



December 14, 2018

By Hand Delivery and U.S. Mail

Ms. Lora Johnson, CMC
Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

**RE: RESOLUTION DIRECTING ENTERGY NEW ORLEANS, INC. TO INVESTIGATE AND
REMEDiate ELECTRIC SERVICE DISRUPTIONS AND COMPLAINTS AND TO
ESTABLISH MINIMUM ELECTRIC RELIABILITY PERFORMANCE STANDARDS AND
FINANCIAL PENALTY MECHANISMS**

Dear Ms. Johnson:

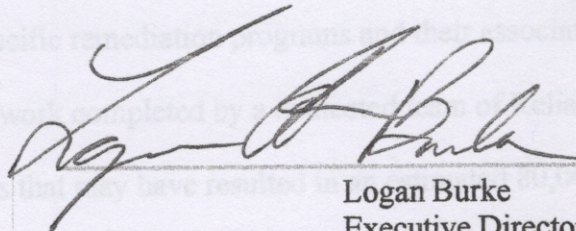
Please find enclosed an original and three (3) copies of the Alliance for Affordable Energy's comments on Entergy New Orleans LLC, ("ENO") Reliability Project Status Report in the above mentioned docket. Please file the attached communication and this letter in the record of the proceeding and return one timestamped copy to our courier, in accordance with normal procedures. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

RECEIVED
DEC 14 2018

BY: 



Logan Burke
Executive Director
Alliance for Affordable Energy

Before the Council of the City of New Orleans

**RE: RESOLUTION DIRECTING ENTERGY
NEW ORLEANS, INC. TO INVESTIGATE
AND REMEDIATE ELECTRIC SERVICE
DISRUPTIONS AND COMPLAINTS AND
TO ESTABLISH MINIMUM ELECTRIC
RELIABILITY PERFORMANCE
STANDARDS AND FINANCIAL PENALTY
MECHANISMS**

Docket No. UD-17-04

December 14, 2018

**The Alliance for Affordable Energy's Response to
Entergy New Orleans, LLC Reliability Project Status Report**

The Alliance appreciates this opportunity to provide comments on Entergy New Orleans LLC, ("ENO") Reliability Project Status Report ("Report"), filed November 30, 2018. ENO's report is a brief update with projected avoided interruptions, dollars spent, and project status for their FOCUS and Backbone programs. The Alliance is encouraged to see the completion of 16 projects, with an additional 10 projects underway, each with significant assumed avoided customer interruptions.

Based on the data provided in this report, the FOCUS and Backbone projects completed as of October 31, 2018 forecast annual avoided customer interruptions of 9,513, with an additional 7,139 annual interruptions avoided upon the completion of the rest of ENO's planned projects. In addition to these specific remediation programs and their associated avoided interruptions, ENO reports that work completed by a dedicated team of Reliability Service Men, has "prevented potential outages that may have resulted in an estimated 80,000 customer interruptions." Finally, as a result of having additional crews available to respond to Tropical Storm Gordon, which thankfully did not impact New Orleans, ENO reports these crews completed work that "is estimated to have prevented outages that may have resulted in

approximately 63,000 customer interruptions.” These projected numbers are extraordinary and represent a total of more than 152,513 customer interruptions depending on the lifetime of the annually avoided interruptions.

Unfortunately, the only data in this docket that reports numbers of “customer interruptions” already experienced is a table on page ii of the Quanta Assessment, filed October 31, 2018. Further, this table only provides the customer interruptions numbers for 2017 and 2018 from January-October 21. The Alliance cannot identify reporting of any prior year’s total customer interruptions. The calculation of customer interruptions in the Quanta assessment does not appear to be comparable to the data reported in ENO’s Bi-Monthly Outage Cause Analysis where “Total Customers Affected” are reported and August-September 2018 alone reports 129,034 total customers affected.

We understand the distinction between outages and customer interruptions, however, without some standardized values across reports, it is difficult to ascertain the actual progress being made as a result of the work underway, and impossible to project the future effectiveness of the remediation projects in the context of reliability problems already experienced in New Orleans. Therefore, the Alliance recommends the utility provide customer interruption data from previous years, employing the same calculations used in their forecasted improvements and avoided interruptions from Progress Reports. In addition, ENO’s Bi-Monthly update should include “customer interruptions” alongside the existing reporting.

ENO’s efforts are reportedly somewhat under budget for completed projects and, with a few exceptions, projects underway appear to be on-target for their budgets or better, which is reassuring considering the total costs for remediation. Unfortunately his report does not provide the cost for the additional work completed by the Reliability Service Men team or the work done

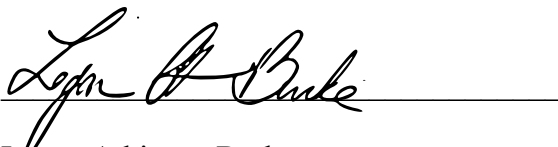
with crews in place for Tropical Storm Gordon. That work is apparently not part of ENO's FOCUS or Backbone remediation programs so budget comparisons are difficult at this time, but considering the very high values for avoided customer interruptions for these two items the Alliance would like to see the total cost.

Finally, the Alliance is interested in the outcome of ENO's review and assessment of transmission related outages and, as noted in our comments to the Quanta report, a better understanding of the utility's designation of substation outages as transmission or distribution reliability.

Conclusion

The Alliance is generally encouraged by ENO's status report, and looks forward to continued improvements in reliability. We do believe reporting should be standardized across this docket in order for stakeholders to compare past outages, projected avoided interruptions, and finally determine if these forecasted improvements meet expectations.

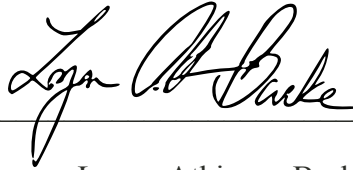
Respectfully Submitted,

A handwritten signature in cursive script, reading "Logan A. Burke", is written over a solid horizontal line.

Logan Atkinson Burke
Executive Director
Alliance for Affordable Energy

Certificate of Service
Docket No. UD-17-04

I hereby certify that I have on this 14th day of December, 2018, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.

A handwritten signature in black ink, reading "Logan A. Burke". The signature is written in a cursive style with a large initial "L".

Logan Atkinson Burke
Alliance for Affordable Energy