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Timothy S. Cragin
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January 11, 2019

By Hand Delivery

Ms. Lora W. Johnson, CMC, LMMC
Clerk of Council
City Hall - Room 1E09
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 – CNO Docket No. UD-17-04

Dear Ms. Johnson:

Please find enclosed for your further handling an original and three copies of Entergy New Orleans, LLC's ("ENO") Response to Comments of the Alliance for Affordable Energy and the Council Advisors regarding ENO's 2018 Reliability Project Status Report, which is submitted pursuant to Judge Jeffrey S. Gulin's Order dated November 19, 2018, and is being filed in the above-referenced docket. Please file an original and two copies into the record and return a date-stamped copy to our courier.

Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink that reads "Timothy S. Cragin".

Timothy S. Cragin

TSC\rdm

Enclosures

cc: Official Service List (UD-17-04 *via electronic mail*)

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

RESOLUTION DIRECTING)	
ENTERGY NEW ORLEANS, INC. TO)	
INVESTIGATE AND REMEDIATE)	
ELECTRIC SERVICE DISRUPTIONS)	
AND COMPLAINTS AND TO)	
ESTABLISH MINIMUM ELECTRIC)	DOCKET NO. UD-17-04
RELIABILITY PERFORMANCE)	
STANDARDS AND FINANCIAL)	
PENALTY MECHANISMS)	

**ENTERGY NEW ORLEANS, LLC’S RESPONSE
TO COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY AND THE
COUNCIL ADVISORS REGARDING
ENO’S 2018 RELIABILITY PROJECT STATUS REPORT**

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits this Response to the Comments filed by Intervenor, the Alliance for Affordable Energy (“Alliance”), and by the Advisors to the Council of the City of New Orleans (the “Council”) related to the Reliability Project Status Report as of October 31, 2018 (“Status Report”), that ENO filed with the Council on November 30, 2018.

I. Response to Comments of the Alliance for Affordable Energy

The Alliance filed brief Comments on ENO’s Status Report December 14, 2018. Essentially, the Alliance’s Comments focused on three areas: (1) ENO’s reporting of customer interruptions; (2) the cost associated with ENO’s Fix-It-Now crew and the post-Tropical Storm Gordon crews; and (3) the distinction between substation and transmission outages.

With regard to customer interruptions, it should first be noted that customer interruptions are one component of the calculation of the System Average Interruption Frequency Index (“SAIFI”). SAIFI is only calculated formally for comparison purposes at the end of the year,

although ENO does track SAIFI throughout the year. The Alliance states in their Comments that ENO has not supplied any customer interruption information for previous years; however, that is incorrect. In fact, Exhibit TSP-4 to Tad S. Patella's Direct Testimony filed on June 6, 2018, provides detailed customer interruption data for 2015, 2016, and 2017 on a feeder-by-feeder basis. The Alliance also points out that the "customers affected" numbers supplied in ENO's Bi-Monthly Reports on outages do not seem to match with the customer interruption numbers noted in the Quanta report. It is ENO's understanding that the customer interruptions reported by Quanta come from periodic internal reports that calculate customer interruptions in conjunction with SAIFI methodology (which excludes certain interruptions, such as those on Major Event Days, etc.). The customers affected numbers in the Bi-Monthly reports are based on a database query and may be more in the nature of raw data than that supplied by Quanta. ENO will investigate the discrepancy and report back to the parties, as well as work to ensure consistency and clarity in the reporting going forward.

With regard to the cost of the Fix-It-Now crew and the post-Tropical-Storm-Gordon crews, ENO does not have that information set out separately as of this filing but will investigate to determine if it can be separated and, if so, will provide that information to the parties at a later date.

With regard to the distinction between distribution outages (or D-line view) and transmission outages (T-line view), distribution outages are outages associated with distribution equipment and transmission outages are associated with transmission equipment (or equipment managed by the transmission organization), which includes substation equipment. Finally, it should be noted that ENO filed testimony in response to the Council's prudence investigation that addresses the transmission system and recent outages in detail. ENO also plans to file its

2019 transmission reliability plan with the Council on January 18, 2019, in addition to its 2019 distribution reliability plan.

II. Response to Comments of the Council Advisors

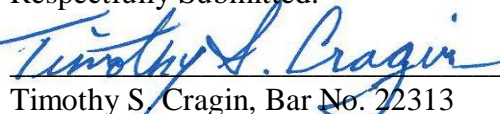
The Advisors in their Comments essentially reiterate the issues raised by the Alliance (e.g., comparability of reported data, transmission outages, etc.) and ENO has addressed these issues above. ENO will follow up with the Advisors and the other parties to provide the additional requested information and to provide clarity and consistency in the reporting.

V. Conclusion

Overall, ENO is pleased with the progress made in 2018 with regard to distribution line reliability work and looks forward to continuing to refine its reliability work to make continued progress in its reliability efforts.

Respectfully Submitted:

By:



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**ATTORNEYS FOR ENTERGY NEW
ORLEANS, LLC**

CERTIFICATE OF SERVICE

Docket No. UD-17-04

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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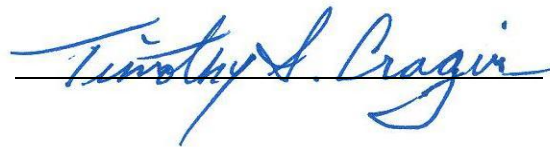
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New Orleans, Louisiana, this 11th day of January 2019

A handwritten signature in blue ink, reading "Timothy S. Cragin", is written over a horizontal line.