

**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 Fifth Set of Requests for Information  
August 29, 2017**

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The Alliance for Affordable Energy ("Alliance") hereby serves upon Entergy New Orleans, Inc. (ENO) this Fifth 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.

10. 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:**

- a. "ENO" or "the Company" shall mean Entergy New Orleans, Inc.;
- b. "NOPS" shall mean New Orleans Power Station;
- c. "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**

#### **Background information**

AAE 5-1: Please provide specific information about major event days that have occurred within the last ten (10) years. (ie. Contributing factors to outages, number of outages, dates, locations)

AAE 5-2: Describe the process by which the utility categorizes major event days and how they are defined.

AAE 5-3: Please provide specific information about the last outage related to generation that ENO has experienced.

AAE 5-4: Please list examples of credible contingencies that have occurred over the last ten (10) years.

AAE 5-5: Please provide System Average Interruption Duration Index (SAIDI) and System Average Interruption Frequency Index (SAIFI) filed with the New Orleans City Council for 2010, 2011, 2012, 2013, 2014, 2015, 2016.

AAE 5-6: Was ENO's updated (as of February 2017) forecast included in the Navigant study included in the July, 2017 Supplemental Application?

AAE 5-7: Please refer to the Navigant study, included in ENO's Supplemental and Amending Application, dated July 2017.

- a) On what date was this study commissioned?
- b) Please provide instructions, including any inputs, constraints, guidelines, and scope of work for this study.
- c) Please provide list of technologies, measures, and programs included in either the development of the Navigant study or the guidelines for the Navigant study.
- d) Did ENO request that Navigant consider demand reduction goals?

AAE 5-8: Did the above mentioned Navigant study consider the 2013 American Council for an Energy Efficient Economy (ACEEE) study of Energy Efficiency Potential in New Orleans? If no, why not?

AAE 5-9: Please refer to the Business Case Forecast, provided in February, 2017 to the parties of this docket.

- a) When was this forecast model finalized?
- b) Were expected energy and demand savings, forecast by CBI/ENO, from Energy Smart program years through 2019, included in the model for the updated sales/load forecast?
- c) Were expected energy and demand savings expected from advanced metering (see Entergy's application to acquire Advanced Metering Infrastructure, in Docket UD-16-04) included in the above referenced Business Case Forecast?