



November 29, 2018

By Hand Delivery and U.S. Mail

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

**RE: RESOLUTION DIRECTING ENTERGY NEW ORLEANS, INC. TO INVESTIGATE AND
REMEDiate ELECTRIC SERVICE DISRUPTIONS AND COMPLAINTS AND TO ESTABLISH
MINIMUM ELECTRIC RELIABILITY PERFORMANCE STANDARDS AND FINANCIAL
PENALTY MECHANISMS Docket No. UD-17-04**

Dear Ms. Johnson:

Please find enclosed an original and three (3) copies of the Alliance for Affordable Energy's Comments Re. Quanta's Reliability Study in the above mentioned docket. Please file the attached communication and this letter in the record of the proceeding and return one timestamped copy to our courier, in accordance with normal procedures. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

Logan Burke
Executive Director
Alliance for Affordable Energy

fruit and beginning to arrest and reverse the trend of extreme outages resulting from neglect and underinvestment.

The Alliance is pleased to see this robust discussion of ENO's reliability in the context of national peers and best practices. The coordinated systems approach Quanta's report recommends is in line with the Alliance's understanding of thoughtful planning that acknowledges the realities of aging infrastructure and antiquated system design and seeks to efficiently modernize the grid, using technologies that bring values to customers who have come to expect a different kind of utility service. Perhaps most illuminating is Quanta's point that an antiquated interpretation of distribution design is now "obsolete and incomplete,"¹ and that a modern even advanced view of distribution planning has more objectives than ever before and is able to accomplish these goals by leveraging new technologies to deliver greater benefits and services to customers, including reliability.

In order to reduce redundancies and spending the Alliance is supportive of the kind of coordinated distribution planning described in Quanta's recommendations. As ENO continues its deployment of Advanced Metering Infrastructure and Advanced Distribution Management System we believe customers will enjoy the benefits of a more easily monitored system, including asset management.

As the Alliance has noted elsewhere, to conduct planning of one piece of the system without integrating the others will necessarily cause inefficiencies. This is why the Quanta report's discussion of reliability and grid modernization together is so important. In the future,

¹ Quanta Report, pg. 14.

further coordination of additional pieces of ENO's energy system should be coordinated with distribution system planning, especially as more resources are shifted *to* the distribution grid.

What most concerns the Alliance about the state of Entergy's existing legacy distribution system is that the slide into excessive outages may cause a reactive solution in the short term that simply patches the old system to solve problems with "quick fixes" and on a separate track develops grid modernization planning, and further, conduct other resource planning on a third track. Meanwhile, technologies like Volt-Var Optimization and Voltage Reduction or distributed resources may provide some over-lap and benefits on multiple parts of the system. To that end, the Alliance encourages Entergy's resource planning to connect these dots. Otherwise, ratepayers may wind up paying for unnecessary redundancies that do not actually provide additional reliability or resilience.

Metrics and continued Improvement

- The Alliance supports Quanta's recommendation to add MAIFI to the indices in order to account for some of the concerns expressed by Sewerage and Water Board about dips and spikes in service. Momentary outages can be just as impactful to the city of New Orleans as hour-long interruptions, and momentary outages can have a chain reaction across multiple utilities and all customers in the city.
- As a respected program, IBM Maximo appears to be an appropriate solution to the lack of asset management system. The implementation of this software and

coordination of it alongside ENO's AMI deployment should position New Orleans to plan and modernize their system in a proactive and thoughtful way.

- While the Quanta report discusses a very high cost to underground every distribution line in the city, the Alliance suggests the Council and Entergy consider burying key lines that are considered critical, in neighborhoods that are most vulnerable to outages. While the City undergoes continued road and drainage work, collaborative planning with other agencies would improve the cost to benefit ratio. We recognize the cost to underground every line is prohibitive, and we do not recommend it, and especially do not believe it is a silver bullet solution.

Substation-related Interruptions

One interesting piece of Quanta's report is the increase in substation outages in 2018, where the record is not clear which of the substation outages are categorized separately from the distribution system. For example, page ii of Quanta's assessment separates ENO's Distribution View from Transmission View customer interruptions and is unclear if all substation outages in 2018 are considered part of the Transmission View. Additionally, the first time a substation related outage is reported in an ENO bi-monthly report, was on February 21, and within the "cause" characterization, is described as "Distribution Substation (describe in remarks)." The Federal Energy Regulatory Commission's Order 773² identifies a "bright-line threshold" of 100 kV as the division between distribution and the "bulk power system". However, there is no data

² Federal Energy Regulatory Commission, Order 773, Issued December 20, 2012, pg 1.

defining the voltage level of the outage cause in ENO's bi-monthly filings or in the Quanta assessment. The Alliance is interested in better understanding Quanta's classification of substations as transmission.

In addition, the Alliance is aware of an outage that was publicly reported as substation-related on June 29, 2017.³ However, this outage is in no way included in ENO report of the same time⁴, even as a distribution related outage. This is concerning as this outage was reportedly fairly large and impacted many customers, and calls into question if all outages are being reported, or potentially categorized in a way that cuts them from reports.

Conclusion

The Alliance acknowledges that the necessary reliability programs will take time for significant improvements to ENO's system, but the Quanta report lays out an encouraging vision for ENO's next steps to develop concerted planning. We appreciate this opportunity to offer our comments and look forward to hearing from other parties their experiences of improved reliability, and preferred standards.

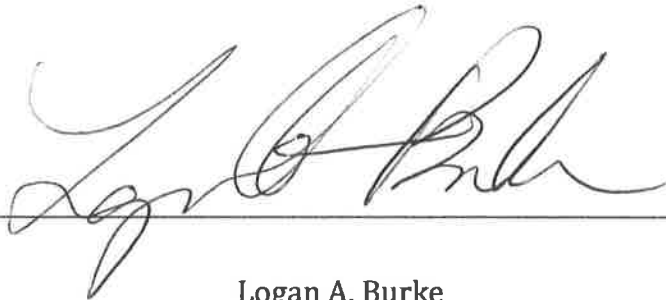
³ June 29, 2017, Times Picayune, "Power Outages ongoing in many parts of New Orleans after Entergy substation vandalized." Retrieval at https://www.nola.com/traffic/index.ssf/2017/06/power_outages_expected_for_cen.html

⁴ December 12, 2017, Entergy New Orleans, LLC's Bi-Monthly Report on Customer Outages, period ended September 30, 2017.

**In Re: RESOLUTION DIRECTING ENTERGY NEW ORLEANS, INC. TO
INVESTIGATE AND REMEDIATE ELECTRIC SERVICE DISRUPTIONS AND
COMPLAINTS AND TO ESTABLISH MINIMUM ELECTRIC RELIABILITY
PERFORMANCE STANDARDS AND FINANCIAL PENALTY MECHANISMS**

Certificate of Service Docket No. UD-17-04

I hereby certify that I have this 29th Day of November 2018, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.

A handwritten signature in black ink, appearing to read "Logan A. Burke", is written over a horizontal line. The signature is fluid and cursive.

Logan A. Burke
Alliance for Affordable Energy

November 16, 2018

Docket UD-17-04

ENERGY NEW ORLEANS, INC. TO INVESTIGATE AND REMEDIATE ELECTRIC SERVICE DISRUPTIONS AND COMPLAINTS AND TO ESTABLISH MINIMUM ELECTRIC RELIABILITY PERFORMANCE STANDARDS AND FINANCIAL PENALTY MECHANISMS

Lora W. Johnson, lwjohnson@nola.gov

Clerk of Council

City Hall - Room 1E09

1300 Perdido Street

New Orleans, LA 70112

(504) 658-1085 - office

(504) 658-1140 - fax

Service of Discovery not required

Erin Spears, espears@nola.gov

Chief of Staff, Council Utilities Regulatory Office

Connolly A. F. Reed, careed@nola.gov

Bobbie Mason, bfmason1@nola.gov

City Hall - Room 6E07

1300 Perdido Street

New Orleans, LA 70112

(504) 658-1110 - office

(504) 658-1117 - fax

Andrew Tuozzolo, CM Moreno Chief of Staff, avtuozzolo@nola.gov

1300 Perdido St. Rm. 2W40

New Orleans, LA. 70112

David Gavliniski, 504-658-1101, dsgavliniski@nola.gov

Council Chief of Staff

City Hall - Room 1E06

1300 Perdido Street

New Orleans, LA 70112

Sunni LeBeouf, Sunni.LeBeouf@nola.gov

Law Department

City Hall - 5th Floor

New Orleans, LA 70112

(504) 658-9800 - office

(504) 658-9869 - fax

Service of Discovery not required

Norman White, Norman.White@nola.gov
Department of Finance
City Hall - Room 3E06
1300 Perdido Street
New Orleans, LA 70112
(504) 658-1502- office
(504) 658-1705 – fax

ADMINISTRATIVE HEARING OFFICER

Hon. Jeffrey S. Gulin, judgegulin@gmail.com
3203 Bridle Ridge Lane
Lutherville, MD 21093
(410) 627-5357

NEW ORLEANS CITY COUNCIL CONSULTANTS

Clinton A. Vince, clinton.vince@dentons.com
Presley Reed, presley.reedjr@dentons.com
Emma F. Hand, emma.hand@dentons.com
Herminia Gomez, herminia.gomez@dentons.com
1900 K Street NW
Washington, DC 20006
(202) 408-6400 - office
(202) 408-6399 - fax

Basile J. Uddo (504) 583-8604 cell, buddo@earthlink.net
J. A. “Jay” Beatmann, Jr. (504) 256-6142 cell, (504) 524-5446 office direct,
jay.beatmann@dentons.com
c/o DENTONS US LLP
650 Poydras Street
Suite 2850
New Orleans, LA 70130

Yves Gelin, ygelin@wilkersonplc.com
Wilkerson and Associates, PLC
650 Poydras Street - Suite 1913
New Orleans, LA 70130
504) 522-4572 - office
(504) 522-0728 - fax

Joseph W. Rogers, jrogers@ergconsulting.com

Philip J. Movish, pmovish@ergconsulting.com

Lauren Oliva, loliva@ergconsulting.com

Legend Consulting Group

8055 East Tufts Ave., Suite 1250

Denver, CO 80237-2835

(303) 843-0351 - office

(303) 843-0529 – fax

Errol Smith, (504) 284-8733, ersmith@btcpas.com

Bruno and Tervalon

4298 Elysian Fields Avenue

New Orleans, LA 70122

(504) 284-8296 – fax

ENTERGY NEW ORLEANS, INC.

Gary E. Huntley, 504-670-3680, ghuntle@entergy.com

Entergy New Orleans, Inc.

Vice-President, Regulatory Affairs

1600 Perdido Street, L-MAG 505B

New Orleans, LA 70112

504-670-3615 fax

Polly S. Rosemond, 504-670-3567, prosemo@entergy.com

Entergy New Orleans, Inc.

Manager, Regulatory Affairs

1600 Perdido Street, L-MAG 505B

New Orleans, LA 70112

Derek Mills, 504-670-3527, dmills3@entergy.com

Project Manager

1600 Perdido Street, Bldg. #505

New Orleans, LA 70112

Seth Cureington, 504-670-3602, scurein@entergy.com

Entergy New Orleans, Inc.

Manager, Resource Planning

1600 Perdido Street, L-MAG 505B

New Orleans, LA 70112

Tim Cragin (504) 576-6523 office, tcragin@entergy.com
Brian L. Guillot (504) 576-2603 office, bguill1@entergy.com
Alyssa Maurice-Anderson (504) 576-6523 office, amauric@entergy.com
Harry Barton (504) 576-2984 office, hbarton@entergy.com
Karen Freese (504) 576-4170 office, kfreese@entergy.com
Entergy Services, Inc.
Mail Unit L-ENT-26E
639 Loyola Avenue
New Orleans, LA 70113
(504) 576-5579 - fax

Joe Romano, III (504) 576-4764, jroman1@entergy.com
Suzanne Fontan (504) 576-7497, sfontan@entergy.com
Therese Perrault (504-576-6950), tperrau@entergy.com
Entergy Services, Inc.
Mail Unit L-ENT-4C
639 Loyola Avenue
New Orleans, LA 70113
(504)576-6029 – fax

MID CITY NEIGHBORHOOD ORGANIZATION

Emily K. Leitzinger, (540) 421-3997, President@MCNO.org
4313 Palmyra St.
New Orleans, LA. 70119

ALLIANCE FOR AFFORDABLE ENERGY

Logan Atkinson Burke, logan@all4energy.org
Forest Bradley-Wright, forest@all4energy.org
Sophie Zaken, regulatory@all4energy.org
4505 S. Claiborne Ave.
New Orleans, LA 70115

CARROLLTON RIVERBEND NEIGHBORHOOD ASSOCIATION

Julianna D. Padgett, (504) 274-8158, juliannapadgett@gmail.com
935 Dante St.
New Orleans, LA.

PARKVIEW NEIGHBORHOOD ASSOCIATION

Ian Dreyer, President, ian@nanollc.net

432 N. Anthony Street Suite 303
New Orleans , LA 70119
504-486-3272

TULANE CANAL NEIGHBORHOOD ASSOCIATION

Jacob Rickoll, (504) 473-6943, Tulane.Canal@gmail.com
2301 Conti St.
New Orleans, LA. 70119

URBAN CONSERVANCY PETITION

Abigail Sebton, (504) 717-6187, abigail@staylocal.org
1307 OC Haley Blvd #307
New Orleans, LA 70113

MAPLE AREA RESIDENTS, INC

Keith Hardie, (504) 522-6222, keithhardie@yahoo.com
618 Audubon St.
New Orleans, LA 70118
Fax: (504) 522-6226

DEEP SOUTH CENTER FOR ENVIRONMENTAL JUSTICE

Monique Harden, (504) 517-2534, MoniqueCovHarden@gmail.com
3157 Gentilly Blvd., #145
New Orleans, LA. 70122

350 LOUISIANA-NEW ORLEANS

Renate Heurich, (504) 473-2710, 350louisiana@gmail.com
1407 Napoleon Ave., #B
New Orleans, LA 70115

SEWERAGE AND WATER BOARD

James E. Thompson III, jthompson@swbno.org
625 St. Joseph Street, Room 201
New Orleans, LA 70165
(504) 529-2837

Luke F. Piontek, (225) 929-7033, Lpiontek@roedelparsons.com
Judith Sulzer, jsulzer@roedelparsons.com
8440 Jefferson Highway, suite 301
Baton Rouge, LA. 70809

ALGIERS NEIGHBORHOOD PRESIDENTS COUNCIL

Eric J. Songy, (504) 394-4039, info@anpenola.org
P.O. Box 740446
New Orleans, LA 70174

LOWER 9 RESILIENT

Warrenetta C. Banks, (504) 324-8586, Warrenetta@L9Resilient.org
5130 Chartres Street
New Orleans, LA 70117

LOWER 9TH WARD CENTER FOR SUSTAINABLE ENGAGEMENT AND DEVELOPMENT

Arthur J. Johnson, (504) 421-9643, ajohnson@sustainthenine.org
5227 Chartres St.
New Orleans, LA 70117

INDIVIDUALS

David Dalia, (504) 524-5541, davidadalia@gmail.com
609 Dumaine St.
New Orleans, LA 70115

Dawn Hebert, (504)875-0352 or (504)245-9959, Dhebert28@cox.net
6846 Lake Willow Dr.
New Orleans, LA. 70126

Denise T. Turbinton, (504) 309-0400, turbinton@msn.com
931 Mazant St.
New Orleans, LA 70117