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April 20, 2020

VIA EMAIL
Lora W. Johnson, CMC, LMMC
Clerk of Council
Room 1E09, City Hall
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New Orleans, LA 70112

Re: *Revised Application of Entergy New Orleans, LLC for a Change in Electric and Gas Rates Pursuant to Council Resolutions R-15-194 and R-17-504 and for Related Relief*
Council Docket No. UD-18-07

Dear Ms. Johnson:

On behalf of Entergy New Orleans, LLC ("ENO"), please find for electronic filing *Entergy New Orleans, LLC's Report Regarding the Gas Infrastructure Replacement Program and Mitigation Measures*, which I would appreciate your filing into the record of this proceeding. As a result of the remote operations of the Council's office related to COVID-19, ENO submits this filing electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations, or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Should you have any questions regarding the above/attached, please do not hesitate to contact me.

Sincerely,

Kimberly R. Silas

KRS/amb
Enclosures

cc: Official Service List via email

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

APPLICATION OF ENTERGY NEW ORLEANS, LLC, FOR A CHANGE IN ELECTRIC AND GAS RATES PURUSANT TO COUNCIL RESOLUTIONS R-15-194 AND R-17-504 AND FOR RELATED RELIEF	)))))))	**DOCKET NO. UD-18-07**

ENTERGY NEW ORLEANS, LLC'S REPORT REGARDING THE GAS INFRASTRUCTURE REPLACEMENT PROGRAM AND MITIGATION MEASURES

Entergy New Orleans, LLC ("ENO") respectfully submits its Report Regarding the Gas Infrastructure Replacement Program and Mitigation Measures ("Report").

On November 7, 2019, the Council for the City of New Orleans, ("Council"), adopted Resolution No. R-19-457, *Revised Application of Entergy New Orleans, LLC for a Change in Electric and Gas Rates Pursuant to Council Resolutions R-15-94 and R-17-504 and for Related Relief*, ("Resolution"), which ordered ENO to "propose . . . a rate of gas distribution pipe installation and dollar investment that is required to maintain the safe operation of ENO's gas distribution system, including potential mitigation measures to mitigate the identified impact on ratepayers."[1] The Council further ordered ENO to "convene a working group comprised of Advisors, ENO, and Intervenors to explore appropriate cost mitigation measures."[2] Each directive was to be completed within 120 days of the Resolution, or March 6, 2020. To comply with the Council's directive, the working group met at ENO's office on February 19, 2020, to explore

1 *See* Resolution at Ordering Paragraph 10 (b).

2 *See* Resolution at Ordering Paragraph 10 (c).

potential mitigation measures.[3] During that meeting, the working group discussed several potential mitigation measures including cost reduction, extension of the amortization period related to utility conflicts, extension of the depreciable life of the pipe, and securitization. Recognizing that ENO would need additional time to analyze the feasibility of the mitigation measures discussed, the working group agreed to seek, and was subsequently granted, an extension of the deadline to file the Report until April 20, 2020.[4] Subsequent to that meeting, ENO conducted further analysis and reconvened the working group on April 7, 2020, to present its recommendations,[5] which are the recommendations set forth herein.

First, ENO proposes to maintain its current pace of pipe replacement through the gas infrastructure replacement program ("GIRP"), based on the schedule on page four, which averages to be 25 miles per year through 2027 and at a projected remaining cost of $85.2 million.[6] *Further*, to reduce the bill impact of GIRP on customers' bills, ENO recommends increasing the depreciable life of the high density polyethene ("HDPE") pipe by five years, extending it from 30 years to 35 years and to also extend the amortization period related to utility conflicts from 10 years to 15 years. ENO believes that extension of the depreciable life of the HDPE pipe and the utility

[3] Though all Intervenors who have made an appearance in this Docket were invited to participate in the working group, only the following Intervenors attended: Alliance for Affordable Energy, Crescent City Power Users' Group, and Building Science Innovators, LLC.

[4] ENO filed an unopposed Motion for Extension of Time on February 21, 2020. The Motion was granted the same day.

[5] All Intervenors were invited to attend the second meeting of the working group; however, the Alliance for Affordable Energy was the only Intervenor to appear. In addition, Bobbie Mason with the Council Utilities Regulatory Office attended.

[6] In ENO's Revised Application for a Change in Electric and Gas Rates Pursuant to Council Resolution R-15-194 and R-17-504 and for Related Relief, the proposed gas rates reflected a total revenue reduction of approximately $2.5M, which resulted in an approximate 3.2% rate decrease across all rate classes. *See* Council Docket UD-18-07. In the Resolution, the Council approved the Advisors' recommendation and approved the GIRP costs through the end of 2019. Thus, the remaining forecasted GIRP investment is approximately $85M from 2020 through 2027. This cost is expected to be recovered through an FRP mechanism, with approximately $15.2M that would be expected to be recovered in 2020.

conflicts amortization period results in an overall decrease in customers' gas bills, all other things equal, when compared to the current depreciable life and amortization period.

I. ENO's Current Pace and Dollar Investment is Appropriate.

At its inception in 2007, the Gas Infrastructure Rebuild Program, ("Rebuild Program"), the predecessor to GIRP, aggressively targeted to replace 50 miles of flooded gas pipe a year in order to restore gas services and service reliability as quickly as possible. The Rebuild Program later decelerated to half the original pace to better monitor the effects of flooding on the pipe and to better understand which areas of New Orleans were being repopulated. The Rebuild Program continued at the decelerated pace of approximately 25 miles per year from 2011 through the end of 2016. This pace proved to be the most cost-effective pace for continued improvements to service reliability and public safety.

In 2017, ENO began GIRP, utilizing the expertise and resources from the Rebuild Program. ENO's proposed rate of gas distribution pipe replacement through GIRP sets a finite timeframe to eliminate system risk due to low pressure leaks and over-pressurization events. ENO's schedule optimizes the inherent operational and reliability benefits associated with high pressure systems by accelerating resiliency to storms and non-routine emergencies. The recommended rate of replacement shown below minimizes impacts to residents and businesses due to concurrent projects and removes risk earlier in the program.

ENO Gas Infrastructure Replacement Program ("GIRP") Low Pressure Replacement Schedule

	End of Rebuild	GIRP										
	2016 [2]	2017	2018	2019	2020	2021	2022 [3]	2023	2024	2025	2026	2027 [4]
UP Miles In Service (year-end)	231	186	128	76	38	31	26	20	16	11	7	0
UP Miles Abandoned	45	58	52	38	7	5	5	5	5	5	7	
HP Block Miles Installed	419	25	29	28	30	14	5	7	4	4	4	
Annual Spend ($M)[1]	$165.3	$12.0	$13.5	$14.0	$15.0	$14.0	$11.7	$12.5	$10.0	$10.0	$10.0	$2.0
Cost per Pipe Mile Installed ($k)	$395	$480	$460	$500	$500	$1,300	$1,500	$1,857	$2,500	$2,500	$2,500	N/A

^ Included Bourbon Street Improvement Project Phase I Cost

Start Central Business District in 2021, end 2023; Also replace 7.4 miles of vintage plastic in year 2022 at a cost of $4 million

French Quarter Starting in 2023

When considering this proposed pace, ENO relied on several sources for guidance, including the U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration, ("PHMSA"), which oversees natural gas distribution companies, as well as on ENO's state natural gas regulator, the Department of Natural Resources.

PHMSA requires gas distribution companies to have an integrity management plan ("DIMP"). DIMP requires ENO to develop, write, and implement an integrity management plan which serves as an action plan for threat identification, risk ranking and evaluation, risk identification, measures to address those risks, and performance measurement. In identifying both the threat and risk to ENO's gas distribution system, it became apparent that the presence of cast iron in ENO's gas distribution system posed the biggest risk. In fact, industry wide, 10% of incidents that occur on gas distribution mains involve cast iron,[7] while only 2% of distribution mains are cast iron. In ENO's service territory, cast iron is the pipe material that experiences the most leaks on our gas distribution system and that is the majority of material that ENO is replacing

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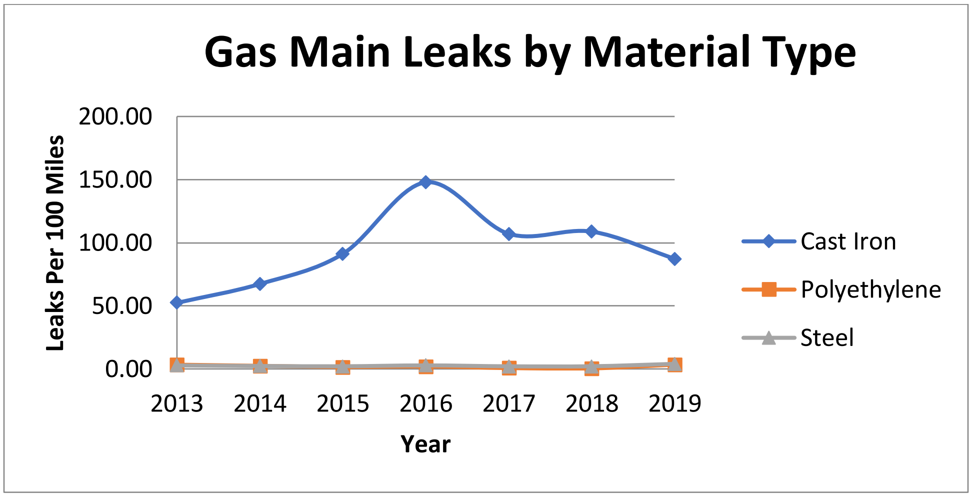
[7] The following examples illustrate the dangers of a cast iron distribution system and supports ENO's gas infrastructure replacement program. *January 10, 2020 (Jersey City, NJ)*: A gas fire explosion resulted in an injury that required hospitalization. The explosion resulted from leak in the cast iron main. *December 19, 2019 (Philadelphia, PA)*: An explosion occurred when a cast iron gas main broke due to ground movement. The explosion led to two fatalities. *Available at* https://www.phmsa.dot.gov/data-and-statistics/pipeline-replacement/cast-and-wrought-iron-inventory.

through GIRP. Also, the Department of Natural Resources has mandated that ENO replace all box-in-concrete gas services with newer material, rather than simply making repairs to such facilities.



As depicted in the above graph, cast iron is the pipe material that has the most leaks per 100 miles in ENO's service territory. Thus, ENO has replaced the worst performing cast iron, which has resulted in a reduction of leaks per 100 miles.

II. Typical Winter Bills for ENO's Gas Customers Peak at Approximately 70ccfs.

Approximately 95% of ENO's 100,000 gas customers are residential. Those customers' average monthly gas usage was approximately 30 one hundred cubic feet ("ccf") over the three-year period from 2016 through 2019. Notably, this average usage is heavily weighted during the winter months where monthly average usage sometimes peaks to 70 ccf.[8] In the summer months, the average monthly usage drops significantly, averaging around 12 ccf. Further, a correlation exists between monthly average gas usage and household income. As shown below, on average,

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8 December through February are considered winter months.

customers who have higher household incomes consume more gas, while gas usage generally decreases as household income decreases.

Typical Winter Bill is ~70 ccf

	2016	2017	2018	2019	Average
January	61	58	102	65	**71**
February	72	41	73	67	**63**
March	40	31	29	43	**36**
April	22	19	23	31	**24**
May	15	16	18	18	**17**
June	14	14	14	13	**14**
July	12	12	12	12	**12**
August	11	11	11	11	**11**
September	12	12	12	11	**12**
October	12	11	12	11	**11**
November	15	20	23	28	**22**
December	39	48	56	50	**48**
Annual Usage	325	294	385	360	**341**
Avg Monthly Usage	27	25	32	30	**28**
Yr-End # of Customers (Residential Only)	100,603	100,871	101,434	102,531	**101,360**

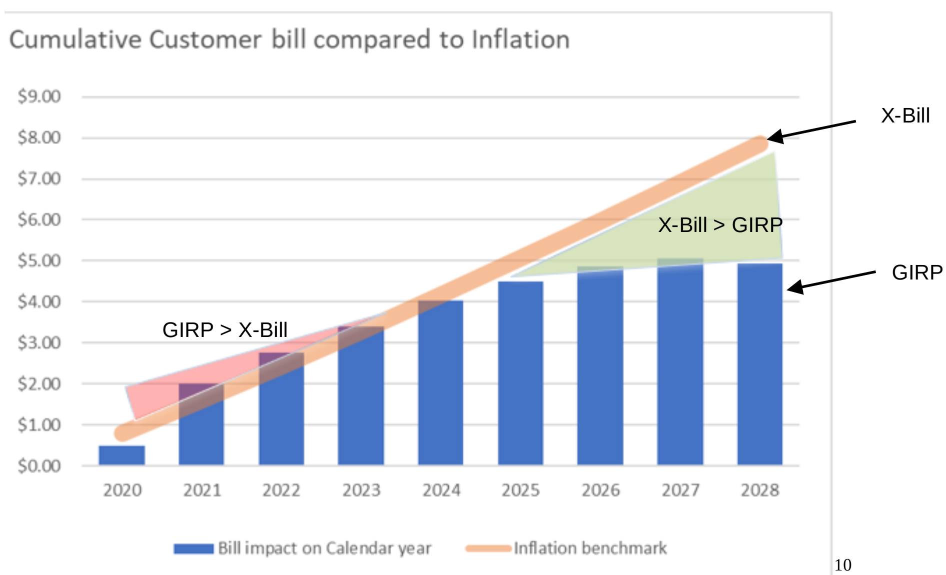
2019 Gas CCF - Avg Monthly Usge				
Based on 2019 BW ENOL gas data				
Income Information from Experian - Dec 2019 Extract on Active Accts				
Does not Include Unknown Income levels				
OPCO	Est Household Incom	Income_Category	# of Accts	Avg Monthly CCF Usage
ENOL	A	$1,000-$14,999	12,135	26
ENOL	B	$15,000-$24,999	11,521	28
ENOL	C	$25,000-$34,999	10,913	27
ENOL	D	$35,000-$49,999	14,268	28
ENOL	E	$50,000-$74,999	18,179	30
ENOL	F	$75,000-$99,999	11,371	32
ENOL	G	$100,000-$124,999	6,819	32
ENOL	H	$125,000-$149,999	4,733	36
ENOL	I	$150,000-$174,999	1,860	28
ENOL	J	$175,000-$199,999	2,620	37
ENOL	K	$200,000-$249,999	2,438	38
ENOL	L	$250,000+	4,012	48
		Total	100,869	

~30 ccf is the average monthly usage

One concern expressed by the working group was whether the effect of GIRP would disproportionately affect low-income households. This concern was largely driven by an assumption that low-income households likely use more gas than other households. The above data does not support such an assumption and indicates that low-income households should not be disproportionately affected by GIRP.

III. The Rate of Inflation is Higher Than GIRP's Impact on Customers' Bills.

Current estimates suggest that ENO's residential gas customers will experience a slower rate of growth on their gas bills than they will on other consumer goods and services. To illustrate the GIRP impact and how it compares to the forecasted rate of inflation, assume a residential gas customer who uses a monthly average of 30 ccf has a monthly gas bill of approximately $35. Further assume that this customer spends a similar amount of money on other goods and services, hereinafter referred to as X-Bill, and that X-Bill is impacted by an inflation rate of 2.3%.[9] Under these assumptions, this customer's X-Bill increases by an estimated $7.90 per month by 2028. However, when compared to GIRP's plan proposal, this customer would be expected to see an average yearly increase of only 1.5%. This means that ENO's residential gas customers would see an increase in their gas bill of approximately $5.00 per month by 2028, which is $2.90 less than the rate increase that the same customer would see on X-Bill. X-Bill will be higher than ENO's residential customers' gas bill by 2028. However, due to GIRP's recommended investment pace, the gas bill may be higher in the earlier years of the forecasted period than X- Bill, but it will end at a lower growth rate by 2028.



[10]

IV. The Working Group Considered Several Potential Cost Mitigation Measures Relating to GIRP.

To comply with the Council's directive, the working group discussed several cost mitigation measures including (i) extension of the amortization period and depreciable life of the pipe, (ii) cost reduction, and (iii) securitization. ENO explored each of these measures after its initial meeting with the working group and several findings resulted. *First*, extending the depreciable life of the HDPE pipe and the amortization period related to utility conflicts by five years results in an overall decrease in customers' gas bills when compared to the current depreciable life and amortization period. *Second*, cost reduction is a factor that ENO always considers and continues to be ongoing. *Third*, securitization is not an appropriate financing mechanism for GIRP. Each of these options is discussed more fully below.

A. ENO Recommends Extending Both the Depreciable Life of the HDPE Pipe and the Amortization Period by 5 Years.

To help reduce GIRP's overall impact to customers and to help further flatten the cost curve in the early years of the program, ENO recommends changing the depreciable rate of the HDPE pipe from 3.334% to 2.8751%. This change will increase the period over which these GIRP costs are depreciated and collected from customers from approximately 30 years to approximately 35

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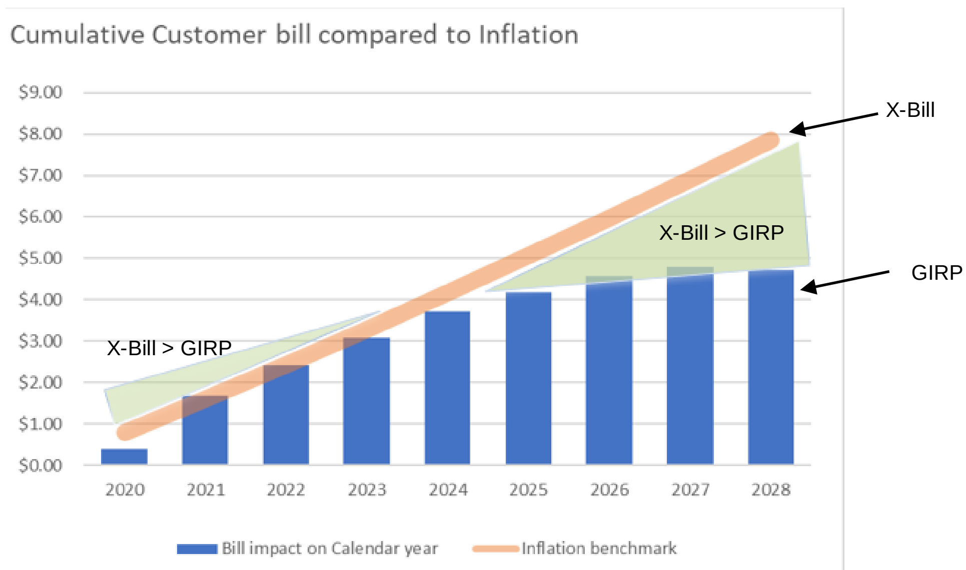
9 This inflation rate is based on the most recent Consumer Price Index ("CPI") reading from the U.S. Bureau of Labor Statistics. The CPI measures the change in prices consumers pay for goods and services. The CPI bases its index on the price consumers pay for things such as food, clothing, shelter, fuels, transportation, doctors' and dentists' services, drugs, and other goods and services purchased for day-to-day living. The latest reading from the U.S Bureau of Labor Statistics indicates that the CPI for February 2019 through February 2020 is 2.3% for all categories. *See* U.S Bureau of Labor Statistics, Consumer Price Index News Release, March 11, 2020.

10 This table assumes that HDPE pipe is being used in GIRP for pipe replacement. The depreciation for that asset in FERC Account 376.3 is 3.33%. Depending on the worksite, however, ENO may determine to use other materials. For example, as ENO moves into the French Quarter and Central Business, it may elect to use steel. In that case, the depreciation would be 2.45% or approximately 40 years. Therefore, the impact to customers' bills would be less than what is represented herein.

years. ENO also recommends an extension of the amortization period to recover costs related to utility conflicts. Currently, ENO is expected to spend $20M over the next five years and has been authorized by the Council to recover $2M per year in base rates over a 10-year period. ENO proposes to extend the amortization period by five years, meaning it will amortize $1.33M over 15 years. Applying these recommendations to the previous example, ENO's customers would be expected to realize a 2020-2028 CAGR[11] of approximately 1.4% on the gas bill, which results in an average monthly gas bill that is approximately $4.70 higher by 2028 over the course of the next eight years when compared to the $35 bill in the earlier example. This would be a much lower bill impact than the generic X-Bill which would have increased by $7.90.



B. Ongoing Cost Reduction is Always a Consideration in ENO's Operations.

The Advisors also recommended that ENO reduce costs related to GIRP. ENO considered cost effectiveness throughout the Rebuild Program and, going forward, will continue to be alert to opportunities to reduce the cost of implementing GIRP. Indeed, through the implementation of best practices, ENO reduced its gas main replacement cost from $564K per mile in 2007 to $395K

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11 CAGR is the compound annual growth rate.

per mile in 2016. Further, ENO increased its efficiencies through several broad measures such as design standardization, material selection and pre-work, contractor multi-year competitive bidding, and project coordination with other utilities, contractors, and agencies (e.g., the Sewerage and Water Board of New Orleans ("SWBNO"), the City's Department of Public Works, and others on improvement projects such as Bourbon Street). Accordingly, though ENO believes the costs presented are the lowest reasonable cost at this time, cost reduction is an ongoing factor that is always considered.

C. Securitization Fails to Meet the Statutory Requirements and is not an Appropriate Financing Mechanism.

Both the Advisors and Intervenors asked ENO to consider securitization as a potential mitigation measure. Though securitization, generally speaking, provides an alternative to finance certain utility obligations in a manner that reduces costs to ratepayers when compared to traditional ratemaking, securitization bonds must be backed through legislation. In Louisiana, only three securitization statutes are applicable to electric utilities seeking securitization to finance certain utility obligations — La. R.S. 45:1311-1328 ("Act 55"), La. R.S. 45:1251-1261 ("Act 64"), and La. R.S. 45:1251-1261 ("Act 988"). In this case, the GIRP costs fail to meet the statutory requirements for securitization under these Louisiana statutes.[12] Moreover, given the nature of the GIRP costs – standard utility investment to improve aging infrastructure -- securitization is not an appropriate financing mechanism here. Traditionally, Louisiana utilities have used securitization

[12] The GIRP costs fail to meet the statutory definition of "system restoration activity" as defined by Act 55 because they are not sufficiently correlated to outages, nor do they result from a storm. Act 64, which applies to restoration of electric service in connection with a storm, is not applicable to GIRP. Notwithstanding the fact that Act 64 applies to restoration of *electric* service, rather than gas, Act 64 allows securitization for the recovery of "storm recovery costs," which GIRP is not. Finally, Act 988 is inapplicable because like Act 64, it applies to the recovery of electric investments. Moreover, recovery under Act 988 only applies to capital investments that exceed $350 million. The GIRP costs are approximately $85.2 million.

bonds to mitigate costs absorbed by ratepayers due to extraordinary force majeure events such as major storm reparations or stranded construction costs of an uneconomic generating asset. In this case, the GIRP investment is not akin to these types of extraordinary costs and is therefore neither an available alternative for financing, nor an appropriate one. In short, even if legally feasible, securitizing GIRP costs would provide an imbalanced mechanism whereby ENO would completely forego its Council-authorized return on a traditional reliability and infrastructure upgrade. ENO does not believe this is sound ratemaking policy. Therefore, ENO does not consider securitization as an appropriate cost mitigation measure for GIRP.

V. **Conclusion.**

ENO maintains its recommended pace of pipe replacement as depicted in the table on page four, as well as the estimated dollar investment of $85.2 million. This schedule sets a finite timeframe to eliminate risk due to over-pressurization events and aligns with industry trends to remove low pressure gas systems, while spreading the cost to customers over a number of years. The pace set by ENO since the program's inception has focused on mitigating safety risks associated with the legacy gas system, while minimizing disruption to residents and businesses due to street congestion created by the large number of concurrent public works projects. Further, to reduce GIRP's impact on ENO's gas residential customers, ENO recommends changing the depreciable rate of the HDPE pipe from 3.334% to 2.8571% or from 30 years to 35 years and further recommends extending the amortization period to 15 years which allows ENO to amortize $1.33M over 15 years.

Respectfully submitted,

BY: ___________________________

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CERTIFICATE OF SERVICE

I hereby certify that I have this 20th day of April, 2020, served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual, by: ☒ electronic mail, ☐ facsimile, ☒ hand delivery, and/or by depositing same with ☒ overnight mail carrier, or ☐ the United States Postal Service, postage prepaid.

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