# 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 First Set of Requests for Information**

**November 30, 2017**

The Alliance for Affordable Energy (“Alliance”) hereby serves upon the Advisors to the Council of the City of New Orleans (“Advisors”) this First 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 the Advisors 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 the Advisors are 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.
5. For each response, identify the person who prepared the answer to the data request.
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. “Advisors” shall mean the Advisors to the Council of the City of New Orleans;
  2. “DSM” means demand side management;
  3. “ENO” or “the Company” shall mean Entergy New Orleans, Inc.;
  4. “NERC” means North American Electric Reliability Corporation
  5. “NOPS” shall mean New Orleans Power Station;
  6. “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 1-1: Refer to Mr. Movish’s direct testimony at page 8, lines 10-11, where he states that “major storm events … historically have resulted in significant transmission disruptions.” Have “major storm events” resulted in significant local generation disruptions in ENO’s service territory?

* 1. If yes, please describe the event including:
     1. Date of event;
     2. Specific generator effected; and
     3. Length of disruption

AAE 1-2: Refer to Mr. Movish’s direct testimony starting at page 9, lines 13-16. Please confirm that ENO has not demonstrated that NOPS (under either proposed alternative) could provide power to the Sewage & Water Board of New Orleans’ Carrolton pumping plant.

AAE 1-3: Is it Mr. Movish’s understanding that ENO currently is violating the NERC TPL-001-4 Standard? Please explain including when the violation, if any, first occurred.

AAE 1-4: Refer to Mr. Movish’s direct testimony at page 13, lines 13-15. Please state the probability (in quantifiable terms) of a NERC Category P2.3 contingency occurring in ENO’s service territory in:

* 1. 2019
  2. 2022
  3. 2024
  4. 2027.

AAE 1-5: Refer to Mr. Movish’s direct testimony at page 13, lines 13-15. Please state the probability (in quantifiable terms) of a NERC Category P6 contingency occurring in ENO’s service territory in:

* 1. 2019
  2. 2022
  3. 2024
  4. 2027

AAE 1-6: Refer to Mr. Movish’s direct testimony at page 15, line 7 through page 16, line 19, where Mr. Movish discusses ENO’s inconsistent DSM and solar input assumptions and the result that ENO’s transmission reliability analysis reflects a load condition that inaccurately increases the stress on ENO’s transmission lines in the event of a transmission contingency. Please explain how, if at all, the inaccurate increase in stress on ENO’s transmission lines impacts the probability of a transmission reliability violation.

AAE 1-7: Refer to Mr. Movish’s direct testimony at page 24, lines 17-20. Would an event that triggers a P6 contingency also impact the performance of generation?

AAE 1-8: Refer to Mr. Movish’s direct testimony at page 8, lines 19-20, through page 9, lines 1-2. Please provide the analyses and any work papers that resulted in the “belief” that a cranking path potentially exists for local generation located at the Michoud site to potentially provide power to the Sewage & Water Board pumping station.

AEE 1-9: Refer to Mr. Movish’s direct testimony at page 10, lines 7-8. What is the basis for the conclusion that Mr. Movish “fully expects” the gas plant alternative to be designed as voltage and local reliability units.

AEE 1-10: Refer to Mr. Vumbaco’s testimony at page 8, lines 7 through 12 (Conclusion No. 7). Please describe the amount of renewable generation and DSM that is recommended for incorporation in ENO’s service territory in this conclusion.

AEE1-11: Please provide a copy of the Advisors’ September 19, 2016, request that ENO perform additional Integrated Resource Planning modeling which is referred to in City Council Resolution R-16-506 at page 8.