efforts. This enabled the Company to

1 secure turn-key providers quickly and for the providers to efficiently set up staging
2 sites without having to negotiate individual contracts right before or in the
3 immediate aftermath of a storm.

4 **Q. HOW WERE MUTUAL ASSISTANCE AND CONTRACTOR RESOURCES**
5 **ABLE TO QUICKLY AND EFFICIENTLY BE DEPLOYED TO**
6 **DAMAGED PARTS OF CENTERPOINT HOUSTON'S SYSTEM**
7 **FOLLOWING HURRICANE BERYL?**

8 A. CenterPoint Houston uses two types of resources for system restoration purposes:
9 MA resources and contractor resources. MA and contractor resources are governed
10 by two different types of agreements.

- 11 • MA Resources - when CenterPoint Houston secures resources from MA
12 utilities, the process is covered by a memorandum of understanding or volunteer
13 agreement. The terms of this agreement are based on guidelines established in
14 the Edison Electric Institute's ("EEI's") Mutual Assistance Agreement. The
15 SEE utilizes the EEI Agreement and SEE guidelines. The agreement identifies
16 the responsibilities of the sending utility and the receiving utility, when costs
17 start and stop accruing, the rate of pay, and the process to cover their
18 expenditures.
- 19 • Contractor Resources - CenterPoint Houston has pre-established master
20 services agreements ("MSA") in place with a number of utility contractors that
21 provide linemen, damage assessment services, and VM resources. Upon
22 resource acquisition, a statement of work or an amendment was executed. In
23 instances where a pre-established MSA was not in place, but resources were
24 secured to support Hurricane Beryl, procurement would execute a term sheet
25 specific to the storm.

26 This approach was followed consistent with the May 2024 EOP Storms. For details
27 on deployment and utilization of resources refer to Messrs. Mercado's and Pryor's
28 direct testimonies.

1 **Q. HOW WERE MUTUAL ASSISTANCE AND CONTRACTOR RESOURCES**
2 **ENGAGED AND AT WHAT RATES?**

3 A. MA and contractor resources were engaged by Operations to align resource needs
4 to support system restoration efforts. Procurement was notified by Operations of
5 the need to complete a Statement of Work in support of the storm. Resource
6 engagement followed a sequential approach—beginning with on-premises
7 contractors under existing pre-negotiated rates, followed by MA resources from
8 peer utilities at pass-through costs based on established MA agreements.

9 As the scope of required resources expanded beyond those available from
10 these two groups, outreach was made to additional contractor resources. Due to the
11 critical urgency of restoration efforts and the need to expedite resource
12 mobilization, storm restoration rates submitted by qualified contractor resources
13 were accepted as presented. This approach is consistent with the Company's
14 emergency response protocols and aligned with the rate practices used during the
15 May 2024 EOP Storms.

16 **Q. DID PROCUREMENT VALIDATE WHETHER MUTUAL ASSISTANCE**
17 **AND CONTRACTOR RESOURCES CONTRACTS WERE IN PLACE?**

18 A. Yes, the Company focused on prioritizing timely acquisition of resources while
19 ensuring contract compliance. Procurement validated a contract was in place with
20 contractors that were engaged, and if necessary, took action to implement a new
21 contract or amend to reflect appropriate information applicable to system
22 restoration efforts.

1 **Q. HOW WAS CENTERPOINT HOUSTON ABLE TO TIMELY SOURCE**
2 **SERVICES, EQUIPMENT AND/OR MATERIALS TO SUPPORT**
3 **HURRICANE BERYL RESTORATION EFFORTS?**

4 A. The Company pre-established emergency response agreements with suppliers of
5 services, equipment, and/or materials to source the needs quickly and efficiently.
6 Examples include, but are not limited to, fuel, environmental services, fleet and
7 equipment, telecommunications, security, and logistics transportation. If additional
8 services or equipment and/or materials were needed to support system restoration,
9 the Logistics Procurement Unit assisted with securing them. This approach was
10 consistent with the approach for the May 2024 EOP Storms.

11 **4. Fleet and Fuel Unit**

12 **Q. DESCRIBE THE TRANSPORTATION ARRANGEMENTS THAT WERE**
13 **NECESSARY TO RESPOND TO HURRICANE BERYL.**

14 A. Fleet obtained light fleet vehicle rentals from rental agencies (pickup trucks, cars
15 and SUVs) to aid with staging site logistics, Foreign Crew Coordinators, Corporate
16 Security and Crew Spokespersons.

17 **Q. DESCRIBE THE FUEL SERVICES PROVIDED DURING HURRICANE**
18 **BERYL RESTORATION EFFORTS.**

19 A. For Hurricane Beryl, service center fuel tanks were monitored continuously and
20 topped off each day by suppliers. Fuel was also provided for contractors at
21 Company service centers to make fueling more efficient. During the Hurricane
22 Beryl restoration, staging sites were assigned a fuel provider that sourced fuel and
23 wet hosing, which is mobile on-site fueling for MA, DA, and VM crew vehicles
24 and equipment as well as for vehicles and equipment that were dedicated to the

1 staging sites. This approach was consistent with the approach for the May 2024
2 EOP Storms.

3 **Q. WHAT CHALLENGES DID THE COMPANY FACE IN ACQUIRING OR**
4 **PROVIDING FUEL DURING HURRICANE BERYL RESTORATION**
5 **EFFORTS?**

6 A. There were no challenges faced with acquiring or providing fuel for Hurricane
7 Beryl.

8 **5. Lodging and Bussing Unit**

9 **Q. DID CENTERPOINT HOUSTON PROVIDE LODGING FOR PERSONNEL**
10 **RESOURCES BROUGHT INTO HOUSTON TO SUPPORT THE**
11 **RESTORATION EFFORT FOR HURRICANE BERYL?**

12 A. Yes. Providing lodging was a necessary part of the restoration effort. CenterPoint
13 Houston secured 5,600 to 12,000 total hotel beds nightly and 5,800 man-camp beds
14 nightly to support the restoration efforts.

15 **Q. WHO WERE THE RECIPIENTS OF LODGING PROVIDED BY THE**
16 **COMPANY DURING HURRICANE BERYL RESTORATION?**

17 A. Lodging at hotels and man-camps were provided to linemen, DA and VM crews as
18 well as other contractors. Additionally, Company employees supporting the
19 restoration efforts were able to utilize hotel rooms in certain circumstances such as
20 an employee living far from their assigned storm response location needing to be
21 on call and readily available to report for their storm response duties. This approach
22 was consistent with the approach for the May 2024 EOP Storms.

1 **Q. WHAT STEPS DID THE COMPANY TAKE TO PREPARE FOR**
2 **LODGING FOR HURRICANE BERYL RESTORATION?**

3 A. The Company maintains a relationship with a national hotel acquisition company,
4 HelmsBriscoe, who acquires hotel rooms on the Company's behalf. On July 7,
5 2024, the Lodging and Bussing Unit began dialogue with HelmsBriscoe to begin
6 securing rooms to support the restoration efforts. As the damage assessment results
7 were becoming known to the Company, the Lodging and Bussing Unit coordinated
8 with HelmsBriscoe to continue to acquire the required number of hotel rooms. This
9 approach was consistent with the approach for the May 2024 EOP Storms.

10 **Q. DID THE COMPANY HAVE CHALLENGES REGARDING LODGING**
11 **DURING HURRICANE BERYL RESTORATION?**

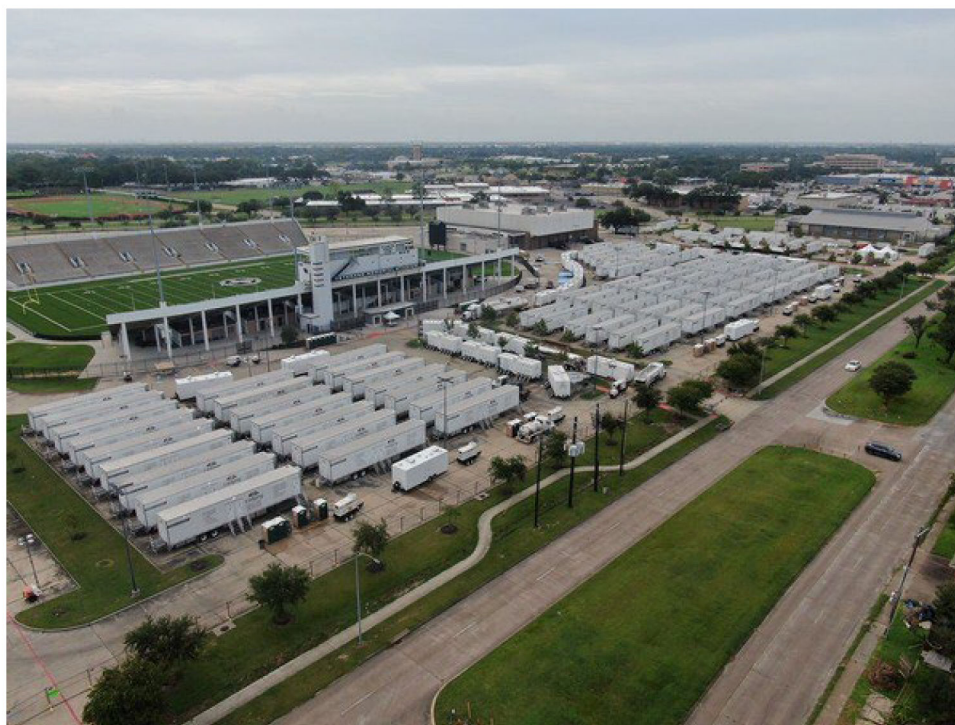
12 A. Yes, there were challenges securing sufficient lodging during Hurricane Beryl.

13 **Q. WHAT DID THE COMPANY DO TO ACQUIRE ADDITIONAL LODGING**
14 **FOR HURRICANE BERYL?**

15 A. When it became evident that available hotel rooms near staging sites would be
16 constrained due to the breadth of the storm impacts, the Company mobilized man-
17 camps located close to storm-impacted areas to accommodate linemen, DA, and
18 VM crews. The Lodging and Bussing Unit worked in close coordination with the
19 Staging Site Unit to determine if, when, and where to deploy temporary man-camps
20 to support the restoration efforts. This approach was consistent with the approach
21 for the May 2024 EOP Storms.

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Figure CAK-45 Beryl - Pasadena Man-Camp



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Figure CAK-46 Beryl - Lake Jackson Man-Camp



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Figure CAK-47 Beryl - Lake Jackson Man-Camp



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Figure CAK-48 Beryl - Tomball Man-Camp Logistics Solutions Site



1 **Figure CAK-49 Beryl - Tomball Man-Camp Logistics Solutions Site**



2 **Q. HOW MANY MAN-CAMPS AND/OR COT FACILITIES DID**
 3 **CENTERPOINT HOUSTON ESTABLISH FOR HURRICANE BERYL?**

4 A. For Hurricane Beryl, four man-camps were established to provide temporary
 5 sleeping arrangements: Pasadena Fairgrounds, Freedom Field, Lake Jackson and
 6 Tomball ISD.

7 **Q. WHAT DID CENTERPOINT HOUSTON DO TO ACQUIRE BUSES TO**
 8 **GET PERSONNEL AND CREWS TO AND FROM AVAILABLE**
 9 **LODGING FOR HURRICANE BERYL RESTORATION?**

10 A. The Company maintains existing charter agreements with local transportation
 11 companies who support day-to-day business needs as well as during emergency
 12 restoration efforts. In addition, Metro provided busses which were used to support

1 moving crews from their staging sites to man-camp lodging accommodations. The
2 Company began reaching out to bus companies on July 7, 2024, to secure busses.
3 Busses were available at the staging sites from 5:00 p.m. to approximately 10:00
4 p.m., or when the last crew left the staging site to bring resources to their assigned
5 lodging. Busses picked up crews beginning at 5:00 a.m. each morning during
6 restoration efforts to bring resources to their assigned staging site. In total, the
7 Company secured 233 busses to transport crews between lodging and staging sites.
8 This approach was consistent with the approach for the May 2024 EOP Storms.

9 **Q. DID THE COMPANY HAVE CHALLENGES REGARDING BUSSING**
10 **DURING HURRICANE BERYL RESTORATION?**

11 A. Generally, there were no challenges regarding busses. Occasionally, there were
12 crews that experienced longer wait times and/or crowded busses.

13 **6. Security Unit**

14 **Q. WHAT STEPS DID THE COMPANY TAKE TO ENSURE SECURITY**
15 **AMONG THE COMPANY'S EMPLOYEES AND THE CONTRACT**
16 **PERSONNEL DURING HURRICANE BERYL RESTORATION**
17 **EFFORTS?**

18 A. To support Hurricane Beryl, the Security Unit deployed previously identified and
19 trained Company site security coordinators, as well as uniformed security guards
20 and contracted off-duty uniformed police officers, to staging sites, laydown yards,
21 and Company service centers. At staging sites and laydown yards, the Security
22 Unit provided traffic control support and secured the staging site property,
23 materials, supplies, and vehicles. This helped provide a secure working
24 environment for employees and contractors. In addition to staging sites, off-duty

1 uniformed police officers were posted at the Company's service centers.
 2 Uniformed security guards and/or contracted uniformed police officers remained at
 3 staging sites and laydown yards until demobilization was complete and all
 4 equipment and personnel were removed and accounted for.

5 **Q. WAS ADDITIONAL SECURITY NECESSARY TO RESPOND TO**
 6 **HURRICANE BERYL?**

7 A. Yes. Uniformed security guards and contracted uniformed police officers were
 8 required to facilitate the additional security coverage needs at the staging sites.
 9 Additionally, a higher level of certified security personnel (Level IV Personal
 10 Protection Officers) were utilized during the restoration efforts due to threats to
 11 Company employees and contractors, which required heightened security
 12 measures.² Despite the numerous threats, the Company fortunately did not
 13 experience serious harm to any employees or third-parties during Hurricane Beryl
 14 restoration efforts.

15 **7. Telecommunications Unit**

16 **Q. HOW WAS THE TELECOMMUNICATIONS UNIT ABLE TO**
 17 **EFFICIENTLY ESTABLISH CONNECTIVITY AT THE STAGING SITES**
 18 **TO SUPPORT HURRICANE BERYL RESTORATION EFFORTS?**

19 A. Utilizing established telecommunications staging site kits enabled timely
 20 telecommunications set-up at the staging sites. During the course of Hurricane

² NPR, "Repair crews face threats in Houston by those still without power a week after Beryl," <https://www.npr.org/2024/07/17/nx-s1-5043279/beryl-houston-repair-crews-face-threats-still-without-power> (Jul. 17, 2024); KHOU 11, "'Please God, stop harassing these people' | County leaders, law enforcement call for end to threats against crews restoring power," <https://www.khou.com/article/weather/hurricane/beryl/threats-centerpoint-energy-crews-restoring-power-hurricane-beryl/285-b3ea76a0-98ab-448f-ba54-5d0fa96d9ef4> (Jul. 14, 2024).

1 Beryl restoration efforts, the Telecommunication Unit was able to secure additional
2 telecommunications related equipment to support the mobilization of additional
3 staging sites.

4 **8. Environmental Unit**

5 **Q. WHAT ENVIRONMENTAL SUPPORT WAS PROVIDED DURING THE**
6 **ESTABLISHMENT OF STAGING SITES FOR HURRICANE BERYL?**

7 A. Once the determination was made to mobilize staging sites and the staging site
8 locations were selected, the Environmental Unit assisted in staging site preparation
9 by inspecting the staging sites and documenting environmental concerns such as
10 pre-existing spills, stains, and dumped or abandoned materials prior to our crews or
11 materials occupying the staging sites. If time did not allow for an environmental
12 inspection prior to staging site occupation, the Environmental Unit performed the
13 inspection as the staging site was receiving crews and materials or as soon as
14 reasonably possible thereafter. Environmental concerns identified prior to, or
15 during, the occupation of a staging site were documented. This approach was
16 consistent with the approach for the May 2024 EOP Storms.

17 **Q. WHAT ENVIRONMENTAL SUPPORT WAS PROVIDED AT STAGING**
18 **SITES DURING THE SYSTEM RESTORATION EFFORTS FOR**
19 **HURRICANE BERYL?**

20 A. During operation of a staging site, the Environmental Unit contracted with vendors
21 to supply waste bins to contain debris generated from repair of Company
22 infrastructure and brought back to the staging sites. The Environmental Unit also
23 arranged for disposal of the repair debris and ensured that an adequate and steady
24 supply of bins was provided to the staging sites. In addition to managing waste and

debris, the Environmental Unit also performed routine inspections of staging sites to ensure ongoing environmental compliance. In the event of a spill or release, the Environmental Unit dispatched a spill cleanup supplier to complete the cleanup of the impacted area. This approach was consistent with the approach for the May 2024 EOP Storms.

Figure CAK-50 – Environmental Waste Bins



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Figure CAK-51 – Environmental Waste Bins



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Figure CAK-52 – Environmental Waste Bins



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Figure CAK-53 Beryl – Scrap Metal Recycling Bins

2 **Q. WHAT ENVIRONMENTAL SUPPORT WAS PROVIDED AT**
 3 **CENTERPOINT HOUSTON'S SERVICE CENTERS DURING THE**
 4 **SYSTEM RESTORATION EFFORTS FOR HURRICANE BERYL?**

5 A. As damaged transformers were brought back to the service centers from the field,
 6 the Environmental Unit supported the Logistics and Materials Unit in identifying
 7 and disposing of the damaged transformers. The Environmental Unit also helped
 8 coordinate the disposal of damaged transformer mineral oil impacted debris
 9 brought back to the service centers from the field. This approach was consistent
 10 with the approach for the May 2024 EOP Storms.

1 **Q. WHAT ENVIRONMENTAL IMPACTS DID THE COMPANY HAVE TO**
 2 **ADDRESS AS A RESULT OF HURRICANE BERYL?**

3 A. Hurricane Beryl caused a total of 181 spills from mineral oil filled electrical
 4 equipment. The Environmental Unit coordinated the clean-up of those spills and
 5 proper disposal of all oily debris that was generated by contractor spill clean-up
 6 crews.

7 **9. Facilities Unit**

8 **Q. WERE COMPANY FACILITIES DAMAGED BY HURRICANE BERYL?**

9 A. Yes, there was damage at Company facilities. Damaged facilities included the
 10 Addicks Operations Center and the following service centers: Baytown, Bellaire,
 11 Brazoria, Cypress, Galveston, Greenspoint, Greenspoint Annex, Harrisburg, Katy,
 12 and Spring Branch. For example, the hurricane force winds broke windows and
 13 tore a portion of the roof off the Greenpoint Service Center and blew ceiling tiles
 14 and light fixtures out at Harrisburg & Spring Branch Service Centers. The Facilities
 15 Unit also addressed damaged generators and switchgear and performed the
 16 requisite repair measures to ensure personnel could work safely.

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Figure CAK-54 Beryl - Facilities Damage



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Figure CAK-55 Beryl - Facilities Damage



**Direct Testimony of Carla Kneipp
CenterPoint Energy Houston Electric, LLC**

1 **10. Internal Logistics Section Resources Group**

2 **Q. DID THE INTERNAL LOGISTICS SECTION RESOURCES GROUP**
 3 **PROVIDE SUPPORT FOR THE HURRICANE BERYL RESTORATION**
 4 **EFFORTS?**

5 A. Yes, the Internal Logistics Section Resources group (Logistics Coordinators, EOP
 6 Logistics Resource Backup Support and EOP Logistics Financial Reporting)
 7 performed their responsibilities as defined earlier in the testimony.

8 **Q. DID THE EOP LOGISTICS RESOURCE BACKUP SUPPORT TEAM,**
 9 **WITHIN THE INTERNAL LOGISTICS SECTION RESOURCES GROUP,**
 10 **EXPERIENCE ANY CHALLENGES SUPPORTING THE RESTORATION**
 11 **EFFORTS FOR HURRICANE BERYL?**

12 A. Yes, due to the breadth of the Company's service territory that was impacted and
 13 the number of staging sites that were necessary, the EOP Logistics Resource
 14 Backup Support team had to secure resources to help support the restoration efforts.
 15 They leveraged CNP affiliate employees for the numerous roles they were asked to
 16 fill to provide additional support. Examples include fuel coordinators, hotel
 17 coordinators, and staging site managers, among others.

18 **D. Logistics Section Demobilization After Hurricane Beryl**

19 **Q. WHEN DID THE LOGISTICS UNITS BEGIN DEMOBILIZATION**
 20 **EFFORTS RELATED TO HURRICANE BERYL?**

21 A. On July 18, 2024, the Operations Section Chief requested that the Logistics Section
 22 commence demobilization efforts for staging sites, man-camps, and laydown yards
 23 in a phased approach. Two staging sites, Sam Houston Racetrack and Reed Road,
 24 were requested to be kept open longer to support line and VM resources.

1 **Q. WHAT SERVICES WERE PROVIDED AT STAGING SITES AFTER**
2 **JULY 19, 2024, RELATED TO HURRICANE BERYL?**

3 A. After July 19, 2024, the Logistics Section provided Level III staging site services
4 at Sam Houston Racetrack and Reed Road to support the restoration of localized
5 outages in the hardest hit areas that needed to be addressed. Examples of the
6 services provided included telecommunications, materials, ice, water, beverages,
7 and security. Specifically, Sam Houston Racetrack was operational through
8 August 20, 2024, and Reed Road was operational through September 12, 2024.
9 Demobilization efforts commenced on August 20, 2024, for Sam Houston
10 Racetrack and September 12, 2024, for Reed Road.

11 **Q. WHAT ENVIRONMENTAL SUPPORT WAS PROVIDED DURING**
12 **DEMOBILIZATION FROM HURRICANE BERYL?**

13 A. After each staging site was demobilized and all materials and debris removed, the
14 Environmental Unit, or one of its spill cleanup vendors, inspected the site for
15 releases or remaining solid waste and removed the material in accordance with all
16 applicable environmental laws. After each staging site was cleaned and prior to
17 returning the property to the owner, a final walk-through was performed to
18 document the condition of each property. This approach was consistent with the
19 approach for the May 2024 EOP Storms.

1 **E. Logistics Section Preparations Immediately in Advance of and**
 2 **After Hurricane Francine**

3 **Q. HOW DID THE LOGISTICS SECTION PREPARE FOR HURRICANE**
 4 **FRANCINE?**

5 A. Similar to Hurricane Beryl, the advanced planning by the Logistics Section and the
 6 timely decision to mobilize the Logistics Section and related support resources was
 7 critical to enabling the Logistics Section to commence mobilization to support
 8 anticipated Hurricane Francine impacts.

9 **Q. WHEN WAS THE LOGISTICS SECTION LEADERSHIP NOTIFIED OF**
 10 **ACTIVATION TO SUPPORT HURRICANE FRANCINE RESTORATION**
 11 **EFFORTS?**

12 A. Notification was provided to the Logistics Section on Friday, September 6, 2024,
 13 of the anticipated need to support Hurricane Francine restoration efforts. On
 14 September 8, 2024, the EOC was activated, and in the afternoon, an activation call
 15 was held with the Logistics Section. All members of the Logistics Unit leadership
 16 were on the call to ensure they were informed of the needs of the Logistics Section
 17 related to anticipated restoration efforts.

18 **Q. WHICH LOGISTICS SECTION UNITS WERE MOBILIZED FOR**
 19 **HURRICANE FRANCINE?**

20 A. The Logistics Units and the resources (manpower and materials) were mobilized in
 21 proportion with the forecasted storm impacts to prepare for Hurricane Francine
 22 restoration efforts. Ultimately, the EOP Logistics Resource Backup Support team
 23 was the only group not mobilized in Hurricane Francine.

1 **Q. WERE THE LOGISTICS SECTION RESPONSE ACTIVITIES FOR**
2 **HURRICANE FRANCINE CONSISTENT WITH THE MAY 2024 EOP**
3 **STORM AND HURRICANE BERYL RESPONSE EFFORTS?**

4 A. Yes, the approach followed for Hurricane Francine emergency response was largely
5 consistent with the approach followed for the May 2024 EOP Storms and as
6 detailed in this filing with Hurricane Beryl. There were also instances where the
7 approach for Hurricane Francine was different from the response for Hurricane
8 Beryl primarily because the emergency storm response needs themselves were
9 different.

10 Exhibit CAK-2 to my testimony includes Hurricane Francine related
11 pictures.

12 **Q. WHAT OCCURRED ONCE THE LOGISTICS SECTION MOBILIZED TO**
13 **SUPPORT POTENTIAL HURRICANE FRANCINE RESTORATION**
14 **EFFORTS?**

15 A. On September 7th, the Logistics Procurement Unit contacted turn-key providers to
16 mobilize assets to establish six staging sites. Subsequent to notification and prior
17 to storm landfall, the turn-key providers were on-call to make any necessary
18 adjustments. The Logistics Unit leaders notified additional storm-related suppliers
19 of our support needs, e.g. fuel, vehicle rental, security, facility. On September 9th,
20 the Lodging and Bussing unit contacted the hotel provider to secure and assign
21 rooms. In anticipation of the storm, the turn-key providers and additional storm-
22 related suppliers arrived early on the morning of September 10th to begin the set-
23 up of three staging sites.

1 **Q. WHEN WAS THE LOGISTICS SECTION NOTIFIED TO DEMOBILIZE**
2 **HURRICANE FRANCINE SUPPORT EFFORTS?**

3 A. As a result of the storm's trajectory shifting, the Operations Section notified the
4 Staging Site Unit on September 11, 2024, that support would no longer be needed
5 and demobilization efforts commenced later that morning.

6 **Q. WHY DID THE LOGISTICS SECTION MOBILIZE FOR HURRICANE**
7 **FRANCINE?**

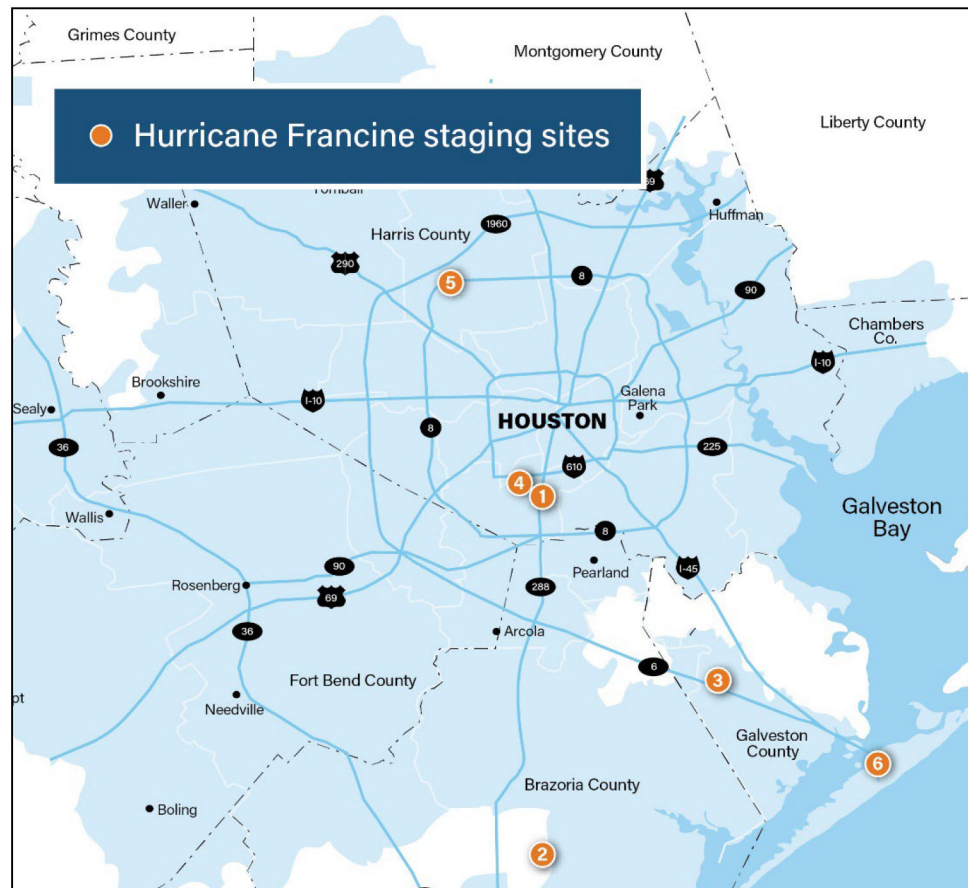
8 A. As Mr. Carroll explains, due to the uncertainty around the projected path of
9 Hurricane Francine and Governor Abbott's directive to the Company to ensure it
10 had a sufficient number of pre-staged resources, the Company decided that it was
11 necessary to prepare for the potential impact of the storm. Eventually on
12 September 10, 2024, the storm shifted away from the Texas coast and ultimately
13 made landfall in Louisiana, rendering the Company Logistics Section emergency
14 response efforts no longer necessary. If the storm had not shifted and the impact
15 remained on the Texas Coast, the requisite logistics support was prepared.

16 **Q. HOW MANY STAGING SITES DID CENTERPOINT HOUSTON**
17 **ESTABLISH TO SUPPORT HURRICANE FRANCINE RESTORATION**
18 **EFFORTS?**

19 A. Six Level I staging sites were established to support restoration efforts for
20 Hurricane Francine at the locations shown below in Figure CAK-56. Six Level I
21 sites were appropriate because the storm forecasts indicated that the impacts would
22 be to the south of our service territory and not widespread throughout the
23 Company's service territory. The established Level I staging sites were located at:

1. Reed Road
2. Brazoria County Fair Grounds
3. Galveston County Fairgrounds
4. NRG – Astroworld
5. Sam Houston Race Track
6. Moody Gardens

Figure CAK-56 – Site Map of the Hurricane Francine Staging Sites



Q. FOR HURRICANE FRANCINE, WHEN WERE THE STAGING SITES ESTABLISHED, AND WHAT WAS THE CREW CAPACITY?

A. The table below (Figure CAK-57) shows the date each staging site was established in preparation for Hurricane Francine and the capacity of each site.

Figure CAK-57 – Hurricane Francine Staging Site with Capacity

Staging Site Name	Crews Capacity	Mobilized
Reed Rd	800	10-Sep
Brazoria County Fair Grounds	500	10-Sep
Galveston County Fair Grounds	500	10-Sep
NRG - Astroworld	1000	10-Sep
Sam Houston Race Track	700	10-Sep
Moody Gardens	500	10-Sep

Q. WERE THE LOGISTICS SECTION RESPONSE ACTIVITIES FOR HURRICANE FRANCINE CONSISTENT WITH THOSE PERFORMED FOR THE MAY 2024 EOP STORMS AND HURRICANE BERYL?

A. Yes, the approach followed for Hurricane Francine emergency response was consistent with the approach followed for the May 2024 EOP Storms and those detailed in this filing for Hurricane Beryl.

Q. WERE THE LOGISTICS SECTION RESOURCES MOBILIZED IN SUPPORT OF HURRICANE FRANCINE THE SAME SIZE AND SCALE AS MOBILIZED IN HURRICANE BERYL?

A. No, the anticipated size and scale of Hurricane Francine was anticipated to be smaller than Hurricane Beryl's size and scale and therefore resources (manpower, materials, and equipment) were planned accordingly.

F. Logistics Section Preparations Immediately in Advance of and After Winter Storm Enzo

Q. HOW DID THE LOGISTICS SECTION PREPARE FOR WINTER STORM ENZO?

A. Just as in Hurricane Beryl and Hurricane Francine, the advance planning by the Logistics Section and the timely decision to mobilize the Logistics Section and related support resources were critical to enabling the Logistics Section to

1 commence mobilization to support potential Winter Storm Enzo restoration efforts
2 in advance of the weather impacts.

3 **Q. HOW DID THE COMPANY MOBILIZE ITS LOGISTICS SECTION**
4 **PERSONNEL TO PREPARE FOR WINTER STORM ENZO?**

5 A. Notification was provided to the Logistics Section on January 15, 2025, to ensure
6 Logistics Section leadership was fully aware of the potential storm and affirm their
7 availability. As the storm continued to reflect a significant impact to the
8 Company's service territory, the Logistics Section commenced mobilizing for an
9 emergency response on January 17, 2025. During the activation call, I discussed
10 which Logistics Units would be needed to support a potential Winter Storm Enzo
11 storm response. All members of the Logistics Unit leadership were on the call to
12 ensure they were informed of the needs of the Logistics Section related to
13 restoration efforts.

14 **Q. WHICH LOGISTICS SECTION UNITS WERE MOBILIZED FOR**
15 **WINTER STORM ENZO?**

16 A. The Logistics Units and the resources (manpower and materials) were mobilized in
17 proportion with the forecasted storm impacts in anticipation of Winter Storm Enzo
18 restoration efforts. The EOP Logistics Resource Backup Support team was the only
19 group not mobilized in Winter Storm Enzo.

1 **Q. WERE THE LOGISTICS SECTION RESPONSE ACTIVITIES FOR**
2 **WINTER STORM ENZO CONSISTENT WITH THE MAY 2024 EOP**
3 **STORM, HURRICANE BERYL AND HURRICANE FRANCINE**
4 **RESPONSE EFFORTS?**

5 A. Yes, the approach followed for Winter Storm Enzo emergency response was largely
6 consistent with the approach followed for the May 2024 EOP Storms and as
7 detailed in this filing for Hurricane Beryl and Hurricane Francine. There were also
8 instances where the approach for Winter Storm Enzo was different primarily
9 because the emergency storm response needs themselves were different, e.g. pre-
10 storm mobilization.

11 Exhibit CAK-3 to my testimony includes Winter Storm Enzo related
12 pictures.

13 **Q. WHAT OCCURRED ONCE THE LOGISTICS SECTION MOBILIZED TO**
14 **SUPPORT POTENTIAL WINTER STORM ENZO RESTORATION**
15 **EFFORTS?**

16 A. On January 15, 2025, the Logistics Procurement Unit contacted turn-key providers
17 to confirm availability to mobilize assets. As the storm forecasts continued to
18 reflect storm impacts of potential freezing rain, sleet, and snow in the Company's
19 service territory, and the potential weather-related risks to our system, it was
20 determined that three staging sites would be established in advance of the storm.
21 Subsequent to notification and prior to storm impact, the turn-key providers were
22 on-call to make any necessary adjustments. The Logistics Unit leaders notified
23 additional storm-related suppliers of our support needs, e.g., fuel, vehicle rental,

1 security, facility. On January 17th, the Lodging and Bussing unit contacted the
2 hotel provider to secure and assign rooms. Potential weather-related risks to our
3 transmission and distribution systems are discussed in the direct testimonies of
4 Messrs. Carroll, Mercado and Pryor.

5 **Q. WHEN DID THE LOGISTICS SECTION BEGIN MOBILIZATION OF**
6 **STAGING SITES TO SUPPORT WINTER STORM ENZO RESTORATION**
7 **EFFORTS?**

8 A. Due to the nature of Winter Storm Enzo, turn-key providers were able to mobilize
9 in advance of the storm. As a result, turn-key providers and additional storm-
10 related suppliers arrived at 6 a.m. on January 20, 2025, to begin the mobilization of
11 three staging sites.

12 **Q. HOW MANY STAGING SITES DID CENTERPOINT HOUSTON**
13 **ESTABLISH TO SUPPORT WINTER STORM ENZO RESTORATION**
14 **EFFORTS?**

15 A. Three Level I staging sites were established to support restoration efforts for Winter
16 Storm Enzo at the locations shown below in Figure CAK-58. Three Level I sites
17 were appropriate because the storm forecasts indicated a high risk of freezing rain,
18 sleet, and snow and the resulting impacts would be to the south of the Company's
19 service territory and not widespread throughout the Company's service territory.

20 The established Level I staging sites were located at:

- 21 1. NRG - Astroworld
- 22 2. Moody Gardens
- 23 3. Brazoria County Fair Grounds

1 **Q. WERE THE LOGISTICS SECTION RESPONSE ACTIVITIES FOR**
2 **WINTER STORM ENZO CONSISTENT WITH THE MAY 2024 EOP**
3 **STORMS, HURRICANE BERYL, AND HURRICANE FRANCINE?**

4 A. Yes, the approach followed for Winter Storm Enzo emergency response was
5 consistent with the approach followed for the May 2024 EOP Storms and those
6 detailed in this filing for Hurricane Beryl and Hurricane Francine.

7 **Q. WERE THE LOGISTICS SECTION RESOURCES MOBILIZED IN**
8 **SUPPORT OF WINTER STORM ENZO THE SAME SIZE AND SCALE AS**
9 **MOBILIZED IN HURRICANE BERYL?**

10 A. No, the anticipated size and scale of Winter Storm Enzo was smaller than Hurricane
11 Beryl's size and scale, and therefore resources (manpower, materials, and
12 equipment) were planned accordingly.

13 **Q. WHEN DID THE LOGISTICS SECTION BEGIN DEMOBILIZATION OF**
14 **STAGING SITES FROM WINTER STORM ENZO RESTORATION**
15 **EFFORTS?**

16 A. Although our service territory experienced impacts from the winter storm, our
17 transmission and distribution systems were minimally impacted, and restoration
18 efforts occurred rapidly as further discussed in the direct testimonies of Mr.
19 Mercado and Mr. Pryor. On the afternoon of January 21, 2025, the Operations
20 Section notified the Logistics Section that support would no longer be needed, and
21 demobilization efforts commenced on January 22nd.

G. Logistics Section Responses for Hurricane Francine and Winter Storm Enzo

1. Staging Site Unit

Q. DID THE STAGING SITE UNIT PERFORM THE SAME ACTIVITIES FOR THE HURRICANE FRANCINE AND WINTER STORM ENZO RESPONSES THAT WERE PERFORMED FOR HURRICANE BERYL?

A. Yes, generally, the Staging Site Unit performed the same activities for Hurricane Francine and Winter Storm Enzo that were performed for Hurricane Beryl as discussed in this filing, as well as for the May 2024 EOP Storms.

Q. DID THE STAGING SITE UNIT EXPERIENCE ANY CHALLENGES SUPPORTING HURRICANE FRANCINE OR WINTER STORM ENZO PREPARATION AND/OR RESTORATION EFFORTS?

A. Generally, there were no material challenges that the Staging Site Unit experienced for either Hurricane Francine or Winter Storm Enzo emergency response efforts.

2. Logistics and Materials Unit

Q. DID THE LOGISTICS AND MATERIALS UNIT EXPERIENCE ANY CHALLENGES SUPPORTING HURRICANE FRANCINE OR WINTER STORM ENZO PREPARATION AND/OR RESTORATION EFFORTS?

A. Generally, there were no material challenges that the Logistics and Materials Unit experienced for either Hurricane Francine or Winter Storm Enzo emergency response efforts.

1 **Q. DID THE COMPANY TAKE PREPARATORY MEASURES TO DELIVER**
 2 **MATERIALS TO STAGING SITES FOR HURRICANE FRANCINE AND**
 3 **WINTER STORM ENZO PREPARATION AND/OR RESTORATION**
 4 **EFFORTS?**

5 A. Yes, as part of the emergency response preparatory measures for Hurricane
 6 Francine and Winter Storm Enzo, materials were delivered to the staging sites that
 7 were mobilized. For Winter Storm Enzo, the Company was able to deliver
 8 materials in advance of the storm's impact.

9 **Q. DID THE COMPANY MAINTAIN STAGING SITE MATERIAL KITS FOR**
 10 **HURRICANE FRANCINE AND WINTER STORM ENZO STAGING**
 11 **SITES?**

12 A. Yes, as noted earlier, the Company has a long-standing practice of maintaining
 13 staging site material kits to enable quick deployment. After Hurricane Beryl, the
 14 Company re-examined the number of staging site material kits to maintain and
 15 decided to increase the number of maintained staging site material kits from eleven
 16 to a total of twenty-one. Additionally, the standard kit content was reviewed to
 17 incorporate Hurricane Beryl material usage data and was revised. These kits were
 18 available for use in September 2024. The kits are maintained in locations
 19 throughout the Company's footprint to support timely deployment.

1 **Q. DID THE COMPANY DELIVER MATERIAL KITS TO THE STAGING**
2 **SITES IN SUPPORT OF HURRICANE FRANCINE OR WINTER STORM**
3 **ENZO RESTORATION EFFORTS?**

4 A. Staging site material kits were readily available for but not delivered to the staging
5 sites for Hurricane Francine. For Winter Storm Enzo, material kits were delivered
6 to the staging sites in preparation for restoration efforts.

7 **Q. DID THE COMPANY MAKE A REQUEST TO THE MUTUAL**
8 **ASSISTANCE EMERGENCY MATERIAL NETWORK FOR HURRICANE**
9 **FRANCINE OR FOR WINTER STORM ENZO PREPARATION AND/OR**
10 **RESTORATION EFFORTS?**

11 A. No, CenterPoint Houston did not make a mutual assistance materials request in
12 support of Hurricane Francine or Winter Storm Enzo restoration efforts.

13 **Q. WERE TRANSFORMERS DELIVERED TO STAGING SITES TO**
14 **SUPPORT HURRICANE FRANCINE OR WINTER STORM ENZO**
15 **PREPARATION AND/OR RESTORATION EFFORTS?**

16 A. No, overhead and underground transformers were not delivered to the staging sites.
17 In the event they were needed to support restoration efforts, the intent was to deliver
18 directly to the job site.

1 **Q. DID THE COMPANY UTILIZE ANY CONTRACT RESOURCES TO**
2 **HELP WITH MATERIAL LOGISTICS FOR HURRICANE FRANCINE OR**
3 **WINTER STORM ENZO PREPARATION AND/OR RESTORATION**
4 **EFFORTS?**

5 A. Yes, just as the Company did for Hurricane Beryl, the primary material delivery
6 contractor was Ardmore Logistics in support of Hurricane Francine and Winter
7 Storm Enzo. This approach is consistent with the approach used for the May 2024
8 EOP Storms and Hurricane Beryl.

9 **Q. WHAT WAS THE PROCESS FOR CREWS TO RETURN UNUSED**
10 **MATERIALS WHEN THE STAGING SITES WERE SCHEDULED TO BE**
11 **CLOSED FOR HURRICANE FRANCINE AND WINTER STORM ENZO**
12 **RESTORATION EFFORTS?**

13 A. No materials were utilized for Hurricane Francine. For Winter Storm Enzo,
14 material was kept available for use by contractors while a staging site was active.
15 During Winter Storm Enzo, the staging site material was not utilized, and the
16 limited amount of material that was used was issued from Service Center
17 warehouses. Upon demobilization, the materials held at staging sites were
18 palletized, wrapped and prepared for safe transport back to the Company's
19 warehouses. This approach was consistent with the approach for Hurricane Beryl
20 as discussed in this filing, as well as for the May 2024 EOP Storms.

1 **Q. WERE COSTS FOR ANY OF THE UNUSED MATERIALS CHARGED**
2 **AGAINST EOP WORK ORDERS FOR HURRICANE FRANCINE OR**
3 **WINTER STORM ENZO PREPARATION AND/OR RESTORATION**
4 **EFFORTS?**

5 A. No, all unused material was counted and returned to inventory as part of the
6 demobilization process after each storm.

7 **Q. DID THE COMPANY UTILIZE CONTRACTORS TO PICK UP UNUSED**
8 **MATERIALS THAT WERE REMAINING AT STAGING SITES AND**
9 **LAYDOWN YARDS FOR HURRICANE FRANCINE OR WINTER STORM**
10 **ENZO PREPARATION AND/OR RESTORATION EFFORTS?**

11 A. Yes, for both Hurricane Francine and Winter Storm Enzo, as part of demobilization,
12 material was loaded by CenterPoint Houston material handlers onto Ardmore
13 Logistics trucks and returned to the assigned warehouses. This approach was
14 consistent with the approach for Hurricane Beryl as discussed in this filing, as well
15 as for the May 2024 EOP Storms.

16 **3. Logistics Procurement Unit**

17 **Q. DID THE LOGISTICS PROCUREMENT UNIT PERFORM THE SAME**
18 **ACTIVITIES FOR THE HURRICANE FRANCINE AND WINTER STORM**
19 **ENZO RESPONSES THAT WERE PERFORMED FOR HURRICANE**
20 **BERYL?**

21 A. Yes, generally, the Logistics Procurement Unit performed the same activities in the
22 Hurricane Francine and Winter Storm Enzo responses that were performed for
23 Hurricane Beryl as discussed in this filing, as well as for the May 2024 EOP Storms.

1 **Q. WERE EXISTING MUTUAL ASSISTANCE AND CONTRACTOR**
2 **RESOURCES UTILIZED FOR THE HURRICANE FRANCINE OR**
3 **WINTER STORM ENZO RESPONSES?**

4 A. Yes, existing MA and contractor resources were primarily utilized to support
5 system restoration efforts for Hurricane Francine and Winter Storm Enzo.

6 **Q. WERE MUTUAL ASSISTANCE AND CONTRACTOR RESOURCES**
7 **RATES USED FOR THE HURRICANE FRANCINE AND WINTER**
8 **STORM ENZO RESPONSES CONSISTENT WITH OTHER STORMS?**

9 A. Yes, the rates utilized for the standard work during Hurricane Francine were
10 consistent with those previously applied for the May 2024 EOP Storms and
11 Hurricane Beryl. For Winter Storm Enzo, although it is standard practice for the
12 Company to solicit rates on an annual basis, the Company successfully maintained
13 these established emergency response rates into 2025.

14 **Q. DID THE LOGISTICS PROCUREMENT UNIT EXPERIENCE ANY**
15 **CHALLENGES SUPPORTING HURRICANE FRANCINE OR WINTER**
16 **STORM ENZO PREPARATION AND/OR RESTORATION EFFORTS?**

17 A. Generally, there were no material challenges that the Logistics Procurement Unit
18 experienced for either Hurricane Francine or Winter Storm Enzo emergency
19 response efforts.

4. Fleet and Fuel Unit

Q. DID THE FLEET AND FUEL UNIT PERFORM THE SAME ACTIVITIES FOR THE HURRICANE FRANCINE AND WINTER STORM ENZO RESPONSES THAT WERE PERFORMED FOR HURRICANE BERYL?

A. Yes, generally, the Fleet and Fuel Unit performed the same activities performed for Hurricane Beryl.

Q. DID THE FLEET AND FUEL UNIT EXPERIENCE ANY CHALLENGES SUPPORTING HURRICANE FRANCINE OR WINTER STORM ENZO PREPARATION AND/OR RESPONSE EFFORTS?

A. Generally, there were no material challenges that the Fleet and Fuel Unit experienced for either Hurricane Francine or Winter Storm Enzo emergency response efforts.

5. Lodging and Bussing Unit

Q. DID THE LODGING AND BUSSING UNIT PERFORM THE SAME ACTIVITIES FOR THE HURRICANE FRANCINE AND WINTER STORM ENZO RESPONSES THAT WERE PERFORMED FOR HURRICANE BERYL?

A. Yes, generally, the Lodging and Bussing Unit performed the same activities for Hurricane Francine and Winter Storm Enzo that were performed for Hurricane Beryl as discussed in this filing, as well as for the May 2024 EOP Storms.

1 **Q. DID THE LODGING AND BUSSING UNIT EXPERIENCE ANY**
2 **CHALLENGES SUPPORTING HURRICANE FRANCINE OR WINTER**
3 **STORM ENZO PREPARATION AND/OR RESPONSE EFFORTS?**

4 A. Generally, there were no material challenges that the Lodging and Bussing Unit
5 experienced for either Hurricane Francine or Winter Storm Enzo emergency
6 response efforts.

7 **6. Security Unit**

8 **Q. DID THE SECURITY UNIT PERFORM THE SAME ACTIVITIES FOR**
9 **THE HURRICANE FRANCINE AND WINTER STORM ENZO**
10 **RESPONSES THAT WERE PERFORMED FOR HURRICANE BERYL?**

11 A. Yes, generally, the Security Unit performed the same activities for Hurricane
12 Francine and Winter Storm Enzo that were performed for Hurricane Beryl as
13 discussed in this filing, as well as for the May 2024 EOP Storms.

14 **Q. DID THE SECURITY UNIT EXPERIENCE ANY CHALLENGES**
15 **SUPPORTING HURRICANE FRANCINE OR WINTER STORM ENZO**
16 **PREPARATION AND/OR RESPONSE EFFORTS?**

17 A. Generally, there were no material challenges that the Security Unit experienced for
18 either Hurricane Francine or Winter Storm Enzo emergency response efforts.

7. Telecommunications Unit

Q. DID THE TELECOMMUNICATIONS UNIT PERFORM THE SAME ACTIVITIES FOR THE HURRICANE FRANCINE AND WINTER STORM ENZO RESPONSES THAT WERE PERFORMED FOR HURRICANE BERYL?

A. Yes, the Telecommunications Unit performed the same activities for Hurricane Francine and Winter Storm Enzo that were performed for Hurricane Beryl as discussed in this filing, as well as for the May 2024 EOP Storms.

Q. DID THE TELECOMMUNICATION UNIT EXPERIENCE ANY CHALLENGES SUPPORTING HURRICANE FRANCINE OR WINTER STORM ENZO?

A. Generally, there were no material challenges that the Telecommunication Unit experienced for either Hurricane Francine or Winter Storm Enzo emergency response efforts.

8. Environmental Unit

Q. DID THE ENVIRONMENTAL UNIT PERFORM THE SAME ACTIVITIES FOR THE HURRICANE FRANCINE AND WINTER STORM ENZO RESPONSES THAT WERE PERFORMED FOR HURRICANE BERYL?

A. Yes, the Environmental Unit performed the same activities for Hurricane Francine and Winter Storm Enzo that were performed for Hurricane Beryl as discussed in this filing, as well as for the May 2024 EOP Storms.

1 **Q. DID THE ENVIRONMENTAL UNIT EXPERIENCE ANY CHALLENGES**
2 **SUPPORTING HURRICANE FRANCINE OR WINTER STORM ENZO**
3 **PREPARATION AND/OR RESPONSE EFFORTS?**

4 A. Generally, there were no material challenges that the Environmental Unit
5 experienced for either Hurricane Francine or Winter Storm Enzo emergency
6 response efforts.

7 **Q. WHAT ENVIRONMENTAL IMPACTS DID THE COMPANY HAVE TO**
8 **ADDRESS AS A RESULT OF HURRICANE FRANCINE OR WINTER**
9 **STORM ENZO?**

10 A. There were no spills from mineral oil filled electrical equipment from Hurricane
11 Francine or from Winter Storm Enzo.

12 **9. Facilities Unit**

13 **Q. DID THE FACILITIES UNIT PERFORM THE SAME ACTIVITIES FOR**
14 **THE HURRICANE FRANCINE AND WINTER STORM ENZO**
15 **RESPONSES THAT WERE PERFORMED FOR HURRICANE BERYL?**

16 A. Yes, the Facilities Unit generally performed the same activities for Hurricane
17 Francine and Winter Storm Enzo that were performed for Hurricane Beryl. For
18 Hurricane Francine, advance preparation was performed to ensure that Company
19 facilities were protected from the risk of high winds and flooding. For Winter
20 Storm Enzo, advance preparation was performed to ensure that Company facilities
21 were prepared for the freezing conditions such as insulation of pipes, salting
22 driveways and walkways. Fortunately, neither storm caused damage to the
23 Company's facilities.

1 **Q. DID THE FACILITIES UNIT EXPERIENCE ANY CHALLENGES**
 2 **SUPPORTING HURRICANE FRANCINE OR WINTER STORM ENZO**
 3 **PREPARATION AND/OR RESPONSE EFFORTS?**

4 A. Generally, there were no material challenges that the Facilities Unit experienced
 5 for either Hurricane Francine or Winter Storm Enzo emergency response efforts.

6 **10. Internal Logistics Section Resources Group**

7 **Q. DID THE INTERNAL LOGISTICS SECTION RESOURCES GROUP**
 8 **PERFORM THE SAME ACTIVITIES FOR THE HURRICANE FRANCINE**
 9 **AND WINTER STORM ENZO RESPONSES THAT WERE PERFORMED**
 10 **FOR HURRICANE BERYL?**

11 A. Generally, the Internal Logistics Section Resources Group performed the same
 12 activities for Hurricane Francine and Winter Storm Enzo that were performed for
 13 Hurricane Beryl as discussed in this filing, as well as for the May 2024 EOP Storms.
 14 The Logistics Coordinators and EOP Logistics Financial Reporting Group
 15 performed activities in support of Hurricane Francine and Winter Storm Enzo
 16 preparedness activities. However, because Hurricane Francine shifted and did not
 17 make landfall in Houston, the support from the EOP Logistics Resource Backup
 18 Support Group was ultimately not needed.

19 **Q. DID THE INTERNAL LOGISTICS SECTION RESOURCES GROUP**
 20 **EXPERIENCE ANY CHALLENGES SUPPORTING HURRICANE**
 21 **FRANCINE OR WINTER STORM ENZO PREPARATION AND/OR**
 22 **RESPONSE EFFORTS?**

23 A. Generally, there were no material challenges that the Facilities Unit experienced
 24 for either Hurricane Francine or Winter Storm Enzo emergency response efforts.

1 **H. Logistics Section Demobilization After Hurricane Francine and**
 2 **Winter Storm Enzo**

3 **Q. WHEN DID THE LOGISTICS UNITS BEGIN DEMOBILIZATION**
 4 **EFFORTS RELATED TO HURRICANE FRANCINE?**

5 A. On September 10, 2024, the Operations Section Chief requested that the Logistics
 6 Section commence demobilization efforts of five staging sites (Reed Road,
 7 Galveston County Fairgrounds, NRG – Astroworld, Sam Houston Race Track, and
 8 Moody Gardens). Notice of demobilization for Brazoria County Fairgrounds was
 9 provided on September 11, 2024.

10 **Q. WHEN DID THE LOGISTICS UNITS BEGIN DEMOBILIZATION**
 11 **EFFORTS RELATED TO WINTER STORM ENZO?**

12 A. On January 21, 2025, in the afternoon, the Operations Section Chief requested that
 13 the Logistics Section commence demobilization efforts for the staging sites (NRG
 14 – Astroworld, Moody’s and Brazoria County Fairgrounds).

15 **IV. NON-LOGISTICS SUPPORT RESOURCES COSTS**

16 **Q. ARE THE NON-LOGISTICS SUPPORT RESOURCES COSTS**
 17 **EMPLOYEES OF CENTERPOINT HOUSTON AND ITS AFFILIATES?**

18 A. Yes, the personnel costs from non-logistics support resources roles are either
 19 CenterPoint Houston or affiliate employees assigned to non-logistics support roles
 20 necessary for restoration efforts, e.g., crew spokespersons, safety, incident
 21 command and general staff, Governmental and State liaison. Depending on the
 22 severity of the storm, the Company may utilize resources from outside of Texas.
 23 Therefore, CenterPoint Houston incurred affiliate costs for employees who worked

1 to support restoration efforts. For details on the non-logistics activities refer to the
2 direct testimonies of Messrs. Carroll, Mercado, and Pryor.

3 **V. LOGISTICS SECTION AND NON-LOGISTICS SUPPORT**
4 **RESTORATION COSTS**

5 **Q. WOULD THE LOGISTICS SECTION AND NON-LOGISTICS SUPPORT**
6 **RESOURCES SEEK TO SUPPORT RESTORATION EFFORTS JUST AS**
7 **QUICKLY IF THE COMPANY'S SYSTEM IS THREATENED OR**
8 **AFFECTED BY EVENTS IN THE FUTURE WHOSE MAGNITUDE IS**
9 **SIMILAR TO HURRICANE BERYL, HURRICANE FRANCINE OR**
10 **WINTER STORM ENZO?**

11 A. Yes, the goal of the Logistics Section and non-logistics support resources is to
12 support the safe and orderly restoration of electric facilities after an emergency in
13 the shortest possible time through pre-planned preparation activities. For the
14 Logistics Section, it also includes the efficient use of logistics contracted personnel,
15 equipment, and materials throughout a restoration event.

16 **Q. GENERALLY, HOW DO THE LOGISTICS COSTS AN ELECTRIC**
17 **UTILITY INCURS DURING AN EMERGENCY COMPARE TO COSTS**
18 **FOR SIMILAR SERVICES DURING NORMAL OPERATIONS?**

19 A. Generally, the costs incurred during an emergency are higher compared to costs for
20 similar services during normal operations. Mobilization of equipment and
21 resources to assist with restoration efforts within the Logistics Section does not
22 happen without a significant effort and an associated cost.

23 For example, there are increased costs associated with fueling services and
24 logistics transportation services in comparison to services that occur in the normal

1 course of business, and the level of overtime hours required of the resources
2 committed to safely restoring service as quickly as possible is higher during
3 restoration conditions compared to typical operations.

4 This increased cost was reasonable as the Company took the appropriate
5 measures to safely and quickly prepare for and restore service, when looking at the
6 offsetting the impact to customers and considering the overall economic
7 implications that transpire when electric resources and the industries that they
8 support are unavailable.

9 **Q. WHAT ARE THE TOTAL LOGISTICS SECTION AND NON-LOGISTICS**
10 **SUPPORT RESOURCES COSTS THAT CENTERPOINT HOUSTON**
11 **INCURRED AS OF MARCH 31, 2025, AS A RESULT OF HURRICANE**
12 **BERYL, HURRICANE FRANCINE, AND WINTER STORM ENZO?**

13 A. CenterPoint Houston has incurred approximately \$250.2 million in logistics section
14 and non-logistics support related costs due to Hurricane Beryl, Hurricane Francine,
15 and Winter Storm Enzo. This reflects the costs detailed throughout my testimony
16 related to supporting the preparation and restoration efforts from a logistical and
17 non-logistical standpoint for CenterPoint Houston. Mr. Carroll and Mr. Wright
18 address these and other restoration costs in more detail in their direct testimonies
19 and Mr. Wright explains how these costs were validated and functionalized.

20 **Q. WHAT ARE THE COST CATEGORIES THAT MAKE UP THE TOTAL**
21 **LOGISTICS SECTION AND NON-LOGISTICS SUPPORT COSTS?**

22 A. Figure CAK-60 below provides the logistics section and non-logistics support costs
23 for Hurricane Beryl, Hurricane Francine, and Winter Storm Enzo. In addition,

Mr. Mercado and Mr. Pryor discuss transmission and distribution related costs, respectively.

Figure CAK-60 – System Restoration Costs (SRCs) for Logistics and Non-Logistics

Cost Category	SRCs (millions)
Payroll	\$ 15.6
Contract Services	4.9
Logistics	178.0
Materials & Supplies	31.5
Fleet/Fuel/Transportation	20.2
Total Incurred	\$ 250.2

Q. WHAT IS INCLUDED IN EACH COST CATEGORY FOR LOGISTICS SECTION AND NON-LOGISTICS SUPPORT RELATED COSTS?

A. Figure CAK-61 provides a list of the types of costs included in each category.

Figure CAK-61 – Cost Categories and Descriptions

Cost Category	Description
Payroll	Non-Operational CenterPoint Houston personnel and affiliate labor
Contractor Services	Environmental, material handler contractors, other contract resources, rental and lease equipment
Logistics	Staging Site Related, Lodging and Bussing, Security, Facilities, and Employee Expenses
Materials & Supplies	Restoration materials, courier, freight
Fleet/Fuel/ Transportation	Fleet, Fuel, Rental Vehicles

1 **A. Payroll**

2 **Q. WHAT IS INCLUDED IN THE PAYROLL/INTERNAL LABOR COST**
3 **CATEGORY RELATED TO LOGISTICS SECTION AND NON-**
4 **LOGISTICS SUPPORT ROLES?**

5 A. This includes the cost for non-operational CenterPoint Houston and affiliate
6 personnel who were responsible for support tasks necessary for the preparation
7 and/or restoration of service related to Hurricane Beryl, Hurricane Francine, and
8 Winter Storm Enzo. This cost includes labor, payroll taxes (Social Security,
9 Medicare and Unemployment) and benefits (medical, life, dental and vision
10 insurance, savings plan and retirement).

11 **Q. DOES CENTERPOINT HOUSTON ASSIGN EMERGENCY RESPONSE**
12 **ROLES TO EMPLOYEES TO SUPPORT THE RESTORATION EFFORT?**

13 A. Yes. As explained by Mr. Carroll, the Company assigns emergency response roles
14 to a significant number of Texas-area employees. Assignments are given to non-
15 operational CenterPoint Houston and affiliate employees to support restoration
16 efforts. Additionally, if more resources are needed, the Company utilizes resources
17 from non-Texas areas.

18 **Q. TO WHAT EXTENT DID CENTERPOINT HOUSTON RELY ON**
19 **CENTERPOINT HOUSTON NON-OPERATIONAL AND AFFILIATE**
20 **EMPLOYEES TO SUPPORT RESTORATION EFFORTS?**

21 A. During the preparation, mobilization, restoration, and demobilization efforts for
22 Hurricane Beryl, Hurricane Francine, and Winter Storm Enzo, members of the
23 Logistics Section that supported these events paused their normal day-to-day
24 activities and became part of the CenterPoint Houston restoration effort, working

1 overtime hours. These personnel were located throughout the Company's service
2 territory at locations such as service centers, EOC, Addicks Operations Center,
3 distribution operations center, warehouses, and staging sites, or in the field to help
4 ensure support was provided efficiently and effectively.

5 As a result, employees who do not typically charge time to CenterPoint
6 Houston charged their time to account for their support efforts. Additionally,
7 CenterPoint Houston employees charged their time, including overtime hours, in
8 support of restoration efforts.

9 **Q. WAS THERE A BENEFIT TO USING INTERNAL EMPLOYEES TO FILL**
10 **THESE ROLES?**

11 A. Yes. These employees are readily available and familiar with CNP and Company
12 procedures, the service territory and each other, and as a result, supported the
13 efficiency and safety of the restoration efforts. Additionally, their availability is
14 assured, without the Company paying an exorbitant cost for that availability. These
15 resources were used to the maximum extent possible.

16 **Q. WERE THE LOGISTICS SECTION AND NON-LOGISTICS SUPPORT**
17 **PAYROLL COSTS REASONABLE AND NECESSARY?**

18 A. Yes. CNP is staffed by employees with an extreme commitment to service on
19 behalf of customers; therefore, employees acted quickly to work collectively
20 towards a common goal. These employees have first-hand knowledge of the
21 Company's transmission and distribution system. The labor was provided at cost.
22 The use of CenterPoint Houston and affiliate labor was absolutely necessary to
23 restore service in the timeframe in which it was accomplished.

1 **B. Contractor Services**

2 **Q. IN THE COST CATEGORY FOR “CONTRACTOR SERVICES” WHAT IS**
 3 **INCLUDED IN “OTHER CONTRACTOR SERVICES”?**

4 A. Other Contractor Services costs were for ice contractors, caterers, fencing
 5 contractors, IT and WIFI services and other miscellaneous contractors.

6 **Q. WERE THE COSTS FOR CONTRACTOR SERVICES REASONABLE**
 7 **AND NECESSARY?**

8 A. Yes. These costs were necessary to support restoration activities so that service
 9 could be restored to CenterPoint Houston’s customers efficiently and safely. The
 10 Logistics Section brought in numerous resources to aid in restoration support.

11 As I discussed earlier in my testimony, the Company pre-established
 12 numerous contracts with logistics-related suppliers during the annual planning
 13 process. The Logistics Section engaged these suppliers as expeditiously as possible
 14 for Hurricane Beryl, Hurricane Francine, and Winter Storm Enzo to establish the
 15 logistics support necessary to enable restoration work to begin as soon as
 16 reasonably possible. During the pre-storm window for each storm, the Company
 17 continuously monitored needed support and scale for each logistics unit.
 18 Additionally, throughout the restoration processes, the Company continuously
 19 monitored the level of logistical and non-logistical support needed to ensure
 20 linemen and VM resources could work in a safe and effective manner. As the
 21 restoration work was reaching completion, the Company made sure that the level
 22 of logistical and non-logistical resources was ramped down to match the reduced
 23 work requirement accordingly.

1 **C. Logistics**

2 **Q. WHAT TYPES OF EXPENSES WERE CAPTURED IN THE LOGISTICS**
3 **COST CATEGORY?**

4 A. Staging Site Related, Lodging and Bussing, Security, and Facilities were captured
5 in the logistics cost category.

6 **Q. WHAT TYPES OF EXPENSES WERE CAPTURED IN THE STAGING**
7 **SITE SUBCATEGORY?**

8 A. These costs include expenses for staging sites such as catering, busses,
9 telecommunications, ice, as well as equipment and materials needed to stand up a
10 staging site such as tents, generators, and port-o-lets.

11 **Q. WERE THE COSTS FOR STAGING SITES REASONABLE AND**
12 **NECESSARY?**

13 A. Yes. The costs for staging sites were necessary to provide food for all workers; ice
14 and water for the field crews; and tents, materials and equipment for the staging
15 sites support restoration efforts. Additionally, the communication links established
16 at the staging sites were necessary to enable personnel to communicate regarding
17 the restoration and reconstruction of the transmission and distribution systems.
18 These costs were essential to keep the workforce focused on restoration work.
19 These costs were reasonable because the rates paid to the turn-key providers,
20 caterers, and equipment providers were competitively bid and evaluated.

1 **Q. DID THE COMPANY PROVIDE LODGING AND BUSSING FOR**
2 **RESOURCES BROUGHT INTO HOUSTON TO SUPPORT THE**
3 **RESTORATION EFFORT?**

4 A. Yes. Resources who came to the Houston area to support restoration efforts that
5 did not already live here needed lodging, and the Company provided it.

6 **Q. WERE THE COSTS FOR LODGING AND BUSSING REASONABLE AND**
7 **NECESSARY?**

8 A. Yes. The costs for lodging and bussing were necessary because they were essential
9 to support the restoration workforce by providing the basic human need for rest,
10 shelter and hygiene. It is a reasonable and necessary business practice to arrange
11 and provide lodging and bussing to lodging for workers supporting emergency
12 restoration activities. The costs were reasonable because most of the suppliers
13 charged rates similar to those for the same services under non-storm circumstances.

14 **Q. WHAT TYPES OF EXPENSES WERE CAPTURED IN THE SECURITY**
15 **COST CATEGORY?**

16 A. The expenses included the costs of security personnel and police officers.

17 **Q. WERE THE COSTS FOR SECURITY REASONABLE AND NECESSARY?**

18 A. Yes. Security of the many workers and the work centers involved in the restoration
19 effort was necessary and critical. Security work was negotiated with suppliers prior
20 to the storms. Contract security work was obtained at prices consistent with or less
21 than non-storm conditions. Security costs were reasonable and necessary.

1 **Q. WHAT TYPES OF EXPENSES WERE CAPTURED IN THE FACILITIES**
2 **COST CATEGORY?**

3 A. The expenses included the cost to repair Company facilities; staging sites, laydown
4 yards and man-camps remediations; and environmental remediation.

5 **Q. WERE THE COSTS FOR FACILITIES REASONABLE AND**
6 **NECESSARY?**

7 A. Yes. The repairs costs were reasonable and necessary to fix damage caused to
8 Company facilities and staging sites, man-camps and laydown yards properties.
9 Having fully operational worksites was paramount to a timely and safe restoration.
10 Additionally, as part of the staging sites, man-camps and laydown yards property
11 lease agreements, the Company is obligated to return the property to pre-storm
12 condition.

13 **Q. WHAT TYPES OF EXPENSES WERE CAPTURED IN THE EMPLOYEE**
14 **EXPENSE COST CATEGORY?**

15 A. Employee Expenses include meals, fuel, travel, and supplies employees purchased
16 in their support of restoration efforts.

17 **Q. WERE EMPLOYEE EXPENSES REVIEWED IN ACCORDANCE WITH**
18 **COMPANY POLICY?**

19 A. Yes. Prior to reimbursement, the submitted expenses were reviewed and approved
20 in accordance with the Corporate General Expense and Reimbursement Policy,
21 which Mr. Wright addresses in his direct testimony.

1 **Q. WERE THE COSTS FOR EMPLOYEE EXPENSES REASONABLE AND**
 2 **NECESSARY?**

3 A. Yes. The employee expenses were reasonable and necessary to support the
 4 restoration efforts of the Company.

5 **D. Inventory – Materials & Supplies**

6 **Q. WHAT TYPES OF COSTS WERE CAPTURED IN THE MATERIALS AND**
 7 **SUPPLIES COST CATEGORY?**

8 A. This category included the costs for materials, supplies, courier fees, freight,
 9 computer hardware and office supplies used in the restoration effort.

10 **Q. WHAT TYPES OF MATERIAL WERE CAPTURED IN THE MATERIALS**
 11 **AND SUPPLIES COST CATEGORY?**

12 A. The “material” in the materials and supplies cost category was used to rebuild and
 13 repair the distribution system. This included, but is not limited to, transformers,
 14 poles, wire, cable, splices, cross arms, reclosers, insulators, lightning arresters,
 15 clamps, brackets, cutouts, fuses, capacitor cans, streetlight fixtures, etc., as well as
 16 certain tools, rope, insect repellent and batteries. It also included materials
 17 associated with the restoration of the transmission system such as structures,
 18 hardware and insulators.

19 **Q. WERE THE COSTS FOR GOODS AND MATERIALS REASONABLE AND**
 20 **NECESSARY?**

21 A. Yes. This material was necessary to restore service to the Company’s customers
 22 and to repair the damage to the transmission and distribution systems. The
 23 contracting practices and establishment of on-hand emergency material stock,
 24 discussed earlier in my testimony, ensured that the materials were available and

1 that the costs were reasonable and necessary to support a timely restoration of
2 service to our customers.

3 **E. Fleet / Fuel / Transportation**

4 **Q. WHAT TYPES OF EXPENSES WERE CAPTURED IN THE**
5 **TRANSPORTATION, FLEET AND FUEL COST CATEGORY?**

6 A. Transportation costs include the Company's costs for fuel, rental vehicles, vehicle
7 repairs, vehicle maintenance, and other fleet expenses related to the restoration
8 efforts.

9 **Q. WERE THE COSTS FOR TRANSPORTATION, FLEET AND FUEL**
10 **REASONABLE AND NECESSARY?**

11 A. Yes. The costs for transportation, fleet and fuel were reasonable and necessary
12 because they were essential to support the restoration work activities as vehicles
13 involved in the restoration effort required fuel. Repairs and maintenance were
14 performed when necessary. Light fleet rentals were required to help move people
15 and materials. The price of fuel was consistent with the price of fuel prior to the
16 storm.

17 **VI. CONCLUSION**

18 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

19 A. Hurricane Beryl caused extensive damage to the Company's transmission and
20 distribution systems. The Company also mobilized to prepare for Hurricane
21 Francine and Winter Storm Enzo. The Company's EOP was activated for each of
22 these extreme weather events. The Logistics Section support preparation efforts
23 began well in advance of the EOP-activated weather events as part of established
24 annual emergency preparedness activities. The annual emergency preparedness

1 activities were a key factor in the ability to quickly mobilize logistics personnel and
2 other resources necessary to support restoration of the transmission and distribution
3 system. It was important to establish staging sites to support the linemen and VM
4 resources that were brought in to perform restoration activities for CenterPoint
5 Houston. It was also important to ensure that all requisite logistics unit resources
6 were efficient and effective in providing their services. An effectively performing
7 Logistics Section and related personnel enabled our internal and external
8 restoration teams to perform their work in a safe manner, focused on restoring
9 service to customers as quickly as possible. The logistics and non-logistics costs
10 that I address in my testimony incurred by the Company related to Hurricane Beryl,
11 Hurricane Francine, and Winter Storm Enzo were reasonable and necessary.

12 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

13 **A.** Yes.

Logistics and Staging

<div>July 8<div>Hurricane Beryl makes landfall 4AM</div></div>	<div><div>Staging Pre-Beryl</div><ul style="list-style-type: none">CenterPoint maintained permanent agreements with landowners for 16 staging sites and 2 man camp sites.CenterPoint maintained agreements with 7 turnkey providers for staging site support.By July 7, four staging sites were activated with landowner and turnkey providers. 6 additional staging sites were on standby.</div>
	<div><div>Staging Sites During Beryl</div><p>By July 12, CenterPoint has 22 total staging sites to allow for strategic deployment of crews and material.</p><p>July 8: AM: CenterPoint began loading staging site materials at approximately 10:20 AM and departed for the first 4 staging sites in approximately one hour.</p><p>PM: First 4 staging sites were "check-in and dispatch" ready.</p><p>July 9: 14 additional staging sites were "check-in and dispatch" ready.</p><p>July 10: Staging sites continued operations.</p><p>July 11: 1 additional staging site was "check-in and dispatch" ready.</p><p>July 12: 3 additional staging sites were "check-in and dispatch" ready.</p><p>Post July 12: CenterPoint continued operating staging sites in strategic locations.</p></div>
	<div><div>Lodging During Beryl</div><ul style="list-style-type: none">Hotels: CenterPoint reserved approximately 5,600 to 12,000 total hotel beds nightly.Man camps: As of July 9, estimated bed capacity was approximately 5,800 nightly.Buses: CenterPoint secured 233 buses to transport crews between lodging and staging sites.</div>

*"Check-in and dispatch ready" means the staging site had sufficient materials and resources to receive, check in, and dispatch mutual assistance crews.

Logistics and Staging

	TOTAL STAGING SITES	TOTAL STAGING SITE CAPACITY	STAGING SITES ADDED	STAGING SITE CAPACITY ADDED	SEMI-TRUCKS IN USE	HOT SHOT TRUCKS IN USE
July 8	4	3,596	4	3,596	18	0
July 9	18	12,288	14	8,692	40	0
July 10	18	12,288	0	0	39	0
July 11	19	12,748	1	460	36	14
July 12	22	13,665*	3	1,317	36	30
July 13	21	13,665	0	0	35	30
July 14	21	13,665	0	0	35	30
July 15	21	13,665	0	0	25	19
July 16	21	13,665	0	0	35	29
July 17	21	13,665	0	0	35	30
July 18	21	13,665	0	0	40	6

*Due to security concerns, Barnett staging site was deactivated and relocated to Berry Center staging site. Barnett continued to be used for materials pickup through July 12.

"Staging Site" means a site that became "check-in and dispatch ready" that day. A staging site provides services and infrastructure including fueling for vehicles and equipment, material laydown yards, food, security, telecommunications, bussing to lodging facilities, laundry service, and other human needs.

"Capacity" means headcount capacity, not number of trucks.

"Total sites" refers to the total number of sites (cumulatively) that are "check-in and dispatch ready."

"Hot shot truck" means a truck capable of carrying between 2-4 pallets.

Material Delivered to Staging Sites

as of July 19, 2024

2,222 Poles
2,718 Transformers
225,751 Conductor/wire ft.
479,466 Conductor/wire lbs.
10,649 Splices
37,755 Insulators

- All staging sites received materials.
- Different conductor/wire have units of measure in feet (ft.) and others are in pounds (lbs.). These counts are for different items.

EXHIBIT CAK-2 Hurricane Francine Pictures

FIGURE 1 _Francine_Reed Rd Staging Site without set up



FIGURE 2 _Francine_Reed Rd Staging Site Command Trailer Internal



EXHIBIT CAK-2 Hurricane Francine Pictures

FIGURE 3 _Francine_ Brazoria County Fairground Staging Site Command Trailer Internal



EXHIBIT CAK-3 Winter Storm Enzo Pictures

FIGURE 1 _Enzo_ Brazoria Command Trailer



FIGURE 2 _Enzo_ Brazoria Staging Site Command Trailer Internal



EXHIBIT CAK-3 Winter Storm Enzo Pictures

FIGURE 3 _Enzo_Moody Staging Site Command Trailer Internal

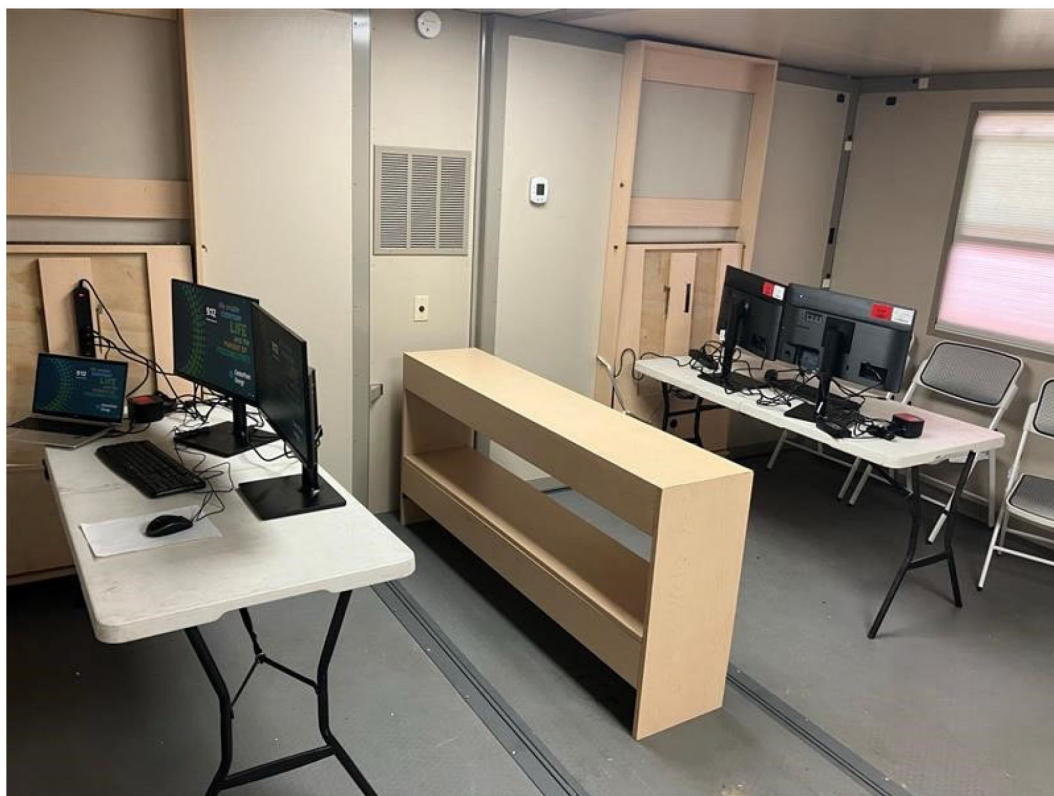


FIGURE 4 _Enzo_NRG Astroworld Command Trailer



EXHIBIT CAK-3 Winter Storm Enzo Pictures

FIGURE 5 _Enzo_NRG Astroworld Command Trailer with Telecommunication Infrastructure



FIGURE 6 _Enzo_NRG Astroworld Staging Site Command Trailer Internal

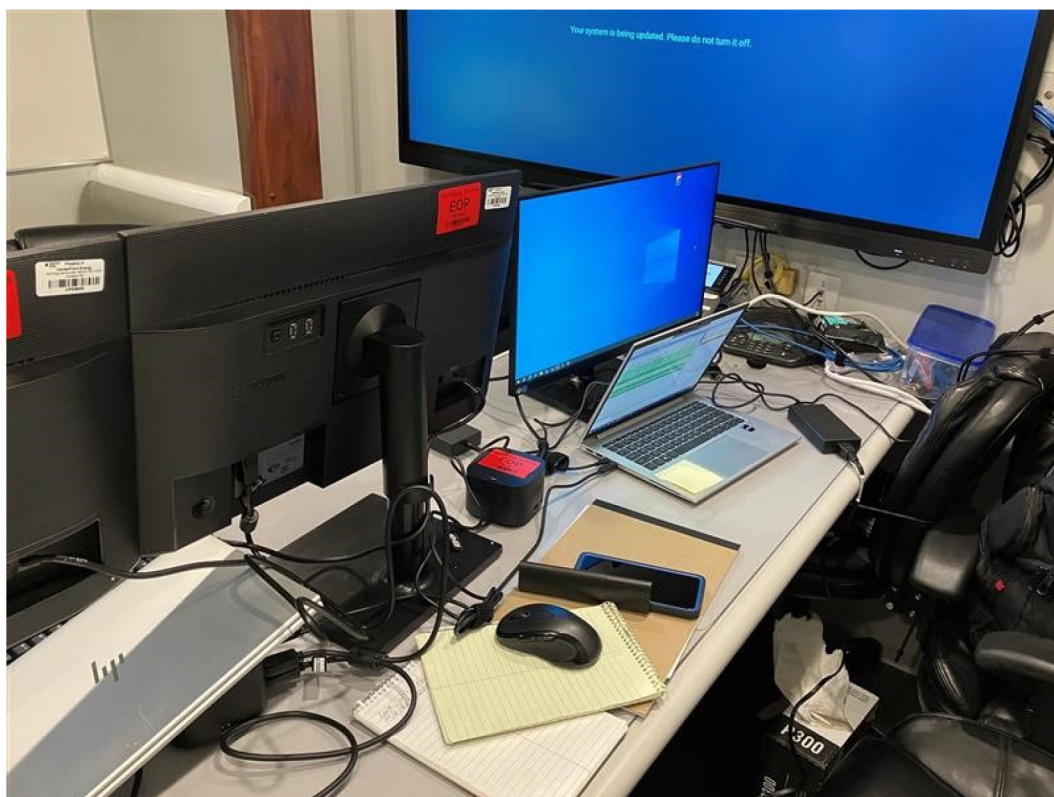


FIGURE 7_Enzo_NRG Astroworld Staging Site Pre-storm



FIGURE 8_Enzo_NRG Astroworld Staging Site



EXHIBIT CAK-3 Winter Storm Enzo Pictures

FIGURE 9_Enzo_NRG Astroworld Staging Site Vehicles Parked



EXHIBIT CAK-3 Winter Storm Enzo Pictures

FIGURE 10 _Enzo_NRG Astroworld Staging Site



FIGURE 11 _Enzo_Facilities De-Icing Preparation



FIGURE 12_Enzo_Staging Site Mobilization



FIGURE 13_Enzo_Staging Site Food Tent



FIGURE 14_Enzo_Staging Site Materials Unloading



FIGURE 15_Enzo_Staging Site Materials Laydown Space Storm Kit 5



FIGURE 16_Enzo_Staging Site Materials Delivery



FIGURE 17_Enzo_Staging Site Materials Demobilization



FIGURE 18_Enzo_Staging Site Materials Demobilization



FIGURE 19_Enzo_Astroworld Demobilization of Telecommunication Infrastructure



WORKPAPERS
OF
CARLA KNEIPP



RE: [External Email] RE: CenterPoint Energy Material MA Request

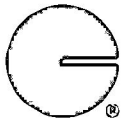
From [REDACTED]@centerpointenergy.com>
Date Wed 07/10/2024 06:47
To [REDACTED] <[REDACTED]@[REDACTED]>
Cc [REDACTED] <[REDACTED]@[REDACTED]>; [REDACTED] <[REDACTED]@centerpointenergy.com>; [REDACTED] <[REDACTED]@centerpointenergy.com>

1 attachment (948 KB)

CNP 2024 Beryl Material Summary for MA Request.xlsx;

Good morning [REDACTED],

Attached is the material MA request for CenterPoint Energy. I added a couple of tabs to the spreadsheet to include our long text description as well as all of our approved manufacturers for each item. Please let me know if I missed anything or if you have any questions.



[REDACTED]
Manager, High Voltage Materials Management

CenterPoint Energy | CEHE Warehouse & Materials Management

[REDACTED] w | [REDACTED] c
CenterPointEnergy.com

1. Material Request Summary

Appendix 3: Attachment 1 - Tab 1
Material Summary for Mutual Assistance Request

Date	Function	ReqCo Part ID#	Catalog Description	UOM	Total Need	Priority	RespCo Confirmed	Confirm Date	Part Number1	Manufacturer Desc1	Part Number2	Manufacturer Desc2
7/9/2024	Distribution	108654	CLAMP,ANGL SSPNSN CLVS 1/0 ACS	EA	800	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	108713	SPLICE,AUTO 2 AAAC,ACSR	EA	400	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	108715	SPLICE,AUTO 4/0 AAAC,ACSR	EA	800	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	108716	SPLICE,TENSION,AUTOMATIC 1/0-1/0	EA	2000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	108881	AUTO SPLICE #2-#4 RANGE TAKING	EA	2000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	109143	CNCTR,INSLTD CMPRSN 1/0-2	EA	10000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	109288	BRACKET "L" TYPE FOR MTGING AR	EA	5000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	112951	FUSE LINK,35KV,80A,TYPE T	EA	1000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	112954	FUSE LINK,35KV,20A,TYPE K	EA	800	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	112958	FUSE LINK,35KV,30A,TYPE K	EA	1000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	113062	FUSE LINK, 12KV, 6A,TYPE T	EA	1000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	113063	FUSE LINK, 12KV, 8A, TYPE T	EA	1000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	113065	FUSE LINK, 12KV, 12A, TYPE T	EA	1000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	113066	FUSE LINK, 12KV, 15A, TYPE T	EA	1000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	113067	FUSE LINK, 12KV, 20A TYPE T	EA	1000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	113069	FUSE LINK, 12KV, 30A, TYPE T	EA	1000	High			See tab 1b.	See tab 1b.		
7/9/2024	Distribution	113074	FUSE LINK, 12KV, 100A, TYPE T	EA	2000	High			See tab 1b.	See tab 1b.		

1a. Long Text Desc

ReqCo Part ID#	Catalog Description	Long Text Description
108654	CLAMP,ANGL SSPNSN CLVS 1/0 ACS	CLAMP ANGLE SUSPENSION-PERPENDICULAR CLEVIS. SEAT DIA 0.23" TO 0.6". ULTIMATE STRENGTH 7,000 LBS. FOR NO. 4 THRU 4/0.
108713	SPLICE,AUTO 2 AAAC,ACSR	SPLICE AUTOMATIC TENSION-FOR 2 AAAC AND 2 ACSR 6/1 STRANDS.
108715	SPLICE,AUTO 4/0 AAAC,ACSR	SPLICE AUTOMATIC TENSION-FOR 4/0 AAAC AND 4/0 ACSR.
108716	SPLICE,TENSION,AUTOMATIC 1/0-1/0	SPLICE AUTOMATIC TENSION-FOR #1/0 AAAC/ACSR/AAC.
108881	AUTO SPLICE #2-#4 RANGE TAKING	SPLICE AUTOMATIC TENSION - RANGE TAKING - FOR #4 ACSR (6/1 OR 7/1 STRANDS) AND #4 AAAC AND #2 ACSR (6/1 OR 7/1 STRANDS) AND #2 AAAC AND #2 AAC.
109143	CNCTR,INSLTD CMPSRN 1/0-2	CONNECTOR COMPRESSION-5/8" INSULATED SLEEVE, ONE END FOR 1/0 STR TO 2 STR AND OTHER END FOR 1 STR. CONDUCTORS, TO BE INSTALLED WITH BURNDY MD5-3 TOOL USING "BG" DIE OR WITH KEARNEY 0-52 TOOL USING "5/8" NOSE DIE. ALUMINUM SLEEVE TO BE A MINIMUM OF 2" LONG AND MUST BE SECURED INSIDE INSULATION.
109288	BRACKET "L" TYPE FOR MTGING AR	BRACKET "L"-FOR MOUNTING LIGHTNING ARRESTORS TO CONVENTIONAL TRANSFORMER AND REGULATOR TANKS. DRAWING & SPECS: HL&P DWG 007-205-02 <H><U>NOTES TO VENDOR:</></> THE FABRICATOR SHALL IMPRESS EACH UNIT ASSEMBLY OF THIS ITEM WITH A MARK OR SYMBOL, ACCEPTED BY THE ELECTRICAL FACILITIES ENGINEERING DEPARTMENT OF CNP, WHICH WILL IDENTIFY THE FABRICATOR. THE MARK SHALL BE LEGIBLE AND RESIST OBLITERATION: PAINTS, INKS OR DECALS ARE UNACCEPTABLE. THE FABRICATOR SHOULD CONTACT THE DISTRIBUTION FACILITY DESIGN DIVISION WITH QUESTIONS CONCERNING THE FABRICATION OF THIS ITEM. <H><U>BRACKETS SHALL BE PACKAGED 400 PER PALLET</></>.
112951	FUSE LINK,35KV,80A,TYPE T	FUSE LINK 80 AMP, ANSI-NEMA TYPE "T", 26" MINIMUM LENGTH, 9" MINIMUM AUX. TUBE LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 27/38KV CUTOUTS. (ANSI C37.42)
112954	FUSE LINK,35KV,20A,TYPE K	FUSE LINK 20 AMP, ANSI-NEMA TYPE "K", 26" MINIMUM LENGTH, 9" MINIMUM AUX. TUBE LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 27/38KV CUTOUTS. (ANSI C37.42)
112958	FUSE LINK,35KV,30A,TYPE K	FUSE LINK 30 AMP, ANSI-NEMA TYPE "K", 26" MINIMUM LENGTH, 9" MINIMUM AUX. TUBE LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 27/38KV CUTOUTS. (ANSI C37.42)
113062	FUSE LINK, 12KV, 6A,TYPE T	FUSE LINK 6 AMP, ANSI/NEMA TYPE "T", 20" MINIMUM LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 15KV CUTOUTS. (ANSI C37.42)
113063	FUSE LINK, 12KV, 8A, TYPE T	FUSE LINK 8 AMP, ANSI/NEMA TYPE "T", 20" MINIMUM LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 15KV CUTOUTS. (ANSI C37.42)
113065	FUSE LINK, 12KV, 12A, TYPE T	FUSE LINK 12 AMP, ANSI/NEMA TYPE "T", 20" MINIMUM LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 15KV CUTOUTS. (ANSI C37.42)
113066	FUSE LINK, 12KV, 15A, TYPE T	FUSE LINK 15 AMP, ANSI/NEMA TYPE "T", 20" MINIMUM LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 15KV CUTOUTS. (ANSI C37.42)
113067	FUSE LINK, 12KV, 20A TYPE T	FUSE LINK 20 AMP, ANSI/NEMA TYPE "T", 20" MINIMUM LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 15KV CUTOUTS. (ANSI C37.42)
113069	FUSE LINK, 12KV, 30A, TYPE T	FUSE LINK 30 AMP, ANSI/NEMA TYPE "T", 20" MINIMUM LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 15KV CUTOUTS. (ANSI C37.42)
113074	FUSE LINK, 12KV, 100A, TYPE T	FUSE LINK 100 AMP, ANSI/NEMA TYPE "T", 20" MINIMUM LENGTH, WITH REMOVABLE BUTTONHEAD, FOR USE IN ANSI STANDARD 15KV CUTOUTS. (ANSI C37.42)

1b. Approved Mfg List

Int. material no.	Material description	Name 1	MPN
108654	CLAMP,ANGL SSPNSN CLVS 1/0 ACS	ANDERSON	AAC-301
108654	CLAMP,ANGL SSPNSN CLVS 1/0 ACS	BETHEA	RALS-1-N
108654	CLAMP,ANGL SSPNSN CLVS 1/0 ACS	JOSLYN	BT-2300
108654	CLAMP,ANGL SSPNSN CLVS 1/0 ACS	OHIO BRASS	82860
108713	SPLICE,AUTO 2 AAAC,ACSR	FARGO MFG CO INC	GL-404 OR GL4042A
108713	SPLICE,AUTO 2 AAAC,ACSR	RELIANCE ELECTRIC CO	7652
108715	SPLICE,AUTO 4/0 AAAC,ACSR	FARGO MFG CO INC	GL-409 OR GL-409A
108715	SPLICE,AUTO 4/0 AAAC,ACSR	RELIANCE ELECTRIC CO	7656-1 OR 7656 AP
108716	SPLICE,TENSION,AUTOMATIC 1/0-1/0	FARGO MFG CO INC	GL-406 OR GL-406A
108716	SPLICE,TENSION,AUTOMATIC 1/0-1/0	RELIANCE ELECTRIC CO	7653
108881	AUTO SPLICE #2-#4 RANGE TAKING	FARGO MFG CO INC	GL-4042A
108881	AUTO SPLICE #2-#4 RANGE TAKING	RELIANCE ELECTRIC CO	7652AP
109143	CNCTR,INSLTD CMPSRN 1/0-2	BURNDY CORP	ES25R2R (ON HOLD)
109143	CNCTR,INSLTD CMPSRN 1/0-2	HILLS-MCCANNA	U1N102 (ON HOLD)
109143	CNCTR,INSLTD CMPSRN 1/0-2	HOMAC	U1N102
109143	CNCTR,INSLTD CMPSRN 1/0-2	INGERSOLL-RAND	ICS771 (ON HOLD)
109143	CNCTR,INSLTD CMPSRN 1/0-2	PENN-UNION	PIK01 (ON HOLD)
109288	BRACKET "L" TYPE FOR MTGING AR	AMBOX CO	AB-LAMB
109288	BRACKET "L" TYPE FOR MTGING AR	JOSLYN	J26017
109288	BRACKET "L" TYPE FOR MTGING AR	MACLEAN POWER - DIXIE	D-1621
109288	BRACKET "L" TYPE FOR MTGING AR	S&H MANUFACTURING	32-165
112951	FUSE LINK,35KV,80A,TYPE T	COOPER POWER SYSTEMS	51080-53-60*
112951	FUSE LINK,35KV,80A,TYPE T	COOPER POWER SYSTEMS - EDISON	FL27T80
112951	FUSE LINK,35KV,80A,TYPE T	HUBBELL POWER SYSTEMS INC	C705-80BT39
112954	FUSE LINK,35KV,20A,TYPE K	COOPER POWER SYSTEMS	31020-53-60*
112954	FUSE LINK,35KV,20A,TYPE K	COOPER POWER SYSTEMS - EDISON	FL27K20
112954	FUSE LINK,35KV,20A,TYPE K	COOPER POWER SYSTEMS KEARNEY	31020-53B
112954	FUSE LINK,35KV,20A,TYPE K	HUBBELL POWER SYSTEMS INC	C705-20BK39
112958	FUSE LINK,35KV,30A,TYPE K	COOPER POWER SYSTEMS	31030-53-60*
112958	FUSE LINK,35KV,30A,TYPE K	COOPER POWER SYSTEMS - EDISON	FL27K30
112958	FUSE LINK,35KV,30A,TYPE K	COOPER POWER SYSTEMS KEARNEY	31030-53B
112958	FUSE LINK,35KV,30A,TYPE K	HUBBELL POWER SYSTEMS INC	C705-30BK39
113062	FUSE LINK, 12KV, 6A,TYPE T	COOPER POWER SYSTEMS	51006-60*
113062	FUSE LINK, 12KV, 6A,TYPE T	COOPER POWER SYSTEMS - EDISON	FL3T6
113062	FUSE LINK, 12KV, 6A,TYPE T	HUBBELL POWER SYSTEMS INC	M6TA23

1b. Approved Mfg List

Int. material no.	Material description	Name 1	MPN
113062	FUSE LINK, 12KV, 6A,TYPE T	INDEL BAURU	EF6TCCIR
113062	FUSE LINK, 12KV, 6A,TYPE T	S & C ELECTRIC COMPANY	279006
113063	FUSE LINK, 12KV, 8A, TYPE T	COOPER POWER SYSTEMS	51008-60*
113063	FUSE LINK, 12KV, 8A, TYPE T	COOPER POWER SYSTEMS - EDISON	FL3T8
113063	FUSE LINK, 12KV, 8A, TYPE T	HUBBELL POWER SYSTEMS INC	M8TA23
113063	FUSE LINK, 12KV, 8A, TYPE T	INDEL BAURU	EF8TCCIR
113063	FUSE LINK, 12KV, 8A, TYPE T	S & C ELECTRIC COMPANY	279008
113065	FUSE LINK, 12KV, 12A, TYPE T	COOPER POWER SYSTEMS	51012-60*
113065	FUSE LINK, 12KV, 12A, TYPE T	COOPER POWER SYSTEMS - EDISON	FL3T12
113065	FUSE LINK, 12KV, 12A, TYPE T	HUBBELL POWER SYSTEMS INC	M12TA23
113065	FUSE LINK, 12KV, 12A, TYPE T	INDEL BAURU	EF12TCCIR
113065	FUSE LINK, 12KV, 12A, TYPE T	S & C ELECTRIC COMPANY	279012
113066	FUSE LINK, 12KV, 15A, TYPE T	COOPER POWER SYSTEMS	51015-60*
113066	FUSE LINK, 12KV, 15A, TYPE T	COOPER POWER SYSTEMS - EDISON	FL3T15
113066	FUSE LINK, 12KV, 15A, TYPE T	HUBBELL POWER SYSTEMS INC	M15TA23
113066	FUSE LINK, 12KV, 15A, TYPE T	INDEL BAURU	EF15TCCIR
113066	FUSE LINK, 12KV, 15A, TYPE T	S & C ELECTRIC COMPANY	279015
113067	FUSE LINK, 12KV, 20A TYPE T	COOPER POWER SYSTEMS	51020-60*
113067	FUSE LINK, 12KV, 20A TYPE T	COOPER POWER SYSTEMS - EDISON	FL3T20
113067	FUSE LINK, 12KV, 20A TYPE T	HUBBELL POWER SYSTEMS INC	M20TA23
113067	FUSE LINK, 12KV, 20A TYPE T	INDEL BAURU	EF20TCCIR
113067	FUSE LINK, 12KV, 20A TYPE T	S & C ELECTRIC COMPANY	279020
113069	FUSE LINK, 12KV, 30A, TYPE T	COOPER POWER SYSTEMS	51030-60*
113069	FUSE LINK, 12KV, 30A, TYPE T	COOPER POWER SYSTEMS - EDISON	FL3T30
113069	FUSE LINK, 12KV, 30A, TYPE T	HUBBELL POWER SYSTEMS INC	M30TA23
113069	FUSE LINK, 12KV, 30A, TYPE T	INDEL BAURU	EF30TCCIR
113069	FUSE LINK, 12KV, 30A, TYPE T	S&C ELECTRIC	279030
113074	FUSE LINK, 12KV, 100A, TYPE T	COOPER POWER SYSTEMS	51100-60*
113074	FUSE LINK, 12KV, 100A, TYPE T	COOPER POWER SYSTEMS - EDISON	FL3T100
113074	FUSE LINK, 12KV, 100A, TYPE T	HUBBELL POWER SYSTEMS INC	M100TA23
113074	FUSE LINK, 12KV, 100A, TYPE T	INDEL BAURU	EF100TCCIR
113074	FUSE LINK, 12KV, 100A, TYPE T	S&C ELECTRIC	279100

2. Responding Co Template

Material Summary for Mutual Assistance Request Responding Company

Request Date*	Function*	Requesting Co Part ID#*	Catalog Description*	UOM*	Total Need*	Priority*	Responding Co Name	Date of Response	Part Number	Manufacturer Desc	Quantity offered	Requesting Co response to offer

*repeated from Material Request Summary on first tab

3. Standard Packing Slip

Standard Packing Slip

Responding Company		Ship To:		Bill To:	
Responding Co. Name:		Requesting Co. Name:		Requesting Co. Name:	
Street Address:		Street Address:		Street Address:	
City/State/Zip Code:		City/State/Zip Code:		City/State/Zip Code:	
Point of Contact Name:		Attention To:		Attention To:	
Mobile #:		Phone #:		Phone #:	
Email:					

ORDER DATE		ORDER NUMBER		JOB	

[illegible]

GRAND TOTAL

\$ -

STATE OF TEXAS

COUNTY OF HARRIS


§
§
§

AFFIDAVIT OF CARLA KNEIPP

BEFORE ME, the undersigned authority, on this day personally appeared Carla Kneipp, who having been placed under oath by me did depose as follows:

1. "My name is Carla Kneipp and my current position is Vice President Supply Chain and Workplace Services, for CenterPoint Energy Service Company, LLC."
2. "I am of sound mind and capable of making this affidavit. The facts stated herein are true and correct based on my personal knowledge."
3. "I have prepared the foregoing direct testimony, and the information contained in this document is true and correct to the best of my knowledge."

Further affiant sayeth not.



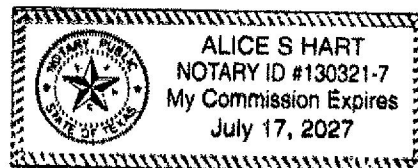
Carla Kneipp

SUBSCRIBED AND SWORN TO BEFORE ME by the said Carla Kneipp on this 24th
day of April 2025.



Notary Public, State of Texas

My commission expires: 07/17/2027



DIRECT TESTIMONY

OF

RUSSELL WRIGHT

ON BEHALF OF

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

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EXHIBIT RW-6	Internal Audit Memo
EXHIBIT RW-7	General Expense & Reimbursement Policy

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WP RW-1	Substation Functionalization
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EXECUTIVE SUMMARY OF RUSSELL WRIGHT

My testimony supports CenterPoint Energy Houston Electric, LLC's ("CenterPoint Houston" or the "Company") application to determine the amount of reasonable and necessary system restoration costs ("SRCs") associated with Hurricane Beryl, Hurricane Francine, and Winter Storm Enzo. In particular, my testimony addresses:

- how the SRCs were compiled, reviewed, approved and recorded on the Company's books;
- the functionalization of the SRCs between Transmission and Distribution functions;
- affiliate costs included in the SRCs;
- the proposed cost recovery and accounting treatment of the SRCs;
- the appropriate carrying cost rate to apply prior to recovery of the SRCs from customers;
- accumulated deferred federal income tax ("ADFIT") issues related to the SRCs; and
- recovery of certain distribution-related SRCs deferred from Docket No. 57271, consistent with the parties' settlement agreement in that case.

Together with the testimony of other CenterPoint Houston witnesses, my testimony demonstrates that approximately \$1.3 billion in total SRCs, which includes estimated amounts and carrying costs associated with Hurricane Beryl, Hurricane Francine, Winter Storm Enzo, and deferred costs from Docket No. 57271 are reasonable and necessary and should be recovered in accordance with the statutory standard for recovery of SRCs.

DIRECT TESTIMONY OF RUSSELL WRIGHT

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

A. My name is Russell Wright. I am the Vice President of Financial Planning and Analysis for CenterPoint Energy Service Company, LLC (“Service Company”) and CenterPoint Houston, a wholly owned indirect subsidiary of CenterPoint Energy, Inc. (“CNP”), in Houston, Texas. My business address is 1111 Louisiana St., Houston, Texas 77002.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PREVIOUS WORK EXPERIENCE.

A. I graduated from Texas A&M with a bachelor of science and master of science in accounting. I am currently a Certified Public Accountant in Texas. Before joining CNP in January 2019, I was the director of technical accounting for a global engineering and construction company and also worked for Deloitte & Touche, LLP (“Deloitte”) for approximately eleven years in the firm’s Audit and Enterprise Risk Services practice, rising to the position of Senior Manager. Since joining CNP in January 2019, I have served as a Director of Business Services and Business Acquisition Accounting, Vice President of Financial Services and Special Projects, and Vice President of Financial Planning and Analysis.

Q. WHAT EXHIBITS HAVE YOU INCLUDED WITH YOUR TESTIMONY?

A. I have prepared or supervised the preparation of the exhibits listed in the table of contents.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. My testimony discusses and supports recovery of the approximately \$1.3 billion of SRCs due to Hurricane Beryl, Hurricane Francine, Winter Storm Enzo, and distribution-related SRCs deferred from Docket No. 57271.¹

Specifically, my direct testimony addresses the following:

- (1) how the SRCs were compiled, reviewed, approved and recorded on the Company's books;
- (2) the functionalization of the SRCs between Transmission and Distribution functions;
- (3) affiliate costs included in the SRCs;
- (4) the proposed cost recovery and accounting treatment of the SRCs;
- (5) the appropriate carrying cost rate to apply prior to recovery of the SRCs from customers; and
- (6) ADFIT issues related to the SRCs.

Q. HOW DOES YOUR TESTIMONY RELATE TO THE TESTIMONY PROVIDED BY OTHER WITNESSES IN THIS CASE?

A. Company witness Darin Carroll provides an overview of the Company's filing, explains the Emergency Operations Plan ("EOP") processes as they relate to the Company's preparation and restoration efforts for Hurricane Beryl, Hurricane Francine, and Winter Storm Enzo, provides a summary of the SRCs included in the case, and addresses customer service and communications efforts during the preparation and restoration. Company witness Randal M. Pryor addresses the

¹ *Application of CenterPoint Energy Houston Electric, LLC for Determination of System Restoration Costs*, Docket No. 57271, Stipulation and Settlement Agreement (Mar. 19, 2025).

1 Company's distribution-related storm preparation and restoration efforts and
2 related costs while Company witness David Mercado explains the Company's
3 transmission-related storm preparation and restoration efforts and related costs.
4 Company witness Carla Kneipp discusses the Company's extensive logistics efforts
5 and related costs that were also a necessary part of the preparation and restoration
6 efforts. Company witness John Durland addresses the proposed methods of cost
7 recovery and allocation of SRCs functionalized to Distribution and to the retail
8 customer classes. Finally, Company witness Thomas L. Keefe with Deloitte
9 provides testimony addressing the external attestation of the Company's SRCs, and
10 Company witness Derek HasBrouck with PA Consulting Group provides an
11 external review of the reasonableness and necessity of the Company's preparation
12 for, restoration processes, and efforts related to Hurricane Beryl, Hurricane
13 Francine, and Winter Storm Enzo, as well as the SRCs incurred as a result of those
14 storms.

15 **III. SCOPE OF THIS SYSTEM RESTORATION**
16 **COST RECOVERY FILING**

17 **Q. WHAT COST RECOVERY IS THE COMPANY REQUESTING IN THIS**
18 **CASE?**

19 A. Based on Public Utility Regulatory Act ("PURA") § 36.402, the Company is
20 requesting recovery of the reasonable and necessary SRCs it incurred in connection
21 with the restoration of service and related infrastructure repair following damage to
22 the Company's system caused by Hurricane Beryl, Hurricane Francine and Winter
23 Storm Enzo. The amounts include costs for mobilizing, staging, constructing,
24 reconstructing, replacing and repairing damage to the Company's transmission and

distribution facilities. The requested amounts also include reasonable estimates of legal and consulting costs the Company has not yet incurred but expects to, as well as estimated carrying charges through the projected time the Company expects to recover the SRC amounts requested in this proceeding. The Company is requesting recovery of SRCs functionalized to Distribution and Transmission in Table RW-1 below.

Table RW-1
System Restoration Costs² (\$ millions)

Distribution	\$ 1,282
Transmission	\$ 13

Q. HOW IS THE COMPANY PROPOSING TO RECOVER SRC AMOUNTS APPROVED BY THE PUBLIC UTILITY COMMISSION OF TEXAS (“COMMISSION”)?

A. The Company proposes to securitize SRCs related to restoration of the distribution system, assuming the Commission approves that form of cost recovery in a separate securitization proceeding the Company will file with the Commission. SRCs related to restoration of the transmission system would be recovered through interim Transmission Cost of Service (“TCOS”) or base rate proceedings.

Q. HOW WILL THE COMPANY ACCOUNT ON ITS BOOKS FOR THE SRCs THE COMMISSION APPROVES FOR RECOVERY IN THIS CASE?

A. The incurred SRCs are currently recorded on the Company’s books in capital accounts or as a regulatory asset. The Distribution SRCs, upon securitization,

² SRCs incurred through March 31, 2025, for Hurricane Beryl, Hurricane Francine, Winter Storm Enzo, and distribution-related costs deferred from Docket No. 57271, as well as estimated other expenses and estimated carrying costs.

1 become “transition property” under PURA §§ 39.304 and 36.456. In accordance
2 with that change in status, the SRCs will be classified as a regulatory asset on the
3 Company’s books; however, the regulatory asset recovered through securitization
4 will not be included in future CenterPoint Houston base rate filings because the
5 securitized SRC amounts will be recovered through a separate surcharge.

6 The transmission-related SRCs will be accounted for as capital or as a
7 regulatory asset and will be recovered through the Company’s future TCOS rate
8 proceedings as allowed by PURA § 36.403(g) or base rate proceedings.

9 **Q. WHY WERE THE SRCS NOT RECORDED TO THE COMPANY’S**
10 **PROPERTY SELF-INSURANCE RESERVE?**

11 A. The property insurance reserve is not intended to cover the costs of a major weather
12 event like a hurricane. Costs for the preparation and restoration efforts related to
13 Hurricane Beryl, Hurricane Francine, and Winter Storm Enzo far exceed the
14 limitation of costs contemplated in the development of the property self-insurance
15 reserve. Specifically, in Docket Nos. 49421 and 56211, the annual reserve was
16 calculated excluding individually significant storms, specifically losses from
17 named storms such as Hurricane Ike, Hurricane Rita, Hurricane Harvey, Hurricane
18 Nicholas and Winter Storm Uri.

19 **Q. WHAT IS THE TOTAL AMOUNT THE COMPANY IS ASKING THE**
20 **COMMISSION TO APPROVE FOR RECOVERY IN THIS DOCKET?**

21 A. The Company is asking the Commission to approve approximately \$1,295 million
22 in SRCs for Hurricane Beryl, Hurricane Francine, Winter Storm Enzo, and the
23 distribution-related SRCs that were deferred to this filing pursuant to the settlement

1 agreement filed in Docket No. 57271. The total SRC amount includes preparation
2 and restoration costs recorded through March 31, 2025, and estimated amounts for
3 additional other expenses and carrying charges through the projected time the
4 Company expects to recover the SRC amounts requested in this proceeding.
5 Exhibit RW-1 provides the details of the total SRC amount.

6 **Q. WHAT SPECIFICALLY DO THE SRCS REPRESENT?**

7 A. The SRCs are costs the Company incurred for pre-storm preparation activities and
8 for the restoration of service and related infrastructure repair following damage to
9 the Company's system as a result of Hurricane Beryl, Hurricane Francine, and
10 Winter Storm Enzo. Exhibit RW-1 contains the cost details by (1) function
11 (Distribution or Transmission); and (2) cost categories (Payroll, Contract Services,
12 Logistics, Materials and Supplies, Fleet/Fuel/Transportation, Employee Expenses).
13 Costs are comprised of both directly incurred charges and affiliate costs directly
14 billed from Service Company, CenterPoint Energy Resources Corp. ("CERC"),
15 and/or Vectren Corp. to CenterPoint Houston.

16 **Q. WHY DOES THE COMPANY'S REQUEST INCLUDE ESTIMATED**
17 **COSTS?**

18 A. As shown on Exhibit RW-3, the SRCs include estimated additional other expenses
19 related to this case such as outside attorneys and consultants, as well as other
20 reasonable out-of-pocket expenses incurred in these proceedings. The Company's
21 requested carrying costs are also based on an expected date by which it will begin
22 recovery of the SRCs requested in this case.

1 **Q. DOES THE TOTAL REQUESTED AMOUNT INCLUDE ANY OTHER**
2 **COST ESTIMATES?**

3 A. Yes. Exhibit RW-3 contains a cost estimate for municipal rate case expenses to the
4 extent the Commission deems recovery is reasonable and appropriate.

5 **Q. ARE ESTIMATED COSTS INCLUDED IN THE DEFINITION OF SRCS?**

6 A. Yes. Under PURA § 36.402(a), “[s]ystem restoration costs shall include reasonable
7 *estimates* of the costs of an activity or activities conducted or expected to be
8 conducted by or on behalf of the electric utility in connection with the restoration
9 of service or infrastructure associated with electric power outages, but such
10 *estimates* shall be subject to true-up and reconciliation after the actual costs are
11 known.”³

12 **Q. IF NOT ALL AMOUNTS ARE KNOWN AT THIS TIME, WHY IS THE**
13 **COMPANY REQUESTING RECOVERY OF SRCS?**

14 A. In addition to PURA § 36.402(a) permitting recovery of estimated amounts,
15 identifying the total amount of SRCs promptly and obtaining securitization cost
16 recovery for the Distribution SRCs helps to reduce carrying costs and the overall
17 impact on customers. The same is true for promptly recovering Transmission SRCs
18 through TCOS.

³ Emphasis added.

1 **Q. DOES THE TOTAL REQUESTED AMOUNT INCLUDE COSTS**
2 **RELATED TO OUTSIDE VENDORS WHO ASSISTED IN THE**
3 **PREPARATION OF THIS FILING?**

4 A. Yes. The total requested amount includes incurred and estimated costs for services
5 being provided to the Company including legal, consultant, and administrative
6 costs associated with this filing.

7 **Q. HOW WILL ANY RESTORATION COSTS FOR HURRICANE BERYL,**
8 **HURRICANE FRANCINE, OR WINTER STORM ENZO THAT ARE NOT**
9 **INCLUDED IN THE COMPANY'S REQUEST BE ACCOUNTED FOR AND**
10 **RECOVERED?**

11 A. Those amounts will be properly recorded on CenterPoint Houston's books and
12 records as capital or a regulatory asset when they are incurred and subsequently
13 paid or appropriately accrued. They will be addressed in a future proceeding.

14 **Q. IS THE COMPANY'S REQUEST EXCLUSIVE OF ANY INSURANCE**
15 **PROCEEDS OR FEDERAL OR STATE RELIEF GRANTS?**

16 A. Yes. Under PURA § 36.402(c), if a utility receives insurance proceeds,
17 governmental grants, or any other sources of funding that compensate it for SRCs,
18 those amounts shall be used to reduce the utility's SRCs recoverable from
19 customers. At the time of this filing and as discussed below, the Company has not
20 received insurance proceeds, governmental grants, or any other source of funding
21 that compensate it for SRCs. If, subsequent to this filing, the Company receives
22 any other source of funding which compensates it for SRCs during this proceeding,
23 the SRC request will be updated. If other funding is received after this proceeding,

1 it will be included in the next base rate case or in another proceeding where the
2 Commission considers SRCs as permitted by PURA § 36.402(c).

3 **Q. HAS THE COMPANY INCLUDED ANY SRCS FROM A STORM EVENT**
4 **OTHER THAN HURRICANE BERYL, HURRICANE FRANCINE, OR**
5 **WINTER STORM ENZO?**

6 A. Yes. Based on the settlement agreement filed in Docket No. 57271,⁴ the Company
7 agreed to defer \$17,500,000 of requested distribution-related SRCs related to two
8 May 2024 storm events (“May 2024 EOP Storms”) to a future regulatory
9 proceeding. The Company has included these distribution-related SRCs from the
10 May 2024 EOP Storms in this proceeding. Mr. Pryor and Mr. HasBrouck address
11 these costs in their direct testimonies.

12 **Q. DID CENTERPOINT HOUSTON INCUR COSTS RELATED TO**
13 **HURRICANE BERYL THAT ARE NOT INCLUDED IN THIS FILING AND**
14 **WILL NOT BE RECOVERED FROM CUSTOMERS?**

15 A. Yes. The Company incurred over \$100 million related to system hardening and
16 improvements that are not included in this filing. Further, the Company has not
17 included in this filing any costs associated with the development and enhancements
18 to the Company’s Outage Tracker tool. The Company will not seek recovery of
19 these costs from customers.

⁴ Docket No. 57271, Stipulation and Settlement Agreement.

1 **IV. ACCOUNTING FOR SYSTEM RESTORATION COSTS**

2 **A. Books and Records**

3 **Q. HOW DID CENTERPOINT HOUSTON COMPILE AND RECORD THE**
4 **SRCS ADDRESSED IN THIS DOCKET?**

5 A. As discussed in more detail below, and consistent with the Company's traditional
6 accounting practices, CenterPoint Houston directly charged cost objects
7 specifically created for Hurricane Beryl, Hurricane Francine, and Winter Storm
8 Enzo SRCs. Individual cost objects (which are codes that are used to track and
9 record costs) were separately created for each storm event's preparation and
10 restoration efforts and in a manner to identify costs by operational department,
11 along with relevant cost categories.

12 **Q. ARE THERE PROCEDURES IN PLACE REGARDING THE INITIAL**
13 **COST OBJECTS TO BE CREATED IN THE EVENT OF A MAJOR**
14 **WEATHER EVENT?**

15 A. Yes. CenterPoint Houston follows an established process of creating individual
16 cost objects in the event of a major weather event. The basic procedure used to
17 create the initial weather event cost objects was consistent with cost objects the
18 Company created for other weather events such as Hurricanes Nicholas, Laura,
19 Harvey, Ike as well as the May 2024 EOP Storms.

1 **Q. HOW DID THE COMPANY AND OTHER CNP PERSONNEL KNOW**
2 **WHICH COST OBJECT THEY SHOULD USE TO BILL THEIR TIME**
3 **AND EXPENSES RELATED TO SYSTEM RESTORATION?**

4 A. Cost objects were distributed to key Operations personnel upon creation. Further
5 communications were distributed to inform broad employee groups of the cost
6 objects to be used for charging time and expenses related to system restoration
7 efforts for each storm.

8 **Q. WERE ANY OF THE COST OBJECTS FOR THE HURRICANE BERYL,**
9 **HURRICANE FRANCINE, OR WINTER STORM ENZO PREPARATION**
10 **AND RESTORATION WORK USED TO RECORD ANY COSTS THAT**
11 **ARE NOT RELATED TO THOSE STORMS?**

12 A. No.

13 **Q. HOW WERE THE COSTS FUNCTIONALIZED BETWEEN**
14 **TRANSMISSION AND DISTRIBUTION?**

15 A. As discussed above, many cost objects were used to capture storm costs. Costs
16 were functionalized between Transmission and Distribution based on the work
17 performed associated with the costs. Generally, cost objects are established such
18 that Transmission and Distribution costs are captured separately. The amounts
19 reflected in cost objects established for capturing only Transmission or only
20 Distribution costs were reviewed to assure detailed line items were appropriately
21 classified as Transmission or Distribution. Allocations were used in instances
22 where the costs incurred were attributable to both Transmission and Distribution.
23 The table below describes the allocation methodology used for cost objects

attributable to both Transmission and Distribution, and a list of all Substation cost objects is shown in WP RW-1 Substation Functionalization.

Table RW-2

Substation	Individual cost objects were created and used to track costs by substation. Substations were individually analyzed to determine which portion of the work supported the Distribution versus Transmission function. In this analysis, the Company utilized existing percentages previously established in Docket No. 56211, to functionalize Substation costs. Those percentages were developed based on analysis of costs at the individual property section level to determine whether the cost was Transmission or Distribution related. The percentages by substation cost object are shown in workpaper WP RW-1 Substation Functionalization.
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Q. ARE COSTS FOR COMPANY STRAIGHT-TIME LABOR INCLUDED IN THE CALCULATION OF SRCS?

A. Yes. Approximately 4,200 Company and affiliate employees were involved in the Company's restoration efforts for Hurricane Beryl, Hurricane Francine, and Winter Storm Enzo. Restoration work and fulfilling EOP-related roles are above and beyond an employee's typical work assignment for a given day.

Q. IS IT APPROPRIATE TO INCLUDE STRAIGHT-TIME LABOR COSTS IN SRCS?

A. Yes. The broad category of "system restoration costs" under PURA § 36.402(a) includes costs due to "any activities" connected with restoration of service after a major storm without distinguishing between straight-time or overtime labor. Also, the statute does not require that the system restoration activities be incremental to typical activities an employee handles in the day-to-day course of work. That being