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October 31, 2018

Via Hand Delivery

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Clerk of Council
Room 1E09, City Hall
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New Orleans, LA 70112

**Re: Rulemaking Proceeding to Establish Rules for Community Solar Projects
CNO Docket No. UD-18-03**

Dear Ms. Johnson:

Enclosed for your further handling please find an original and three copies of Entergy New Orleans, LLC's ("ENO") Reply Comments Regarding Proposed Community Solar Rules, in connection with the above-referenced matter. Please file an original and two copies into the record and return a date-stamped copy to our courier.

Should you have any questions, please do not hesitate to contact me. Thank you in advance for your usual courtesy and assistance with this matter.

Sincerely,

Harry M. Barton

HMB/bkd
Enclosures
cc: Official Service List (via e-mail)

RECEIVED
OCT 31 2018

BY: _____

OCT 31 2018

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

**IN RE: A RULEMAKING)
PROCEEDING TO ESTABLISH)
RULES FOR COMMUNITY SOLAR) DOCKET NO. UD-18-03
PROJECTS)**

**ENTERGY NEW ORLEANS, LLC’S REPLY COMMENTS
REGARDING PROPOSED COMMUNITY SOLAR RULES**

Pursuant to Resolution R-18-223 dated June 21, 2018, Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits these Reply Comments in response to filings made by the Alliance for Affordable Energy (“AAE”), 350 New Orleans, Inc. (“350”), and Air Products and Chemicals, Inc. (“APC”) (collectively, “Intervenors”). The Intervenors, along with ENO, filed their initial comments in response to the White Paper of the Council’s Utility Advisors Regarding Community Solar and Other Shared Distributed Energy Resources (“White Paper”), including the Proposed Community Solar Rules (“Proposed Rules”) for the Council of the City of New Orleans (“Council” or “CNO”). ENO’s Reply Comments focus on areas where ENO agrees with the sentiments expressed by Intervenors, identify areas of concern where ENO and certain Intervenors appear to have major differences in their views on the best policies to adopt for community solar in New Orleans, and point out and briefly discuss minor differences of opinion between the views expressed in Intervenors’ comments and ENO’s views. Overall, ENO remains optimistic about the chances of creating a viable framework that provides multiple options to customers interested in community solar and ensures adequate protections are in place for those customers, as well as customers who do not wish to participate in any community solar options. ENO also remains optimistic that the Council’s proposed program and the Community Solar Offering proposed in

the 2018 Rate Case will be able to co-exist and provide a good variety of options for ENO's customers who wish to support renewable energy.

I. Areas of Agreement

ENO agrees with Intervenors' comments related to several issues that will be important for the success of community solar in New Orleans, including adequate consumer protections, opportunities for low-income participation, proper cost allocation, and the importance of considering safety and the integrity of the distribution system. ENO will address each point of agreement in turn.

The AAE notes the importance of consumer protections for "ensuring [that] all Subscriber Organizations are held to honest business practices" to the overall success of the Council's community solar framework.¹ ENO agrees fully and devoted much of its initial Comments to expounding upon the importance of solidifying consumer protections as part of this proceeding. The AAE also seems to share ENO's view that any rules adopted in this proceeding should resolve the presently outstanding questions of which department(s) within the City will be responsible for enforcing these protections and how resources will be allocated to ensure that adequate enforcement is possible. The AAE suggests that the Council's Utility Regulatory Office ("CURO") may be the proper entity to handle certain aspects oversight of third parties and notes that "this will require additional administrative systems and support for CURO to manage this new responsibility, which should be accounted for in the final rules."² Regardless of whether CURO, another City department, or a combination thereof are ultimately tasked with ensuring that third-party Subscriber Organizations are held accountable for adhering to honest business practices, ENO fully agrees that the additional systems and resources required for enforcement of the

¹ See, AAE Comments at pg. 2.

² See, AAE Comments at pg. 3.

Council's rules need to be determined in this proceeding. As ENO noted in its initial Comments, without adequate resources and procedures for enforcement of the Council's rules being put into place **before** Subscriber Organizations begin recruiting customers and operating in Orleans Parish, there is a risk that unscrupulous organizations may seek to take advantage of New Orleans residents. ENO suggested a few procedural options for how to ensure these issues are resolved in this Docket and looks forward to reviewing other Intervenors' thoughts on the suggestions in ENO's Comments.

Both the AAE and 350 express concerns that the Proposed Rules did not adequately provide for opportunities for low-income customers. 350 also points out that the Proposed Rules provided too little detail on how incentives to enable participation by these customers would be funded. ENO also addressed these issues in its Comments and agrees with 350 and the AAE about the importance of these items and the need to resolve them. AAE and 350 both note that the Proposed Rules only seem to reserve three percent of the total capacity of CSG Facilities for Low-Income Subscribers.³ ENO both agrees that three percent is too low and agrees with the AAE's suggestion that twenty percent of the total capacity of each CSG Facility should be reserved for Low-Income Subscribers. ENO made a similar suggestion in its Comments, suggesting that thirty percent be reserved. Regardless of the percentage (perhaps a range between twenty and thirty percent is appropriate to consider) ENO agrees that setting minimum requirements for each CSG Facility would be a better process for ensuring that Low-Income Subscribers can participate than setting an overall capacity target.

³ As is evident from ENO's Comments, ENO did not have the same interpretation of the Proposed Rules – believing that 30% of total allowed capacity was reserved for Low-Income Subscribers. Upon further review, ENO understands how the AAE and 350's interpretation could be a valid interpretation of the Proposed Rules.

ENO also agrees with 350's suggestion that the Proposed Rules need more detail on the funding sources for incentives to help with low-income participation and that the appropriate kinds of funding sources are non-profit organizations and other community benefit groups. As ENO noted in its initial Comments, the current language of the Proposed Rules is susceptible to an interpretation that could result in other utility customers being charged with funding these incentives. However, ENO has grave concerns with leaving such an interpretation open as many of those other customers themselves live at or below the poverty line and should not be burdened with subsidizing other customers' participation in community solar offerings. ENO provided some suggested edits to the Proposed Rules to help address this issue and looks forward to reviewing input from the Intervenors who share ENO's concerns in this regard.

APC's comments place a great deal of emphasis on ensuring a proper allocation of costs of the Council's community solar program. ENO agrees that this issue is important and shares APC's concerns that the Proposed Rules, as drafted, create a risk that many costs that should rightfully be borne by Subscriber Organizations could be passed on to all ENO customers. ENO suggested several edits to the Proposed Rules to clearly indicate that the incremental costs of accommodating CSG Facilities proposed by Subscriber Organizations should be allocated to those Subscriber Organizations. ENO does not agree, as APC suggests, that all costs caused by those Subscriber Organizations should necessarily be assessed to all community solar subscribers, but rather that the Subscriber Organizations should pay for the costs they cause and then those Subscriber Organizations can make the business decision as to whether to pass on those costs, or portions thereof, to their subscribers.

Finally, the AAE notes the importance of assessing the impact of CSG Facilities on the distribution system and ensuring that these impacts do not jeopardize safety or reliability. The

AAE notes its agreement with the Advisors' recommendations from the White Paper as related to Safety and Reliability. ENO also agrees that these are important concerns; but notes that the recommendations from the White Paper in this regard do not seem to be adequately articulated in the Proposed Rules. ENO recommends that, if the Council adopts a version of the Proposed Rules, additional language be added to incorporate the White Paper's recommendations related to safety and reliability. ENO's Comments noted the importance of preserving reliability on the distribution system and stated that this concern is particularly important during ENO's transition into developing the capabilities required to optimize the location of distributed energy resources ("DERs"). To that end, ENO's Comments suggested expanding the 1,000 kW limit contained in Section IV.B.(5) of the Proposed Rules⁴ to also function as a limit on the amount of capacity that can be located on a single feeder, as an initial rule.⁵ This initial limitation will help to address the AAE and ENO's shared concerns for preserving the integrity of the distribution system. Another important safeguard is ensuring that Subscriber Organizations are required to adhere to the policies and practices enumerated in ENO's interconnection policy. Those policies are intended to protect the integrity, reliability, and safety of the distribution system from adverse impacts that DERs can cause. As noted in the September 28, 2018, Progress Report filed in Docket No. UD-17-05, ENO is continuing to learn how DERs affect the distribution system and is updating its interconnection policies and practices because of the lessons learned. Requiring Subscriber Organizations to adhere to the most current versions of the interconnection policy will provide an important safeguard to address this issue.

⁴ ENO supports the original 1,000 kW limitation set out in the Proposed Rules, and notes that the AAE's redline of the Proposed Rules doubles this limit, without offering an explanation for, or calling attention to, the AAE's proposed change.

⁵ As noted in ENO's Comments, the Council can change this rule for good cause shown when ENO's ability to predict the impact of DERs on the distribution system becomes more refined.

II. Appropriate Calculation of Bill Credits

ENO is encouraged by the many areas where consensus seems likely in this proceeding. However, ENO is concerned that the AAE and 350 advocate for completely disregarding the Advisors' research and suggestions on best practices with regard to calculating appropriate amounts for bill credits to be paid to Subscribers. While, as stated in its initial Comments, ENO has concerns with the fact that the Proposed Rules left certain aspects of the bill credit calculations open to multiple divergent interpretations, it believes that those concerns can be addressed by further refining the framework suggested by the Advisors. In contrast, the AAE and 350 argue for disregarding that framework and simply extending the credit rates established for a different concept, net energy metering ("NEM"), to community solar through a "virtual NEM" crediting framework. ENO disagrees fundamentally with this proposal. This portion of ENO's Reply Comments sets forth suggested refinements to the Advisors' initial proposal and points out the more obvious problems with the well-intended, but inherently-flawed, approach suggested by the AAE and 350.

a. Refining the Advisors' Framework for Bill Credits

As noted in its initial Comments, ENO supports the general concept of the Proposed Rules' bill credit framework that is based on both a monetary credit rate and a cost-based calculation. However, ENO noted that the Proposed Rules do not provide enough detail regarding how the calculations should be performed and what inputs should be used. This lack of detail leaves the Proposed Rules open to such broad interpretation, particularly for the calculation of avoided capacity value, that confusion and disputes are almost certain to arise. In an effort to work productively within the general framework proposed by the Advisors in the White Paper, ENO has created a number of example calculations that it believes would conform to, and clarify, the

Proposed Rules. ENO provides these calculations to allow the Council to consider a range of possible inputs and methodologies as it crafts the final rules related to its community solar program.

The energy value is consistent across all scenarios shown below. In accordance with the methodology in Section VIII of the Proposed Rules, the energy value is based on the 2017 MISO Day-Ahead locational marginal prices (“LMPs”) for ENO's load zone, shaped for system output as projected from the Department of Energy’s PV Watts Calculator for a 1 kW_{DC} PV solar system based in New Orleans.⁶

The methodology and formula used to calculate capacity value was also consistent across all scenarios shown below (the scenarios differ solely with respect to a single input to that formula).

More specifically, the formula used is:

Avoided Capacity = (CV x 50%) / O; where:

- CV: represents an estimation of the underlying value of capacity for resources that differs by scenario, as explained further below.
- 50%: represents the adjustment used by MISO for solar resources in determining the initial Resource Adequacy value for the purposes of the Planning Resource Auction (“PRA”);⁷ and
- O: represents the output projected from PV Watts for a 1 kW_{DC} PV solar system based in New Orleans, LA (and is consistent with the output used to determine energy value noted above).

As noted above, to help the Council determine a more specific methodology to employ for setting the capacity value component of Subscription Credits, ENO has provided examples of three

⁶ To be more specific, the 2017 Day-ahead LMPs described above were converted to \$/kWh units and multiplied by the expected kWh output from PV Watts for each hourly interval in the year. Those calculations resulted in a dollar value for each hourly interval that were summed across all 8,760 intervals to represent the energy value for an entire year. The final step is to divide the energy value for an entire year by the expected kWh output for a full year (also from PV Watts), which results in an average \$/kWh energy value based on 2017 MISO LMPs and projections of annual solar output for a system located within New Orleans.

⁷ Section 4.2.3.5.1 of MISO Business Practice Manual for Resource Adequacy.

See: <https://cdn.misoenergy.org/BPM%20011%20-%20Resource%20Adequacy110405.zip>

different scenarios, each with the following basis for the estimated underlying value of 1 kW of capacity:

- 1) 2019 estimated value of a new Combustion Turbine (CT) for ENO as seen in slide 28 of ENO 2018 IRP Technical Meeting #2 Updated (Docket No. UD-17-03).
- 2) Averaged MISO PRA results applicable for calendar year 2017.⁸
- 3) Averaged MISO PRA results applicable for calendar year 2018.⁹

Scenario:	1	2	3
Energy Value	\$ 0.0372	\$ 0.0372	\$ 0.0372
Capacity Value	\$ 0.0262	\$ 0.0003	\$ 0.0008
Total Bill Credit	\$ 0.0634	\$ 0.0375	\$ 0.0380

b. Virtual NEM is not an Appropriate or Established Method for Calculating Community Solar Bill Credits.

Both the AAE and 350 argue that the framework the Advisors suggest their research identifies as a best practice for community solar bill crediting should be discarded and the unrelated concept of virtual NEM should instead be substituted. Yet, other than expressing a desire to see the highest possible credits applied to Subscribers’ bills regardless of the impact on non-participants, these Intervenors do not set forth any valid reason to justify their refusal to work within the bill credit framework proposed by the Advisors. As ENO’s initial Comments stated, and as demonstrated above, refining and clarifying the bill credit framework proposed by the Advisors can result in appropriate credit amounts.

⁸ MISO’s Planning Year runs from June 1 to May 31, and ENO’s service area falls within MISO Zone 9. The 2016/2017 MISO PRA Result was \$2.99/MW-day for Zone 9, and the corresponding 2017/2018 MISO PRA Result was \$1.50/MW-day. These PRA results were averaged for calendar year 2017 and converted to \$/kW-year values as follows: [(\$2.99 * 151 days) + (\$1.50 * 214 days)]/1,000 kW per MW.

⁹ The 2017/2018 MISO PRA Result was \$1.50 /MW-day for Zone 9, and the corresponding 2018/2019 MISO PRA Result was \$10.00/MW-day. These PRA results were averaged for calendar year 2018 and converted to \$/kW-year values as follows: [(\$1.50 * 151 days) + (\$10.00 * 214 days)]/1,000 kW per MW.

In an attempt to justify their refusal to work within the Advisors' proposed framework, the AAE states that "Energy" has not requested that the Council change its existing NEM policy. This statement is not entirely accurate. In Council Docket No. UD-13-02, ENO requested that the Council consider changes to NEM policy, and ENO engaged in a procedural process over the course of a more than a year to determine what changes would be appropriate; the AAE was an active participant in that proceeding. ENO's work in that Docket demonstrated that the existing NEM policy of providing net-metered customers a 1:1 retail credit on their bills for the energy they export to the grid, regardless of whether that energy is needed at the time, is inherently inequitable because it causes a shift in costs from NEM customers to all others. This cost shift occurs because the current rate design for residential and small commercial customers does not adequately reflect, or ultimately recover, the costs necessary to provide electric service to customers who install net metered self-generation equipment. By shining a light on the inequity inherent in the current NEM policy and associated rules, ENO hoped to correct what it believes to be unfair cost-shifting between participants and non-participants that contravenes well-established and longstanding principles of cost causation and allocation. The Advisors' comments in Docket No. UD-13-02 echoed ENO's concerns in this regard.¹⁰ Despite these concerns (which remain

¹⁰ See Advisors' Comments, filed November 7, 2016 in Docket No. UD-13-02, at pg. 5 ("The problem with allowing rooftop solar customers to pay a decreasing share of the fixed costs of the system (even though those costs do not decrease with reduced usage) is that it creates a significant risk that the utility will not have a reasonable opportunity to meet its Revenue Requirement -- a potential violation of the *Hope Bluefield* doctrine and a significant disincentive to the utility to promote the programs. A secondary problem occurs in that in order to continue to have a reasonable opportunity to earn its Revenue Requirement when rooftop solar customers are paying a decreasing proportion of the fixed costs, the utility must shift those fixed costs increasingly onto the non-participating customers in order to continue to earn a reasonable rate of return on its investment by meeting its Revenue Requirement. In other words, the utility must increase rates to non-participating customers, even though those customers have not changed their consumption patterns. This creates a situation where the non-participating customers are effectively subsidizing service to the participating customers in violation of the principle of cost causation. In addition, if the utility is paying the NEM customers more for electricity than it would otherwise pay to generate or purchase the electricity, the NEM rules would be increasing the cost of electricity to all customers. Thus, it is very important to get the cost-causation balance right to make sure that the benefits of rooftop solar are not offset by an inequitable allocation of costs among customers.").

applicable today), ENO was responsive to feedback from the parties in UD-13-02 that any changes to the inherently inequitable NEM credit rate should be supported by additional data, including a current Cost-of-Service Study and data from AMI meters.¹¹ As such, ENO sought to suspend that proceeding and hold its request for the Council to re-evaluate its NEM policy in abeyance, subject to a reservation of rights to propose any policy changes once additional data became available.

ENO's request to suspend the evaluation of necessary policy changes related to NEM resulted from ENO's responsiveness to stakeholder feedback, not a belief that current NEM policies are appropriate. ENO still firmly believes, and the evidence submitted in UD-13-02 demonstrates, that current NEM policies are inequitable and cause a cost shift that disproportionately burdens non-NEM customers, many of whom live at or below the poverty line. Now the AAE seeks to use ENO's responsiveness to stakeholder feedback in UD-13-02 in an attempt to circumvent the framework proposed by the Advisors in this Docket and extend those inequitable policies to community solar, which would further exacerbate the cross-subsidization that already occurs. ENO does not support extending NEM policy to community solar, and neither does the research underpinning the Advisors' White Paper.

III. Issues Meriting Minor Clarifications

Several of the issues raised in the Intervenor's comments seem to reflect minor points of disagreement or issues where consensus may be possible upon further clarification or refinement of the parties' positions. ENO briefly discusses some of these issues below:

- 350 objects to the initial Community Solar Program Capacity Limits proposed by the Advisors, and the AAE does not see the need for the initial limit but expresses a willingness to accept the limit if the Council sees merit in it. ENO agrees with the recommendation of the Advisors in this regard; the initial limit is not necessarily permanent and can be changed by the Council. This flexibility should resolve the Intervenor's concerns in this regard.

¹¹ ENO recently filed a new Cost of Service Study in Docket No. UD-18-07, which is currently being evaluated by all parties to that Docket and vetted through the discovery process.

- APC expresses concern about ENO’s customers that have not opted to participate in community solar being required to pay for energy from an undersubscribed CSG Facility, and that there is no limit on the amount of such energy that ENO and its customers would be required to purchase. ENO shares these concerns and proposed removal of the requirement that ENO purchase unsubscribed energy from Subscriber Organizations because that arrangement amounts to an uneconomic PPA that is not correlated to any energy or capacity need demonstrated in the IRP.¹² Should the Council not accept ENO’s proposal for removing this requirement, then ENO recommends following APC’s suggestion of establishing a limit on how much unsubscribed energy ENO is required to purchase (*i.e.*, 10% of the capacity from any one Subscriber Organization’s CSG Facilities, up to 5% of the total capacity allowed for the Council’s program) and that, to the extent possible, the costs of such energy be recovered exclusively from customers that chose to participate in community solar, through the tariff ultimately adopted by the Council for its program, so that customers who do not wish to participate are not forced to cover any of the costs of the program.
- The AAE advocates that no minimum participation requirements or commitment lengths be established by the Proposed Rules. ENO notes that minimum participation requirements help to limit administrative costs and cautions against waiving this requirement for any customers other than Low-Income Subscribers. Otherwise, the administrative costs of the program may eliminate any benefits potentially derived by customers.
- The AAE urges that the Council’s program not only apply to solar facilities, but that it should be expanded to “a broad range of renewables and storage projects.” ENO notes that the Council may amend the rules it ultimately adopts at any time. Once the Council’s program has demonstrated success with regard to CSG Facilities, then the Council may choose to consider expanding the scope as the AAE suggests. However, ENO cautions against making the initial scope of the program too broad, particularly during the three-year test-and-evaluate phase that the Proposed Rules seek to establish for initially testing the scope and mechanics of the Council’s program.
- APC and the AAE both discuss the need for transparency and making certain information about CSG Facilities publicly available. However, they differ on who should maintain the publicly accessible information. APC suggests this responsibility should fall to ENO, while the AAE suggests that the Subscriber Organization registry should be maintained by CURO. ENO believes the AAE’s suggestion is more appropriate. Just as CURO maintains registries and other information for various Council Dockets, so too should CURO maintain and make available information related to the Council’s community solar program, including the “tracking metrics” mentioned in the AAE’s comments.
- The AAE proposes that the definition of Low-Income Customers should be those living at or below 50% of Area Median Income. ENO believes that the framework of the definition

¹² ENO notes that the AAE’s recently-filed comments in Council Docket No. UD-18-05 state that decisions about adding generating resources or PPAs to ENO’s supply-side mix should “be informed directly by the IRP.” The AAE’s comments also stress the importance of ensuring that such resources “are contracted at a fair market price” and ensuring that “the customers of New Orleans are receiving reliable and cost-effective service from the resources that best fit the city’s needs.” Presumably, the AAE’s positions on these issues would remain consistent and apply equally to CSG Facilities. If so, the AAE’s comments in UD-18-05 would also tend to support removal of this language from the Proposed Rules.

of Low-Income Customer provided in the Proposed Rules is adequate and does not need to be changed, beyond the clarifying edits suggested in ENO's initial Comments. However, ENO believes that the definition the Council ultimately adopts should be a widely accepted standard with very specific language as opposed to a generic or vague definition that could be open to multiple interpretations.

IV. Conclusion

ENO appreciates the opportunity to submit these Reply Comments. ENO is also encouraged that it shares common priorities with Intervenors as related to community solar: identifying the appropriate bill credit amounts and cost allocation methods, ensuring that adequate consumer protections and enforcement mechanisms are adopted and funded as a result of this proceeding, facilitating participation from low-income customers, and ensuring the continued safe and reliable operation of the distribution system. ENO believes that through continued collaboration, these issues can be resolved and, when they are resolved, the Council's Community Solar Rules can foster options for customers interested in participating in offerings developed by Subscriber Organizations.

By: _____



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**ATTORNEYS FOR
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CERTIFICATE OF SERVICE

Docket No. UD-18-03

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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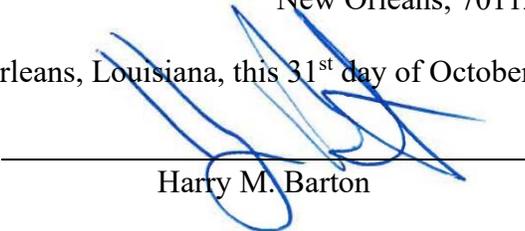
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New Orleans, Louisiana, this 31st day of October, 2018.



Harry M. Barton