



Entergy Services, Inc.
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October 2, 2017

By Hand Delivery

Ms. Lora W. Johnson, CMC
Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112

***Re: Application of Entergy New Orleans, Inc. for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief
CNO Docket NO.: UD-16-02***

Dear Ms. Johnson:

Entergy New Orleans, Inc. (“ENO”) hereby submits for your further handling and filing an original and three copies of ENO’s Objections to the Alliance for Affordable Energy’s (“Alliance”) Eighth Set of Requests for Information. Please file an original and two copies into the record in the above referenced matter, and return a date-stamped copy to our courier.

Should you have any questions regarding the above matter, please don’t hesitate to contact me. Thank you for your assistance with this matter.

Sincerely,


Brian L. Guillot

Enclosures

cc: Official Service List (via *electronic mail*)

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

| | | |
|---------------------------------------|---|----------------------------|
| IN RE: APPLICATION OF ENTERGY |) | |
| NEW ORLEANS, INC. FOR APPROVAL |) | |
| TO CONSTRUCT NEW ORLEANS |) | |
| POWER STATION AND REQUEST FOR |) | DOCKET NO. UD-16-02 |
| COST RECOVERY AND TIMELY |) | |
| RELIEF |) | |

**ENTERGY NEW ORLEANS, INC.'S OBJECTIONS
TO THE ALLIANCE FOR AFFORDABLE ENERGY'S
EIGHTH SET DISCOVERY REQUESTS**

Entergy New Orleans, Inc. (“ENO” or the “Company”) objects to the Alliance for Affordable Energy’s (“Alliance”) Eighth Set of Requests for Information to ENO (the “Requests”) propounded in the above-captioned proceeding, as follows:

I.

GENERAL OBJECTION AND RESERVATION OF RIGHTS

1. Although ENO has sought to identify all applicable objections, it may become apparent later that additional objections may be appropriate. ENO reserves its rights to make such objections.
2. ENO objects to the “Instructions” to the extent that they purport to impose obligations for responding to the Requests beyond those established by the Louisiana Code of Civil Procedure, the City of New Orleans Home Rule Charter, the City Code, and/or Council Resolution No. R-16-104.
3. ENO objects to the Requests to the extent that they exceed thirty-five in number, including subparts, without leave of the Council, in violation of La. Code Civ. P. art. 1457(A).

II.

SPECIFIC OBJECTIONS

At this time, the Company has identified the following Specific Objections:

Request AAE 8-4:

For each transmission line operating at 69 kV or higher in ENO's service area, please provide:

- a. The substation end points of each transmission line
- b. The length of the line in miles, broken down into overhead miles and underground miles.
- c. The voltage of each line.
- d. The date when the line initially went into service.
- e. The date of each major refurbishment or upgrade on the line and a description of the refurbishment and/or upgrade performed.
- f. A description of which party owns the line. If owned by more than one party, give the portion owned by each party.
- g. The maximum summer load carrying capability of each line under normal conditions and under contingency conditions
- h. The loadings on each line for the peak hour of each month during the most recent five-year period.
- i. A description as to whether the line supplies power into the DSG load pocket.

Objection:

ENO objects to this Request on the grounds that it is unduly burdensome and seeks information, analyses and/or calculations that ENO has not performed and/or does not maintain or perform in the ordinary course of its business. The Company further objects on the grounds that this Request seeks information that is not relevant and not reasonably calculated to lead to discovery of admissible evidence in this proceeding. Subject to this objection, the Company will provide a response.

Request AAE 8-9:

Provide the monthly peak demand for the DSG load pocket for the most recent five-year period.

Objection:

ENO objects to this Request on the basis that it is overly broad and unduly burdensome and seeks historic load information, analyses and/or calculations that ENO has not performed and/or does not maintain or perform in the ordinary course of its business.

Request AAE 8-10:

Provide the monthly peak demand for each load-serving entity for their DSG load pocket for the most recent five-year period.

Objection:

ENO objects to this Request on the basis that it is overly broad and unduly burdensome and seeks historic load information, analyses and/or calculations that ENO has not performed and/or does not maintain or perform in the ordinary course of its business.

Request AAE 8-13:

Please describe the damage the Company's transmission lines experienced during Katrina and storms since Katrina including:

- a. The line that was damaged,
- b. When it was damaged
- c. How long it was out of service
- d. How many customers lost service due to the outage
- e. What it cost to repair
- f. Whether the damage occurred on an overhead or underground portion

Objection:

ENO objects to this Request on the basis that it is unduly burdensome. The Request also seeks information, analyses and/or calculations that ENO has not performed and/or does not maintain or perform in the ordinary course of its business.

Request AAE 8-14:

Please describe the damage the Company's distribution lines experienced during Katrina and storms since Katrina including:

- a. When the storm occurred
- b. The portion of the Company's customers that lost service during the storm
- c. How long it took to restore service to these customers
- d. What it cost to repair the distribution system.
- e. Please describe what percentage of the Company's distribution system is underground in terms of circuit miles.
- f. Please describe how the percentage of the Company's distribution system that is underground has changed since Katrina, if at all.

Objection:

ENO objects to this Request on the basis that it is unduly burdensome. The Request also seeks information, analyses and/or calculations that ENO has not performed and/or does not maintain or perform in the ordinary course of its business.

Request AAE 8-15:

Provide the most recent load forecast for ENO as well as the forecasts prepared in the previous five years.

Objection:

The Company objects to the second part of this request on the grounds that it is overly broad and unduly burdensome; and it seeks information not reasonably calculated to lead to discovery of admissible evidence in this proceeding. The Company further states that a load forecast is used as a forward-looking supply planning tool for assessing future resource portfolio needs. It is not used on a historical basis; therefore, the requested analysis is not relevant.

Request AAE 8-16:

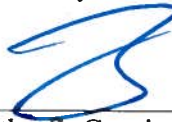
Provide any ENO area load forecasts provided to or prepared by MISO during the most recent five years.

Objection:

The Company objects this request on the grounds that it is overly broad and unduly burdensome; and it seeks information not reasonably calculated to lead to discovery of admissible evidence in this proceeding. The Company further states that a load forecast is used as a forward-looking supply planning tool for assessing future resource portfolio needs. It is not used on a historical basis; therefore, the requested analysis is not relevant.

Respectfully submitted:

BY:



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**ATTORNEYS FOR ENTERGY
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CERTIFICATE OF SERVICE
CNO Docket No. UD-16-02

I, the undersigned counsel, hereby certify that a copy of the above and foregoing has been served on the persons listed below by facsimile, by hand delivery, by electronic mail, or by depositing a copy of same with the United States Postal Service, postage prepaid, addressed as follows:

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New Orleans, Louisiana, this 2nd day of October, 2017.



Brian L. Guillot