



Council Utilities Regulatory Office

November 18, 2020

BY ELECTRONIC DELIVERY

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Ms. Lora W. Johnson
Clerk of Council
Council of the City of New Orleans
City Hall, Room IE09
1300 Perdido Street
New Orleans, LA 70112

In Re: 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:

Enclosed please find the Council Utilities Regulatory Office's ("CURO") Recommendation Memorandum in the above referenced docket, which is being submitted for filing into the record along with this letter.

As a result of the remote operations of the Council's office related to COVID-19, CURO 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. Please file this submission in accordance with Council regulations as modified for the present circumstances.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bobbie Mason".

Bobbie Mason
Deputy Chief, CURO

Attachment: Recommendation Memorandum
cc: Official Service List for UD-20-01

BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS

Establishing a Docket to Streamline Entergy)
New Orleans Reporting Requirements) Docket No. UD-20-01
to the New Orleans City Council)

COUNCIL UTILITIES REGULATORY OFFICE
RECOMMENDATION MEMORANDUM

Pursuant to Council Resolution No. R-20-223 (“Streamlining Resolution”), the Council Utilities Regulatory Office (“CURO”) submits its Recommendation Memorandum regarding the streamlining of Entergy New Orleans, LLC (“ENO”) reporting requirements. On July 16, 2020, the Council of the City of New Orleans (“Council”) as the governmental body with the power of supervision, regulation, and control over public utilities providing service within the City of New Orleans, issued a resolution establishing Council docket UD-20-01 to seek input from ENO, the Council’s Utility Advisors (“Advisors”), and interested parties as to which reporting requirements remain relevant to the Council’s regulatory responsibilities and whether ENO’s reporting requirements can be more effectively streamlined.

In addition to receiving comments from ENO and the Advisors, the Council received comments from the following parties: Crescent City Power Group (“CCPUG”) and the Alliance for Affordable Energy (“AAE”). On September 14, 2020, ENO, the Advisors, and CCPUG filed their initial comments regarding this Streamline Docket, and on October 14, 2020, ENO and the Advisors filed their respective reply comments. Thereafter, on October 16, 2020, AAE filed a *Motion to Respond Out of Time and Reply Comments Regarding Streamlining of Reporting Requirements to the City of New Orleans*. On November 17, 2020, the hearing officer for this docket, Maria

Auzenne, issued an order granting AAE's motion out of time.¹ AAE did not file itemized comments for each reporting requirement as listed in Resolution R-20-223; however, CURO did insert AAE's specific comments as provided herein.

Therefore, in light of all the comments filed by the parties in this proceeding, CURO recommends streamlining ENO's reporting requirements as follows:

A. The CURO agrees the Council should maintain the following reporting requirements *without* modification:

1. ENO's Bi-annual filing of gas design peak demand;
2. Post-MISO Integration Report;
3. Semi-Annual Securitized Storm Cost Recovery Rider (SSCR Rider) Filing;
4. Annual Securitized Storm Cost Offset Rider (SSCO Rider) filing;
5. NOPS Quarterly Reports;
6. NOPS Post-Implementation Report on Internal Controls and Cyber Security;
7. Estimated O&M Expenditures for NOPS;
8. ENO's lost contribution to fixed costs (LCFC) and utility performance incentive to Program Year of Energy Smart;
9. Release of Whole Building Aggregated Data;
10. ENO's New Orleans Solar Station (NOSS) project quarterly reports;
11. Fuel Adjustment Clause (Paragraph B);
12. Annual review of general service customers' billing alternative rate

¹ In AAE's October 16, 2020 *Motion to Respond Out of Time and Reply Comments Regarding Streamlining of Reporting Requirements to the City of New Orleans*, AAE stated that "the Alliance is largely supportive of the comments previously filed by CCPUG on September 14, 2020". However, AAE specifically requested the following reporting requirements be maintained: 1) the Monthly Progress Report on ENO's collaboration with the S&WB; (2) Entergy Smart Quarterly Reports; and (3) the Bi-Monthly Report on Customer Outages.

schedules – new rate structures updated via the 2018 Rate Case;

13. Annual statement regarding the nature of inter-company transactions: independent accountants' report and annual report identifying non-clerical personnel from any regulated utility;
14. ENO MISO Cost Recovery Rider (True Up);
15. Bi-Annual application to the City Council for approval of ENO's financing plan;
16. Bi-Annual reporting of data in accordance with Section 210 of the Public Utility Regulatory Act of 1978;

B. The CURO recommends modifications to ENO's remaining reporting requirements as follows:

1. Annual Net Energy Metering ("NEM") Report

CURO - recommends consolidating the Annual Net Energy Report into one annual compliance filing for all distributed energy resources. For example, consolidate the Annual Net Metering Report, the annual Community Implementation Plan Report, and any future distributed resource energy reports into one single distributed energy report. Further, the CURO recommends ENO include reporting of the capacity and inverter ratings for each NEM installation as an exhibit/attachment to the 1 page Annual NEM Report summary.

Parties' Positions:

Advisors – consolidate the Annual Net Energy Report with the annual Community Implementation Plan Report into a single distributed energy resources report. In addition, the Advisors request keeping this report, but for ENO to change the format to include reporting the capacity and inverter rating of each NEM installation.

ENO – is willing to modify the report per Advisors request to include reporting the capacity and inverter rating of each NEM installation; however, it will lengthen a 1 page report into a report that includes approximately 9000 rows of information.

CCPUG – maintain current reporting.

AAE – supports consolidating distributed energy resource reports.

2. Community Solar Implementation Plan's annual compliance filing to the Council

CURO - recommends consolidating the Community Solar Implementation Plan's annual compliance filing into one annual compliance filing for all distributed energy resources.

Parties' Positions:

Advisors - consolidate the Community Solar Implementation Plan's annual compliance filing with the Annual Net Energy Metering report into a single distributed energy resources filing.

ENO - amendable to consolidating the Community Solar Implementation Plan's annual compliance filing with the Annual Net Energy Metering report into a single distributed energy resources filing.

CCPUG - maintain current reporting.

AAE - supports consolidating distributed energy resource reports.

3. Securitized Storm Reserve Report

CURO - recommends combining the annual Securitized Storm Reserve Report with the annual Storm Reserve Fund Escrow because these are both storm related reporting. No supplemental information required.

Parties' Positions:

Advisors - consolidate the annual Securitized Storm Reserve Report with the annual Storm Reserve Fund Escrow Report into one annual filing, but no objection to maintaining as separate filings if preferred.

ENO - amendable to consolidating the annual Securitized Storm Reserve Report with the annual Storm Reserve Fund Escrow Report into one annual filing.

CCPUG - maintain current reporting.

4. Storm Reserve Fund Escrow Report

CURO - recommends consolidating the annual Storm Reserve Fund Escrow Report with the annual Securitized Storm Reserve Report. No supplemental information required.

Parties' Positions:

Advisors - supports consolidating the annual Storm Reserve Fund Escrow Report and the annual Securitized Storm Reserve Report into one annual filing.

ENO – amendable to consolidating the annual Storm Reserve Fund Escrow Report and annual Securitized Storm Reserve Report into one annual filing.

CCPUG – maintain current reporting.

5. Rough Production Cost Equalization Adjustment (RPCEA)

CURO – recommends terminating the quarterly Rough Production Cost Equalization Adjustment Report since the System Agreement terminated in 2015. There are no new RPCEA funds, therefore this reporting requirement is moot and should be terminated.

Parties' Positions:

Advisors – terminate the RPCEA reporting requirement as moot.

ENO – terminate the RPCEA reporting requirement as moot.

CCPUG – maintain current reporting.

6. Quarterly Report of Entergy Corporation's proportionate share of its regulated utilities' assets, operating, and maintenance expenses (per Rule 53 Settlement Agreement)

CURO – recommends continuing this reporting requirement until such time as Entergy Wholesale Commodities exits the merchant power business and no longer has ownership, or interests in joint ventures that own nuclear or non-nuclear power plants. This recommendation recognizes that while Entergy has indicated its intent to exit the merchant power business, the timing of that exit is uncertain.

Parties' Positions:

Advisors – terminate reporting as moot. The SEC complaint is no longer relevant because Entergy Corporation is exiting its merchant nuclear business, but no objection to maintaining filing if preferred.

ENO – amenable to terminating this report.

CCPUG – no recommendation.

7. Annual 1992 affiliate settlement agreement report per 1998 revision & R-98-187. (1992 settlement related to Public Utility Holding Company Act ("PUHCA") revisions of Rule 53 relative to affiliates and holding company transactions later revised in 1998)

CURO – recommends continuing this reporting requirement until such time as Entergy Wholesale Commodities exits the merchant power business and no longer has ownership, or interests in joint ventures that own nuclear or non-nuclear power plants. This recommendation recognizes that while Entergy has indicated its intent to exit the merchant power business, the timing of that exit is uncertain.

Parties' Positions:

Advisors – terminate reporting requirement as moot. The SEC complaint is no longer relevant because Entergy Corporation is exiting its merchant nuclear business, but no objection to maintaining filing if preferred.

ENO – amenable to termination of this report.

CCPUG – no recommendation.

8. Annual Gas Marketing Justification Report (gas hedging request)

CURO – recommends maintaining the Annual Gas Marketing Justification Report (gas hedging request) as a separate report to allow the Advisors and Council adequate time for review in order to take advantage of summer prices.

Parties' Positions:

Advisors – support consolidating gas reports into a single annual gas report.

ENO – maintain the Annual Gas Marketing Justification Report separately in order to give the Advisors and Council adequate time for review in order to take advantage of summer prices.

CCPUG – no recommendation.

9. Annual Gas Distribution System Report

CURO – recommends maintaining the Annual Gas Distribution System Report separately because ENO uses the industry standard of a June through July planning year to reduce the wide variance that can be seen when ENO calculates the Lost and Unaccounted For (“L&UF”). Moving the report earlier in the year requires changing the months to calculate L&UF and moving the Gas Storage Reports to later in the year makes the information less valuable to ENO for analysis.

Parties' Positions:

Advisors – supports consolidating gas reports into a single annual gas report.

ENO – maintain the Annual Gas Distribution System Report separately because ENO uses the industry standard of a June through July planning year to reduce the wide variance that can be seen when ENO calculates the Lost and Unaccounted For (L&UF). Moving the report earlier in the year requires changing the months to calculate L&UF and moving the Gas Storage Reports to later in the year makes the information less valuable to ENO for analysis.

CCPUG – no recommendation.

10. NOPS Bi-Monthly Construction Reports

CURO – recommends maintaining the existing reporting requirements since the NOPS Bi-monthly reports will terminate by default after ENO files its final report, which ENO anticipates filing no later than January 31, 2021.

Parties' Positions:

Advisors – no modification to existing resolution is needed because the NOPS Bi-monthly reports will terminate when all NOPS construction is completed. ENO anticipates Dec. 31, 2020 as the NOPS construction completion date.

ENO – recommends that the final NOPS bi-monthly report be filed by January 31, 2021 since all NOPS construction will be completed as of December 31, 2020.

CCPUG – no recommendation.

11. NOPS LDEQ Report - semi-annual monitoring report (due semi-annually March 30th & September 30th)

CURO – supports ENO's recommendation to file the NOPS LDEQ Report with the Council within 10 days after filing the report with LDEQ, provided ENO complies with the 1-day LDEQ filing notice requirements as outlined in City Code Sec. 158-181.

Parties' Positions:

Advisors – no modification to the existing reporting requirement is necessary; however, the Advisors have no objection to ENO's recommendation except to note that City Code Sec. 158-181 still requires ENO's notice of the filing to the City Council within 1 working day of the LDEQ filing.

ENO – requests to file report with Council within 10 days after filing with LDEQ.

CCPUG – no recommendation.

12. NOPS LDEQ Report – Title V certification report (due annually by March 30th)

CURO – supports ENO's recommendation to file the NOPS LDEQ Report with the Council within 10 days after filing the report with LDEQ, provided ENO complies with the 1-day LDEQ filing notice requirements as outlined in City Code Sec. 158-181.

Parties' Positions:

Advisors – no modification to the existing reporting requirement is necessary; however, the Advisors have no objection to ENO's recommendation except to note that City Code Sec 158-181 still

requires ENO's notice of the filing to the City Council within 1 working day of the LDEQ filing.

ENO – requests to file report with Council within 10 days after filing with LDEQ.

CCPUG – maintain current reporting, major capital expenditure and operational information.

13. NOPS LDEQ Report – RICE engine annual report (due annually by April 30th)

CURO – supports ENO's recommendation to file the NOPS LDEQ Report with the Council within 10 days after filing the report with LDEQ, provided ENO complies with the 1-day LDEQ filing notice requirements as outlined in City Code Sec. 158-181.

Parties' Positions:

Advisors – no modification to the existing reporting requirement is necessary; however, the Advisors have no objection to ENO's recommendation except to note that City Code Sec 158-181 still requires ENO's notice of the filing to the City Council within 1 working day of the LDEQ filing.

ENO – requests to file report with Council within 10 days after filing with LDEQ.

CCPUG – maintain current reporting, major capital expenditure and operational information.

14. NOPS LDEQ Report – emergency diesel generator report (due annually by March 31st)

CURO – supports ENO's recommendation to terminate this report; however, CURO recommends ENO file a final report relative to LDEQ's termination of this NOPS LDEQ Emergency Diesel Generator Report to the council within 60 days from Council's adoption of the final streamline resolution per UD-20-01.

Parties' Positions:

Advisors – no modification to the existing reporting requirement is necessary; however, the Advisors agree with ENO that to the extent LDEQ removed this report, the reporting requirement may be terminated.

ENO – terminate this reporting requirement. The LDEQ removed this reporting requirement therefore this report can be eliminated.

CCPUG – maintain current reporting, major capital expenditure and operational info.

15. NOPS LDEQ Report – emissions inventory (by April 30th)

CURO –supports ENO’s recommendation to file the NOPS LDEQ Report with the Council within 10 days after filing the report with LDEQ, provided ENO complies with the 1-day LDEQ filing notice requirements as outlined in City Code Sec. 158-181.

Parties’ Positions:

Advisors – no modification to the existing reporting requirement is necessary; however, the Advisors have no objection to ENO’s recommendation except to note that City Code Sec 158-181 still requires ENO’s notice of the filing to the City Council within 1 working day of the LDEQ filing.

ENO – requests to file report with Council within 10 days after filing with LDEQ.

CCPUG – maintain current reporting, major capital expenditure and operational information.

16. NOPS LDEQ Report – unauthorized discharges of pollutants

CURO –supports ENO’s recommendation to file the NOPS LDEQ Report with the Council within 10 days after filing the report with LDEQ, provided ENO complies with the 1-day LDEQ filing notice requirements as outlined in City Code Sec. 158-181.

Parties’ Positions:

Advisors – no modification to the existing reporting requirement is necessary; however, the Advisors have no objection to ENO’s recommendation except to note that City Code Sec 158-181 still requires ENO’s notice of the filing to the City Council within 1 working day of the LDEQ filing.

ENO – requests to file reports with Council within 10 days after filing with LDEQ.

CCPUG – maintain current reporting, major capital expenditure and operational information.

17. Quarterly NOPS O&M Expenditures

CURO –supports ENO’s recommendation to file NOPS O&M Expenditure Report two times per year (August 15th and February 15th) reflecting year-to-date expenditures as of June 30th and as of Dec. 31st instead of quarterly reporting.

Parties’ Positions:

Advisors – no modification to the existing reporting requirement is necessary; however, the Advisors believe ENO’s request is reasonable

to shift quarterly NOPS O&M Expenditure Reports to semi-annual reporting (twice a year) instead.

ENO – request to file NOPS O&M Expenditure Reports semi-annually on June 30th & Dec 31st reflecting year-to-date expenditures rather than quarterly filings.

CCPUG – maintain, major capital and operational information; however, supports annual reporting instead of quarterly.

18. Quarterly AMI Progress Reports to the Council Advisors

CURO – recommends requiring Quarterly AMI Progress Reports to the Council Advisors for electric AMI deployment until the full completion of the electric and gas AMI deployment respectively, including a final report detailing the number of customers who opted-out, final costs, *etc.* for both electric and gas AMI deployment. Any necessary modifications to the timeline of AMI deployment due to COVID-19 related issues should be acknowledged and noted in the Quarterly AMI Progress Reports to inform the Council Advisors of anticipated delays.

Note: The reporting information contained in the Quarterly AMI Progress Reports to the Advisors requires ENO to establish with the Advisors a quarterly on-site review of its AMI implementation; however, this is a field review and does not result in a report filed with the Council. The Quarterly AMI Progress Reports to the Advisors is included in Docket UD-20-01 for transparency purposes only.

Parties' Positions:

Advisors – this reporting requirement can be eliminated due to advance stage of electric deployment to be completed by end of 2020 and gas by Sept 2021; however, if this reporting is maintained, the Advisors concur with ENO's recommendation.

ENO – no recommended modifications to the existing Quarterly AMI Progress Reports to the Council Advisors except when AMI deployment is complete, clarification that reporting will end and include recognition of any COVID-19 related delay modifications.

CCPUG – no recommendation.

19. Energy Smart Updated Rate Impact Analysis Report (with annual level of funding)

CURO – recommends supporting ENO's recommendation that the Energy Smart Updated Rate Impact Analysis Report as a result of any change in rates related to funding Energy Smart should be filed after program costs and evaluations are complete in May or June each year.

Parties' Positions:

Advisors – no recommended modifications to the existing reporting requirement; however, ENO's request is reasonable. ENO's Energy Smart Implementation plans will be filed and approved every 3 years and the filings should include bill impacts for the approved program year funding levels.

ENO – requests to delay implementation filings until May or June each year so Energy Smart program costs and evaluations are complete before rate impact analysis report filing.

CCPUG – no recommendation.

20. Bi-Monthly Report on Customer Outages

CURO – recommends making ENO's Bi-Monthly Report on Customer Outages a quarterly report; thus, the report on customer outages and the annual SAIFI and SAIDI reports will be consolidated quarterly reports.

Parties' Positions:

Advisors – support consolidating the Customer Outages Report and SAIFI and SAIDI Reports into quarterly reports since these reports are needed for the Council's timely understanding of distribution system reliability issues and assessing ENO's progress in improving distribution reliability.

ENO- recommends consolidating the Customer Outages Report with the SAIFI and SAIDI Reports. In addition, ENO recommends consolidating the Report on Customer Outage report with the Bi-monthly Progress Report on Reliability Plan.²

CCPUG – maintain, major operational information; however, the Bi-Monthly Report on Customer Outages could shift to quarterly reports.

21. City of New Orleans' Reports on Outside Services

CURO – recommends modifying this quarterly report to semi-annual (twice a year). Quarterly is not necessary; however annual filings may not permit sufficient information or notice to the City as to outsourced budgetary spending.

² Note: For purposes of this Streamlining Docket, in a separate proceeding, the Council may re-visit ENO's recommendation to consolidate the Bi-Monthly Progress Reports on Reliability Plan and ENO's request to establish an Annual Reliability Plan per Resolution R-17-427 (Ordering Paragraph 6 of the *Resolution Directing ENO to Investigate and Remediate Electric Service Disruptions and Complaints and to Establish Minimum Electric Reliability Performance Standards and Financial Penalty Mechanisms*).

Parties' Positions:

Advisors – no modification of the existing quarterly filings necessary; however, the Advisors do not object to ENO's recommendation to make filings annual rather than quarterly.

ENO – requests to modify the existing quarterly report to an annual filing.

CCPUG – no recommendation.

22. ENO's Quarterly Reports of Natural Gas Storage Program

CURO – recommends consolidating ENO's Quarterly Reports of Natural Gas Storage Program Report with the Annual Gas Storage Program Analysis Report into one annual report. Thus, ENO's Quarterly Reports of Natural Gas Storage Program Report will be modified into an annual report instead of quarterly report.

Parties Positions:

Advisors – supports consolidating gas reports (excluding MDQ) into a single annual gas report.

ENO – convert the Quarterly Reports of Natural Gas Storage Program into annual reports and consolidate with the Annual Gas Storage Report.

CCPUG – no recommendation.

23. Order on Compliance regarding final calculation of refunds to ENO

CURO – recommends ENO provide a final report on the order on compliance regarding the final calculation of refunds to ENO within 60 days upon the final resolution of FERC proceedings and/or provide a final report to Council regarding the final refunds directed by FERC indicating that the reporting requirements have concluded and therefore terminates. The final report will terminate this reporting requirement.

Parties' Positions:

Advisors – no modifications to the order on compliance regarding final calculation of refunds to ENO necessary at this time because there are still ongoing FERC dockets that may result in additional rough production cost equalization (RPCE) among the Operating Companies involving costs or benefits to ENO and customers; however, this reporting requirement will terminate upon resolution of last FERC docket resulting in RPCE payments among the operating companies.

ENO – requests clarification that this reporting requirement terminates upon final resolution of FERC proceedings and/or final report to Council regarding final refunds directed by FERC.

CCPUG – maintain, major operational info and cost recovery/refund Information.

24. Annual SAIFI and SAIDI Reports

CURO - recommends combining the annual SAIFI and SAIDI Reports with ENO’s Report on Customer Outages as a quarterly report. (See above #20) To the extent the calendar year information normally contained in the Annual SAIFI and SAIDI Reports is included in the Report on Customer Outages, the Annual SAIFI and SAIDI Reports should be consolidated with that report.

Parties’ Positions:

Advisors – supports consolidating the SAIFI and SAIDI Reports and the Customer Outages Report.

ENO – assuming Bi-Monthly Reliability Progress Reports are modified to quarterly as requested by ENO, the SAIDI and SAIFI metrics can be consolidated with the Reliability Reports.³

CCPUG – maintain, major operational information.

AAE – supports quarterly reporting and combining SAIFI and SAIDI reports with Customer Outage Reports (UD-17-04).

25. ENO’s mid-year report on actual revenue requirement associated with the Union Power Station Power Block

CURO – recommends terminating ENO’s mid-year report on actual revenue requirement associated with the Union Power Station Power Block 1 because the Purchased Power and Capacity Acquisition Cost Recovery Rider (“PPCACR”) associated with Union Power Station Power Block 1 is no longer in effect as of August 2019 and has since been realigned to base rates per ENO’s 2018 Combined Rate Case.

Parties’ Positions:

Advisors – terminate this reporting requirement as moot because Union Power Block 1 non-fuel costs have been realigned in base rates and no longer associated in a rider.

ENO – terminate this reporting requirement as moot because Union Power Block 1 non-fuel costs have been realigned in base rates and no longer associated in a rider.

³ Note: For purposes of this Streamlining Docket, in a separate proceeding, the Council may re-visit ENO’s recommendation to consolidate the Bi-Monthly Progress Reports on Reliability Plan and ENO’s request to establish an Annual Reliability Plan per Resolution R-17-427 (Ordering Paragraph 6 of the *Resolution Directing ENO to Investigate and Remediate Electric Service Disruptions and Complaints and to Establish Minimum Electric Reliability Performance Standards and Financial Penalty Mechanisms*).

CCPUG – maintain, major capital expenditure and cost recovery information.

26. Annual Union Power Station Power Block 1 Revenue Requirement True-Up

CURO – recommends terminating the Annual Union Power Station Power Block 1 Revenue Requirement True-Up Report because the Purchased Power and Capacity Acquisition Cost Recovery Rider (“PPCACR”) associated with Union Power Station Power Block 1 is no longer in effect as of August 2019 and has since been realigned to base rates per ENO’s 2018 Combined Rate Case.

Parties’ Positions:

Advisors – terminate this reporting requirement as moot because Union Power Block 1 non-fuel costs have been realigned in base rates and no longer associated in a rider. This data should be included in the next rate action (such as the FRP evaluation).

ENO – terminate this reporting requirement as moot because Union Power Block 1 non-fuel costs have been realigned in base rates and no longer associated in a rider.

CCPUG – maintain, major capital expenditure and cost recovery true-up information.

27. NOPS Usage Reports (real-time usage)

CURO – recommends ENO convert real-time NOPS usage into quarterly aggregated public reports within 30 days after the end of each quarter due to sensitive nature of reporting real-time usage information; however, CURO recommends ENO continue to provide detailed HSPM operational information to the Advisors quarterly.

Parties’ Positions:

Advisors – no modification to the existing reporting requirements necessary; however, the Advisors support ENO’s recommendation to aggregate the usage information for the public report, but propose ENO provide more detailed operational HSPM information to the Advisors.

ENO – recommends aggregate usage information by quarter within 30 days after the end of each quarter.

CCPUG – maintain because this report includes major capital expenditure and operational information.

28. AMI Deployment Progress Report

CURO – recommends ENO file the AMI Deployment Progress Report quarterly rather than semi-annually to report the progress of AMI

deployment. CURO recommends the final quarterly AMI Deployment Progress Report be filed upon the completion of deployment for electric AMI in 2020 and a final quarterly AMI Deployment Progress Report to be filed upon completion of gas meter deployment in 2021. In addition, CURO recommends ENO be granted leave to cure filing deficiencies via filing progress report in UD-16-04 (AMI).

Note: The AMI Deployment Progress Report is ENO's report on the progress of AMI deployment versus the reporting information contained in the Quarterly AMI Progress Reports to the Advisors, the latter requires ENO to establish with the Advisors a quarterly on-site review of its AMI implementation. However, this is a field review and does not result in a report filed with the Council. The Quarterly AMI Deployment Progress Reports to the Advisors is included in this docket in the interest of transparency.

Parties' Positions:

Advisors – eliminate the remaining semi-annual reports, but require a final report six months after the AMI deployment is complete since all electric meters will be deployed by end of 2020 and gas by Sept 2021.

ENO – amendable to the Advisors' recommendation.

CCPUG - maintain, major capital expense, operational & cost recovery info.

29. Energy Smart Quarterly Reports

CURO – recommends ENO file the Energy Smart Reports semi-annually (every 6 months) instead of quarterly. The Energy Smart Reports currently tracks the progress of the kWh savings and spending by program. In addition, CURO supports the Advisors' recommendation that in addition to the progress of the kWh and kW savings and spending for each EE and DR program, the Energy Smart semi-annual reports must continue to provide documentation showing funding and expenditures, funds carryover, and the balance of Energy Smart's funding account. If any individual program has difficulty reaching the savings target, ENO should promptly notify CURO and the Council within one week of identifying the potential deficiency in reaching the savings target.

Parties' Positions:

Advisors – file reports semi-annually instead of quarterly.

ENO – file reports annually instead of quarterly.

CCPUG – no recommendation.

AAE – agrees with Advisors that reports can be filed semi-annually instead of quarterly.

30. Monthly Progress Report on ENO's Collaboration with the Sewerage and Water Board ("S&WB") to improve reliability of electric service

CURO – recommends maintaining the Monthly Progress Report on ENO's Collaboration with the S&WB to improve reliability of electric services with a sunset date. CURO takes the position that more progress is needed in order to reduce the frequency of this reporting requirement.

Parties' Positions:

Advisors – terminate this reporting requirement as moot in light of Council staff and CURO direct involvement via working group meetings.

ENO – amendable to the Advisors' recommendation to terminate the report.

CCPUG – maintain, major operational info.

AAE – disagrees with the Advisors and recommends maintaining the monthly progress reports (non-sensitive details should be made public), agrees with ENO to add a sunset date once discussions are complete.

31. Annual Gas Storage Program Analysis Report

CURO – recommends consolidating the Annual Gas Storage Program Analysis Report and ENO's Quarterly Reports of Natural Gas Storage Program Report into one annual report.

Parties' Positions:

Advisors – recommend consolidating the Annual Gas Storage Program Analysis Report and ENO's Quarterly Reports of Natural Gas Storage Program Report into one annual report. In addition, the Advisors recommend combining ENO's gas reports (excluding MDQ) into a single annual gas report filing.

ENO – recommend consolidating the Annual Gas Storage Program Analysis Report and ENO's Quarterly Reports of Natural Gas Storage Program Report into one annual report. However, the Annual Gas Marketing Justification Report (gas hedging) and the Annual Gas Distribution System Report should be maintained separately from the Annual Gas Storage Program Analysis Report.

CCPUG – maintain current reporting, major operational and cost recovery information.

32. ENO's' Quarterly 10-Q and Annual 10-K Financial Statements

CURO – recommends terminating ENO's Quarterly 10-Q and Annual 10-K Financial Statements because the financial statements are

available on Entergy Corporation's website; however, ENO is still required to comply with the 1-day filing notice requirement as outlined in City Code Sec. 158-181.

Parties' Positions:

Advisors - terminate reporting requirements because ENO's Quarterly 10-Q and Annual 10-K Statements are available on Entergy Corporation's website; however, ENO is still required to comply with the 1-day filing notice requirement as outlined in City Code Sec. 158-181.

ENO - terminate reporting requirements because ENO's Quarterly 10-Q and Annual 10-K Statements are available on Entergy Corporation's website.

CCPUG - maintain current reporting, major capital expenditures, operational information, and cost recovery information.

33. Monthly EAC Rate Report

CURO - for purposes of this Streamlining Docket UD-20-01, the CURO recommends maintaining the monthly EAC Rate Report since this report was not included in the original streamline resolution for all parties to consider and timely respond. ENO added this supplemental report in its comments.

Parties' Positions:

Advisors - maintain reporting requirements.

ENO - maintain reporting requirements.

CCPUG - no recommendation.

34. Monthly Purchased Power Cost Recovery Rider (PPCR)

CURO - recommends maintaining the Monthly Purchased Power Cost Recovery Rider (PPCR) since this report was not included in the original streamline resolution for all parties to consider and timely respond. ENO added this supplemental report in its comments.

Parties' Positions:

Advisors - maintain reporting requirements.

ENO - maintain reporting requirements. Rider PPCR replaced PPCACR and will service as a monthly true-up rider between actual costs and estimated costs in base revenues.

CCPUG - - no recommendation.

35. 5 MW DG Solar Annual Report

CURO – recommends maintaining the 5 MW DG Solar Annual Report since this report was not included in the original streamline resolution for all parties to consider and timely respond. ENO added this supplemental report in its comments.

Parties' Positions:

Advisors –no recommendation.

ENO – maintain reporting requirements.

CCPUG –no recommendation.

36. Monthly PGA Report

CURO –recommends maintaining the current reporting requirements for the Monthly PGA Report since this report was not included in the original streamline resolution for all parties to consider and timely respond; however, should the Council wish to consider ENO's proposal, the Council may wish to evaluate the monthly PGA reporting requirements per resolutions R-95-361, R-05-518, and R-05-547 in a separate proceeding. ENO added this supplemental report in its comments.

Parties' Positions:

Advisors – no recommendation because ENO subsequently added its report in comments; however, in the event of consideration, the Advisors recommend no modifications to the current reporting requirements and opposes ENO's proposal.

ENO – ENO recommends the gas rate be modified to use per book costs based on accounting records for the operating month rather than using a calculation to derive same with a subsequent true-up.

CCPUG - no recommendation because ENO subsequently added report in comments.

37. Annual Energy Efficiency Rider Rate Report

CURO –recommends maintaining the current reporting requirements for the Annual Energy Efficiency Rider Report per resolutions R-17-623, R-15-140, and R-17-176 since this report was not included in the original streamline resolution for all parties to consider and timely respond; however, the Council may wish to consider aligning the Annual Energy Efficiency Rider Rate Report due date with the Energy Smart budget approval and evaluation of the actual program year costs since Energy Smart budget is approved every 3 year per the

Integrated Resource Plan's ("IRP") process. ENO added this supplemental report in its comments.

Parties' Positions:

Advisors – no recommendation because ENO subsequently added report in comments; however, no objection to ENO's proposal.

ENO – align report due date with budget approval and evaluation of actual program year costs. Energy Smart budget approved every 3 years via IRP process. Rates for PY 10 (2020) took effect April 2020. ENO proposes an annual deadline of June 30th to allow reporting of numbers, verification, and confirmation of all credits (LCFC) which new rider rates effective January of the following year per terms of rate schedule.

CCPUG - no recommendation because ENO subsequently added report in comments.

38. Annual Reliability Plan

CURO –recommends maintaining the current reporting requirements for ENO to produce bi-monthly reliability plan progress reports per Resolution R-17-427 (Ordering Paragraph 6 of the *Resolution Directing ENO to Investigate and Remediate Electric Service Disruptions and Complaints and to Establish Minimum Electric Reliability Performance Standards and Financial Penalty Mechanisms*) since this report was not included in the original streamline resolution for all parties to consider and timely respond; however, the Council may wish to consider establishing an Annual Reliability Plan per R-17-47. ENO added this supplemental report in its comments.

Parties' Positions:

Advisors – no recommendation; however, the Advisors have no objection to ENO's proposal.

ENO – establish and file an Annual Reliability Plan every January 31st of the planning year.

CCPUG - no recommendation because ENO supplemented this report in its comments.

39. Bi-monthly Reliability Plan Progress Report

CURO –recommends maintaining the current reporting requirements for the bi-monthly reliability plan progress reports since this specific report was not included in the original streamline resolution for all parties to consider and timely respond; however, the Council may wish to consider combining the bi-monthly reliability plan progress

report and bi-monthly outage reports into one report per Resolution R-17-427.⁴ ENO added this supplemental report in its comments.

Parties' Positions:

Advisors – no recommendation because ENO subsequently added the report in comments; however, if ENO's recommendation is considered in a separate proceeding, the consolidated report should contain the same level of detail as the individual report.

ENO – modify the reporting requirement of the bi-monthly reliability plan progress report to quarterly and combine with bi-monthly outage report to have just one Quarterly Reliability Plan Progress Report.

CCPUG - no recommendation because ENO subsequently added this report in its comments.

C. Conclusion

The Council Utilities Regulatory Office appreciates all of the parties' feedback in this Streamlining Docket. We hope that this Recommendation Memorandum will serve as a guide to the City Council to assist in mitigating regulatory costs and increase efficiency in ENO's current reporting requirements. Thank you.

⁴ See Resolution R-17-427 (Ordering Paragraph 6 of the *Resolution Directing ENO to Investigate and Remediate Electric Service Disruptions and Complaints and to Establish Minimum Electric Reliability Performance Standards and Financial Penalty Mechanisms*).