



Entergy New Orleans, LLC
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September 24, 2018

Via Hand Delivery

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

Re: *Application of Entergy New Orleans, Inc. for Approval to Deploy Advanced Metering Infrastructure, and Request for Cost Recovery and Related Relief; Resolution and Order Directing Entergy New Orleans, LLC to Accelerate Implementation of its Advanced Metering Initiative; CNO Docket No. UD-16-04*

Dear Ms. Johnson:

Pursuant to Resolution R-18-37, Entergy New Orleans, LLC (“ENO” or the “Company”), respectfully submits this Compliance Filing. In February 2018, the Council approved ENO’s Application to Deploy Advanced Meter Infrastructure (“AMI”), filed October 18, 2016, finding that that ENO’s proposed AMI deployment is prudent and in the public interest.¹ In connection with its approval of ENO’s Application, the Council authorized the Company to implement an opt-out policy for residential customers who do not wish to receive an AMI meter.² The Council directed the Company to make a compliance filing in 2018 prior to meter deployment for approval of the opt-out fees consistent with the methodology described in the Direct Testimony of Company witness Jay A. Lewis.

The Parties in this case were also directed to convene a technical conference for the purpose of reaching consensus on a methodology and calculation of the opt-out charge designed to avoid cost shifting between AMI customers and opt-out customers. On June 15, 2018, the Parties convened the required technical conference, and no Party expressed any specific

¹ See Resolution R-18-37, February 8, 2018.

² See Resolution R-18-37, at 5.

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objections to the proposed opt-out tariff methodology described in the Direct Testimony of Jay A. Lewis, pages 30-36, which was approved by Resolution R-18-37.

Accordingly, pursuant to Resolution R-18-37, the Company hereby files its Compliance Filing attaching its proposed AMI Opt-Out Tariff for approval by the Council before AMI deployment, which updates its October 2016 filing for current cost assumptions and inputs.³ The Company also requests expedited consideration and approval of this Compliance Filing in order to support the timely notification of the Opt-Out option for ENO's customers before meter deployment begins in February 2019 (*i.e.*, ENO has contemplated a 90-day notice period for customers, which would begin in November 2018). Please file an original and two copies into the record in the above referenced matter, and return a date stamped copy to our courier.

In connection with the Company's filing, a Confidential Version of the above-described documents bearing the designation "Highly Sensitive Protected Materials" are being provided to the appropriate reviewing parties pursuant to the terms and conditions of the Official Protective Order adopted in Council Resolution R-07-432. Portions of the information included in the filing consist of Highly Sensitive Protected Materials pursuant to Council Resolution R-07-432, the disclosure of which could subject not only the Company, but also its customers, to a substantial risk of harm. As such, these confidential materials shall be exempt from public disclosure, subject to the provisions of Council Resolution R-07-432.

If you have any questions regarding this information, please contact me at (504) 670-3680.

Sincerely,



Gary E. Huntley

Enclosure

cc: Official Service List, Council Docket No. UD-16-04

³ The Company herein attaches (1) the proposed tariff, (2) an Opt-Out Tariff Fee Summary, (2) Customer Opt-Out Forms, and (3) HSPM Workpapers.

ENTERGY NEW ORLEANS, LLC
ELECTRIC SERVICE

RIDER SCHEDULE AMO

Effective: October 30, 2018
Filed: September 24, 2018
Supersedes: New Schedule
Schedule Consists of: One Page

ADVANCED METERING OPT-OUT

I. AVAILABILITY

This rider is available to customers served on an Entergy New Orleans, LLC ("ENOL" or "the Company") rate schedule for residential service, where facilities of adequate capacity and suitable phase and voltage are adjacent to the premises to be served, and service is taken under the regular terms and conditions of the Company.

This rider is available to residential customers who elect non-standard meter service in lieu of the standard communicating advanced meter service (Opt-Out) and who are currently taking service at no more than 200 Amps under a rate schedule for which a communicating advanced meter is the standard meter service. Customers electing this service must submit the applicable required up-front fee along with the required signed form requesting such service.

II. APPLICABILITY

Pursuant to the Council of the City of New Orleans (the "Council") Resolution No. R-18-37, ENOL is authorized to implement an Opt-Out policy for residential customers. The Council's Order No. XXXXX defines the approved opt-out fees in Section III.

III. ADVANCED METER OPT-OUT FEES

A customer receiving non-standard metering service and opting out from receiving an advanced meter shall be charged a one-time fee depending upon when the request to opt-out is received relative the customer's meter being replaced and a recurring monthly manual meter reading fee:

One-time Up-Front Fee for Opt-Out before the initial Advanced Meter Install*	\$131.94
One-time Up-Front Fee for Opt-Out after the initial Advanced Meter Install	\$146.96
Monthly Manual Meter Reading Fee for Opt-Out Customers	\$12.42 per Month

**Existing meters must pass an inspection to ensure the meter meets safety and accuracy standards. If the existing meter fails the safety inspection or accuracy test, the existing meter will be replaced with a refurbished digital non-communicating meter.*

Customers taking service under Rider Schedule AMO relocating to a new premise who wish to continue service under Rider Schedule AMO are required to request new service according to the Company's Opt-Out request requirements including payment of the one-time service and administration fee at the new premise. A Customer who cancels service under Rider Schedule AMO and later re-enrolls for this service at any location served by the Company would be required to pay another one-time service and administration fee.

If a customer's account includes both an electric contract and a gas contract, the fees in Section III will be applicable to only the electric contract; however, the customer's electric and gas meters will be read manually.

**Entergy New Orleans, LLC.
 Docket UD-16-04
 Calculation of Opt-Out Fees**

Ln #	Up-front Fee Components	Estimated Cost	Estimated # Opt-Out Customers	Estimated Fee
1	Billing programming changes to build the one-time and monthly fees in CCS	\$ 38,500	510	\$ 75.49
2	Barrel lock and seal for non-advanced meters	\$22.86/ea		\$ 22.86
3	Opt out paperwork mailing costs for one-time mailing to customers, to enroll and confirm opt-out election Trip charge: employee labor and vehicle costs to perform field test and inspect meter (assuming opt-out occurs prior to installation of advanced meter) OR to remove AMI meter and replace with non-AMI meter (assuming opt-out occurs after installation of advanced meter)	\$4.86ea		\$ 4.86
4		\$28.73/ea		\$ 28.73
5	Total Up-Front Fee for Opt-Out Pre-Advanced Meter Install			\$ 131.94
7	Meter fee for replacing AMI meter with tested salvaged digital meter (Assuming opt-out occurs after installation of advanced meter)	\$15.02/ea		\$ 15.02
8	Total Up-Front Fee for Opt-Out Post Advanced Meter Install			\$ 146.96
	Monthly Fee components			
9	Trip charge: employee labor and vehicle costs for meter reads	\$10.91/ea		\$ 10.91
10	ENO Share of Salary for two ESI customer service specialists (Estimate = \$131K annual labor / ~7,300 system opt outs * ENO Opt-Outs)	\$ 9,204	510	\$ 1.50
11	Total Monthly Fee for Opt-Out Customers			\$ 12.42

[DATE]
[CUSTOMER ACCOUNT NUMBER]
[CUSTOMER NAME]
[MAILING ADDRESS]
[MAILING CITY STATE ZIP]

Dear Entergy New Orleans Customer,

Thank you for contacting us about the meter that you currently have at your location. Your request to keep a non-communicating meter rather than receiving a new advanced meter has been received. Your choice to opt out of receiving an advanced meter and to receive service using a non-communicating meter will require that you pay additional fees. These fees are required to cover the additional costs that the Company will incur for equipment, monthly meter readings, ongoing maintenance, and visits to your premises to manually perform meter services. If you have gas and electric services with us at this location, you will be automatically opted out for both your gas and electric meters.

In order to retain a non-communicating meter, please sign and complete this form and return it to Entergy New Orleans by **MM/DD/YYYY** along with your payment for the non-refundable one-time service and administration fee listed below. Once your signed and completed form has been received, we will bill you the monthly manual meter reading fee shown below. It will be automatically added to your monthly bills.

Non-refundable opt-out fees approved by the City Council of New Orleans:

- | | |
|---|-----------|
| • One-Time Service and Administration Fee* | \$ 131.94 |
| • Monthly Manual Meter Reading Fee** | \$ 12.42 |

*Any applicable state and local taxes/fees will be added to your next bill after submitting this signed and completed form with your payment.

**The recurring monthly fee is in addition to all other applicable charges that appear on your bill.

Because you are choosing to have non-standard metering service and to forego the benefits of having an advanced meter:

- You are responsible for providing and maintaining access to Entergy New Orleans for meter installation, maintenance, readings, etc. Failure to do so may result in termination of your opt-out participation, along with the installation of an advanced meter.
- You are only eligible for Entergy New Orleans' residential rate schedule tariff and will not be able to receive any other enhanced benefits that the advanced metering system may provide.
- You may opt-in to receive an advanced meter at any time by calling 1-800-Entergy (1-800-368-3749).

In order to complete your request to retain a non-standard meter, please:

- Return this completed and signed document to Entergy New Orleans by **MM/DD/YYYY**.
- Pay the applicable non-refundable one-time service and administration fee, listed above.

Both the completed document and payment (by Check, Cashier's Check, or Money Order ONLY made payable to Entergy New Orleans, LLC. ATTN: _____) should be sent to _____.

Failure to complete these steps by the above date will result in the replacement of your existing non-standard meter with an advanced meter. If you have any questions, please call the Entergy Customer Service Center at 1-800-Entergy (1-800-368-3749).

Acknowledgement: I represent and warrant that I am the named, authorized person on the customer account number above. I understand that if my existing meter does not meet applicable standards, it will be replaced with a non-communicating meter. Further, I understand and accept the above fees, requirements, and limitations associated with non-standard metering service and hereby request that you initiate non-standard metering service at the address above.

Account Holder Signature

Date

Print Name

Phone number

[DATE]
[CUSTOMER ACCOUNT NUMBER]
[CUSTOMER NAME]
[MAILING ADDRESS]
[MAILING CITY STATE ZIP]

Dear Entergy New Orleans Customer,

Thank you for contacting us about the meter that you currently have at your location. Your request to have a non-communicating meter rather than an advanced meter has been received. This letter is being sent to inform you that your option to have your advanced meter removed and to receive service using a non-communicating meter requires you to pay additional fees. These fees are required to cover the additional costs that the Company will incur for equipment, monthly meter readings, ongoing maintenance, and visits to your premises to manually perform meter related services. If you have gas and electric services with us at this location, you will be automatically opted out for both your gas and electric meter.

In order to receive a non-communicating meter, please sign and complete this form and return it to Entergy New Orleans along with your payment for the non-refundable one-time service and administration fee listed below. Once your signed and completed form and payment have been received, we will bill you the monthly manual meter reading fee shown below. It will automatically be added to your monthly bill(s).

Non-refundable opt-out fees approved by the New Orleans City Council:

- | | |
|---|-----------|
| • One-Time Service and Administration Fee* | \$ 146.96 |
| • Monthly Manual Meter Reading Fee** | \$ 12.42 |

*Any applicable state and local taxes/fees will be added to your next bill after submitting this signed and completed form with your payment.

**The recurring monthly fee is in addition to all other applicable charges that appear on your bill.

Because you are choosing to have non-standard metering service and to forego the benefits of having an advanced meter:

- You are responsible for providing and maintaining access to Entergy New Orleans for meter installation, maintenance, readings, etc. Failure to do so may result in termination of your opt-out participation and may require the installation of an advanced meter.
- You are only eligible for Entergy New Orleans' residential rate schedule tariff and will not be able to receive any other enhanced benefits that the advanced metering system may provide.
- You may opt-in to receive an advanced meter at any time by calling 1-800-Entergy (1-800-368-3749), or by visiting one of our walk-in centers.

In order to complete your request to receive a non-standard meter, please:

- Return this completed and signed document to Entergy New Orleans.
- Pay the applicable non-refundable one-time service and administration fee, listed above.

Both the completed document and payment (by Check, Cashier's Check, or Money Order ONLY made payable to Entergy New Orleans, LLC. ATTN: _____) should be sent to _____.

If you have any questions, please call the Entergy Customer Service Center at 1-800-Entergy (1-800-368-3749).

Acknowledgement: I represent and warrant that I am the named, authorized person on the customer account number above. I understand that my existing advanced meter will be replaced with a non-communicating meter. Further, I understand and accept the above fees, requirements, and limitations associated with non-standard metering service and hereby request that you initiate non-standard metering service at the address above.

Account Holder Signature

Date

Print Name of Account Holder

Phone number

**HIGHLY SENSITIVE PROTECTED MATERIALS
HAVE BEEN REDACTED PURSUANT TO
COUNCIL RESOLUTION R-07-432**

**ATTACHMENT 5 : Opt Out Fee Workpaper (HSPM) HAS BEEN REDACTED
PURSUANT TO COUNCIL RESOLUTION R-07-432**