

**ADVISORS TO THE COUNCIL OF THE CITY  
OF NEW ORLEANS  
FIRST SET OF REQUESTS FOR INFORMATION TO  
ENERGY NEW ORLEANS, LLC  
REGARDING THE  
COUNCIL’S 2021 DEMAND SIDE MANAGEMENT POTENTIAL STUDY**

**IN THE MATTER OF 2021 TRIENNIAL INTEGRATED RESOURCE PLAN OF  
ENERGY NEW ORLEANS, LLC**

**DOCKET NO. UD-20-02**

**Definitions**

1. “And” means and/or.
2. “Affiliates” has the meaning as defined in City Council Resolution R-01-676.
3. “Any” shall be understood to include and encompass “all.”
4. “CNO” means City of New Orleans.
5. “Communications” means any verbal or written exchange of information between individuals, regardless of mode, and includes all verbal and written communications of every kind, including but not limited to, telephone calls, conferences, and correspondence, and all memoranda concerning the requested communications. Where a communication that is requested is not in writing, provide copies of all memoranda and Documents made relating to the requested communication and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and Documents provided.
6. “Companies” means Entergy Louisiana, LLC and Entergy New Orleans, LLC both as individuals and collectively.
7. “DSM” means Demand Side Management.
8. Documents.
  - a. “Documents” or “Documentation” includes all writings and records of every type in your possession, control or custody, produced by any means, conveying visible and/or audible and/or electronic information, including, but not limited to: testimony and exhibits, memoranda, contracts, agreements, correspondence, emails, letters, reports (including drafts, preliminary, intermediate and final reports), statutes, ordinances, resolutions, articles,

textbooks, treatises, pleadings, briefs, data responses currently or previously under the custody, care and/or control of plaintiffs, plaintiffs' counsel and/or anyone acting on behalf of plaintiffs or plaintiffs' counsel, surveys, analyses, studies, summaries, comparisons, tabulations, charts, books, pamphlets, photographs, maps, bulletins, corporate or other minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, microfiche, computer data, computer files, computer tapes, computer inputs, computer outputs and printouts, vouchers, accounting statements, budgets, work papers, engineering diagrams (including "one-line" diagrams), mechanical and electrical recordings, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical or otherwise and drafts of any of the above.

- b. "Documents" or "Documentation" includes copies of Documents, where the originals are not in your possession, custody, or control.
  - c. "Documents" or "Documentation" includes every copy of Documents which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy.
  - d. "Documents" or "Documentation" also includes any attachments or appendices to any document.
- 9. "Each" shall be understood to include and encompass "every."
  - 10. "EAI" means Entergy Arkansas, Inc.
  - 11. "ELL" means Entergy Louisiana, LLC
  - 12. "EMI" means Entergy Mississippi, Inc.
  - 13. "ENO" means Entergy New Orleans, LLC
  - 14. "Entergy Operating Companies," or "EOC" means ENO, ELL, EAI, EMI, and EGSL.
  - 15. "Entergy" or "Entergy System" means Entergy Corporation (formerly Middle South Utilities), any affiliates or subsidiaries, any merged or consolidated predecessors in interest, past or present employees, officers, directors, agents, contractors, consultants, attorneys, and representatives, and any other person who has in the past or is now acting or purporting to act on its behalf.
  - 16. "Enterprises" means Entergy Enterprises, Inc.
  - 17. "EOI" means Entergy Operations Services, Inc.
  - 18. "EPD" means Entergy Power Development Corp.
  - 19. "EPI" means Entergy Power, Inc.
  - 20. "ESI" means Entergy Services, Inc.

21. “Identify” or “Identifying” means:
  - a. With respect to a natural person, the person’s full name, present employer, title, job description, and professional or home address.
  - b. With respect to documents, the title (if any), nature, substance, date and source of origin on the document, all described with sufficient particularity to enable the document to be specified or recognized.
22. “Information” means any knowledge, fact, data, or intelligence whether contained in a Document or unrecorded.
23. “IRP” means Integrated Resource Planning.
24. “Intervenors” means all parties who filed an intervention request with the Clerk of the Council, with a copy submitted to the Director of the Council Utilities Regulatory office, and whose interventions were subsequently granted.
25. “MCF” means thousands of cubic feet of natural gas.
26. “MISO” means Midcontinent Independent System Operator, Inc. or predecessor entities, its operations, its assets, its member organizations, its territory of operations, the territory of operations of its member organizations, Entergy operations within or under MISO authority, its marketplaces related to energy, its planning mechanisms, or other assets or operations related to MISO.
27. “MW” means megawatts.
28. “MWh” means megawatt hours.
29. “Or” means and/or.
30. “Parties” means the Companies, CNO’s Advisors, and all parties to Docket No. UD-17-03.
31. “Person” includes any individual, corporation, business or governmental entity whatsoever, and every other type of entity or organization.
32. “Relating to” shall be understood to include pertaining to, referring to, having as its subject matter, constituting, supporting, analyzing, discussing, evaluating, or bearing upon, directly or indirectly the subject matter of the specific Request.
33. “Respondent” means ENO and any of its representatives including any other Entergy representative.
34. “SEC” means Securities and Exchange Commission.

35. “SERI” means System Energy Resources, Inc.
36. “SFI” means System Fuel, Inc.
37. “Testimony” means any verbal or written declaration made under oath in connection with any regulatory, administrative or adjudicative proceeding or other judicial process or formal dispute resolution process (*e.g.* arbitration) for any purpose, including but not limited to depositions, hearings or trial.
38. “Publications” include, but are not limited to, articles, books, reviews, papers, presentations, studies, reports, analyses, or other documents released for publication.
39. “You” and “Your” means Entergy, ELL, ENO, any affiliates or subsidiaries, any merged or consolidated predecessors in interest, past or present employees, officers, directors, agents, contractors, consultants, attorneys, and representatives and any other person who has in the past or is now acting or purporting to act on its behalf.
40. As used herein, the singular shall include the plural and the plural shall include the singular.

## Instructions

1. Data Requests, interrogatories, and requests for production of documents or any other discovery requests (collectively “Requests” or individually “Request”) call for all information, including information contained in documents in native electronic format with all cells and formulas in tact when appropriate, which is known or available to the Respondents in this proceeding.
2. Where a Request has a number of separate parts or aspects, a complete response is required to each part or aspect. The response should separately address each part by its individual designation: “(CNO 3-1)(A),” “(CNO 3-1)(B),” etc. Any objection to a part or aspect of a Request should clearly indicate the part or aspect to which it is directed.
3. If a Request specifically seeks an answer in response that is not contained in the Document, an answer is required.
4. The person who prepares and is responsible for providing the response should be identified on the response.
5. If a Request can be answered in whole or in part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other response or part or aspect thereof which is responsive to the instant Request and by specifying whether the response to the other request is a full or partial response to the instant Request. If the response to the other Request constitutes a partial response, the balance of the instant Request must be answered.
6. If a Request cannot be answered in full after exercise of due diligence to secure the information requested, state the answer to the extent possible, state why the Request cannot be answered in full, and state what information or knowledge you have concerning the unanswered portions.
7. If, in answering any of these Requests, you feel that any Request or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the Request.
8. If a document requested is unavailable, identify the document, describe in detail the reasons that the document is unavailable, state where the document can be obtained, and specify the number of pages it contains.
9. If no document is responsive to a Request which calls for a document, then so state. In some instances, the Request should be treated as an interrogatory.
10. All responses to the Requests are to be amended or supplemented if any person answering the requests obtains information upon the basis of which: (a) the party making the response knows that it was incorrect when made and (b) the party making the response knows that the response, though correct when made, is no longer true or is

misleading.

11. All Requests are considered to be continuing in nature, and thereby require you to produce by supplemental responses any document within the scope of the Request that you obtain, acquire, or discover subsequent to your initial response to the Request.
12. If the data or Documents responsive to a Request exist, to any extent, in a native electronic form (e.g. Excel file), provide the original native electronic file as part of your response. To the extent Documents responsive to any part of a Request may be extracted, saved, prepared, or presented in a tabular electronic format (e.g. Excel or Access file), provide that part of the response in a tabular electronic file (e.g. Excel or Access file).

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**DOCKET NO. UD-20-02**

*This is an initial list of data needed by GDS Associates, Inc. to complete the demand side management potential analysis for the City of New Orleans re: the 2021 IRP. Please provide the requested information within 15 calendar days of receipt, or sooner (if possible).*

*Note, each data request has been assigned a level of priority (High, Medium, and Low).*

**ENO-MPS COLLABORATION**

*This following data requests relate to our effort to receive the same set of preliminary utility data that was made available to the ENO contractor (Guidehouse Consulting) for the ENO DSM Potential Study (DSMPS). Once this information has been gathered, please then review the remaining sections of this data request. If the requested item is already included as part of the Guidehouse data request response, please indicate via comment the appropriate file for our team to review. If there are any other items on this list that are original and the information is available, please provide the data requested. If any of the requested information is unavailable, please let us know if that is the case.*

- CNO 1-1      Please provide ENO's data responses provided to Guidehouse Consulting for the purposes of their potential study on behalf of Entergy New Orleans. Once this information has been gathered, then review the remainder of this data request, and if the requested item is included as part of the Guidehouse data request response, please indicate the appropriate file for our team to review. If there are any items on this list that are original and the information is available, please provide the data requested. If any of the requested information is unavailable, please let us know if that is the case. *(High priority)*
- CNO 1-2      Please provide a copy of the 1<sup>st</sup> technical conference video from your initial IRP stakeholder meeting. *(High priority)*

- CNO 1-3 Please provide the appropriate contact information for the Guidehouse project team or project manager who will be able to facilitate coordination between Guidehouse and the GDS team regarding the respective Entergy and City of New Orleans potential studies. *(High priority)*
- CNO 1-4 Please provide the detailed measure list used by Guidehouse for the Entergy New Orleans potential study. *(High priority)*
- CNO 1-5 Please provide any available documentation describing the study methodology. *(Note, we do not need any proprietary modeling documentation beyond what you would provide to stakeholders) (High priority)*

## **LOAD FORECAST**

- CNO 1-6 Ten years of historical data (2011-2020) on annual electric revenues, sales (MWh) and customers by class of service (residential, commercial, industrial, total) for the Entergy New Orleans (ENO) service area. The customer and sales data for the commercial and industrial (C/I) sectors should be broken down into major industry classifications (breakdown by major NAICS codes if possible). *(Low priority)*
- CNO 1-7 Forecast data on electric, and customers in total and by class of service (residential, commercial, industrial) and by end use (space heating, space cooling, water heating, lighting, etc.) for **2022 to 2041** (the IRP study planning horizon). Please provide a breakdown of the customer and sales data for the C/I sectors into major industry classifications (breakdown by major NAICS codes if possible). Please provide any supporting files used in the development of end-use load forecast. *NOTE: Sales forecast should be absent any assumptions about future DSM impacts. (High priority)*

## **ELECTRIC AVOIDED COSTS & OTHER GLOBAL ASSUMPTIONS**

- CNO 1-8 A forecast of electric avoided costs (generation capacity and energy, transmission, distribution) for **2022 to 2060** *(or years available)*. *(High priority)*
- CNO 1-9 Forecast of the general rate of inflation and the appropriate nominal discount rate used for the 2021 IRP and the ENO DSM Potential Study. *(Medium priority)*
- CNO 1-10 Please provide a forecast of the average retail revenue per kWh by class of service for 2022 to 2041. *(Low priority)*
- CNO 1-11 Please provide the average wholesale and retail cost per MMBtu or therm of gas in 2022. *(Low priority)*.
- CNO 1-12 Please provide the average cost per gallon of water in the ENO service territory in 2022. *(Low priority)*.



- CNO 1-13 Please provide any available line losses factors, planning reserve margin, and valuations of non-energy resources. (*High priority*)
- CNO 1-14 Please provide any environmental emissions factors (SO<sub>2</sub>, NO<sub>X</sub>, CO<sub>2</sub>, particulates) per MWh/MMBtu of generation or other valuation metrics already being used by ENO for planning purposes. (*Low priority*)

### **MEASURE ASSUMPTIONS**

- CNO 1-15 Please provide a copy of the ENO technical reference manuals used to develop measure assumptions. (*High priority*)
- CNO 1-16 Please provide any alternative databases of deemed kWh, and kW savings for energy efficiency measures and assumptions used by ENO and/or provided to Guidehouse. (*High priority*)
- CNO 1-17 Please provide any end-use load shapes that are available or used for program screening. (*High Priority*)
- CNO 1-18 Please provide electronic copies of the latest available electric energy efficiency baseline and/or saturation studies completed for the ENO service area. (*High priority*)
- CNO 1-19 Please provide any available forecasts of appliance saturation trends or electric usage per customer trends for your service area. (*Medium priority*)

### **ADDITIONAL RESIDENTIAL SECTOR**

- CNO 1-20 Please provide the average (per customer) annual kWh use in the residential sector for space heating, water heating and cooling for the residential single-family and multi-family sectors. (*Medium priority*)
- CNO 1-21 Please provide the Company's forecast of the number of new single-family, multi-family and manufactured homes that will be added in your utility's service area each year for 2022 to 2041. (*Medium priority*)
- CNO 1-22 Please provide any available home prototype assumptions used by ENO for energy modeling software (i.e. square footage, building envelope characteristics, window area: floor area ratio; air leakage measurements, existing HVAC stock efficiencies). (*Low priority*)
- CNO 1-23 Please provide an estimate of the current (as of February 2021) number of low-income/income-qualified households (single versus multi-family versus manufactured homes) in the ENO service area. (*Low priority*)

## COMMERCIAL/INDUSTRIAL SECTORS

- CNO 1-24 Please provide the forecast of the annual number of commercial and industrial customers that will be added in the ENO service area for each year from 2022 to 2041. (*Medium priority*)
- CNO 1-25 Please provide data for typical commercial sector buildings and industrial facilities in the service areas, by major industry type (NAICS classification), including:
- a. Average building square footage.
  - b. Typical energy use intensity (EUI) per square of floor space, broken down by end-use (lighting, cooling, water heating, process) if available.
  - c. Saturation of electric space heating, water heating and central cooling in the commercial sector (*Medium priority*)

## DEMAND RESPONSE

- CNO 1-26 Please describe ENO's demand response programs (curtailable program and any others), including (*Medium priority*):
- a. A description of eligible customers / C&I rate classes
  - b. Number of customers currently enrolled in the program.
  - c. Incentives paid to customers (e.g., \$/customer, \$/kW, free thermostat, etc.)
  - d. Installation and equipment cost per load control point.
  - e. Administrative costs of program
  - f. Average load controlled per customer.
- CNO 1-27 Confirm current and/or planned deployment of AMI and % of meters that have AMI. (*Low priority*)

## OTHER

- CNO 1-28 Please provide electronic copies of any electric energy efficiency program evaluation (process or impact) studies completed in the past three years for your service area. (*Medium priority*)
- CNO 1-29 Please provide historical and planned energy efficiency program savings (energy and demand) as well as historical and planned program costs (broken out between incentives and non-incentives) (*High priority*)

CNO 1-30 Please provide any customer survey data or reports that assess the likelihood that customer will participate in DSM programs. (*Low priority*)

Respectfully submitted,

DENTONS US LLP,

*/s Jerry A. Beatmann, Jr.*

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Basile J. Uddo  
Jerry A. Beatmann, Jr. (Bar No. 26189)  
650 Poydras Street, Suite 2850  
New Orleans, LA 70130  
504-524-5446 (Office)  
504-256-6142 (Jay Cell)  
504-583-8604 (Basile Cell)  
buddo@earthlink.net  
jay.beatmann@dentons.com

Clinton A. Vince  
Emma F. Hand  
Presley R. Reed, Jr.  
1900 K Street, N.W.  
Washington, D.C. 20006  
202-408-6400 (Telephone)  
202-408-6399 (Facsimile)  
clinton.vince@dentons.com  
emma.hand@dentons.com  
presley.reedjr@dentons.com

*Attorneys for the Council of the City of New Orleans*

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing First Set of Requests for Information has been served upon “The Official Service List” via electronic email and/or U.S. Mail, postage properly affixed, this 3rd day of March 2021.

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J. A. “Jay” Beatmann, Jr.