

August 15, 2019

BY E-MAIL

Harry M. Barton
Senior Counsel, Legal Services-Regulatory
Entergy Services, LLC
639 Loyola Avenue
New Orleans La. 70113-3125

Re: 2018 Triennial Integrated Resource Plan of Entergy New Orleans, LLC, Docket UD-17-03

Dear Harry:

Please find attached the Advisors' Fourth Set of Requests for Information to Entergy New Orleans, LLC in the above referenced docket. Please provide your responses within the allowed time delay. We have included a version of these requests in Microsoft Word format for your convenience.

Sincerely,

Jay Beatmann

/jb

cc: Official Service List - Docket UD-17-03

**ADVISORS TO THE COUNCIL OF THE CITY
OF NEW ORLEANS
FOURTH SET OF REQUESTS FOR INFORMATION TO
ENTERGY NEW ORLEANS, LLC**

**IN THE MATTER OF 2018 INTEGRATED RESOURCE PLANNING COMPONENTS
AND REPORTING REQUIREMENTS FOR ENERGY NEW ORLEANS, LLC**

DOCKET NO. UD-17-03

Definitions

1. “And” means and/or.
2. “Affiliates” has the meaning as defined in City Council Resolution R-01-676.
3. “Any” shall be understood to include and encompass “all.”
4. “CNO” means City of New Orleans.
5. “Communications” means any verbal or written exchange of information between individuals, regardless of mode, and includes all verbal and written communications of every kind, including but not limited to, telephone calls, conferences, and correspondence, and all memoranda concerning the requested communications. Where a communication that is requested is not in writing, provide copies of all memoranda and Documents made relating to the requested communication and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and Documents provided.
6. “Companies” means Entergy Louisiana, LLC and Entergy New Orleans, LLC both as individuals and collectively.
7. “DSM” means Demand Side Management.
8. Documents.
 - a. “Documents” or “Documentation” includes all writings and records of every type in your possession, control or custody, produced by any means, conveying visible and/or audible and/or electronic information, including, but not limited to: testimony and exhibits, memoranda, contracts, agreements, correspondence, emails, letters, reports (including drafts, preliminary, intermediate and final reports), statutes, ordinances, resolutions, articles, textbooks, treatises, pleadings, briefs, data responses currently or previously under the custody, care and/or control of plaintiffs, plaintiffs’ counsel and/or anyone acting on behalf of plaintiffs or plaintiffs’ counsel, surveys, analyses, studies, summaries,

- comparisons, tabulations, charts, books, pamphlets, photographs, maps, bulletins, corporate or other minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, microfiche, computer data, computer files, computer tapes, computer inputs, computer outputs and printouts, vouchers, accounting statements, budgets, work papers, engineering diagrams (including “one-line” diagrams), mechanical and electrical recordings, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical or otherwise and drafts of any of the above.
- b. “Documents” or “Documentation” includes copies of Documents, where the originals are not in your possession, custody, or control.
 - c. “Documents” or “Documentation” includes every copy of Documents which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy.
 - d. “Documents” or “Documentation” also includes any attachments or appendices to any document.
9. “Each” shall be understood to include and encompass “every.”
10. “EAI” means Entergy Arkansas, Inc.
11. “ELL” means Entergy Louisiana, LLC
12. “EMI” means Entergy Mississippi, Inc.
13. “ENO” means Entergy New Orleans, LLC
14. “Entergy Operating Companies,” or “EOC” means ENO, ELL, EAI, EMI, and EGSL.
15. “Entergy” or “Entergy System” means Entergy Corporation (formerly Middle South Utilities), any affiliates or subsidiaries, any merged or consolidated predecessors in interest, past or present employees, officers, directors, agents, contractors, consultants, attorneys, and representatives, and any other person who has in the past or is now acting or purporting to act on its behalf.
16. “Enterprises” means Entergy Enterprises, Inc.
17. “EOI” means Entergy Operations Services, Inc.
18. “EPD” means Entergy Power Development Corp.
19. “EPI” means Entergy Power, Inc.
20. “ESI” means Entergy Services, Inc.
21. “Identify” or “Identifying” means:
- a. With respect to a natural person, the person’s full name, present employer, title,

- job description, and professional or home address.
- b. With respect to documents, the title (if any), nature, substance, date and source of origin on the document, all described with sufficient particularity to enable the document to be specified or recognized.
22. “Information” means any knowledge, fact, data, or intelligence whether contained in a Document or unrecorded.
23. “IRP” means Integrated Resource Planning.
24. “Intervenors” means all parties who filed an intervention request with the Clerk of the Council, with a copy submitted to the Director of the Council Utilities Regulatory office, and whose interventions were subsequently granted.
25. “MCF” means thousands of cubic feet of natural gas.
26. “MISO” means Midcontinent Independent System Operator, Inc. or predecessor entities, its operations, its assets, its member organizations, its territory of operations, the territory of operations of its member organizations, Entergy operations within or under MISO authority, its marketplaces related to energy, its planning mechanisms, or other assets or operations related to MISO.
27. “MW” means megawatts.
28. “MWh” means megawatt hours.
29. “Or” means and/or.
30. “Parties” means the Companies, CNO’s Advisors, and all parties to Docket No. UD-17-03.
31. “Person” includes any individual, corporation, business or governmental entity whatsoever, and every other type of entity or organization.
32. “Relating to” shall be understood to include pertaining to, referring to, having as its subject matter, constituting, supporting, analyzing, discussing, evaluating, or bearing upon, directly or indirectly the subject matter of the specific Request.
33. “Respondent” means ENO and any of its representatives including any other Entergy representative.
34. “SEC” means Securities and Exchange Commission.
35. “SERI” means System Energy Resources, Inc.
36. “SFI” means System Fuel, Inc.

37. “Testimony” means any verbal or written declaration made under oath in connection with any regulatory, administrative or adjudicative proceeding or other judicial process or formal dispute resolution process (*e.g.* arbitration) for any purpose, including but not limited to depositions, hearings or trial.
38. “Publications” include, but are not limited to, articles, books, reviews, papers, presentations, studies, reports, analyses, or other documents released for publication.
39. “You” and “Your” means Entergy, ELL, ENO, any affiliates or subsidiaries, any merged or consolidated predecessors in interest, past or present employees, officers, directors, agents, contractors, consultants, attorneys, and representatives and any other person who has in the past or is now acting or purporting to act on its behalf.
40. As used herein, the singular shall include the plural and the plural shall include the singular.

Instructions

1. Data Requests, interrogatories, and requests for production of documents or any other discovery requests (collectively “Requests” or individually “Request”) call for all information, including information contained in documents in native electronic format with all cells and formulas in tact when appropriate, which is known or available to the Respondents in this proceeding.
2. Where a Request has a number of separate parts or aspects, a complete response is required to each part or aspect. The response should separately address each part by its individual designation: “(CNO 3-1)(A),” “(CNO 3-1)(B),” etc. Any objection to a part or aspect of a Request should clearly indicate the part or aspect to which it is directed.
3. If a Request specifically seeks an answer in response that is not contained in the Document, an answer is required.
4. The person who prepares and is responsible for providing the response should be identified on the response.
5. If a Request can be answered in whole or in part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other response or part or aspect thereof which is responsive to the instant Request and by specifying whether the response to the other request is a full or partial response to the instant Request. If the response to the other Request constitutes a partial response, the balance of the instant Request must be answered.
6. If a Request cannot be answered in full after exercise of due diligence to secure the information requested, state the answer to the extent possible, state why the Request cannot be answered in full, and state what information or knowledge you have concerning the unanswered portions.
7. If, in answering any of these Requests, you feel that any Request or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the Request.
8. If a document requested is unavailable, identify the document, describe in detail the reasons that the document is unavailable, state where the document can be obtained, and specify the number of pages it contains.
9. If no document is responsive to a Request which calls for a document, then so state. In some instances, the Request should be treated as an interrogatory.
10. All responses to the Requests are to be amended or supplemented if any person answering the requests obtains information upon the basis of which: (a) the party making the response knows that it was incorrect when made and (b) the party making the response knows that the response, though correct when made, is no longer true or is misleading.

11. All Requests are considered to be continuing in nature, and thereby require you to produce by supplemental responses any document within the scope of the Request that you obtain, acquire, or discover subsequent to your initial response to the Request.
12. If the data or Documents responsive to a Request exist, to any extent, in a native electronic form (e.g. Excel file), provide the original native electronic file as part of your response. To the extent Documents responsive to any part of a Request may be extracted, saved, prepared, or presented in a tabular electronic format (e.g. Excel or Access file), provide that part of the response in a tabular electronic file (e.g. Excel or Access file).

**ADVISORS TO THE COUNCIL OF THE CITY
OF NEW ORLEANS
FOURTH SET OF REQUESTS FOR INFORMATION TO
ENERGY NEW ORLEANS, LLC**

**IN THE MATTER OF 2018 INTEGRATED RESOURCE PLANNING COMPONENTS
AND REPORTING REQUIREMENTS FOR ENERGY NEW ORLEANS, LLC**

DOCKET NO. UD-17-03

- CNO 4-1 Please refer to the 2018 Triennial Integrated Resource Plan of Entergy New Orleans, Inc., Section 5.5 Total Relevant Supply Cost Results, Figure 23 and Figure 24, and Appendix C, and provide the Xcel-based workpapers, calculations and reference documents used to develop the present values of the total supply cost (2019\$ NPV) for each of the five Portfolios by Scenario.
- CNO 4-2 Please refer to the 2018 Triennial Integrated Resource Plan of Entergy New Orleans, Inc., Section 5.4 Capacity Optimization and Results. Relating to the portfolio optimizing process of the Aurora capacity expansion model which provided the set of lowest total supply cost resource Portfolios within the constraints of the Strategy and Scenario combinations (Table 16):
- a. Please provide the Xcel-based workpapers and calculations used to develop the lowest total supply cost from the Aurora capacity expansion model for each of the portfolios.
 - b. Please provide the criteria and metrics used to identify the subset of five resource portfolios that would be moved through the total supply cost evaluation.
- CNO 4-3 Please refer to the 2018 Triennial Integrated Resource Plan of Entergy New Orleans, Inc., Section 4.2.4 Demand-Side Management, and the statement on page 44: “Given Optimal’s general conclusions that significantly more kWh savings can be achieved at a lower cost per kWh than Navigant projects, it seems likely that Optimal may have more aggressive assumptions about measure costs, initial measure saturation levels, and adoption rates as well.” Refer also to the statement on page 44: “In the context of short-term DSM implementation planning, ENO must consider the different perspectives offered by the studies as it designs an Energy Smart Implementation Plan that it believes is reasonable, cost-effective, and achievable for the Council to review. To that end, ENO intends to develop the Energy Smart Implementation Plan by drawing on information from both studies.” Please describe in detail how the measure costs, initial measure saturation levels, and adoption rates for each program will be drawn from both studies to support the Energy Smart implementation plan

for program years 10, 11, and 12.

CNO 4-4 Please refer to the 2018 Triennial Integrated Resource Plan of Entergy New Orleans, Inc., Section 5.7 Scorecard Metrics and Results, and page 68, which states: “Again, due to differing Scenario and Strategy characteristics the grades of the scorecard should not be relied upon at face value without considering the inherent compositional differences among the Portfolios. Metrics that consider costs inclusive of DSM program cost (e.g. Net Present Value) cannot be utilized to compare Portfolios that were optimized using different vendor DSM programs and costs; thus, the grade is not representative of ranking based on equal testing criteria.”

- a. Given the statements that the grades of the scorecard should not be relied upon at face value and the expressed difficulty of comparing portfolios because of the differences in the DSM results, please explain how the Scorecard can be used to assess the IRP based on the Resource Portfolios.
- b. Please describe how the relative grades of the portfolios might be relied upon by “...considering the inherent compositional differences among the Portfolios.”

Respectfully submitted,
DENTONS US LLP,

/s J. A. Beatmann, Jr.

J. A. “Jay” Beatmann, Jr. (Bar No. 26189)
650 Poydras Street, Suite 2850
New Orleans, LA 70130
504-524-5446 (Office)
504-256-6142 (Cell)
jay.beatmann@dentons.com

Clinton A. Vince
Emma F. Hand
Presley R. Reed, Jr.
1900 K Street, N.W.
Washington, D.C. 20006
202-408-6400 (Telephone)
clinton.vince@dentons.com
emma.hand@dentons.com
presley.reedjr@dentons.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Fourth Set of Requests for Information has been served upon “The Official Service List” via electronic email and/or U.S. Mail, postage properly affixed, this 15th day of August, 2019.

J. A. Beatmann, Jr.
