



July 30, 2021

By Electronic Mail
Clerk of Council
Room 1E09, City Hall
1300 Perdido St.
New Orleans, LA 70112

**RE: Comments on Resolution and Order Instituting a Prudence Investigation
Docket No. UD-21-01**

Dear Ms. Johnson,

Enclosed please find an original and three copies of the comments of Sustainable Energy Economy Solutions in the above referenced docket. Please file the attached comments in the record of this proceeding and return a one-time stamped copy to our courier, in accordance with normal procedures.

Thank you for your assistance with this matter.

Sincerely,

Andrew S Kowalczyk

Andy Kowalczyk
Sustainable Energy Economy Solutions
415-676-1047
819 Saint Roch Avenue
New Orleans, LA 70114

Cc: Known parties Docket UD-20-01

Before The Council of the City of New Orleans

In Re:
Resolution and Order Instituting a Prudence
Investigation
Docket No. UD-21-01

DOCKET NO. UD-21-01
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July 30, 2021

Sustainable Energy Economy Solutions Comments on Docket No. UD-21-01

On May 6th 2021, the full Council for the City of New Orleans issued Resolution R-21-151, establishing docket UD-20-01, providing for intervention by interested parties by June 7th 2021.

SEES is a public advocacy organization, and sole proprietor-ship of Andy Kowalczyk¹, which seeks to promote holistic economic solutions for the energy system, including those related to the power sector in the City of New Orleans. SEES focuses on upstream and downstream public benefits across the spectrum of the energy system, including those associated with the reliability of the power system that the City of New Orleans is dependent on. Given the scope and intention of this docket, SEES feels that it can be a productive and useful stakeholder in this proceeding and wishes to submit the comments herein.

Overview

Winter Storm Uri ('Uri') was the kind of extreme weather event that has become all too common in recent years to simply refer to it as 'unprecedented'. The storm was initiated by a host of factors, including a 'meandering' jet stream (*Fig 1*), bringing frigid arctic temperatures into regions in the southern United States which normally do not experience subzero or freezing temperatures. This meandering jet stream is one of many extreme shifts in our global climate that have happened due to warming temperatures in the Arctic Circle. The sheer size of this event was an anomaly compared to winter weather patterns in a stable climate; but its impacts to public goods like water and electricity demand a response in terms of planning for the future. There are important questions that need to be answered in this docket related to the prudence of decisions made on behalf of Entergy New Orleans ("ENO") in the very immediate response

¹ For further context and full disclosure to other parties to this docket, and related to the scope of these comments, I am the registered MISO Environmental Sector representative for the 501(c)(3) organization 350 New Orleans, and a consultant under contract with the Energy Foundation working on issues related to MISO South. I am not being compensated by either of these organizations, for any work related to this docket, nor am I receiving oversight or guidance by either of these organizations in these comments. The work of SEES related to this docket relies on my experience as a MISO stakeholder, but is independent of those organizations in all other aspects.

to the challenges of providing stability to the electric grid throughout Uri. There are also questions that should be raised related to Entergy Operating Companies (“EOC”) approach to infrastructure planning. Given the frequency and intensity of extreme weather events, the grid of yesterday simply will not be sufficient for providing the necessary access to reliable electricity in times of need if there is not a change in priorities.

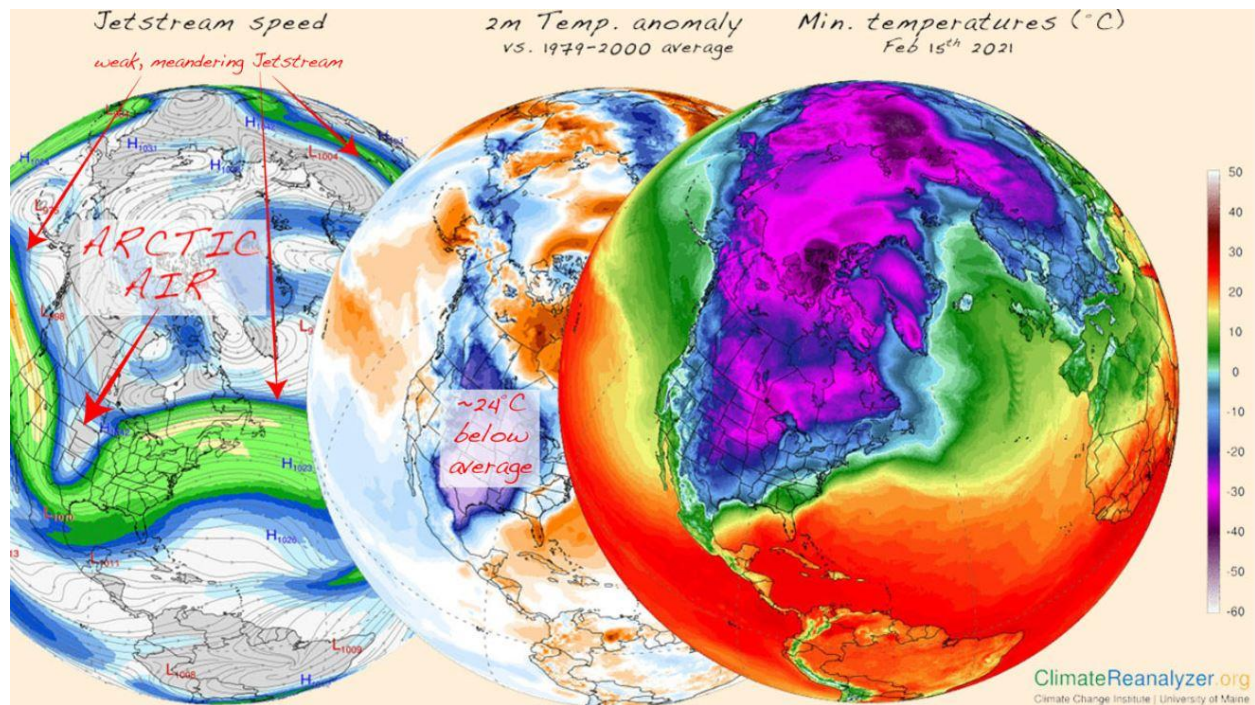


Figure 1
Source: ClimateReanalyzer.org, Climate Change Initiative, University of Maine

ENO and its subsidiaries, collectively referred to as EOC, have limited direct control over the cause of extreme weather events like Winter Storm Uri, being that the accumulated greenhouse gas emissions from the fossil fuel industry and power sector globally have contributed the most to climate change. However, EOC and ENO are uniquely positioned as vertically integrated electric utilities to shift their resource portfolios from GHG emitting fossil fueled resources to zero emission resources. They also could conceivably allow for a more resilient energy system in their operating territories; which could help prepare for extreme weather events caused by climate change.

There have been inroads on behalf of EOC’s to address their portfolio of GHG emitting energy generation resources, through the City Council of New Orleans’ (“CCNO”) recently adopted ‘Renewable and Clean Portfolio Standard’ public policy mandate, passed by ENO’s regulator CCNO, as well as Entergy Corporation’s voluntary corporate decarbonization goal, referred to as ‘Entergy’s 2050 Net Zero

Commitment².³ A comparison of the merits of either policy are not in the scope of these comments, but it's an important distinction to make, that because of a lack of accountability metrics, most voluntary goals do not provide clarity or predictability on the pace of decarbonization that public policy goals do. It is at the discretion of a corporation's shareholders to have them comply with that corporation's own goals if they want to, and when they want to.

However, regardless of the law, or corporate environmental, sustainability or governance policy; failures in infrastructure have very real consequences for the public which relies on it. Power outages in neighboring Texas reached millions in the state, and the grid operator ERCOT conveyed that they were 4 minutes and 37 seconds away from a collapse of the grid that would leave tens of millions in the state without power³. Although the neighboring Midcontinent Independent System Operator ("MISO") fared much better, with outages for all EOC amounting to 216,100 customers⁴⁵, this bar is set unacceptably low. The status quo in planning the electricity grid is simply not sufficient to address the increasing demands of extreme weather in coming years, and it's critical for New Orleans to have a system that can support the evolving needs of the power grid it relies on.

These demands are not just limited to extreme weather events however, and it's critical that a plan which ensures reliability for the energy system will consider emerging trends that will drive new demands on the grid. These shifts are not limited to MISO, but are trends throughout other Regional Transmission Organizations ("RTOs") and non RTO systems as well.

It's not in the scope of these comments to provide an overview of how these trends will impact all transmission owning utility members of all RTOs, or all transmission owning utility members in the MISO footprint, but it is to acknowledge that these changes are widely forecasted across the U.S. and thus can be a dependable forecast of challenges facing the electric power industry.

² Entergy Climate Report Addendum "Entergy's 2050 Net Zero Commitment" 2020
(https://cdn.entergy.com/userfiles/content/environment/docs/ClimateReportAddendum_2020.pdf)

³ KHOU 11 Staff, Benito, Marcelino (KHOU), WFAA Staff "4 minutes, 37 seconds: That's how close Texas came to complete grid failure"
(<https://www.khou.com/article/news/local/texas/ercot-texas-power-grid-total-collapse-blackout/285-ae35263d-dfad-49b5-aa6b-26f12c3e1654>)

⁴ Brackett, Ron "Winter Storm Uri Turns Deadly As Millions Remain Without Power" The Weather Channel February 15, 2021
(<https://weather.com/news/news/2021-02-15-winter-storm-uri-texas-power-outages-impacts>)

⁵ Press Release "Entergy Texas Winter Storm Update – 2/17/21 @ 8 a.m." February 17, 2021
(<https://www.energynewsroom.com/article/entergy-texas-winter-storm-update-2-17-21-8-m/>)

Due to market transformation, public policy goals across the U.S. and in EOC territory; the following demands will likely place an increasing burden on the bulk and distribution networks in the region within the next 30 years:

- **Extreme Weather**

Increasing frequency of extreme weather events, requiring a more efficient and resilient means of facilitating delivery of power to end users

- **Electrification**

Increased demand for electricity from end users, primarily through electrification of automobile transportation, but extending to emerging efficient and affordable alternatives to fossil fueled processes.

- **Generation Shift**

A shift in generation from dispatchable to variable renewable energy and dispatchable hybrid resources⁶; driven by cost declines, consumer preference, voluntary corporate Environmental Sustainability and Governance (“ESG”) goals, and public policy requirements.

It is therefore critical that the Council understands that the role of MISO in preserving reliability and a competitive market for the City of New Orleans as an important element to planning the grid of the future. It is not sufficient to rely solely on the directives of ENO and EOC leadership for the development of a grid that supports a reliable system for consumers in their service territory. FERC Order 1000 recognizes that the interests of incumbent utilities can be at odds with the holistic benefits received by consumers, and for this reason, RTOs like MISO can play a crucial role in providing access to competitive options in wholesale electricity markets through planning processes⁷. While Entergy Corporation (“ETR”) has indicated that they will be investing in a ‘Customer-Centric Plan’ per a recent presentation targeting \$3 billion in transmission investments⁸; without granular insight into what these projects are, or the kind of

⁶ Referring to renewable energy hybrid resources: Solar PV or wind power and battery energy storage, or so-called ‘tri-brid’ projects including solar PV, wind power and battery energy storage

⁷ FERC Order 1000, ¶ 254 “As the FERC Commission recognized in Order Nos. 888 and 890, it is not in the economic self-interest of public utility transmission providers to expand the grid to permit access to competing sources of supply. 232 In Order No. 890, the Commission required greater coordination in transmission planning on a regional level to remedy the potential for undue discrimination by transmission providers that have an incentive to avoid upgrading transmission capacity with interconnected neighbors where doing so would allow competing suppliers to serve the customers of the public utility transmission provider”

⁸ Entergy Corporation Presentation ‘Building the Premier Utility’ at pg. 19. 2020 (<https://entergycorporation.gcs-web.com/static-files/944e8670-db50-4580-a65d-502f10560844>)

independent vetting that MISO performs in its annual MTEP, through a stakeholder driven process, it's not apparent whether these projects will provide the kind of regional reliability and competitiveness necessary to adapt to emerging trends on the grid. It is entirely possible, and understandable if EOC were to build transmission projects ensuring the highest degree of access for their own generation assets in the MISO South network, and in line with the FERC's concerns stated in Order 1000 related to incumbent utilities.

From a certain perspective, it may even appear defensible to many regulators because the dominant share of consumer demand (likely over 70%) already filled by EOC's⁹ in MISO South¹⁰. However, this is not a goal that puts the needs of consumers in New Orleans and those in the service territory of all EOC's first, which is the exact issue. It's not clear in light of the response to Winter Storm Uri, that this approach would help to establish the necessary foundation for a reliable and affordable system for customers in the region as more affordable renewable energy options become available, electrification increases demand, and increasing extreme weather events become more prevalent.

Furthermore, the trend of electrification will simultaneously consolidate energy usage into the power sector, while increasing demand for reliable and affordable power. Concerning reliability, it's critical that the recent proposal to electrify the power supply for the New Orleans Sewerage and Water Board is accompanied by a transmission system in MISO South that is focused on long term regional reliability, instead of a system that relies on access to EOC's generation fleet, when there's both a business and reliability case for other options. This approach will also help mitigate the likelihood of future load-shed events as well as dramatic peaks in nodal prices throughout MISO South that are a result of system strain.

Transmission projects focused on long term regional reliability in the past have produced benefits in the present. A recent analysis prepared by the group Grid Strategies LLC for the American Council on Renewable Energy ("ACORE") found that MISO's Multi-Value Projects ("MVPs") provided much needed stability throughout Winter Storm Uri and mitigated nodal price spikes during the storm as well [Fig 2]. Relayed in their study were recent comments by MISO President and Chief Operating Officer Clair Moeller, stating that MISO North received roughly \$18 billion in benefits from these projects over

⁹ Entergy Corporation 'Utility of the Future' "The fleet includes 31 active natural gas, oil, hydroelectric, solar and coal generating facilities, with the capacity to generate nearly 18,500 megawatts of power, with more under construction." (<https://cdn.entergy.com/userfiles/docs/UtilityoftheFuture.pdf>)

¹⁰ MISO Presentation 'Informational Forum' The average peak load in MISO South is 24.84 GW. at slide 36, 2021 (<https://cdn.misoenergy.org/202106%20Informational%20Forum%20Presentation565279.pdf>)

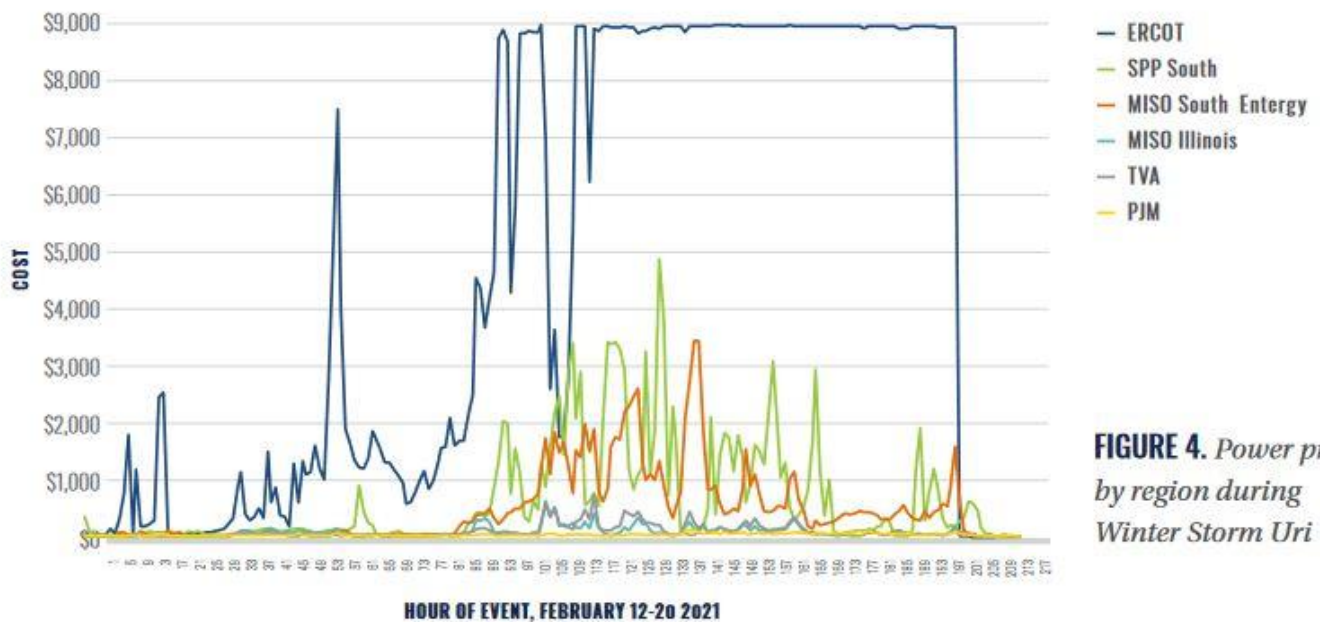


FIGURE 4. Power prices by region during Winter Storm Uri

Figure 2

Source: Grid Strategies LLC Report “Transmission Makes the Power System Resilient to Extreme Weather”, Prepared for ACORE w/ support from the Macro Grid Initiative

three days during the storm. For a downpayment of \$6.57 billion¹¹ for the MVP projects, the benefits received were 3 times that for MISO North over a very brief period of time. .

Although you cannot put a price on human lives, you can put a price on access to electricity when it’s needed. The success of MISO planning is illustrative of considerable benefits to consumers, given the proper investments in transmission.

MISO’s Market Efficiency Projects (“MEP”) are more limited in scope, but important in providing consumer benefits, reduced congestion and mitigation of load pockets in MISO South, and could possibly played a role in providing a more stable grid in MISO South during the period that the load shed event was initiated. The only MEP ever approved in MISO South through the annual MISO MTEP process however, is currently in an uncertain state due to the passage of a controversial ‘Right of First Refusal’

¹¹ MISO “Regionally Cost Allocated Project Reporting Analysis” MVP Project Status January 2021 (<https://cdn.misoenergy.org/MVP%20Dashboard%20Q4%202020117055.pdf>)

("ROFR") law which Entergy Texas supported¹², but the U.S. Department of Justice Antitrust Division relayed their concern over early in the legislative process¹³.

The Texas ROFR is a troubling example of efforts by one company with considerable market power to further solidify their control over the bulk power system in MISO South. For the purposes of this docket, it is preserving a status quo in transmission planning which has not been sufficient for the region, and almost certainly will increase the use of load shed to manage instances related to extreme weather. The demands of EOC customers during Winter Storm Uri could not be met in MISO South without shedding load, and aside from the errors that prompted this docket which led to ENO shedding much more than was required; load shedding should not be a commonly applied strategy for mitigating stress on the grid during future extreme weather events. Demand response should never be done on an involuntary basis.

With respect to emerging trends in the electric power industry, its critical that the response from the CCCNO is not just to respond to ENO's lapses in management in the near term that led to an error in load shed, but also to leverage regional transmission planning efforts through the MISO MTEP process to increase the competitiveness and resilience of the MISO South system. To increase resilience for the electricity system, but also to ensure that consumers are not only provided with a more reliable system, but also one that rewards competitive options and innovation in the pursuit of a modern clean energy grid.

Winter Storm Uri's Impacts on the MISO South Energy System

From February 15th-16th 2021, MISO South load serving entities were called on by MISO to shed 2.8 GW's of load spread over four separate intervals in order to preserve the MISO system. One third of these load shed events were not concurrent with the others in MISO South, but the EOC global response to the event called from 7:40 pm EST-10:00pm EST on February 16th¹⁴ included the incidents which are the subject of this docket, and which ENO's initial comments on UD-21-01 covered extensively. In aggregate, over 17 hours, these load shed events are analogous to roughly 11% of the 24.8 GW average annual load

¹² Promotional flyer for supporters of HB Texas ROFR
(https://legacy-assets.eenews.net/open_files/assets/2019/07/08/document_ew_05.pdf)

¹³ Response to State of Texas Rep. Travis J. Clardy from U.S. Department of Justice Antitrust Division Letter from Daniel Haar, Acting Chief, Competition Policy and Advocacy Section, "as a result of lost competition, consumers may have higher expenses in the form of greater transmission rates. Furthermore, consumers may face higher electricity rates and less reliable service as H.B. 3995 may limit construction of transmission that would increase the supply of generation available to serve a local territory or area." 2019 (<https://www.justice.gov/atr/page/file/1155881/download>)

¹⁴ MISO '2021 Arctic Event Report' at 5. 2021
(<https://cdn.misoenergy.org/2021%20Arctic%20Event%20Report554429.pdf>)

for MISO South¹⁵. In contrast to the 2.8 GW of load shed in MISO South, over the same period, only 130 MWs were shed in MISO North, which is analogous to roughly 0.2% of the annual average demand for the subregion. Furthermore, this disruption was much more localized in its impacts, due a transmission emergency related to thermal limits, rather than the documented cold weather outages of multiple power generation units in MISO South.

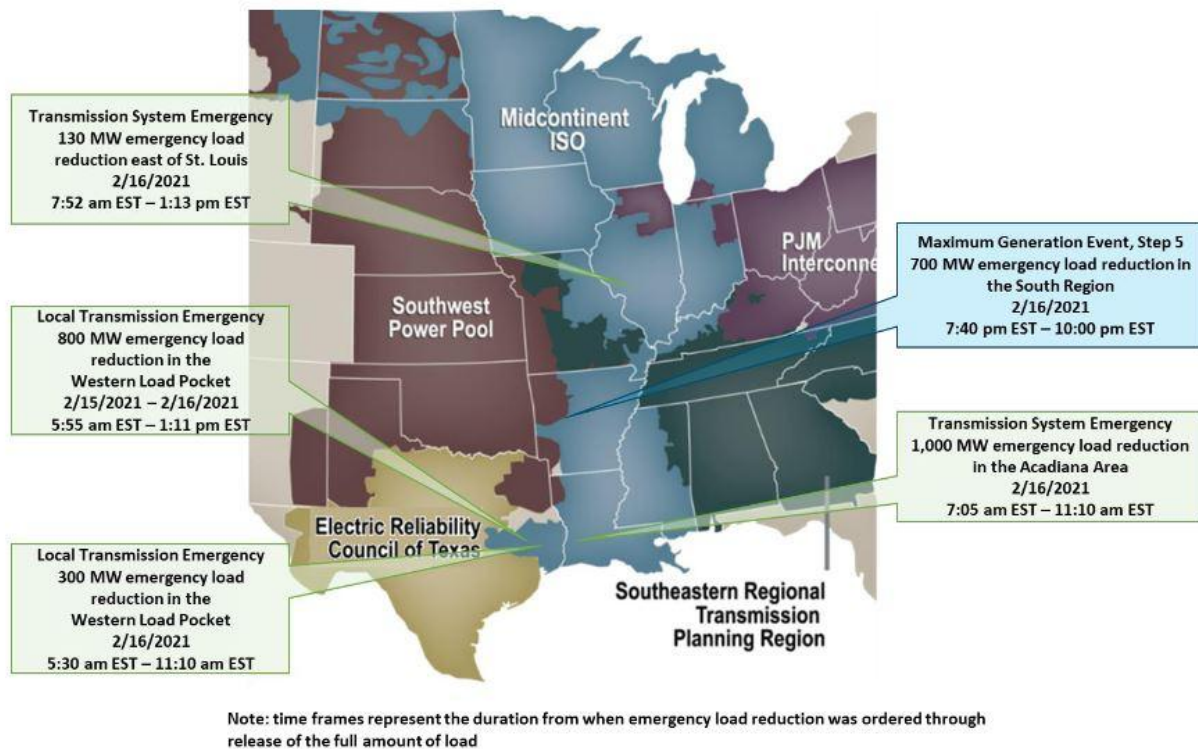


Figure 3

Source: MISO ‘2021 Arctic Event Report’

MISO’s Arctic Event Report released in June 2021 covers the impacts to the MISO system throughout Winter Storm Uri, and provides important detail on the evening load shed event that contained the errant amount of load that ENO shed. Most importantly, is the limitation of MISO South to import available power from MISO North across the Regional Directional Transfer (RDT), or what is sometimes referred to as the ‘North/South Constraint’ that offers only 1GW of transfer capacity between regions, but allows for up to 3GW of transfer in the event of an emergency like Winter Storm Uri. It can very roughly be likened to a highway for electricity between both subregions in MISO that has only one lane in either direction. To extend the metaphor; it also becomes the sole supply route for electricity during an

¹⁵ MISO Presentation ‘Informational Forum’ Slide 36. June 2021
(<https://cdn.misoenergy.org/202106%20Informational%20Forum%20Presentation565279.pdf>)

emergency when there are better outcomes in the North or South of the footprint, with the caveat that you can't airlift electricity to where it's needed.

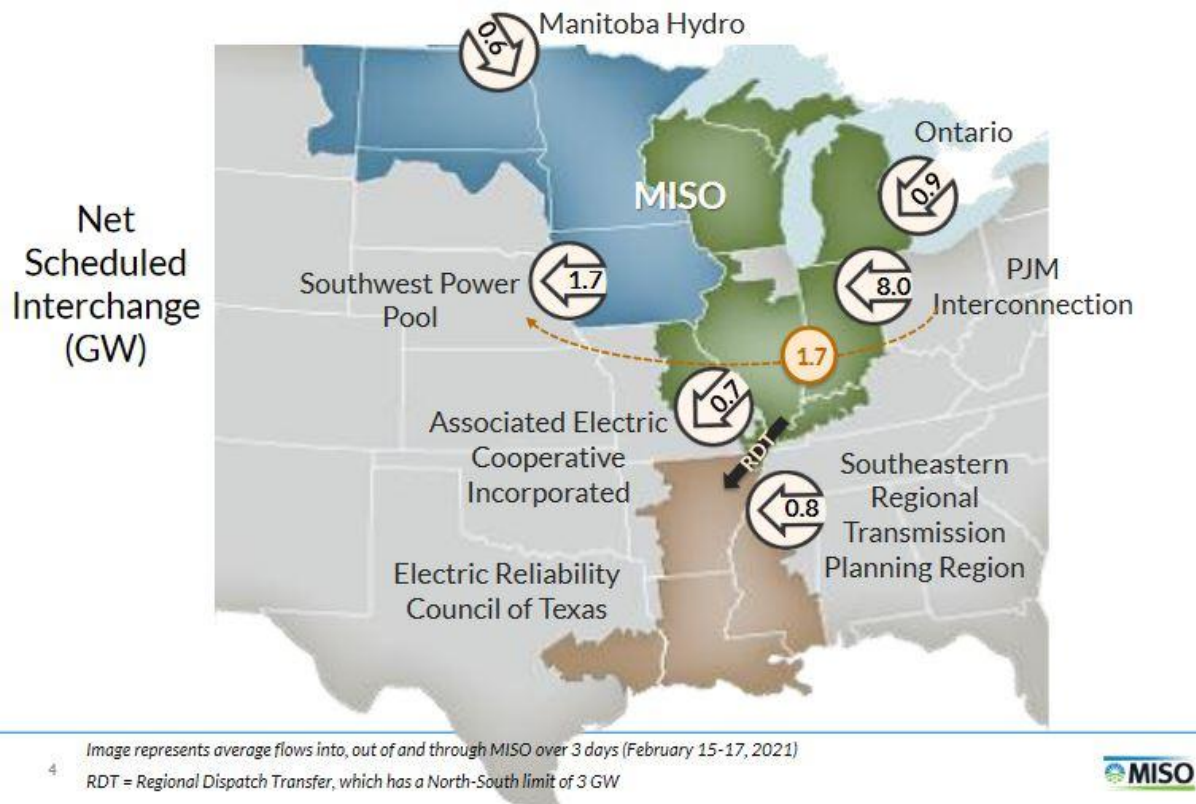


Figure 4

Source: MISO '2021 Arctic Event Report'

The reality of the North/South Constraint during Uri, was that this limited ability to import electricity became an insurmountable challenge to providing the needed capacity for MISO South, even when the transfer capacity was allowed to be raised to its 3GW emergency limit. Even with permission to increase to maximum capacity for the RDT, there was no way for electricity to reach the one supply route from MISO North to MISO South because of overloads in neighboring systems connected to the RDT. In MISO North however, there was greater access to neighboring markets PJM to the East which over the course of February 15th - 17th sent 8 GW of capacity into MISO to relieve demand on the grid. Were there a stronger connection and greater capacity between MISO North and South, the MISO South subregion could have benefitted from this connection in the North.

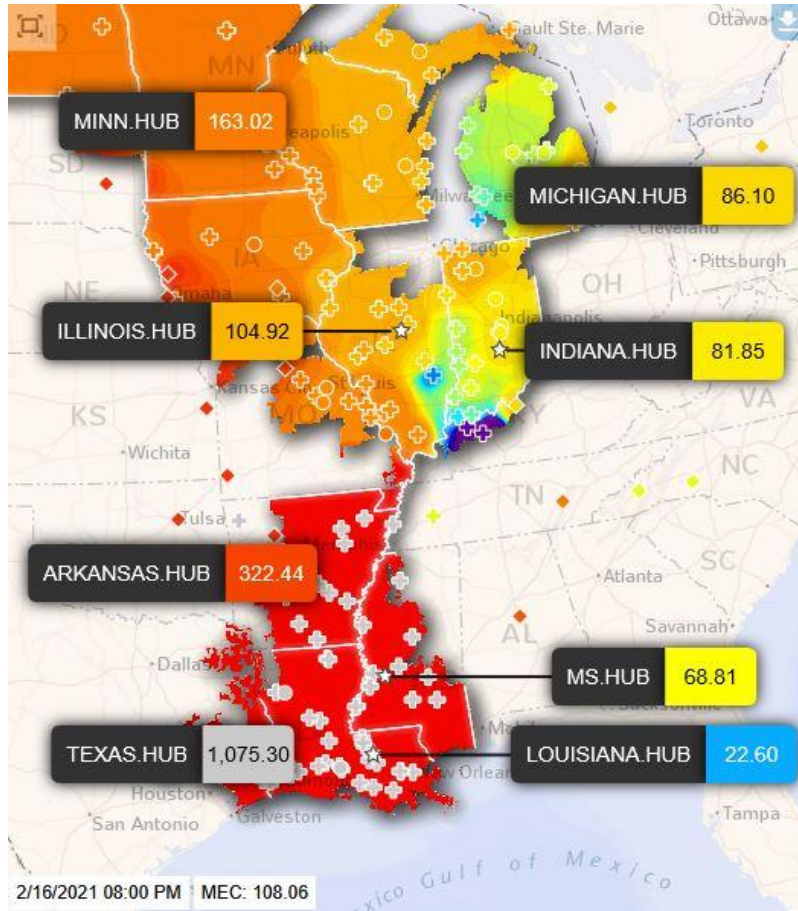
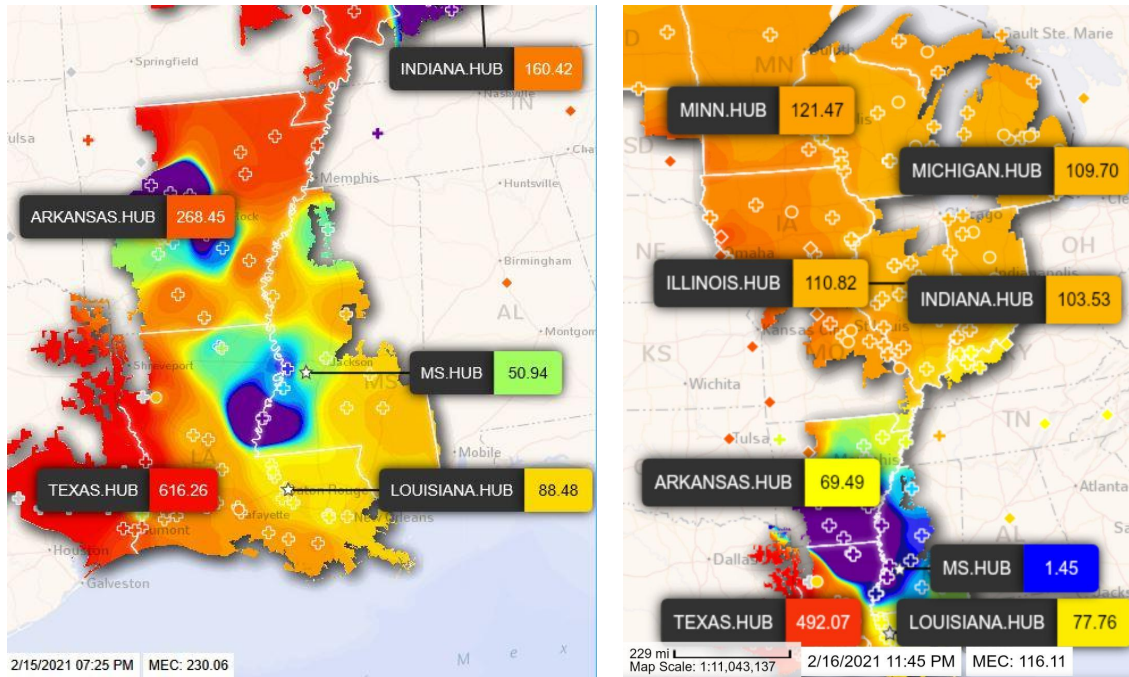


Figure 5
MISO's Real Time LMP Contour Map during the peak of rolling outages in New Orleans shows scarcity of power in MISO South in red, while indicating more power available in MISO North indicated by lighter hues. Congestion is indicated by a significant and distinct color shift like that on the border of Kentucky and Southern Indiana.

Source: MISO Real Time LMP Contour Map (2/16/2021 08:00 pm)

This kind of congestion around the MISO North entry point of the RDT was witnessed throughout portions of MISO South, as well throughout the subregional footprint; and it could be witnessed in the moments leading up to the 17 hour period incurring 2.8GW's of load shed for MISO South. Since there was only limited capacity through the North-South RDT, the subregion was forced to make due with a system reliant only on power in MISO South. Yet generation assets in the subregion could not always sufficiently bring it to demand because of limited transmission capacity, which contributed to transmission congestion. Many of the dark purple hues on MISO's Real Time LMP Contour Map

indicating congestion [Fig 4 & 5] correlate with MISO studies as early as the MTEP17 process [Fig 6]; and yet there have been scant efforts to relieve these issues. This prominence of congestion is not unique only to MISO South, but combined with the RDT constraint, their presence not only contributes to inefficiency, but also a risk in terms of reliability and price shocks for consumers. In either case, it does not provide an encouraging picture of system resilience during extreme weather events for EOC consumers. It begs the question, had the margin for error been even tighter, would EOCs have been able to handle the stresses of Uri?



Figures 6 and 7

Source: MISO Real Time LMP Contour Map (2/15/2021 07:25 pm & 2/16/2021 11:45 pm)

Top Congested Flowgate Analysis

The top congested flowgate analysis identifies system congestion trends based on both the historical market data and forecasted congestion. The analysis identifies and prioritizes highly congested flowgates within the MISO market footprint and on the seams Figure 5.3-2.



Figure 5.3-2: Projected top congested flowgates in MISO South Region

Figure 8

Source: MISO MTEP 17 Transmission Workbook

An Insurance Plan for the City’s Energy System

In order to increase the resilience and reliability of the energy system in the City of New Orleans, it’s important to restore faith in the sole electric utility serving New Orleans. It is appropriate and within the scope of the City Council of New Orleans to require a management audit of ENO based on the failure to prepare for high grid stress scenarios like that experienced on the evening of February 16th 2021. Even under periods of minor stress in MISO South [Fig 9], there are challenges related to moving power through the subregion that indicate a possible scenario where load shed will be needed. This clearly makes the case that in lieu of large scale improvements in the transmission system, mitigating congestion, load shedding may be increasingly necessary under higher stress conditions affecting MISO South, due to a lack of capacity to import power from MISO North.

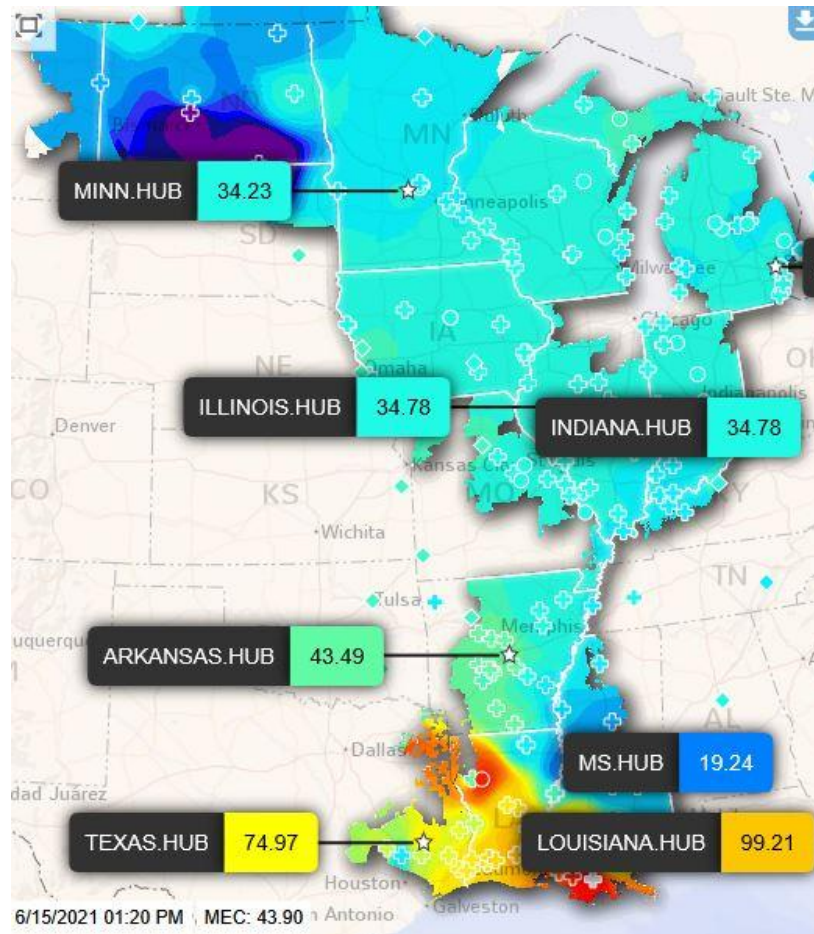


Figure 9
Source: MISO Real Time LMP Contour Map (6/15/2021 01:20 pm)

While MISO executes regular load shed testing on a monthly basis with balancing authorities¹⁶, at the bare minimum, ENO should engage in load shed testing prior to summer and winter seasons in preparation for increased seasonal peak demand. This testing could identify problems with software programs controlling load busses, and be remedied before a MISO initiated emergency load shed event. Most importantly though for ENO’s consumers, it could eliminate the burden of unnecessary power outages for a greater number of consumers than is absolutely necessary if load shedding is absolutely necessary.

¹⁶ MISO, MCS Notification, (<https://extranet.misoenergy.org/mcsnotification/?id=836>)

In response to ENO's comments which relayed that, had they conducted load shed testing, the simulations used would not have identified the errors experienced during their implementation of load shedding on February 16th 2021 - this argument is irrelevant, as there is no evidence to support or rebut the findings of a test that was never conducted. However, the absence of this testing is indicative of a larger issue related to ENO's preparedness for extreme weather conditions. Forecasting and identifying contingencies where EOC and ENO processes could result in error, and subsequent unnecessary outages should be a priority for the largest load serving entity in MISO South, and the only load serving entity in New Orleans respectively. Given the unpreparedness of ENO for Uri, and a lack of priority given to reliability for the wholly dependent consumer base in New Orleans, a management audit is warranted.

It also should not be the sole responsibility of one transmission owning company to engage in planning for the energy system that New Orleans is dependent on. Notwithstanding the error leading to excessive loadshedding in New Orleans, EOCs global response to the initiation of load shed events may have helped to preserve the larger MISO system, but the increasing reliance on load shedding warrants engagement by the Council on issues of regional reliability impacting the city. There are open questions related to whether the power system in MISO South is prepared for future extreme weather events due to a lack of long term planning for the subregion. Especially considering that the combined load shed events during Uri were the second time the region required load shedding in 6 months¹⁷. Load pockets continue to persist throughout the subregion that increase dependency on generation assets located within these pockets, over more economical assets.

The long run economics of investing in the weatherization of fossil fuel power plants in EOC's fleet of gas generators, is not as beneficial to consumers as investment in transmission improvements for MISO South through MISO's MTEP process can provide. Investments that provide flexibility and optionality over rigid bulkization of the energy system can provide annual economic benefits as well as seasonal reliability benefits. Approaching every reliability issue through the addition of more generation certainly does not comport with EOC's or the CCNO's climate goals in the long term; regardless of short term reliability requirements for the region. Improving market congestion, which was an issue during Uri, and increasing capacity between MISO North and South will provide benefits over the short and long term, which includes providing a more flexible system that is able to adapt to new generation types like solar and wind.

¹⁷ Potomac Economics "2020 STATE OF THE MARKET REPORT FOR THE MISO ELECTRICITY MARKETS" P. 42, 2021

Strategic investment in the transmission system for MISO South has the potential to unlock greater reliability and year round benefits for consumers; but it must also be met with the strategic investment of time on behalf of CCNO leadership.

Conclusion

SEES appreciates the opportunity to comment on Docket UD-21-01 and urges the Council to use its authority as the regulator of ENO to initiate an independent management audit of ENO. To identify the management decisions and priorities that have often led to divergent outcomes on behalf of the company for electric ratepayers in New Orleans is a critical first step to providing better outcomes. To acknowledge that there is a problem however, is only the first step. Additionally, it is important for matters related to long term reliability that there's ongoing engagement in MISO processes that can identify solutions that will provide ENO ratepayers access to a competitive, reliable, and affordable electricity system.

All communications and pleadings in this proceeding should be directed to:

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Respectfully Submitted,



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**Re: Resolution and Order Instituting a Prudence Investigation
Docket No. UD-21-01**

I hereby certify that I have this 30th Day of July 2021, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.

Andrew S Kowalczyk

Andy Kowalczyk

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