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September 14, 2020

Via Electronic Delivery

Ms. Lora W. Johnson, CMC, LMMC
Clerk of Council
City Hall - Room 1E09
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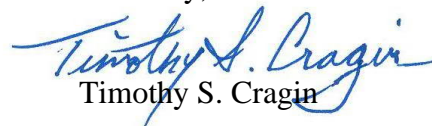
**Re: Resolution Establishing a Docket to Streamline Entergy New Orleans Reporting Requirements to the New Orleans City Council
CNO Docket No. UD-20-01**

Dear Ms. Johnson:

Please find enclosed for your further handling Entergy New Orleans, LLC's Comments Regarding Streamlining Its Reporting Requirements to the Council of the City of New Orleans, which are being submitted for filing in the above-referenced docket. As a result of the remote operations of the Council's office related to COVID-19, ENO submits this filing electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations, or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Thank you for your assistance with this matter.

Sincerely,


Timothy S. Cragin

TSC\rdm

Enclosures

cc: Official Service List (UD-20-01 *via electronic mail*)

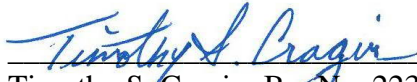
**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

RESOLUTION ESTABLISHING A DOCKET)	
TO STREAMLINE ENTERGY NEW)	
ORLEANS REPORTING REQUIREMENTS)	DOCKET NO. UD-20-01
TO THE NEW ORLEANS CITY COUNCIL)	

**ENTERGY NEW ORLEANS, LLC'S COMMENTS
REGARDING STREAMLINING ITS REPORTING REQUIREMENTS
TO THE COUNCIL OF THE CITY OF NEW ORLEANS**

Pursuant to Council Resolution R-20-223 (the "Resolution"), Entergy New Orleans, LLC ("ENO" or the "Company") respectfully submits its Comments Regarding Streamlining Its Reporting Requirements to the Council of the City of New Orleans (the "Council"). ENO's item-by-item comments regarding the reporting requirements are included in the attached Matrix (Exhibit "A") and include ENO's proposals for streamlining or modifying certain reporting requirements to the Council.

Respectfully Submitted:

By: 
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**ATTORNEYS FOR
ENTERGY NEW ORLEANS, LLC**

CERTIFICATE OF SERVICE

Docket No. UD-20-01

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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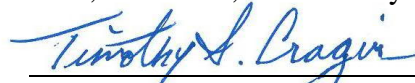
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New Orleans, Louisiana, this 14th day of September 2020.



Timothy S. Cragin

	NAME OF REPORT INITIATED	Per Council Resolution	PURPOSE OF REPORT	COMMENTS
1.	ENO's Biannual filing of Gas Design peak demand.	R-00-650 accepting settlement offers of ENO & S&WB in Dockets UD-97-2B and UD-98-2	The Company will submit to the Council for review, not later than March 1, 2002, based upon then currently available data and every twenty-four (24) months thereafter, the Company's model(s) and the output of all model(s) used for this purpose, as well as all workpapers used in the determination of the design-day peak demand. The Council will, based upon the Practices, then review the Company's forecast and thereafter will notify the Company as to whether the Company's forecast is consistent with the Practices and therefore acceptable. If the Council does not issue such a notification within one-hundred eighty (180) days of the Company's submission of the model, output, and workpapers, then the Company's determination of the design-day peak demand shall be deemed appropriate.	ENO recommends no change to this reporting requirement, as it provides a record detailing the basis upon which ENO's long-term planning and supply practices for natural gas is executed. The information required by this reporting requirement is submitted nine months in advance of the operational cycle for which planning is performed by and on behalf of ENO. Accordingly, it is ENO's position that the information provided through this report enables the Council to monitor ENO's planning to supply gas to its local distribution company.
2.	Post-MISO Integration Report	R-15-139	Annual filing per the Summary of Proposed Post-MISO-Integration Reporting Guidelines, in Exhibit 4 to the Agreement in Principle attached to Council Resolution R-15-139.	ENO recommends no changes to the current reporting requirements. Annual reports are now due on May 11th. It should be noted that a streamlined reporting format was developed during the 4th Post-MISO integration reporting requirement. The fifth and sixth reports followed that re-designed format.
3.	Annual SAIFI and SAIDI Reports	R-15-31	Vegetation-related SAIFI and SAIDI reports.	Assuming that the frequency of the Reliability reports is changed to quarterly, as recommended herein, and based on when the applicable data is typically available, ENO recommends that annual SAIFI and SAIDI metrics for a given year, together with Vegetation-specific

				SAIFI and SAIDI metrics for that year, be included in the Reliability Report for the first quarter of the following year.
4	Annual Net Energy Metering Report	R-07-132 Establishing Rules for Net Energy Metering, and R-09-484 Revising the NEM Rules	The utility shall file a report annually with the Council Utility Regulatory Office listing all existing Net Energy Metering facilities and the generator rating, and where applicable, the inverter power rating of each Net Energy Metering facility as of the end of the previous calendar year.	ENO has no recommended changes to this reporting requirement.
5	Semi-Annual SSCR Rider Filing	R-15-193 (Financing Order)	Per the Financing Order adopted in Resolution R-15-193 on May 14, 2015 in regard to the Application of ENO for Certification of Costs Related to Hurricane Isaac and Related Relief and Application of ELL for Recovery in Rates of Costs Related to Hurricane Isaac and Related Relief in Algiers, ENO as the Servicer of the Storm Recovery Bonds is to apply for a mandatory periodic True-up of the Rate Adjustment to the Securitized Storm Cost Recovery Rider SSCR (“Rider SSCR”). Each semi-annual true-up shall be filed with the Council at least 15 days prior to the first billing cycle of the month in which the proposed Rate Adjustment will be in effect.	ENO has no recommended changes to this reporting requirement.
6	Annual SSCO Rider Filing	R-15-193 (Financing Order)	Per the Financing Order adopted in Resolution R-15-193 on May 14, 2015 in regard to the Application of ENO for Certification of Costs Related to Hurricane Isaac and Related Relief and Application of ELL for Recovery in Rates of Costs Related to Hurricane Isaac and Related Relief in Algiers, and concurrent with the filing for the first adjustment to Rider SSCR, ENO shall file a revised Attachment A containing a revised Rate	ENO has no recommended changes to this reporting requirement.

			Adjustment. The revised Rate Adjustment shall become effective for bills rendered on and after the first billing cycle for the month of August of the filing year and shall then remain in effect until changed pursuant to the provisions of this Rider.	
7	ENO's Mid-Year Report on Actual Revenue Requirement associated with the Union Power Station Power Block 1	R-15-542	Paragraph V(B)(I) of the Purchased Power Cost Recovery Rider (PPCR): On August 1 of each year, ENO shall report to the Council the actual revenue requirement associated with Union for the first six months of the calendar year for the purpose of determining whether the effective estimated monthly revenue requirement should be revised prior to the first billing cycle of the following January.	The Purchased Power and Capacity Acquisition Cost Recovery Rider (PPCACR) previously authorized by the Council recovered the capacity costs associated with Union Power Station Power Block 1 approved in Council Resolution R-15-542. This rider is no longer in effect as of August 2019 since these costs have been realigned to base rates in ENO's 2018 Combined Rate Case. Therefore, it is ENO's position that this filing requirement has been terminated by operation of law. To the extent that the Council holds otherwise, ENO recommends that this reporting requirement be eliminated.
8	Annual Union Power Station Power Block 1 Revenue Requirement True-up	R-15-542	The Purchased Power Cost Recovery Rider (PPCR) provides for an annual true-up filing to compare the prior year's estimated revenue requirement for Union Power Block 1 (the basis for billings) with the actual revenue requirement for that same period.	When it was in effect, the PPCACR recovered the capacity costs associated with Union Power Station Power Block 1 approved in Council Resolution R-15-542. This rider is no longer in effect as of August 2019 since these costs have been realigned to base rates in ENO's 2018 Combined Rate Case. Thus, this filing requirement has effectively been eliminated by the subsequent, contrary superseding rate case resolutions in Docket UD-18-07 that eliminated the rider.
9	NOPS Bi-Monthly Reports	R-19-78 Ordering Paragraph 4 (at p.13)	R-19-78, p. 13 (Resolution and Order Imposing Sanctions; Directing Cost Protections and other Modifications to New Orleans Power Station) directs ENO to provide bi-monthly reports to the Council during construction of NOPS, detailing the expenditures made to date and the currently anticipated schedule for future expenditures.	The primary construction period of NOPS has ended and NOPS entered commercial operation in May 2020. It is anticipated that spending on NOPS closeout projects will be complete by December 31, 2020. Accordingly, ENO recommends that the final bi-monthly NOPS construction report be filed by January 31, 2021 and no bi-monthly reports be required after that date.

10	NOPS Quarterly Reports	R-19-78 Ordering Paragraph 4 (at p. 14)	R-19-78, p. 14 (Resolution and Order Imposing Sanctions; Directing Cost Protections and other Modifications to New Orleans Power Station) directs ENO to file quarterly reports with the Council detailing the NOPS expenditures each quarter.	ENO has no recommended changes to this reporting requirement.
11	NOPS LDEQ Report - Semi-Annual Monitoring Report	R-19-78 Ordering Paragraph 4 (at p. 14)	Due for submittal semi-annually by March 30th and September 30th and requires the reporting of any deviations that may have occurred from the Title V air permit for the semi-annual monitoring period and the corrective actions taken to prevent a re-occurrence	This is a semi-annual report that is filed with the LDEQ by March 30th and September 30th. ENO recommends that it be required to file a copy of those reports with the Council within 10 days after its filing with the LDEQ.
12	NOPS LDEQ Report - Title V Certification Report	R-19-78 Ordering Paragraph 4 (at p. 14)	Due annually by March 30th and requires reporting of any deviations from the Title V air permit for the previous calendar year and the corrective actions taken to prevent a re-occurrence	This is an annual report that is filed with the LDEQ by March 30th. ENO recommends that it be required to file a copy of this report with the Council within 10 days after its filing with the LDEQ.
13	NOPS LDEQ Report - RICE Engine Annual Report	R-19-78 Ordering Paragraph 4 (at p. 14)	Due annually by April 30th and requires reporting of the start-up/shut-down hours, heat input, operating hours and fuel consumption for the RICE engines (required per specific requirement 71 of the Title V permit)	This is an annual report that is filed with the LDEQ by April 30th. ENO recommends that it be required to file a copy of this report with the Council within 10 days after its filing with the LDEQ.
14	NOPS LDEQ Report - Emergency Diesel Generator Operating Report	R-19-78 Ordering Paragraph 4 (at p. 14)	Due annually by March 31st per specific requirement 34 of the Title V permit. Requires the reporting of any hours of operation of the NOPS Emergency Diesel Generator at the Michoud site for the specific purposes specified in 40 CFR 60.4214(d)	The requirement to file this report was removed by LDEQ as a permit condition. Because the report is not required to be filed with the LDEQ, ENO recommends eliminating this requirement.

15	NOPS LDEQ Report - Emissions Inventory	R-19-78 Ordering Paragraph 4 (at p. 14)	Due annually by April 30th per specific requirement 100 of the Title V permit and requires the reporting of the total NOPS Criteria Pollutant Emissions for the previous calendar year.	This is an annual report that is filed with the LDEQ by April 30th. ENO recommends that it be required to file a copy of this report with the Council within 10 days after its filing with the LDEQ.
16	NOPS LDEQ Report - Reports of Unauthorized Discharges of Pollutants	R-19-78 Ordering Paragraph 4 (at p. 14)	Requires reporting of any unauthorized discharges of pollutants to the atmosphere in accordance with state regulations. If there are any unauthorized discharges of pollutants above the reportable quantity, reporting is required to the Louisiana State Police, LDEQ, and the Orleans Parish Local Emergency Planning Committee	ENO recommends that it be required to file a copy of this report with the Council within 10 days after its filing with the LDEQ.
17	NOPS Post-Implementation Report on Internal Controls and Cyber Security	R-19-78	New Orleans Power Station (NOPS) Provide the Council Advisors with a copy of ENO-related post-implementation audit reports on the internal controls in these areas, with the exception of Cyber Security, which is to be handled separately in order to protect sensitive information	Per the Resolution, ENO is to provide a copy of ENO post-implementation audit reports on the internal controls in the areas of Grid Modernization processes and systems, including Advanced Metering Infrastructure, Enterprise Asset Management, Outage Management System/Distribution Management System, Customer Digital and Distribution Automation, including business and information technology, with cyber security to be handles separately. ENO does not recommend any changes to this requirement.
18	NOPS Usage Reports	R-19-78	New Orleans Power Station (NOPS) Real-time reports about the usage of the plant so that the Council can monitor the need as they move forward, given that this is a plant that will be turned on when necessary	Due to the highly sensitive nature of plant usage information, ENO recommends that it be required to provide aggregate usage information by quarter (i.e., the unit ran x MWH in 1Q 2021) within 30 days after the end of each quarter.
19	Estimated O&M Expenditures for NOPS	R-19-78	File report regarding the anticipated NOPS O&M expenditures for the next 12-month period for the Council's review and approval.	ENO has no recommended changes to this reporting requirement.

20	Quarterly NOPS O&M Expenditures	R-19-78	File with the Council a report detailing the NOPS O&M expenditures for each quarter.	ENO recommends changing the filing requirement to two times per year, showing YTD expenditures as of June 30th, and as of December 31st. The reports should be filed by August 15th and February 15th.
21	Quarterly AMI Progress reports to the Advisors to the City Council	R-18-99	ENO is directed to establish, in coordination with the Advisors, a quarterly on-site review of its AMI implementation commencing with the end of the first quarter of 2018 and continuing thereafter until a further order of the Council. This is a field review and does not result in a report filed with the Council; however, it has been listed for purposes of transparency.	ENO has no recommended changes to this reporting requirement, except that it be clarified to end when AMI deployment is complete and that any further Council Order relating to this requirement include recognition of any necessary modifications due to COVID-19.
22	AMI Deployment Progress Reports	R-18-37	ENO will file semi-annual (every six months) reports on the progress of the AMI deployment.	ENO seeks clarification that the semi-annual progress report filing requirement of R-18-37 was superseded by the quarterly reporting requirement of R-18-99. In the alternative, ENO requests leave to remedy any reporting deficiencies by filing progress reports in Docket No. UD-16-04 prospectively.
23	ENO's Lost Contribution to Fixed Costs (LCFC) and Utility Performance Incentive to Program Year of Energy Smart	R-15-140; R-15-599	ENO to make a filing with the Council for the calculation and recovery of LCFC and any utility performance incentive related to the previous Energy Smart program year. If ENO or ELL-Algiers failed to achieve 60% of the kWh goal, ENO had to appear before the UCTTC and show cause why it should not be assessed a penalty. Subsequent annual filings for LCFC and incentives pursuant to Resolution R-15-140 will be made on or before June 30 following each program year.	ENO has no recommended changes to this reporting requirement.
24	Energy Smart Quarterly Reports	R-11-52; R-15-15; R-15-140; R-15-599	ENO and Energy Smart TPA to file reports on Energy Smart progress of kWh savings and spending by program for each quarter of the program year.	ENO proposes that the frequency of required reporting be modified to annually. The Council has instituted performance requirements for ENO. Reduction of time compiling reports increases the time available for identifying new participants and/or projects to enhance program results.

			ENO is hereby directed to include documentation showing funding and expenditures, funds carryover, and the balance of the Energy Smart funding account in all subsequent (<i>as of November 2015</i>) Quarterly Reports.	
25	Energy Smart updated rate impact analysis (with annual level of funding)	R-15-140	ENO shall provide an updated rate impact analysis to the Advisors 30 days prior to the date of any change in rates related to funding Energy Smart. In addition, when the Companies make their initial filing containing their proposed budget levels for Energy Smart Program Year 7 and beyond, they are directed to include in that filing the typical monthly bill impacts associated with the approved annual level of funding.	ENO recommends delaying rate implementation until May or June each year, so that actual program costs and evaluations are complete before rate filing.
26	Bi-Monthly Report on Customer Outages	R-17-427 (Ordering Paragraph 6)	ENO directed to file bi-monthly reports concerning ongoing outages and progress on execution of the annual reliability plan.	ENO recommends that this report be changed to a quarterly filing, within 45 days after the end of the quarter, and that it be combined with reporting on the progress towards completion of the annual Reliability Plan into one Quarterly Reliability Report.
27	Community Solar Implementation Plan's annual compliance filing to the Council	R-18-223 R-19-111 (See also, Community Solar Rules, Section 7(F)(2))	Upon Council's approval of ENO's Implementation Plan, ENO must provide Council with the amount of incremental costs incurred administering the Community Solar Project (CSP) in accordance with the requirements of the CPS resolution. By May of each year, the Utility shall file an annual report with the Council on the Status of the Community Solar Program. The electric Utility shall maintain a list of projects and total program capacity, and shall provide the	ENO's Implementation Plan has not yet been approved by the Council, accordingly, ENO has no recommended changes to this reporting requirement.

			list to the Council by June 30 and December 31 of each year.	
28	Release of Whole-Building Aggregated Data	R-18-539	Per Council Resolution No. R-18-539, customers of an account to which an involved meter is attached will have the opportunity to challenge the appropriateness of the release of the data if there are “special circumstances” where the customer believe the Council’s rules would not sufficiently protect their privacy or belief that the building owner or building owner’s agent is using the data for improper purposes. Customers will be instructed to notify the CURO within 14 days of receipt of the notification letter of their intent to challenge the data release. If challenged, CURO will make the determination of whether or not the data is released.	ENO has no recommended changes to this reporting requirement.
29	ENO’s New Orleans Solar Station (NOSS) Project Quarterly Reports	R-18-353 (See also, Ordering Paragraph 17 on the Stipulated Term Sheet approved in Council Resolution R-19-293	ENO is directed to file quarterly reports on the status of the NOSS Project, including schedule, cost status and summary, and other critical activities, within 45 days of the end of each calendar quarter.	ENO has no recommended changes to this reporting requirement.
30	Securitized Storm Reserve	Resolution R-15-195 (Ordering Paragraph 8)	ENO to annually report the collections, principal, interest, disbursements, and any aggregate amount of costs incurred during the year for restoration of	ENO has no recommended changes to this reporting requirement.

			service from ENO's Securitized Storm Reserve Account.	
31	Storm Reserve Fund Escrow	Resolution R-06-459 (AIP -Paragraph 20)	ENO to annually report the collections, principal, interest, disbursements, and any aggregate amount of costs incurred during the year for restoration of service from ENO's Storm Reserve Fund Escrow Account.	ENO has no recommended changes to this reporting requirement.
32	City of New Orleans' Reports on Outside Services	City Attorney's Request – Mr. Naccari's February 14, 1991 Letter	ENO to file Quarterly informational filings regarding ENO's expenditures on outside attorneys/consultants.	ENO recommends that the frequency of this report be changed to an annual filing.
33	Fuel Adjustment Clause (Paragraph B)	R-19-457	If any of the Fuel Adjustment Clause Rates are expected to be more than 1 cent per kWh higher than the rate charged in the previous month, the Company has the obligation to notify the Council within ten (10) days prior to the first billing cycle in which the Fuel Adjustment Clause Rates will be charged.	ENO has no recommended changes to this reporting requirement.
34	ENO's Quarterly Reports of Natural Gas Storage Program	R-91-102	ENO to assess the cost and benefits of the Natural Storage Program.	ENO recommends that the frequency of this report be changed to annually as gas storage is seasonal event and believes that there is not a need for quarterly reporting. ENO also recommends that this report be combined with the Annual Gas Storage Report referenced below.
35	Monthly Progress Report on ENO's Collaboration with the Sewerage and Water Board of New Orleans to Improve Reliability of Electric Service	R-19-78 (Ordering Paragraph 2 at p. 12)	R-19-78, p. 12 (Resolution and Order Imposing Sanctions; Directing Cost Protections and other Modifications to New Orleans Power Station) directs ENO (1) to develop solutions to help ensure the reliability of electric service the SWBNO to develop solutions and facilitate the transition of SWBNO to ENO as the primary source of reliable and economic power; (2) file a report with the	ENO recommends that the frequency of this report be changed to quarterly and due 45 days after the end of the quarter. ENO also recommends that a reasonable sunset date for the reporting requirement be established.

	and Expedite a Long-Term Solution		Council every 30 days regarding the progress of its collaboration with SWBNO.	
36	Rough Production Cost Equalization Adjustment (RPCEA) Quarterly Accounting Report	R-13-162 (see also, FERC Opinion Nos. 480 and 480-A)	ENO to provide quarterly accounting reports to the Council listing the receipt, accrued interest, and monthly balance of funds related to the annual RPCEA filings required by FERC Opinion Nos. 480 and 480-A.	ENO has no recommended changes to this reporting requirement.
37	Quarterly Report of Entergy Corporation's proportionate share of its Regulated Utilities' assets, operating and maintenance expenses (per Rule 53 Settlement Agreement)	R-98-187 (Rule 53 Settlement Agreement)	Pursuant to the April 10, 1998 Rule 53 Settlement Agreement applicable to Entergy Corporation's Non-Regulated Investments filed with the Securities and Exchange Commission (SEC), on a quarterly basis, Entergy Corporation was directed to provide the SEC with a report detailing the Regulated Utilities' proportionate share of the consolidated total Entergy Corporation's assets, operating and maintenance expenses. Resolution R-98-187 adopted a Settlement Agreement among the Council, ENO, and ELI authorizing the Council of New Orleans to file a Letter of Certification with the SEC relative to Entergy Corporations' unregulated investments and to execute a Settlement Agreement to ensure the retail ratepayers of New Orleans are protected from any adverse consequences of Entergy Corporations' non-regulated investments in foreign utility companies and exempt wholesale generators.	ENO has no recommended changes to this reporting requirement.
38	Annual Gas Storage Program Analysis Report	R-05-518 (Agreement in Principle, Ordering Paragraph 12)	ENO directed to provide an analysis at the end of each withdrawal season on the cost of storage compared to injections into its gas storage facility using strictly the daily Henry Hub price.	Please see ENO's recommendation with regard to ENO's Quarterly Reports of Natural Gas Storage Program.

		R-06-401		
39	Annual Review of General Service Customers' Billing Alternate Rate Schedules	R-93-186	ENO to establish a program to review general service customers' billing records on an annual basis.	ENO has no recommended changes to this reporting requirement.
40	Annual Statement regarding the nature of inter-company transactions: <ul style="list-style-type: none"> • Independent Accountants' Report on Applying Agreed-upon Procedures; • Annual Report Identifying Non-Clerical Personnel from any Regulated Utility 	1992 Settlement Agreement (as amended by the 1998 Settlement Agreements with the Council, MPSC, and Entergy Corporation's compliance with the LPSC affiliate interest conditions in Appendix 3 to the LPSC's 1993 Order); New Orleans City Code Section 158, Article II, Division 3, Sub-section 158-139 establishes requirements with respect to the reporting of transactions between a utility and its affiliates.	Entergy Corporation to provide annual statement regarding the nature of inter-company transactions concerning Entergy Corporation including the basis for cost allocation and transfer pricing. Including a list of billing cost drivers in effect each year by which Entergy Services, LLC allocates costs to both regulated and non-regulated affiliates. A utility must annually file a cost allocation manual that includes: <ol style="list-style-type: none"> a) An organization chart that illustrates the utility and all of its regulated and unregulated affiliate(s); b) Officers of the parent or holding company, the utility, and all of its affiliates, as applicable; c) A complete description of the types of all costs shared with affiliate(s); d) The methodology and procedure used to allocate costs; and e) A summary of the total costs incurred from affiliate(s) and how those affiliate(s) costs are allocated 	ENO has no recommended changes to this reporting requirement.

41	ENO's Quarterly 10-Q and Annual 10-K Financial Statements	1992 Settlement Agreement (as amended by the 1998 Settlement Agreements with the Council, MPSC, and Entergy Corporation's compliance with the LPSC affiliate interest conditions in Appendix 3 to the LPSC's 1993 Order)	Entergy Corporation files quarterly and an annual report presenting financial results and statements along with management discussion and analyses of relevant operational and regulatory issues. The combined Quarterly and Annual Reports are separately filed by Entergy Corporation and its six Registrant Subsidiaries: Entergy Arkansas, LLC, Entergy Louisiana, LLC, Entergy Mississippi, LLC, Entergy New Orleans, LLC, Entergy Texas, Inc. and System Energy Resources, Inc.	ENO recommends that this requirement be eliminated as the referenced reports are publicly available on Entergy's Corporate website.
42	Annual 1992 Affiliate Settlement Agreement Report Pursuant to the 1998 revision & R-98-187	R-98-187	A Settlement was reached in a Federal filing related to PUCHA revisions of Rule 53 related to Affiliates and holding company transactions. This 1992 settlement was later revised and ratified by jurisdictional regulatory commissions in 1998. This later revision required each operating company to file annually compliance verification with regards to affiliate reporting.	ENO has no recommended changes to this reporting requirement.
43	Order on Compliance regarding final calculation of refunds to ENO	LPSC v. Entergy Services, Inc., Opinion No. 561, 163 FERC 61,116 (2018)	ENO to report to Council calculation of refunds to ENO as a result of Rough Production Cost Equalization bandwidth calculation filing.	ENO seeks clarification that this obligation automatically terminates upon final resolution of the underlying FERC proceeding from which this obligation originates, and/or upon the final report to the Council regarding final refunds directed by FERC as a result of this proceeding.
44	Annual Gas Marketing Justification		As a result of high gas prices in the winter of 2000-2001, the Council authorized ENO to enter into Hedging arrangements for winter gas. This program was suspended post-Hurricane Katrina	ENO has no recommended changes to this reporting requirement.

	(Hedging Request) Report		and was later re-adopted. Each March, the Company files its request to hedge the upcoming winter gas.	
45	Annual Gas Distribution System Report	R-05-518 and R-06-401	Reporting requirements are outlined in Attachment A (“Agreement in Principle”) to Council Resolution R-05-518, dated October 12, 2005. These filing requirements were originally suspended as a result of Hurricane Katrina and later reinstated by Council Resolution R-06-401, dated September 21, 2006	ENO has no recommended changes to this reporting requirement.
46	ENO MISO Cost Recovery Rider (True-up)	R-19-457	On or about May 31, beginning in 2020, the Company shall file a redetermination of the MISO Rider Rates by filing updated versions of Attachments A and B with supporting workpapers and documentation. The Annual Update filing will include a True-up Adjustment as calculated on Attachment B, Page 4.	ENO has no recommended changes to this reporting requirement.
47	Bi-Annual Application to the City Council for Approval of the Financing Plan		Pursuant to the 1922 Franchise Ordinance No. 6822 and the most recent approved Council Financing Approval Resolution, ENO is to file Bi-annually (in even years) - its Financing Plans seeking a blanket approval to sell bonds and preferred stock for the next two (2) years.	ENO has no recommended changes to this reporting requirement.
48	Bi-Annual Reporting of Data in Accordance with Section 210 of the Public Utility Regulatory Policy Act of 1978		Pursuant to the Public Utility Regulatory Policy Act of 1978, Section 210, ENO is to file Bi-annually (in even years) - its calculated “Avoided Costs” Forecast for the filing year and the next five (5) years; and, a high level Generation Forecast for the next ten (10) years. This is an informational filing and no action is to be taken by the Council.	ENO has no recommended changes to this reporting requirement.
49	Monthly EAC Rate Filing	R-11-175	Recovery of emission allowance costs	ENO has no recommended changes to this reporting requirement.

50	Monthly PGA Filing	R-95-361 R-05-518 R-05-547	Recovery of Resale Gas expense for LDC business	The monthly filing is made contemporaneous with and is the basis for the required change in the rate for purchased gas adjustment. Although the monthly change in rate remains appropriate, ENO recommends that the rate be modified to use per book costs based on accounting records for the operating month, rather than using a calculation to derive same with a subsequent true-up.
51	Annual Energy Efficiency Rider rate filing	R-17-623 R-15-140 R-17-176	Recovery of Energy Efficiency program costs	ENO proposes that the due date of this report be modified to be better aligned with timing of budget approval and evaluation of actual program year costs. - The Energy Smart budget is approved every three years through an implementation plan filed during the IRP process and reviewed by the Council. Rates for Program Year 10 took effect in April 2020. ENO proposes an annual deadline of June 30 to allow for the reporting numbers to be verified and confirm that all relevant credits have been included, <i>i.e.</i> , lost contributions to fixed costs (LCFC). The new rates for the rider would not go into effect until January of the following year per the terms of the rate schedule.
52	Monthly Purchased Power Cost Recovery Rider (PPCR)	R-19-457	To provide contemporaneous cost recovery of the incremental difference between the estimated PPA capacity costs and Long-Term Service Agreements (LTSA) expenses in base rates and the actual expenses incurred monthly. See tab [Schedule A] for the amounts included in base rates for capacity PPAs and LTSAs.	Rider PPCR replaced PPCACR and will serve as a monthly true-up rider between actual costs and estimated costs in base revenues. ENO recommends no changes to this reporting requirement.
53	5 MW DG Solar Annual Filing	R-18-222 (and AIP)	Report on data gathered concerning output of facilities and any impact on the distribution grid.	ENO has no recommended changes to this reporting requirement.
54	Annual Reliability Plan	R-17-427 R-18-98	There is no explicit requirement to file an annual plan, but ENO is required to file bi-monthly reports on its progress towards accomplishing its Reliability Plan.	ENO recommends that its Annual Reliability Plan be filed by January 31 st of the year for which the plan is scheduled to be worked.

55	Bi-Monthly Reliability Plan Progress Report	R-17-427 (Ordering Paragraph 6)	ENO directed to file bi-monthly reports concerning ongoing outages and progress on execution of the annual reliability plan.	ENO recommends moving the Bi-Monthly Reliability Plan Progress reporting requirement to a quarterly filing and combining it with the Bi-Monthly Outage report, such that one quarterly Reliability Report would be filed.
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