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 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 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,

[Signature]

Logan Burke
Executive Director
Alliance for Affordable Energy

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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 overlap 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 773\(^2\) identifies a “bright-line threshold” of 100 kV as the division between distribution and the “bulk power system”. However, there is no data

\(^2\text{Federal Energy Regulatory Commission, Order 773, Issued December 20, 2012, pg 1.}\)
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. However, this outage is in no way included in ENO report of the same time, 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.

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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.

[Signature]

Logan A. Burke
Alliance for Affordable Energy
November 16, 2018

Docket UD-17-04

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

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