

ROEDEL PARSONS KOCH
BLACHE BALHOFF & MCCOLLISTER
A LAW CORPORATION

September 14, 2020

VIA EMAIL

Lora W. Johnson
Clerk of Council
1300 Perdido Street
1E09
New Orleans, LA 70112

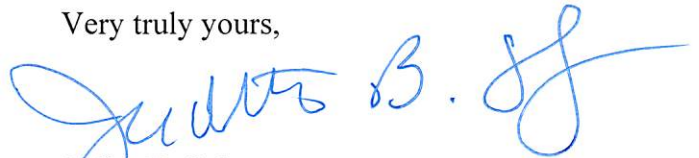
Re: *Resolution and Order Establishing a Docket to Streamline Entergy New Orleans Reporting Requirements to the New Orleans City Council and Accompanying Procedural Schedule*
Docket No. UD-20-01

Dear Ms. Johnson:

Attached please find *Crescent City Power Users' Group's Initial Comments* for filing into the record in the above referenced matter.

Should you have any questions whatsoever, please do not hesitate to contact me.

Very truly yours,



Judith B. Sulzer,
Paralegal to Luke F. Piontek

Enclosure

cc: All Counsel of Record via email

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

RESOLUTION AND ORDER)	
ESTABLISHING A DOCKET TO)	
STREAMLINE ENTERGY NEW)	DOCKET NO. UD-20-01
ORLEANS REPORTING)	
REQUIREMENTS TO THE NEW)	
ORLEANS CITY COUNCIL AND)	
ACCOMPANYING PROCEDURAL)	
SCHEDULE)	

**CRESCENT CITY POWER USERS' GROUP'S
INITIAL COMMENTS**

NOW COMES, Crescent City Power Users' Group ("CCPUG"), through undersigned counsel, which submits the following Initial Comments concerning the potential streamlining of various reporting requirements applicable to Entergy New Orleans, LLC ("ENO"), as follows:

INTRODUCTION

CCPUG appreciates the opportunity to provide these comments for consideration by the Council of the City of New Orleans ("City Council" or "Council").

ENO is subject to numerous filing and reporting requirements, as detailed on Exhibit A to Council Resolution No. R-20-223 in this matter ("Reporting Matrix"), however, many of such filing and reporting requirements were adopted in connection with the Council's approval of requests by ENO to pursue projects that involved significant capital expenditures, such as the New Orleans Power Station ("NOPS"), the Union Power Station, Power Block 1 ("UPS"), and the New Orleans Solar Station ("NOSS") and/or material changes in the planning and operation of the utility, such as ENO's integration into the Midcontinent Independent System Operator, Inc. ("MISO").

As such, many of the filing and reporting requirements can be considered the cost of doing business for ENO.

Such filing and reporting requirements are also vital to the protection of ENO's ratepayers as they provide crucial information to the Council which enables it to monitor ENO's larger capital expenditures, expenses, and other activities, all of which have a direct and substantial effect on the cost of electricity to ENO's ratepayers. Absent a period review structure, such as a Formula Rate Plan ("FRP"), information concerning ENO's larger capital expenditures, expenses, and other activities may not be provided to the Council until the next base rate case which could be years away. CCPUG understands that ENO is planning to file its electric and gas FRPs, but those FRPs are for a term of only three years as it stands now.

Further, several of the filing and reporting requirements contained in the Reporting Matrix are perfunctory. In other words, several of the requirements merely command ENO to provide a copy of filings or reports it is required to make to other regulatory agencies and/or governmental bodies. These requirements should not impose any significant time or cost of preparation burden on ENO.

That said, and while streamlining certain reporting requirements makes some sense and could possibly save some costs of preparation, most of the filing and reporting requirements should be maintained.

SPECIFIC COMMENTS ON REPORTING MATRIX

Listed below are the filing and reporting requirements shown on the Reporting Matrix that CCPUG recommends be maintained. CCPUG takes no position on whether to

maintain or eliminate filing and reporting requirements contained on the Reporting Matrix, but *not* listed below.

REPORT	RESOLUTION	REASON TO MAINTAIN
Post-MISO Integration Report	R-15-139	Major planning and operational information
Annual SAIFI and SAIDI Reports	R-15-31	Major operational information
Annual Net Energy Metering Report	R-17-132 and R-09-484	Major capital expenditure information; Major operational information
Semi-Annual SSCR Rider Filing	R-15-193	Major cost recovery mechanism true up
Annual SSCO Rider Filing	R-15-193	Major cost recovery / offset rate adjustment
Mid-Year Report on Actual Revenue Requirement associated with UPS	R-15-542	Major capital expenditure; Major cost recovery information
Annual UPS Revenue Requirement True-up	R-15-542	Major capital expenditure; Major cost recovery true up
NOPS Quarterly Reports	R-19-78 (Ordering paragraph 4, p. 14)	Major capital expenditure; Major cost recovery information
NOPS LDEQ Report – Title V Certification Report	R-19-78 (Ordering paragraph 4, p. 14)	Major capital expenditure; Major operational information
NOPS LDEQ Report – RICE Engine Annual Report	R-19-78 (Ordering paragraph 4, p. 14)	Major capital expenditure; Major operational information; Required by LDEQ Title V Permit

NOPS LDEQ Report – Emergency Diesel Generator Operating Report	R-19-78 (Ordering paragraph 4, p. 14)	Major capital expenditure; Major operational information; Required by LDEQ Title V Permit
NOPS LDEQ Report – Emissions Inventory	R-19-78 (Ordering paragraph 4, p. 14)	Major capital expenditure; Major operational information; Required by LDEQ Title V Permit
NOPS LDEQ Report – Reports of Unauthorized Discharges of Pollutants	R-19-78 (Ordering paragraph 4, p. 14)	Major capital expenditure; Major operational information; Required by LDEQ Title V Permit
NOPS Post-Implementation Report on Internal Controls and Cyber Security	R-19-78	Major capital expenditure; Major operational information
NOPS Usage Reports	R-19-78	Major capital expenditure; Major operational information
Estimated O&M Expenditures for NOPS	R-19-78	Major capital expenditure; Major operational information; Major cost recovery information
Quarterly NOPS O&M Expenditures	R-19-78	Major capital expenditure; Major operational information; Major cost recovery information; BUT could shift to annual instead of quarterly reports
AMI Deployment Progress Reports	R-18-37	Major capital expenditure; Major operational information; Major cost recovery information

Bi-Monthly Report on Customer Outages	R-17-427 (Ordering paragraph 6)	Major operational information; BUT could shift to quarterly reports
Community Solar Implementation Plan's annual compliance filing to the Council	R-18-223; R-19-111 (See also, Community Solar Rules, Section 7(F)(2))	Major capital expenditure; Major operational information; Major cost recovery information
ENO's New Orleans Solar Station (NOSS) Project Quarterly Reports	R-18-353 (See also, Ordering paragraph 17 on the Stipulated Term Sheet approved in Council Resolution R-19-293)	Major capital expenditure; Major operational information; Major cost recovery information
Securitized Storm Reserve	R-15-195 (Ordering paragraph 8)	Major capital expenditure; Major cost recovery information
Storm Reserve Fund Escrow	R-06-459 (AIP – Paragraph 20)	Major capital expenditure; Major cost recovery information
Fuel Adjustment Clause (Paragraph B)	R-19-457	Major operational information; Major cost recovery information
Monthly Progress Report on ENO's Collaboration with the Sewerage and Water Board of New Orleans to Improve Reliability of Electric Service and Expedite a Long-Term Solution	R-19-78	Major operational information
Rough Production Cost Equalization Adjustment (RPCEA) Quarterly Accounting Report	R-13-162 (See also, FERC Opinion Nos. 480 and 480-A)	Major operational information; Major cost recovery / refund information

Annual Gas Storage Program Analysis Report	R-05-518	Major operational information; Major cost recovery information
Annual Statement regarding the nature of inter-company transaction: <ul style="list-style-type: none"> • Independent Accountants' Report on Applying Agreed-upon Procedures; • Annual Report Identifying Non-Clerical Personnel from any Regulated Utility 	1992 Settlement Agreement (as amended); New Orleans City Code Section 158, Article II, Division 3, Sub-section 158-139	Required by City Code; Major operational information
ENO's Quarterly 10-Q and Annual 10-K Financial Statements	1992 Settlement Agreement (as amended)	Major capital expenditures; Major operational information; Major cost recovery information
Order on Compliance regarding final calculation of refunds to ENO	LPSC v. Entergy Services, Inc., Opinion No. 561, 163 FERC 61,116 (2018)	Major operational information; Major cost recovery / refund information
ENO MISO Cost Recovery Rider (True-up)	R-19-457	Major operational information; Major cost recovery / refund information
Bi-Annual Application to the City Council for Approval of the Financing Plan		Required by 1922 Franchise Ordinance No. 6822; Major operational information; Major cost recovery information
Bi-Annual Reporting of Data in Accordance with Section 210 of the Public Utility Regulatory Policy Act of 1978		Required by PURPA; Major operational information; Major cost recovery information

WHEREFORE, Crescent City Power Users' Group respectfully requests that the Council of the City of New Orleans accept its Initial Comments and maintain the above-listed filing and reporting requirements.


Respectfully submitted:

**ROEDEL, PARSONS, KOCH, BLACHE,
BALHOFF & McCOLLISTER**

8440 Jefferson Highway, Suite 301
Baton Rouge, LA 70809
Telephone: (225) 929-7033
Facsimile: (225) 928-4925

- and -

1515 Poydras Street, Suite 2330
New Orleans, Louisiana 70112
Telephone: (504) 525-7086
Facsimile: (504) 525-4991

By: 

Luke F. Piontek (Bar Roll #19979)
J. Kenton Parsons (Bar Roll # 10377)
George W. Hardy, IV (Bar Roll # 38012)

CERTIFICATE

I hereby certify that on this day a copy of the foregoing Crescent City Power Users' Group's Initial Comments has been sent to the official service list by email, and/or served by United States mail, postage prepaid, through their representatives, at the following addresses:

Lora W. Johnson
lwjohnson@nola.gov
Clerk of Council
City Hall- Room 1E09
1300 Perdido Street
New Orleans, LA 70112

Erin Spears, espears@nola.gov
Chief of Staff, Council Utilities
Regulatory Office
Bobbie Mason, bfmason1@nola.gov
Connolly A. F. Reed, careed@nola.gov
City Hall - Room 6E07
1300 Perdido Street
New Orleans, LA 70112

David Gavlinski, 504-658-1101,
dsgavlinski@nola.gov
Council Chief of Staff
City Hall - Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Sunni LeBeouf,
Sunni.LeBeouf@nola.gov
Michael J. Laughlin,
mjlaughlin@nola.gov
Mary Katherine Kauffman,
mkkaugman@nola.gov
Law Department
City Hall - 5th Floor
New Orleans, LA 70112

Norman White,
Norman.White@nola.gov
Department of Finance
City Hall - Room 3E06
1300 Perdido Street
New Orleans, LA 70112

Hon. Marie Auzenne,
marie@auzennelaw.com

Andrew Tuozzolo,
CM Moreno Chief of Staff,
avtuozzolo@nola.gov
1300 Perdido St. Rm. 2W40
New Orleans, LA. 70112

Paul Harang,
Paul.harang@nola.gov
Interim Chief of Staff
City Hall - Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Jonathan M. Rhodes,
Jonathan.Rhodes@nola.gov
Director of Utilities, Mayor's Office
City Hall – Room 2E04
1300 Perdido Street
New Orleans, LA 70112

Clinton A. Vince,
clinton.vince@dentons.com
Presley Reed,
presley.reedjr@dentons.com
Emma F. Hand,
emma.hand@dentons.com
Herminia Gomez,
herminia.gomez@dentons.com
Dee McGill, dee.mcgill@dentons.com
1900 K Street NW
Washington, DC 20006

Basile J. Uddo buddo@earthlink.net
J. A. "Jay Beatmann, Jr.
jay.beatmann@dentons.com
c/o DENTONS US LLP
650 Poydras Street
Suite 2850
New Orleans, LA 70130

Joseph W. Rogers,
jrogers@legendcgl.com
Victor M. Prep, vprep@legendcgl.com
Byron S. Watson,
bwatson@legendcgl.com
Cortney Crouch,
ccrouch@legendcgl.com
Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111

Errol Smith, (504) 284-8733,
ersmith@btcpas.com
Bruno and Tervalon
4298 Elysian Fields Avenue
New Orleans, LA 70122

Brian L. Guillot, bguill1@entergy.com
Entergy New Orleans, LLC
Vice-President, Regulatory Affairs
Polly S. Rosemond,
prosemo@entergy.com
Derek Millsdmills3 derekmills3@entergy.com
Keith Wood, kwood@entergy.com
Seth Cureington, scurein@entergy.com
Kevin T. Boleware,
kbolewa@entergy.com
1600 Perdido Street, L-MAG 505B
New Orleans, LA 70112

Tim Cragin tcragin@entergy.com
Alyssa Maurice-Anderson
amauric@entergy.com
Harry Barton hbarton@entergy.com
Entergy Services, LLC
Mail Unit L-ENT-26E
639 Loyola Avenue
New Orleans, LA 70113

Joe Romano, III jroman1@entergy.com
Suzanne Fontan sfontan@entergy.com
Therese Perrault tperrau@entergy.com
Entergy Services, LLC
Mail Unit L-ENT-4C
639 Loyola Avenue
New Orleans, LA 70113

Logan Atkinson Burke,
logan@all4energy.org
Sophie Zaken,
regulatory@all4energy.org
4505 S. Claiborne Ave.
New Orleans, LA. 70125

New Orleans, Louisiana, this 14th day of September, 2020.



LUKE F. PIONTEK