

Entergy Services, LLC 639 Loyola Avenue (70113) P.O. Box 61000 New Orleans, LA 70161-1000 Tel 504 576 6571 Fax 504 576 5579

**Timothy S. Cragin** Assistant General Counsel Legal Services - Regulatory

October 1, 2020

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

# Re: Application of Entergy New Orleans, LLC for Approval of Renewables Portfolio and Request for Cost Recovery and Related Relief CNO Docket NO.: UD-18-06

Dear Ms. Johnson:

Pursuant to Council of the City of New Orleans Resolution No. R-19-293, Entergy New Orleans, LLC ("ENO") respectfully submits the attached Estimated First-Year Non-Fuel Revenue Requirement for the New Orleans Solar Station, for electronic filing. 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.

Please note that the exhibits to the attached filing are Highly Sensitive Protected Materials and are being provided in native format this date to appropriate reviewing representatives in accordance with the terms of the Council's Official Protective Order set forth in Resolution R-07-432 via electronic means.

Thank you for your assistance with this matter.

Sincerely,

Timothy S. Cragin Timothy S. Cragin

TSC\rdm

Enclosures

cc: Official Service List (via electronic mail)

#### **BEFORE THE COUNCIL**

### OF THE CITY OF NEW ORLEANS

)

)

)

)

)

APPLICATION OF ENTERGY NEW ORLEANS, LLC FOR APPROVAL OF RENEWABLES PORTFOLIO AND REQUEST FOR COST RECOVERY AND RELATED RELIEF

**DOCKET NO. UD-18-06** 

### ESTIMATED FIRST-YEAR REVENUE REQUIREMENT FOR NEW ORLEANS SOLAR STATION

**NOW COMES** Entergy New Orleans, LLC ("ENO" or the "Company"), through undersigned counsel, and hereby submits the New Orleans Solar Station ("NOSS") Estimated First-Year Revenue Requirement ("Estimated Revenue Requirement"). In the Agreement in Principle approved in Resolution R-19-293, dated July 19, 2019 ("Renewables AIP"), ENO agreed to file the NOSS Estimated Revenue Requirement no later than forty-five days prior to NOSS commencing commercial operation. Also, pursuant to Resolution R-19-293, the Council has monitored and continues to monitor the construction of NOSS and the associated costs through quarterly reports. Currently, ENO anticipates that NOSS will commence operation in the latter half of November 2020, and, therefore, ENO is submitting this filing at this time.

The NOSS Estimated First-Year Revenue Requirement is \$5.3 million and summarized in the table below. A detailed calculation of the NOSS Estimated First-Year Revenue Requirement is attached as Exhibit ENO-1 (Highly Sensitive Protected Materials).

NOSS Estimated First-Year Revenue Requirement Summary (\$)		
Line No.	Description	Amount
1	Rate Base	39,622,794
2	Before-Tax Rate of Return on Rate Base	8.73%
3	Return on Rate Base	3,459,070
4	Expenses	1,834,557
5	Total Estimated First-Year Revenue Requirement	5,293,627

The principal driver of Rate Base is the Plant in Service amount, which reflects ENO's investment in NOSS. The Plant in Service is based on actual costs incurred through August 31, 2020 and estimated future costs through December 31, 2020. As further support of the Plant in Service amount, attached as Workpaper 6 to Exhibit ENO-1 (Highly Sensitive Protected Materials) is the Project Budget Status Table<sup>1</sup> reflecting the actual costs incurred through August 31, 2020 and estimated costs thereafter. Workpaper 6 shows that the NOSS project, which includes the construction of the generating station and related transmission and distribution facilities, continues to be on budget.<sup>2</sup> Accumulated Depreciation & Amortization and Accumulated Deferred Income Taxes reflect one full-year of Depreciation & Amortization Expense. The NOSS depreciation rate is based on a thirty-year service life.

ENO reserves the right to update the NOSS Estimated Revenue Requirement in the event of an unforeseen event (e.g., work stoppage due to worker health concerns or the presence of

<sup>&</sup>lt;sup>1</sup> The Project Budget Status Table is a part of the information included in the Quarterly Reports filed with the Council pursuant to Resolution R-19-293.

 $<sup>^2</sup>$  The difference between the Plant in Service amount shown in Exhibit ENO-1 and the Total before Transmission Cost Estimate is attributable to the fact that the Project Contingency is for the overall NOSS project, which consists of both the generation, transmission, and distribution components.

severe weather at the site) having a material impact on any assumptions or projections relied upon in developing the NOSS Estimated Revenue Requirement.

Respectfully submitted,

BY:

Timothy S. Cragin, LSBN 22313 Courtney R. Nicholson, LSBN 32618 Kimberly R. Silas, LSBN 33371 ENTERGY SERVICES, INC. 639 Loyola Avenue Mail Unit L-ENT-26E New Orleans, Louisiana 70113 Telephone: (504) 576-XXXX Facsimile: (504) 576-5579 Stephen T. Perrien, LSBN 22590 TAGGART MORTON, L.L.C. 1100 Poydras Street, Suite 2100 New Orleans, Louisiana 70113 Telephone: (504) 599-8500 Facsimile: (504) 599-8501

## ATTORNEYS FOR ENTERGY NEW ORLEANS, LLC

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 1st day of October, 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 means.

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

Andrew Tuozzolo CM Moreno Chief of Staff 1300 Perdido Street, Room 2W40 New Orleans, LA 70112

Sunni LeBeouf City Attorney Office City Hall, Room 5th Floor 1300 Perdido Street New Orleans, LA 70112

Norman White Department of Finance City Hall, Room 3E06 1300 Perdido Street New Orleans, LA 70112

Basile J. Uddo J.A. "Jay" Beatmann, Jr. c/o Dentons US LLP The Poydras Center 650 Poydras Street, Suite 2850 New Orleans, LA 70130-6132 Erin Spears, Chief of Staff Bobbie Mason Council Utilities Regulatory Office City of New Orleans City Hall, Room 6E07 1300 Perdido Street New Orleans, LA 70112

David Gavlinski Council Chief of Staff New Orleans City Council City Hall, Room 1E06 1300 Perdido Street New Orleans, LA 70112

Hon. Jeffery S. Gulin 3203 Bridle Ridge Lane Lutherville, MD 21093

Clinton A. Vince Presley R. Reed, Jr. Emma F. Hand Dentons US LLP 1900 K Street, NW Washington, DC 20006

Joseph W. Rogers Victor M. Prep Legend Consulting Group 6041 South Syracuse Way, Suite 105 Greenwood Village, CO 80111 **Errol Smith** Bruno and Tervalon 4298 Elysian Fields Avenue New Orleans, LA 70122

Alyssa Maurice-Anderson Derek Mills Keith Woods Seth Cureington Entergy New Orleans, LLC 1600 Perdido Street Mail Unit L-MAG-505B New Orleans, LA 70112

Joseph J. Romano, III Therese Perrault Entergy Services, LLC 639 Loyola Avenue Mail Unit L-ENT-4C New Orleans, LA 70113

Andy Kowalczyk 350 Louisiana 1115 Congress Street New Orleans, LA 70117

Katherine W. King Randy Young Kean Miller LLP 400 Convention Street, Suite 700 Baton Rouge, LA 70821

Maurice Brubaker Air Products and Chemicals, Inc. 16690 Swingly Ridge Road, Suite 140 Chesterfield, MO 63017

Brian L. Guillot Vice President, Regulatory Affairs Entergy New Orleans, LLC 1600 Perdido Street Mail Unit L-MAG-505B New Orleans, LA 70112

Timothy S. Cragin **Courtney Nicholson** Kimberly Silas Harry M. Barton Entergy Services, LLC 639 Loyola Avenue Mail Unit L-ENT-26E New Orleans, LA 70113

**Renate Heurich** 350 Louisiana 1407 Napoleon Ave., #C New Orleans, LA 70115

Logan Atkinson Burke Sophie Zaken Alliance for Affordable Energy 4505 S. Claiborne Ave. New Orleans, LA 70125

Carrie R. Tournillion Kean Miller, LLP 909 Poydras St., Ste. 3600 New Orleans, LA 70112

Timothy S. Cragin