# 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 Sixth Set of Requests for Information**

**September 15, 2017**

The Alliance for Affordable Energy (“Alliance”) hereby serves upon Entergy New Orleans, Inc. (ENO) this Sixth 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 6-1: Refer to Exhibit CLR-2, page 4.

* 1. Please provide supporting documentation that construction will take six years.
  2. Has this analysis been updated since May 2016?

If so, please provide a copy of that report

AAE 6-2: Refer to Exhibit CLR-2, page 5, Table 1.

* 1. Please provide the share of construction costs made up of labor and materials, for each year.
  2. Please provide a breakdown of construction materials that are purchased in each year, by dollar amount.
  3. Please provide a breakdown how much of each construction was expected to be produced in-state, by dollar amount and year.
  4. Please provide supporting documentation and/or analysis for the in-state construction spending.

AAE 6-3: Refer to Exhibit CLR-2, page 5.

1. Please confirm or deny that value-added or Gross Domestic Product (GDP) is another measurement for “direct impact.”
2. Please explain why value-added or GDP was not reported in the economic impact analysis.

AAE 6-4: Refer to Exhibit CLR-2, page 7, Table 2.

1. Please provide the I/O tables for Orleans Parish that were used in the construction impact analysis.
2. Please provide a breakdown of “direct” and “indirect” impacts by industry, by year.
3. Please provide the assumption for how much of demand for each industry is to be produced within the Parish—for each industry modeled.

AAE 6-5: Refer to Exhibit CLR-2, page 8.

1. Please provide supporting documentation that the plant will have 12 full-time employees.
2. Please provide the expected annual wages of those 12 employees.
3. Please provide how many of these 12 employees are assumed to live in Orleans Parish.

AAE 6-6: Refer to Exhibit CLR-2, page 9, Table 3.

1. Please provide the I/O tables for Orleans Parish that were used in the operations impact analysis.
2. Please provide a breakdown of “direct” impacts by industry, by year.
3. Please provide the assumption for how much of demand for each industry is to be produced within the Parish—for each industry modeled.

AAE 6-7: Refer to Exhibit CLR-2, page 11, Table 5.

1. Please provide the I/O tables for Louisiana that were used in the construction impact analysis.
2. Please provide a breakdown of impacts by year.
3. Please provide a breakdown of “direct” and “indirect” impacts by industry, by year.
4. Please provide the assumption for how much of demand for each industry is to be produced within the Louisiana—for each industry modeled.

AAE 6-8: Refer to Exhibit CLR-2, page 12, Table 6.

1. Please provide the I/O tables for Louisiana that were used in the operations impact analysis.
2. Please provide a breakdown of “direct” impacts by industry, by year.
3. Please provide the assumption for how much of demand for each industry is to be produced within the Louisiana—for each industry modeled.

AAE 6-9: Refer to Exhibit 2017 07 06 UD-16-02 ENO Supplemental and Amended App PUBLIC, page 9: “The Company has engaged Loren C. Scott & Associates, Inc. to perform an analysis of the impacts of the Alternative Peaker, and its economic impact is expected to be similar to the CT’s.”

1. Please provide the final written narrative of these analyses and any background papers related to it.

AAE 6-10: Refer to Exhibit 2017 07 06 UD-16-02 ENO Supplemental and Amended App PUBLIC, p.8: “Based on a study conducted by a qualified engineering firm, WorleyParsons, as described by Mr. Jonathan Long, the RICE units had the lowest levelized cost of electricity on a $/MWh basis compared to alternative CTs in the same output range, as well as other benefits such as very low water usage, a low emissions profile, the ability to support renewable resources, and the inclusion of black-start capability.”

1. Please provide the final written narrative of these analyses and any background papers related to it.