

October 14, 2020

BY ELECTRONIC DELIVERY

Ms. Lora W. Johnson
Clerk of Council
Council of the City of New Orleans
City Hall, Room IE09
1300 Perdido Street
New Orleans, LA 70112

In Re: *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:

Enclosed please find the *Advisors' Reply Comments* in the above referenced docket, which we are requesting be filed into the record along with this letter. As a result of the remote operations of the Clerk of Council's office related to COVID-19, the Advisors submit this filing electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations, or as you direct. Please file this submission in accordance with Council regulations as modified for the present circumstances.

Sincerely,



Jay Beatmann
Counsel

JAB/dpm
Attachment

cc: Official Service List for UD--20-01

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

**Establishing a Docket to Streamline Entergy)
New Orleans Reporting Requirements to the) Docket No. UD-20-01
New Orleans City Council)**

ADVISORS' REPLY COMMENTS

Pursuant to Council Resolution No. R-20-223 (“Resolution”), the Advisors hereby submit their Reply Comments regarding the streamlining of Entergy New Orleans, LLC’s (“ENO”) reporting requirements. The Council issued the Resolution on July 16, 2020 in order to establish this proceeding to seek input from ENO, the Advisors, and interested parties as to which reports currently required of ENO remain relevant to the Council’s regulatory responsibilities and whether ENO’s reporting requirements can be more effectively streamlined. These Reply Comments explain to the Council the Advisors’ final recommendations after review of the comments filed by other parties in this proceeding and the reasons therefore. In addition, a summary chart of the parties’ recommendations and the Advisors’ final recommendations is attached as Appendix A.

On September 14, 2020, the Advisors, ENO, and the Crescent City Power Users’ Group (“CCPUG”) each submitted comments regarding the reporting requirements identified in the Resolution. CCPUG’s Comments identified which specific reporting requirements should remain unchanged in CCPUG’s view (and identified which could be modified) and took no position as to whether the remaining reporting requirements not discussed in CCPUG’s Comments should be eliminated or maintained.¹ ENO and the Advisors both indicated which reporting requirements

¹ *Crescent City Power Users’ Group’s Initial Comments*, Sept. 14, 2020 in Docket No. UD-20-21 at 2-3 (“CCPUG Comments”).

should be maintained, which could be modified, and which could be eliminated for all reporting requirements identified in the Resolution.²

The Advisors note that the parties' comments were in agreement with respect to maintaining many of the reporting requirements without change, and where such agreement exists, the Advisors will not restate the arguments in support of maintaining the reporting requirement. All three parties filing comments agreed that the following reporting requirements should be maintained without change:

- ENO's Biannual filing of Gas Design peak demand
- Post-MISO Integration Report
- Semi-Annual SSCR Rider Filing
- Annual SSCO Rider Filing
- NOPS Quarterly Reports
- NOPS Post-Implementation Report on Internal Controls and Cyber Security
- Estimated O&M Expenditures for NOPS
- ENO's Lost Contribution to Fixed Costs (LCFC) and Utility Performance Incentive to Program Year of Energy Smart
- Release of Whole Building Aggregated Data
- ENO's New Orleans Solar Station (NOSS) Project Quarterly Reports
- Fuel Adjustment Clause (Paragraph B)
- Annual Review of General Service Customers' Billing Alternate Rate Schedules
- Annual Statement regarding the nature of inter-company transactions (Independent Accountant's Report on Applying Agreed-upon Procedures; Annual Report Identifying Non-Clerical Personnel from any Regulated Utility)

² *Entergy New Orleans, LLC's Comments Regarding Streamlining its Reporting Requirements to the Council of New Orleans*, Sept. 14, 2020 in Docket No. UD-20-01 ("ENO Comments"), *Advisors' Comments*, Sept. 14, 2020, Docket No. UD-20-01 ("Advisors' Comments").

- ENO MISO Cost Recovery Rider (true up)
- Bi-Annual Application to the City Council for Approval of the Financing Plan; and
- Bi-Annual Reporting of Data in Accordance with Section 210 of the Public Utility Regulatory Policy Act of 1978

As there appears to be no controversy regarding whether these reporting requirements should be maintained, the Advisors continue to recommend no change to these requirements.

There were also a handful of reporting requirements that the Advisors had proposed changing or eliminating that ENO stated should be maintained in their current form and CCPUG either agreed should not be changed or took no position. Those reports are:

- Annual Net Energy Metering Report
- Community Solar Implementation Plan's annual compliance filing to the Council
- Securitized Storm Reserve
- Storm Reserve Fund Escrow
- Rough Production Cost Equalization Adjustment (RPCEA) Quarterly Accounting Report
- Quarterly Report of Entergy Corporation's proportionate share of its Regulated Utilities' assets, operating and maintenance expenses (per Rule 53 Settlement Agreement)
- Annual 1992 Affiliate Settlement Agreement Report Pursuant to the 1998 revision & R-98-187
- Annual Gas Marketing Justification (Hedging Request) Report
- Annual Gas Distribution System Report

The Advisors in our Comments identified these reports as reports that could be consolidated or eliminated in furtherance of the Council's goal of reducing ENO's reporting requirements. The Advisors continue to support our initial recommendations with respect to these reports, as set forth in the Advisors' Comments; however, to the extent that ENO and CCPUG find

value in continuing these reporting requirements without change, the Advisors have no objection to leaving them in place.

For some of the reporting requirements, the parties agreed or were close to agreement as to possible streamlining that would be appropriate. Those reports are as follows:

- NOPS Bi-Monthly Reports -- ENO argues that the spending on NOPS closeout projects will be complete by December 31, 2020 and recommends that the final report under this requirement be filed on January 31, 2020.³ The Advisors agree that the reporting requirement will terminate when there are no further construction related activities without further action by the Council, and that it is not necessary for the Council to specify a date for expiration, though ENO's proposed date is reasonable if all construction related activity is actually concluded by December 31, 2020.⁴
- NOPS LDEQ Report - Semi-Annual Monitoring Report -- ENO recommends that it be required to file a copy of the reports with the Council within 10 days after its filing with the LDEQ.⁵ The Advisors take no issue with ENO providing a full copy of the report within 10 days of the LDEQ filing being made; however, the Advisors note that ENO would still remain subject to the requirement in City Code Section 158-181 that ENO provide notice of the filing at the LDEQ to the Council within one working day.
- NOPS LDEQ - Title V Certification Report -- ENO recommends that it be required to file a copy of the reports with the Council within 10 days after its filing with the LDEQ.⁶ The Advisors take no issue with ENO providing a full copy of the report within 10 days of the LDEQ filing being made; however, the Advisors note that ENO would still remain subject to the requirement in City Code Section 158-181 that ENO provide notice of the filing at the LDEQ to the Council within one working day.
- NOPS LDEQ Report - RICE Engine Annual Report -- ENO recommends that it be required to file a copy of the reports with the Council within 10 days after its filing with the LDEQ.⁷ The Advisors take no issue with ENO providing a full copy of the report within 10 days of the LDEQ filing being made; however, the Advisors note that ENO would still remain subject to the requirement in City Code Section 158-181 that ENO provide notice of the filing at the LDEQ to the Council within one working day.

³ ENO Comments at 3.

⁴ Advisors Comments at 10.

⁵ ENO Comments at 4.

⁶ ENO Comments at 4.

⁷ ENO Comments at 4.

- NOPS LDEQ Report - Emergency Diesel Generator Operating Report -- ENO notes that the requirement to file this report was removed by LDEQ as a permit condition and argues that therefore, this reporting requirement should be eliminated.⁸ The Advisors agree that to the extent this report is no longer required by the LDEQ, the reporting requirement can be eliminated.
- NOPS LDEQ Report - Emissions Inventory -- ENO recommends that it be required to file a copy of the reports with the Council within 10 days after its filing with the LDEQ.⁹ The Advisors take no issue with ENO providing a full copy of the report within 10 days of the LDEQ filing being made; however, the Advisors note that ENO would still remain subject to the requirement in City Code Section 158-181 that ENO provide notice of the filing at the LDEQ to the Council within one working day.
- NOPS LDEQ Report - Reports of Unauthorized Discharges of Pollutants -- ENO recommends that it be required to file a copy of the reports with the Council within 10 days after its filing with the LDEQ.¹⁰ The Advisors take no issue with ENO providing a full copy of the report within 10 days of the LDEQ filing being made; however, the Advisors note that ENO would still remain subject to the requirement in City Code Section 158-181 that ENO provide notice of the filing at the LDEQ to the Council within one working day.
- Quarterly NOPS O&M Expenditures -- ENO recommended changing the filing requirement to two times per year, showing year to date expenditures as of June 30th, and as of December 31st with reports to be filed by August 15 and February 15.¹¹ CCPUG recommends maintaining the reporting requirement because it pertains to major capital expenditure, major operational information, and major cost recovery information, but recommends the requirement could shift to an annual report instead of quarterly.¹² The Advisors could support a shift to a semi-annual report, as proposed by ENO.
- Quarterly AMI Progress Reports to the Advisors to the City Council -- ENO did not propose any change to this reporting requirement other than requesting clarification that it would end when AMI deployment is complete and that there be recognition of any necessary modifications due to COVID-19.¹³ The Advisors suggested that due to the advanced stage of AMI deployment and the Advisors assessment that ENO has sufficiently established its installation and implementation procedures such that direct quarterly on-site review of implementation is no longer necessary, this reporting requirement could be eliminated.¹⁴ To the extent that the Council prefers to maintain this reporting

⁸ ENO Comments at 4.

⁹ ENO Comments at 5.

¹⁰ ENO Comments at 5.

¹¹ ENO Comments at 6.

¹² CCPUG Comments at 4.

¹³ ENO Comments at 6.

¹⁴ Advisors' Comments at 14.

requirement, the Advisors agree with ENO's comments that it end when AMI deployment is complete and that accommodations for the COVID-19 pandemic be made.

- Energy Smart updated rate impact analysis (with 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 the rate filing.¹⁵ The Advisors did not recommend any change to this reporting requirement, but find ENO's proposal reasonable.
- Bi-Monthly Report on Customer Outages -- ENO, the Advisors, and CCPUG all agree that the Bi-Monthly Reports could be changed to quarterly reports.¹⁶ The Advisors also concur with ENO's recommendation that Quarterly Customer Outages Reports be filed within 45 days after the end of a quarter, and that it be combined with reporting on the progress towards completion of the annual Reliability Plan into one Quarterly Reliability Report.
- City of New Orleans' Reports on Outside Services -- ENO recommended that the frequency of the report be changed to an annual filing.¹⁷ The Advisors did not propose any change to this reporting requirement but have no objection to ENO's proposed change.
- ENO's Quarterly Reports of Natural Gas Storage Program -- ENO suggests that this report be made an annual, rather than a quarterly, reporting requirement and that it be combined with the Annual Gas Storage Report.¹⁸ The Advisors agree with this recommendation, and would also combine the storage reports with the Annual Gas Marketing Justification (Hedging Request) Report and the Annual Gas Distribution System Report into a single annual gas report.¹⁹
- Order on Compliance regarding final calculation of refunds to ENO -- 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.²⁰ The Advisors believe this reporting requirement should remain in place, but agree that it will effectively terminate upon the final resolution of the last FERC docket that may result in additional rough production cost equalization payments among Entergy Operating Companies.²¹

¹⁵ ENO Comments at 7.

¹⁶ ENO Comments at 7, Advisors' Comments at 6, CCPUG Comments at 5.

¹⁷ ENO Comments at 9.

¹⁸ ENO Comments at 9.

¹⁹ Advisors' Comments at 4.

²⁰ ENO Comments at 12.

²¹ Advisors' Comments at 21.

For certain reports, both ENO and the Advisors recommended that the reporting requirement be changed or eliminated while CCPUG argued that it should be kept in place. Those reporting requirements, and the Advisors' final recommendation for each is as follows:

- Annual SAIFI and SAIDI Reports -- While CCPUG recommended that this reporting requirement be maintained because it contains major operational information,²² both ENO and the Advisors suggested that this report could be consolidated into the Report on Customer Outages.²³ Because this information would still be provided with at least the same frequency as it was provided under the existing reporting requirement, the Advisors believe that the consolidation of the Annual SAIFI and SAIDI Reports into the Report on Customer Outages should still reasonably meet the needs of all parties for the major operational information.
- ENO's Mid-Year Report on Actual Revenue Requirement associated with the Union Power Station Power Block 1 -- The Advisors and ENO both note that the reporting requirement was required while Union Power Block 1's costs were being recovered through a rider rather than through base rates.²⁴ Because Union Power Block 1 Costs have now been realigned to base rates and are no longer being collected through a rider, ENO argues that the reporting requirement has been terminated by operation of law, or in the alternative, should be eliminated.²⁵ CCPUG argues that the reporting requirement is necessary because it relates to a major capital expenditure and major cost recovery information.²⁶ The Advisors agree with ENO that the reporting requirement is no longer relevant, and if it has not expired by operation of law, should be eliminated. While the Advisors agree with CCPUG's statement that the information is relative to a major expenditure and cost recovery, as was noted in the Advisors' Comments, because these costs no longer flow through the rider but are incorporated in base rates, the information is now appropriately included in rate actions, such as the Formula Rate Plan adjustment or a base rate case, rather than through this reporting requirement, and therefore the mid-year rider-related reporting requirement may be eliminated.²⁷
- Annual Union Power Station Power Block 1 Revenue True-up -- The Advisors and ENO both note that the reporting requirement was required while Union Power Block 1's costs were being recovered through a rider rather than through base rates.²⁸ Because Union Power Block 1 Costs have now been realigned to base rates and are no longer being collected through a rider, ENO argues that the reporting requirement has been superseded and eliminated by rate case resolutions in Docket

²² CCPUG Comments at 3.

²³ ENO Comments at 1-2, Advisor Comments at 6.

²⁴ Advisors' Comments at 8, ENO Comments at 3.

²⁵ ENO Comments at 3.

²⁶ CCPUG Comments at 3.

²⁷ Advisors' Comments at 8-9.

²⁸ Advisors' Comments at 8, ENO Comments at 3.

No. UD-18-07.²⁹ CCPUG argues that the reporting requirement is necessary because it relates to a major capital expenditure and a major cost recovery true up.³⁰ The Advisors agree with ENO that the reporting requirement is no longer relevant, and if it has not expired by operation of law, should be eliminated. While the Advisors agree with CCPUG's statement that the information is relative to a major expenditure and cost recovery true-up, as was noted in the Advisors' Comments, because these costs no longer flow through the rider, but are incorporated in base rates, the information is now appropriately included in rate actions, such as the Formula Rate Plan adjustment or a base rate case, rather than through this reporting requirement, and therefore the annual rider-related reporting requirement may be eliminated.³¹

- AMI Deployment Progress Reports -- ENO seeks clarification that the semi-annual progress report filing requirements of Resolution No. R-18-37 was superseded by the quarterly reporting requirement of Resolution No. R-18-99, or in the alternative, the ability to remedy any reporting deficiencies prospectively.³² CCPUG argues that this reporting requirement is necessary because it relates to a major capital expenditure, major operational information and major cost recovery information.³³ As noted in the Advisors' Comments, the Advisors believe that in light of the advanced status of AMI deployment, and the success of the deployment to date, the Council could eliminate the semi-annual reporting requirement but still provide a final report six months after the AMI deployment has been completed.³⁴
- Monthly Progress Report on ENO's Collaboration with the Sewerage and Water Board of New Orleans to Improve Reliability of Electric Service -- ENO recommends reducing the frequency of this report to quarterly due 45 days after the end of the quarter and that a reasonable sunset date be established.³⁵ CCPUG argues in favor of keeping the reporting requirement in place because it is related to major operational information.³⁶ As explained in the Advisors' Comments, the Advisors continue to believe that the reports provided under this reporting requirement provide little if no additional useful information to the Council beyond the information already possessed by the members of the Council's staff, CURO and Advisors participating in the working group, and therefore, the reporting requirement can be eliminated.³⁷
- Annual Gas Storage Program Analysis Report -- ENO recommends that this report be combined with the Report of the Natural Gas Storage Program into a single

²⁹ ENO Comments at 3.

³⁰ CCPUG Comments at 3.

³¹ Advisors' Comments at 8-9.

³² ENO Comments at 6.

³³ CCPUG Comments at 4.

³⁴ Advisors' Comments at 14.

³⁵ ENO Comments at 9.

³⁶ CCPUG at 5.

³⁷ Advisors' Comments at 13.

annual report.³⁸ CCPUG argues that the report should be maintained because it relates to major operational information and major cost recovery information.³⁹ The Advisors recommend that this report be combined with the quarterly reports as suggested by ENO, but also with the Annual gas Marketing Justification Report and the Annual Gas Distribution System Report into a single annual gas report.⁴⁰ The Advisors believe that while these various recommendations are not identical, they are reasonably consistent and that the Council could consider creating a single annual gas report that would gather all of the data encompassed in these reporting requirements.

- ENO's Quarterly 10-Q and Annual 10-K Financial Statements -- ENO recommends eliminating this requirement because the referenced reports are publicly available on Entergy's corporate website.⁴¹ CCPUG recommends maintaining the reporting requirement because it relates to major capital expenditures, major operational information, and major cost recovery information.⁴² The Advisors agree that the information required by this reporting requirement is useful and important, but recognize that the information is generally easily publicly available. Thus the Advisors maintain our recommendation that the reporting requirement may be eliminated so long as ENO adheres to the requirement in City Code Sec. 158-181 that it provide notice to the Council when new reports have been submitted to the SEC.⁴³

There were other reporting requirements where the parties either disagreed as to the continued necessity of the reporting requirement, or where they offered different suggestions as to how a requirement could be streamlined.

- NOPS Usage Reports -- ENO proposes that, due to the highly sensitive nature of plant usage information, ENO 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.⁴⁴ The Advisors agree that this level of information may be appropriate for a publicly available document filed at the Council. However, to the extent that the Council seeks to remain informed as to the extent to which NOPS is being run to meet peak or reliability needs, or in times of constraint in MISO, greater granularity of information is important for the Council's purposes. The Advisors recognize that such information is highly sensitive and should not be made publicly available, and therefore recommend that ENO be required to provide detailed information to the Council's Advisors under HSPM protections on a quarterly basis.

³⁸ ENO Comments at 9 and 10.

³⁹ CCPUG Comments at 6.

⁴⁰ Advisors' Comments at 4.

⁴¹ ENO Comments at 12.

⁴² CCPUG Comments at 6.

⁴³ Advisors' Comments at 20.

⁴⁴ ENO Comments at 5.

- Energy Smart Quarterly Reports -- ENO proposes that the frequency of required reporting be modified to annually in order to reduce time compiling reports and increase time available for identifying new participants and/or projects to enhance program results.⁴⁵ The Advisors believe that there is value in progress reports on Energy Smart that allow the Council, CURO and the Advisors to understand how programs are unfolding over the course of the year and to identify any problems or needed course corrections early enough in the year to impact the outcome of the year. As the Advisors discussed in our Comments, this purpose is best served by changing the frequency to a semi-annual reporting requirement.⁴⁶ The Advisors believe that a mid-year report would allow a sufficient length of time from program initiation for trends to be identified while leaving enough time in the program year for adjustments to have an impact on the outcome of the program performance for the year.

In addition, ENO included seven additional reporting requirements in its comments not identified in the Resolution.⁴⁷ ENO proposes no change to the Monthly EAC Rate Filing, the Monthly Purchased Power Cost Recovery Rider (PPCR), the 5 MW DG Solar Annual Filing⁴⁸ and the Advisors agree with those recommendations. ENO proposes changes to the following reporting requirements:

- Monthly PGA Filing - 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 the same with a subsequent true-up.⁴⁹ The Advisors do not believe it is appropriate to adjust the manner in which the PGA is calculated through a proceeding regarding reporting requirements where no parties were put on notice that the calculation of the PGA would potentially be addressed in this proceeding, and therefore, oppose ENO's proposal that this change be made in this proceeding.
- Annual Energy Efficiency Rider rate filing -- ENO proposes that the annual deadline for this report be moved to June 30 to allow for the reporting numbers to be verified and confirm that all relevant credits have been included in the new rates.⁵⁰ The Advisors have no objection to this proposed change.

⁴⁵ ENO Comments at 6.

⁴⁶ Advisors' Report at 15.

⁴⁷ ENO Comments at 13-15.

⁴⁸ ENO Comments at 13-14.

⁴⁹ ENO Comments at 14.

⁵⁰ ENO Comments at 14.

- Annual Reliability Plan -- ENO recommends that this report be filed by January 31 of each year for which the plan is scheduled to be worked.⁵¹ The Advisors have no objection to this proposed change.
- Bi-Monthly Reliability Plan Progress Report -- 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.⁵² The Advisors have no objection to this proposed change, including ENO's recommendation that the combined Quarterly Reliability Report be filed within 45 days after the end of the quarter. The Advisors would add the provision that the consolidated Report continue to include the same level of complete detail that has been provided heretofore in the individual reports.

RESPECTFULLY SUBMITTED:



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Advisors to the Council of the City of New Orleans

⁵¹ ENO Comments at 14.

⁵² ENO Comments at 15.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has been served upon the following parties of record by electronic mail on this 14th day of October, 2020.



J. A. "Jay" Beatmann, Jr.

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APPENDIX A

Summary Chart of Recommendations

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
1	ENO's Biannual filing of Gas Design peak demand.	UD-97-2B	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.	No change to existing filing requirements. The Advisors believe that the current biannual requirement for filing this report is appropriate and does not require a revision.	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.		No change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
2	Post-MISO Integration Report	UD-11-01	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.	<p>No change to existing filing requirements.</p> <p>The Post-MISO Integration Report provides comprehensive, detailed information on ENO's operations in MISO for the previous calendar year that is not otherwise provided to the Council.</p>	<p>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.</p>	<p>Maintain.</p> <p>Major planning and operational information</p>	No change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
3	Annual SAIFI and SAIDI Reports	UD-12-04	R-15-31	Vegetation-related SAIFI and SAIDI reports.	<p>Consolidate filing requirements with periodic Reports on Customer Outages in Docket UD-17-04.</p> <p>To the extent the calendar year information normally contained in the Annual SAIFI and SAIDI Reports is included in the Report on Customer Outages, the Annual SAIFI and SAIDI Reports could be consolidated with that Report.</p>	<p>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.</p>	<p>Maintain.</p> <p>Major operational information</p>	<p>Consolidate as recommended in the Advisors initial Comments.</p>

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4	Annual Net Energy Metering Report	UD-13-02	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.	<p>Report could either be made simultaneously with or consolidated with the Community Solar report into a single distributed energy resources report that satisfies both reporting requirements.</p> <p>In order to streamline the Council's review of customer-owned and utility-owned renewable and clean resources, the Council may wish to consider requiring ENO to submit the information required for the Annual Net Energy Metering Report, the Community Solar annual compliance filing, and any annual compliance filing related to renewable distributed energy resources in the future either simultaneously or as a consolidated distributed energy resources report.</p>	ENO has no recommended changes to this reporting requirement.	Maintain. Major capital expenditure information; Major operational information	The Advisors continue to believe this report could be consolidated as recommended in our initial Comments, but have no objection to maintaining the requirement without change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
5	Semi-Annual SSCR Rider Filing	UD-14-01	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.	No change to existing filing requirements. Rider SSCR's rate is variable and a direct cost to ratepayers. The Council requires this filing's information to perform its oversight duties.	ENO has no recommended changes to this reporting requirement.	Maintain. Major cost recovery mechanism true up	No change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
6	Annual SSCO Rider Filing	UD-14-01	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 Adjustment. The revised Rate Adjustment shall become effective for bills rendered on and after the first billing cycle for the month of May of the filing year and shall then remain in effect until changed pursuant to the provisions of this Rider.	No change to existing filing requirements. Rider SSCO's rate is variable, and the related Resolution requires a recalculation that the Council should validate and oversee.	ENO has no recommended changes to this reporting requirement.	Maintain. Major cost recovery/offset rate adjustment	No change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
7	ENO's Mid-Year Report on Actual Revenue Requirement associated with the Union Power Station Power Block 1	UD-15-01	R-15-542	Paragraph V(B)(I) of the Purchased Power Cost Recovery Rider (PPCR)	<p>Terminate filing requirement as moot.</p> <p>Union Power Block 1 non-fuel costs have been realigned to base rates and no longer pass through a Rider for recovery requiring periodic review by the Council. Such data should now instead be included in the next rate action (such as an FRP evaluation).</p>	<p>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.</p>	<p>Maintain.</p> <p>Major capital expenditure; Major cost recovery information</p>	Terminate as moot.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
8	Annual Union Power Station Power Block 1 Revenue Requirement True-up	UD-15-01	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.	<p>Terminate filing requirement as moot.</p> <p>Union Power Block 1's non-fuel costs have been realigned to base rates and no longer pass through a Rider for recovery requiring periodic review by the Council. Such data should now instead be included in the next rate action (such as an FRP evaluation).</p>	<p>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.</p>	<p>Maintain.</p> <p>Major capital expenditure; Major cost recovery true-up</p>	Terminate as moot.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
9	NOPS Bi-Monthly Reports	UD-16-02	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.	<p>Filing requirement will terminate when all construction items are complete (likely in 2020). No action to revise this reporting is necessary.</p> <p>These reporting requirements were designed to monitor construction costs and construction progress. NOPS achieved commercial operation on May 31, 2020. The Advisors understand that ENO is still working on construction completion punch list items that were not required for achieving commercial operation.</p>	<p>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 bimonthly reports be required after that date.</p>		<p>Filing requirement will terminate when all construction items are complete. No action to revise this reporting is necessary.</p>

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10	NOPS Quarterly Reports	UD-16-02	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.	<p>Filing requirement will terminate when all construction items are complete (likely in 2020). No action to revise this reporting is necessary.</p> <p>These reporting requirements were designed to monitor construction costs and construction progress. NOPS achieved commercial operation on May 31, 2020. The Advisors understand that ENO is still working on construction completion punch list items that were not required for achieving commercial operation.</p>	ENO has no recommended changes to this reporting requirement.	<p>Maintain.</p> <p>Major capital expenditure; Major cost recovery information</p>	No change.

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11	NOPS LDEQ Report - Semi-Annual Monitoring Report	UD-16-02	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	No change to existing filing requirements. The Council's current requirements with regards to these reports require minimal effort by ENO, as the reports will have already been generated by ENO to meet LDEQ requirements.	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.		The Advisors do not object to ENO's proposal, but note that City Code Sec. 158-181 still requires notice of the filing within one working day.
12	NOPS LDEQ Report - Title V Certification Report	UD-16-02	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	No change to existing filing requirements. The Council's current requirements with regards to these reports require minimal effort by ENO, as the reports will have already been generated by ENO to meet LDEQ requirements.	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.	Maintain. Major capital expenditure; Major operational information	The Advisors do not object to ENO's proposal, but note that City Code Sec. 158-181 still requires notice of the filing within one working day.

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13	NOPS LDEQ Report - RICE Engine Annual Report	UD-16-02	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)	No change to existing filing requirements. The Council's current requirements with regards to these reports require minimal effort by ENO, as the reports will have already been generated by ENO to meet LDEQ requirements.	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.	Maintain. Major capital expenditure; Major operational information; Required by LDEQ Title V Permit	The Advisors do not object to ENO's proposal, but note that City Code Sec. 158-181 still requires notice of the filing within one working day.
14	NOPS LDEQ Report - Emergency Diesel Generator Operating Report	UD-16-02	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)	No change to existing filing requirements. The Council's current requirements with regards to these reports require minimal effort by ENO, as the reports will have already been generated by ENO to meet LDEQ requirements.	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.	Maintain. Major capital expenditure; Major operational information; Required by LDEQ Title V Permit	The Advisors concur that to the extent the LDEQ has removed the report as a permit condition, this reporting requirement may be terminated.

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15	NOPS LDEQ Report - Emissions Inventory	UD-16-02	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.	No change to existing filing requirements. The Council's current requirements with regards to these reports require minimal effort by ENO, as the reports will have already been generated by ENO to meet LDEQ requirements.	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.	Maintain. Major capital expenditure; Major operational information; Required by LDEQ Title V Permit	The Advisors do not object to ENO's proposal, but note that City Code Sec. 158-181 still requires notice of the filing within one working day.
16	NOPS LDEQ Report - Reports of Unauthorized Discharges of Pollutants	UD-16-02	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	No change to existing filing requirements. The Council's current requirements with regards to these reports require minimal effort by ENO, as the reports will have already been generated by ENO to meet LDEQ requirements.	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.	Maintain. Major capital expenditure; Major operational information; Required by LDEQ Title V Permit	The Advisors do not object to ENO's proposal, but note that City Code Sec. 158-181 still requires notice of the filing within one working day.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
17	NOPS Post-Implementation Report on Internal Controls and Cyber Security	UD-16-02	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	No change to existing filing requirements. Resolution R-19-78 requires ENO to provide to post implementation audit reports on the internal controls. The Advisors do not see any change in circumstances since February 2019 that would cause the Council to revise this reporting requirement.	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.	Maintain. Major capital expenditure; Major operational information	No change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
18	NOPS Usage Reports	UD-16-02	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	No change to existing filing requirements.	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.	Maintain. Major capital expenditure; Major operational information	The Advisors agree that ENO's proposal is reasonable for a public version of the report, but propose that ENO be required to provide more detailed operational information to the Advisors on an HSPM basis quarterly.
19	Estimated O&M Expenditures for NOPS	UD-16-02	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.	No change to existing filing requirements. The Advisors believe these reporting requirements were implemented by the Council for detailed oversight of the NOPS operation and maintenance expenses. The Advisors do not see any change in circumstances since the adoption of Resolution R-19-78 that would cause the Council to revise this reporting requirement.	ENO has no recommended changes to this reporting requirement.	Maintain. Major capital expenditure; Major operational information; Major cost recovery information	No change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
20	Quarterly NOPS O&M Expenditures	UD-16-02	R-19-78	File with the Council a report detailing the NOPS O&M expenditures for each quarter.	<p>No change to existing filing requirements.</p> <p>The Advisors believe these reporting requirements were implemented by the Council for detailed oversight of the NOPS operation and maintenance expenses. The Advisors do not see any change in circumstances since the adoption of Resolution R-19-78 that would cause the Council to revise this reporting requirement.</p>	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.	<p>Maintain.</p> <p>Major capital expenditure; Major operational information; Major cost recovery information; BUT could shift to annual instead of quarterly reports</p>	The Advisors believe ENO's proposal to shift to semi-annual reporting is reasonable.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
21	Quarterly AMI Progress reports to the Advisors to the City Council	UD-16-04	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.	Eliminate filing requirement as unnecessary given the advanced stage of AMI deployment and the positive results of prior field reviews. ENO expects to achieve full deployment of its advanced electric meters by the end of 2020. ENO expects that its final deployment of its advanced gas meters will be achieved by September 2021. Given the advanced status of the AMI implementation, the Council could eliminate this filing requirement.	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.		The Advisors continue to believe that this requirement could be eliminated as recommended in our initial Comments, however, to the extent the Council chooses to maintain the requirement, the Advisors concur with ENO's proposal.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
22	AMI Deployment Progress Reports	UD-16-04	R-18-37	ENO will file semi-annual (every six months) reports on the progress of the AMI deployment.	<p>Eliminate the remaining semi-annual reports but still require a final report six months after the AMI deployment is complete.</p> <p>ENO expects to achieve full deployment of its advanced electric meters by the end of 2020. ENO expects that its final deployment of its advanced gas meters will be achieved by September 2021. Given the advanced status of the AMI implementation, that the Council could eliminate the remaining semi-annual reports but still require a final report six months after the AMI deployment is complete.</p>	<p>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.</p>	<p>Maintain.</p> <p>Major capital expenditure; Major operational information; Major cost recovery information</p>	<p>Eliminate the remaining semi-annual reports but still require a final report six months after the AMI deployment is complete.</p>

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23	ENO's Lost Contribution to Fixed Costs (LCFC) and Utility Performance Incentive to Program Year of Energy Smart	UD-17-03 UD-08-02	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.	No change to existing filing requirements LCFC will be included in prospective pro-forma adjustments of annual EFRP filings and LCFC data from these program year reports will be a cross-reference. Utility Performance Incentives have been approved for the Energy Smart Implementation Plan and will use these Energy Smart program year filings as a reference.	ENO has no recommended changes to this reporting requirement.		No change.

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24	Energy Smart Quarterly Reports	UD-17-03 UD-08-02	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 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.	Reduce periodicity from quarterly to semi-annual if the Council desires to reduce the frequency of these reports. In addition to the progress of kWh and kW savings and spending for each EE and DR program, the Energy Smart semi-annual reports must continue to provide documentation showing funding and expenditures, funds carryover, and the balance of the Energy Smart funding account. Further, if any individual program may have difficulty reaching the savings targets, ENO should promptly notify CURO and the Council upon identification of the difficulty.	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.		Reduce periodicity from quarterly to semi-annual if the Council desires to reduce the frequency of these reports.

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25	Energy Smart updated rate impact analysis (with annual level of funding)	UD-17-03 UD-08-02	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.	No change to existing filing requirements. It is anticipated that Energy Smart Implementation Plans will be filed and approved on a three-year basis, and such filings should include the bill impacts related to the approved program year funding levels	ENO recommends delaying rate implementation until May or June each year, so that actual program costs and evaluations are complete before rate filing.		The Advisors find ENO's recommendation to be reasonable.

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26	Bi-Monthly Report on Customer Outages	UD-17-04	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.	<p>Revise from bi-monthly filing to quarterly filing and include information previously filed in the Annual SAIFI and SAIDI Reports, if the Council desires to reduce the frequency of the reports.</p> <p>The information provided in these reports is necessary for the Council's timely understanding of distribution system reliability issues and for assessing ENO's progress in improving distribution reliability.</p>	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.	<p>Maintain.</p> <p>Major operational information; BUT could shift to quarterly reports</p>	The Advisors concur with ENO's recommendation.

27	Community Solar Implementation Plan's annual compliance filing to the Council	UD-18-03	R-18-223 R-19-111 (See also, Community Solar Rules, Section 7(F)(2))	<p>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.</p> <p>The electric Utility shall maintain a list of projects and total program capacity, and shall provide the list to the Council by June 30 and December 31 of each year.</p>	<p>Report could either be made simultaneously with or consolidated with the Net Energy Metering report into a single distributed energy resources report that satisfies both reporting requirements.</p> <p>Reporting with respect to Community Solar is identified in Paragraph 7(F) of the Community Solar Rules for the Council of the City of New Orleans which were approved by Council Resolution R-19-111 on March 28, 2019. The Advisors do not recommend any changes to the Council's Community Solar Rules as a result of this streamlining docket other than potential consolidation with the Net Energy Metering Report into a single distributed energy resources report.</p>	ENO's Implementation Plan has not yet been approved by the Council, accordingly, ENO has no recommended changes to this reporting requirement.	Maintain. Major capital expenditure; Major operational information; Major cost recovery information	The Advisors continue to believe this report could be consolidated as recommended in our initial Comments, but have no objection to maintaining the requirement without change.
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28	Release of Whole-Building Aggregated Data	UD-18-04	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.	No change to existing filing requirements. This is not a requirement that ENO report to the Council, but rather a requirement that total building energy use data be released to the building owner, and should remain in place.	ENO has no recommended changes to this reporting requirement.		No change.

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29	ENO's New Orleans Solar Station (NOSS) Project Quarterly Reports	UD-18-06	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.	No change to existing filing requirements. These reporting requirements were designed to monitor construction costs and construction progress of NOSS. These reporting requirements continue until such time as NOSS achieves commercial operation. NOSS is expected to be substantially complete and achieve commercial operation in the fourth quarter of 2020.	ENO has no recommended changes to this reporting requirement.	Maintain. Major capital expenditure; Major operational information; Major cost recovery information	No change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
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 service from ENO's Securitized Storm Reserve Account.	Consolidate Securitized Storm Reserve report and Storm Reserve Fund Escrow report into one annual filing. The report provides the Council information related to ENO's withdrawals from the storm reserve, weather events that caused ENO to expend funds related to storm restoration activities, and the financial condition of the account.	ENO has no recommended changes to this reporting requirement.	Maintain. Major capital expenditure; Major cost recovery information	The Advisors continue to believe this report could be consolidated as recommended in our initial Comments, but have no objection to maintaining the requirement without change.
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.	Consolidate Securitized Storm Reserve report and Storm Reserve Fund Escrow report into one annual filing. The report provides the Council information related to ENO's withdrawals from the storm reserve, weather events that caused ENO to expend funds related to storm restoration activities, and the financial condition of the account.	ENO has no recommended changes to this reporting requirement.	Maintain. Major capital expenditure; Major cost recovery information	The Advisors continue to believe this report could be consolidated as recommended in our initial Comments, but have no objection to maintaining the requirement without change.

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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.	No change to existing filing requirements.	ENO recommends that the frequency of this report be changed to an annual filing.		The Advisors have no objection to ENO's proposal.
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.	No change to existing filing requirements. This reporting requirement provides the Council with advance notice of a significant increase in the FAC rate, such that the Council can consider any appropriate actions to mitigate the impact on ENO's customers.	ENO has no recommended changes to this reporting requirement.	Maintain. Major capital expenditure; Major cost recovery information	No change.
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.	Reduce filing periodicity to annual. Consolidate prescribed filing data into a single annual gas report. The Council can effectively oversee ENO's gas storage practices with annual reporting in the form of a single annual gas report.	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.		The Advisors agree with ENO's suggestion and would also consolidate these reports with the Annual Gas Marketing Justification (Hedging Request) Report and the Annual gas Distribution System Report.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
35	Monthly Progress Report on ENO's Collaboration with the Sewerage and Water Board of New Orleans to Improve Reliability of Electric Service and Expedite a Long-Term Solution		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 Council every 30 days regarding the progress of its collaboration with SWBNO.	Terminate filing requirement as moot in light of Council staff and CURO direct involvement. Subsequent to the Council establishing these reporting requirements, a working group comprised of ENO, SWBNO, Council Staff, CURO and the Advisors was established. The periodic meetings of the working group provide information and interaction that is superior to the monthly reports.	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.	Maintain. Major operational information	Terminate filing requirement as moot in light of Council staff and CURO direct involvement.
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.	Terminate reporting requirement as moot. No new annual calculations of rough production cost equalization are anticipated in light of the 2015 termination of the Entergy System Agreement.	ENO has no recommended changes to this reporting requirement.	Maintain. Major operational information; Major cost recovery / refund information	The Advisors continue to believe that this requirement could be eliminated as discussed in our initial Comments, however, the Advisors have no objection to maintaining the requirement without change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
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.	<p>Terminate filing requirement as moot.</p> <p>This reporting information relates to a SEC complaint that is no longer particularly relevant as Entergy Corporation is in the process of exiting its merchant nuclear business.</p>	ENO has no recommended changes to this reporting requirement.		The Advisors continue to believe that this requirement could be eliminated as discussed in our initial Comments, however, the Advisors have no objection to maintaining the requirement without change.

	NAME OF REPORT INITIATED	Docket	Per Council Resolution	PURPOSE OF REPORT	Advisors' Initial Recommendation	ENO's Initial Recommendation	CCPUG's Initial Recommendation	Advisors' Final Recommendation
38	Annual Gas Storage Program Analysis Report		R-05-518 (Agreement in Principle, Ordering Paragraph 12) R-06-401	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.	Consolidate prescribed filing data into a single annual gas report. Gas storage and gas hedging are both price volatility mitigating practices. The Council's need to consider such price volatility control practices is efficiently accomplished by reviewing these data in a single report.	Please see ENO's recommendation with regard to ENO's Quarterly Reports of Natural Gas Storage Program.	Maintain. Major operational information; Major cost recovery information	The Advisors agree with ENO's suggestion and would also consolidate these reports with the Annual Gas Marketing Justification (Hedging Request) Report and the Annual gas Distribution System Report.
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.	No change to existing filing requirements. ENO's electric rate structure recently was substantially updated with new rates as part of Docket No. UD-18-07. Further, the Council may consider new rate structures in an evolving industry. A continued program to ensure ratepayers are aware of the likely most efficient rate schedule for their needs serves the public interest.	ENO has no recommended changes to this reporting requirement.		No change.

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40	<p>Annual Statement regarding the nature of inter-company transactions:</p> <ul style="list-style-type: none"> Independent Accountants' Report on Applying Agreed-upon Procedures; Annual Report Identifying Non-Clerical Personnel from any Regulated Utility 		<p>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.</p>	<p>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:</p> <ol style="list-style-type: none"> An organization chart that illustrates the utility and all of its regulated and unregulated affiliate(s); Officers of the parent or holding company, the utility, and all of its affiliates, as applicable; A complete description of the types of all costs shared with affiliate(s); The methodology and procedure used to allocate costs; and A summary of the total costs incurred from affiliate(s) and how those affiliate(s) costs are allocated 	<p>No change to existing filing requirements.</p> <p>The report in question is commonly referred to as the affiliate transaction report, and its information is useful to the Council's oversight of substantial portions of ENO's costs.</p>	<p>ENO has no recommended changes to this reporting requirement.</p>	<p>Maintain.</p> <p>Required by City Code; Major operational information</p>	<p>No change.</p>

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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.	Terminate filing requirement as unnecessary in light of the availability of these filings over the internet and the City Code requirement that ENO provide notice of such filings to the Council. These reports are publicly available, produced on a regular basis, and readily available online.	ENO recommends that this requirement be eliminated as the referenced reports are publicly available on Entergy's Corporate website.	Maintain. Major capital expenditures; Major operational information; Major cost recovery information	Terminate filing requirement as unnecessary in light of the availability of these filings over the internet and the City Code requirement that ENO provide notice of such filings to the Council.
42	Annual 1992 Affiliate Settlement Agreement Report Pursuant to the 1998 revision & R-98-187		R-98-187	A Settlement was reach 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.	Terminate filing requirement as moot. This reporting information relates to a SEC complaint that is no longer relevant since Entergy Corporation is in the process of exiting its merchant nuclear business.	ENO has no recommended changes to this reporting requirement.		The Advisors continue to believe that this requirement could be eliminated as discussed in our initial Comments, however, the Advisors have no objection to maintaining the requirement without change.

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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.	No change to existing filing requirements. There are still ongoing FERC dockets that may result in additional rough production cost equalization payments among the Operating Companies. The final resolution of any FERC rough production cost equalization related dockets may involve costs or benefits to ENO and its customers.	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.	Maintain. Major operational information; Major cost recovery / refund information	The Advisors agree that the reporting requirement will terminate upon final resolution of the last FERC docket that may result in additional rough production cost equalization payments among the Entergy Operating Companies.
44	Annual Gas Marketing Justification (Hedging Request) Report			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 and was later re-adopted. Each March, the Company files its request to hedge the upcoming winter gas. Generally, the approval for such hedging contracts is granted to the company via a Council Resolution.	Consolidate prescribed filing data into a single annual gas report. So long as the Council may wish to consider approving a winter heating season gas hedge program, the data provided in this report is useful. However, a single annual gas report is effective for the Council's needs.	ENO has no recommended changes to this reporting requirement.		The Advisors continue to believe this report could be consolidated as recommended in our initial Comments, but have no objection to maintaining the requirement without change.

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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	Consolidate prescribed filing data into a single annual gas report. The data presented in these filings, as prescribed in Paragraph 10 of the referenced Agreement in Principle, are useful for the Council's oversight of ENO's gas utility practices. However, a single annual gas report is effective for the Council's needs.	ENO has no recommended changes to this reporting requirement.		The Advisors continue to believe this report could be consolidated as recommended in our initial Comments, but have no objection to maintaining the requirement without change.
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.	No change to existing filing requirements. Rate actions, including rider true-up calculations, require Council oversight and review.	ENO has no recommended changes to this reporting requirement.	Maintain. Major operational information; Major cost recovery / refund information	No change.
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.	No change to existing filing requirements. ENO's franchises with the City require financing reauthorizations.	ENO has no recommended changes to this reporting requirement.	Maintain. Required by 1922 Franchise Ordinance No. 6822; Major operational information; Major cost recovery information	No change.

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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.	No change to existing filing requirements. "Avoided Cost" information is required to advance various Council policy objectives.	ENO has no recommended changes to this reporting requirement.	Maintain. Required by PURPA; Major operational information; Major cost recovery information	No change.
49	Monthly EAC Rate Filing		R-11-175	Recovery of emission allowance costs	N/A (Report added in ENO's comments.)	ENO has no recommended changes to this reporting requirement.	N/A (Report added in ENO's comments.)	No change.
50	Monthly PGA Filing		R-95-361 R-05-518 R-05-547	Recovery of Resale Gas expense for LDC business	N/A (Report added in ENO's comments.)	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.	N/A (Report added in ENO's comments.)	No change. The Advisors oppose ENO's proposal to change the manner in which the PGA is calculated.

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51	Annual Energy Efficiency Rider rate filing		R-17-623 R-15-140 R-17-176	Recovery of Energy Efficiency program costs	N/A (Report added in ENO's comments.)	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.e., 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.	N/A (Report added in ENO's comments.)	The Advisors have no objection to ENO's proposal.

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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.	N/A (Report added in ENO's comments.)	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.	N/A (Report added in ENO's comments.)	No change.
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.	N/A (Report added in ENO's comments.)	ENO has no recommended changes to this reporting requirement.	N/A (Report added in ENO's comments.)	No change.
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.	N/A (Report added in ENO's comments.)	ENO recommends that its Annual Reliability Plan be filed by January 31st of the year for which the plan is scheduled to be worked.	N/A (Report added in ENO's comments.)	The Advisors have no objection to ENO's proposal.

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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.	N/A (Report added in ENO's comments.)	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.	N/A (Report added in ENO's comments.)	The Advisors have no objection to ENO's proposal, but would add the requirement that the consolidated report contain the same level of detail as the individual reports.