# In the Matter of Entergy New Orleans, Inc. Application for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief

**CNO UD-16-02**

**The Alliance for Affordable Energy’s Seventh Set of Requests for Information**

**September 20, 2017**

The Alliance for Affordable Energy (“Alliance”) hereby serves upon Entergy New Orleans, Inc. (ENO) this Seventh Set of Requests for Information in connection with the above captioned docket and pursuant to New Orleans City Council Resolution R-16-332 as well as the Louisiana Code of Civil Procedure.

# Instructions:

1. Whenever possible, the Alliance prefers to receive electronic copies of data responses either by email or on CD.
2. Responses to any and all of the Alliance’s data requests should be supplied to the Alliance as soon as they become available to Entergy New Orleans and in any event within the delays allowed by the procedural schedule in this docket. Please contact counsel for the Alliance if you believe it is necessary for additional time to respond to any of these requests.
3. The requests herein shall be deemed to be continuing in nature and Entergy New Orleans is requested to supplement its responses as necessary and as additional information becomes available.
4. In responding to each data request, please consult every document source which is in your possession, custody, or control, including all documents in the possession of experts or consultants.
5. For each response, identify the person who prepared the answer to the data request as well as his or her position with Energy New Orleans or any Entergy New Orleans affiliate or parent.
6. Please reproduce the data request before your corresponding response.
7. If the responses include computer modeling input and output files, please provide those data files in electronic machine readable or .txt format.
8. If the responses include spreadsheet files, please provide those spreadsheet files in useable electronic Excel readable format.
9. In responses providing computer files, include the corresponding data request in the file name of the responsive computer file, and if necessary to the understanding of the data, provide a

record layout of the computer files. Computer files provided with a response must be in or compatible with the current version, or the immediately prior version, of Microsoft Office.

1. For each dollar amount provided in response to a discovery request please state if the amount is in nominal or constant dollars and what year’s dollars.

# Definitions:

* 1. “ENO” or “the Company” shall mean Entergy New Orleans, Inc.;
  2. “NOPS” shall mean New Orleans Power Station;
  3. “Document(s)” shall mean any written, typed, printed, computer produced, recorded or graphic matter, however produced or reproduced, of any kind, character, type or description, regardless of origin or location, including, without limitation, all correspondence, records, tables, charts, analyses, graphs, maps, schedule, summaries, reports, memoranda, notes (handwritten or otherwise), notations, drafts, lists, calendar and diary entries, letters (sent or received), telegrams, telexes, telecopies, faxes, Photostats, messages (including, but not limited to reports or notes of telephone conversations and conferences), studies, books, periodicals, magazines, booklets, circulars, bulletins, pamphlets, instructions, papers, files, minutes, Communications, other communications (including, but not limited to, inter and intra-office communications), questionnaires, contracts, memoranda or agreements, assignments, licenses, ledgers, books or account, financial statements, work sheets, work papers, spreadsheets, databases, orders, invoices, statements, bills, checks, check registers, vouchers, notebooks, receipts, acknowledgements, data processing cards, word processing documents, computer generated matter, computer printouts, electronically maintained or stored information, microfilm, contact manager information, internet usage files, network access information, photographs, photographic negatives, phonograph

records, tape or audio recording, compact discs, video tapes or dvds, wirer recordings, voicemail recordings, other mechanical recordings, transcripts or log of any such recordings, all other data compilations from which information can be obtained, or translated if necessary, and any other tangible thing of a similar nature. “Document(s)” shall include originals (or copies if originals are not available) and non-identical copies (whether difference from the original because of handwritten notes or underlining or otherwise) and any translation of any Document. Without limiting the generality of the foregoing, “Document(s)” specifically include telephone billing records, written or audio telephone messages, E-mail, evidence of facsimile transmissions, expense accounts, and other information not necessarily contained in files pertaining exclusively or directly to this matter; “Document(s)” also include, without limitation, materials maintained in magnetic or other storage media, including those maintained in computers, magnetic tapes or disks, and any onsite or offsite backup or so-called “erased” or “deleted” computer information that may be susceptible of retrieval.

# Requests for Information

AAE 7-1: Please describe and provide a copy of the North American Electric Reliability Corporation (‘NERC”) transmission planning criteria which is used to evaluate and plan the Company’s transmission system.

AAE 7-2: Please describe and provide a copy of the Midcontinent Independent System Operator, Inc. (“MISO”) transmission planning criteria which is used to evaluate and plan the Company’s transmission system.

AAE 7-3: Please describe and provide a copy of any transmission planning criteria other than NERC criteria and/or MISO criteria which is used to evaluate and plan the Company’s transmission system.

AAE 7-4: Please describe and provide documentation of MISO operating guides to which operations in the Downstream of Gypsy (“DSG”) load pocket are subject.

AAE 7-5: Please describe and provide documentation of any operating guides other than MISO operating guides to which operations in the DSG load pocket are subject.

AAE 7-6: Please refer to 2017 load forecast which resulted in ENO seeking a stay

of CNO UD-16-02:

* 1. What entities, organizations or individuals (with their affiliations) assisted in the preparation of this document?
  2. For each entity, organization or individual in (a), in what way did they assist?
  3. What entities, organizations or individuals (with their affiliations) contributed background assumptions or data used to prepare this document?
  4. For each entity, organization or individual in (c), what assumptions or data did they provide.
  5. What entities, organizations or individuals (with their affiliations) provided recommendation to ENO on the preparation of this document?
  6. For each entity, organization or individual in (e), what recommendations did they provide?
  7. Please provide any relevant background materials, recommendations, assumptions or data in—where applicable—a machine readable format with formulae intact.