ENTERGY NEW ORLEANS, INC. CITY OF NEW ORLEANS Docket No. UD-16-02

Response of: Entergy New Orleans, Inc. to the Eighth Set of Data Requests

of Requesting Party: Alliance for Affordable

Energy

Question No.: AAE 8-1 Part No.: Addendum:

Question:

Referring to the Direct Testimony of Charles W. Long, on page 10 on lines 4-7 it states:

Additionally, while the Attachment Y analysis performed by MISO covers most of the major contingency categories required by the NERC TPL 001-4 reliability standard, the analyses do not address every requirement of the NERC TPL Standard and thus are not as comprehensive as the Company's annual reliability assessments.

- a. Please describe every requirement of the NERC TPL Standard that is not addressed by the Attachment Y analysis.
- b. Please discuss the findings of the Company's most recent annual reliability assessment in the areas not addressed by the Attachment Y analysis.
- c. Please provide a copy of any reports describing the results of the Company's most recent annual reliability assessment.

Response:

- a. The Attachment Y analysis performed by MISO for Michoud units 2 and 3 differs from the requirements of the NERC TPL standard in the following manner:
 - 1. While the Attachment Y analyses only covered two study years (2016 and 2019), Requirements R2 and R3 of the NERC TPL 001-4 requires reliability assessments of both the Near Term Planning Horizon (Years one through Years One or two, and for year five) and the Long Term Planning Horizon (Years six through ten).
 - 2. While both of these Attachment Y studies only covered Category A, B and C contingencies (which are generally equivalent to the

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- Category P1, P2 and P3 contingencies in Standard TPL 001-4), the NERC TPL 001-4 requires the performance of contingency categories P4 through P7 as well.
- 3. While MISO's Attachment Y study process employs a 5% Power Transfer Distribution Factor and a 3% Outage Transfer Distribution Factor cut-off for a valid SSR constraint¹, no such cut-offs exist for the NERC Standard TPL 001-4 reliability assessments.
- 4. The Attachment Y studies for Michoud units 2 and 3 only involved steady-state reliability assessments. The NERC TPL 001-4 requires the performance of stability analyses as well.
- b. Please see the Company's response to ADV 3-3 for the most recent annual assessment. Please note that the Company's most recent annual reliability assessment assumed that, consistent with the Company's long-term resource plan, NOPS was in-service and, therefore, the constraints which are expected to be observed in the transmission system absent NOPS, are not present in that annual reliability assessment. Please note that the response to Q10 of Mr. Charles Long's Supplemental and Amending Direct Testimony contains the result of a reliability assessment that the Company had performed in order to identify the violations of the NERC TPL reliability standard that would occur if the NOPS were not approved.
- c. Please see the Company's response to ADV 3-3.

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¹ For instance, please see Section IV.b (page 8) of the Attachment Y study report for Michoud unit 2: http://www.oatioasis.com/woa/docs/MISO/MISOdocs/EES Michoud2 Att Y Report Public Final withappendices 20141016.pdf