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Kimberly R. Silas  
Senior Counsel  
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February 26, 2021

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

**Re: 2021 TRIENNIAL INTEGRATED RESOURCE PLAN  
OF ENTERGY NEW ORLEANS, LLC  
Council Docket No. UD-20-02**

Dear Ms. Johnson:

Entergy New Orleans, LLC (“ENO”) respectfully submits its Reply to Advisors’ Motion to Extend Procedural Deadlines 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 original and requisite 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.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Silas".

Kimberly R. Silas

KRS/ddm  
Enclosures

cc: Official Service List via email

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

**IN RE: 2021 TRIENNIAL )  
INTEGRATED RESOURCE PLAN OF ) DOCKET NO. UD-20-02  
ENERGY NEW ORLEANS, LLC )**

**ENERGY NEW ORLEANS, LLC’S  
REPLY TO ADVISORS’ MOTION TO EXTEND PROCEDURAL DEADLINES**

Entergy New Orleans, LLC, (“ENO”), through undersigned counsel, respectfully submits its Reply to the *Advisors’ Motion to Extend Procedural Deadlines*<sup>1</sup> (“Advisors’ Motion”) in the above-captioned Docket.

On August 20, 2020, the Council of the City of New Orleans, (“Council”), adopted Resolution No. R-20-257, (“Initiating Resolution”), which set forth the procedural schedule governing the 2021 Integrated Resource Plan (“IRP”). When the Initiating Resolution was adopted, it contained a provision which stated that the Council was “declin[ing] to hire an independent consultant to perform a DSM Potential Study for the 2021 Triennial IRP.”<sup>2</sup> However, on the same day of its adoption – August 20, 2020 – the Council adopted Motion No. M-20-69, authorizing the Council to issue a RFP to identify a DSM Potential Study Consultant. On January 28, 2021, five months after the adoption of Motion No. M-20-69, the Council, through Motion No. M-21-34, authorized the Council President to contract with GDS Associates, Inc., (“GDS”), as its independent consultant. To make accommodations for the recent retention of GDS, the Advisors filed two motions to amend the procedural schedule on February 19, 2021. One motion sought to

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<sup>1</sup> On Friday, February 19, 2020, the Advisors’ filed two motions: 1) *Advisors’ Motion to Extend Procedural Deadlines*, and 2) *Advisors’ Motion to Extend Procedural Deadline*. The latter motion sought to extend the deadline for the 2021 IRP Report from January 24, 2022 to March 25, 2022. ENO does not oppose that motion. ENO’s Reply is in response to the Advisors’ former motion which seeks to extend the remaining deadlines.

<sup>2</sup> *See In Re: 2021 Triennial Integrated Resource Plan of Entergy New Orleans, Inc., Docket No. UD-20-02, Initiating Resolution*, Resolution No. R-20-257 (August 20, 2020) at p.7.

extend the filing deadline for the final 2021 IRP Report from January 24, 2022 to March 25, 2022. The other motion proposed extensions and adjustments to the other procedural schedule deadlines in order to accommodate the later Report filing deadline. ENO did not oppose the extension of the Report filing deadline in the first motion, but reserved its rights to propose alternative dates for the other procedural milestones once it had a chance to review the Advisors' proposal with the Company's Enterprise Planning Group (EPG) and get that group's input on the time necessary to perform the required IRP analyses.

Based on EPG's feedback, ENO has proposed a series of alternative milestones and deadlines as shown in the table below. In order to sync up with the Advisors' proposed December 21, 2021 date for completing the development of optimized portfolios, and to be ready to share those results at Technical Meeting #4 in January 2022, EPG will need to sequence its work differently than it did in the 2018 IRP cycle.

As discussed in prior technical meetings, the first major component of the IRP analysis involves the modeling of the MISO market outside New Orleans. EPG plans to use the Aurora Capacity Expansion module to build out the MISO market subject to the inputs and assumptions for each of the Planning Scenarios agreed upon by the parties. Given the expectation that the MISO market will need to be modeled under three or four different Scenarios, EPG projects that this work will require almost three months of processing and analysis time. In order to complete the MISO Market Expansion and be in a position to meet the revised deadlines for developing portfolios based on the final Planning Strategies and DSM studies that will now be filed July 31, 2021, EPG would need to start work on the MISO Market buildout no later than May 25, 2021. This would enable EPG to complete the MISO Market Expansion by August 13, 2021.

To accommodate the May 25 start date for this analysis, the parties will need to agree upon the final Planning Scenarios to be used shortly after Technical Meeting #2. While this would require the meeting to be held a couple months earlier than the Advisors proposed in their motion, ENO does not foresee this change from the current schedule (which calls for the Scenarios to be finalized at Technical Meeting #3) presenting substantive issues for the parties. Assuming TM #2 is held in mid-May as shown in the table below, at that meeting the parties would review all of the Business Plan 2021 (BP21) inputs and assumptions and the results of the BP21 technology assessment, further discuss ENO's proposed Scenarios originally shared at Technical Meeting #1, and discuss a proposed Stakeholder Scenario if the Stakeholders have opted to include one. Based on these discussions, the parties would be able to confirm their agreement on the final Planning Strategies shortly thereafter, by May 24, 2021.

In order to stay on track with EPG's workplan, ENO proposes to hold Technical Meeting #3 in early- to mid-August instead of mid- to late-August as proposed by the Advisors. The Planning Strategies would be finalized at Technical Meeting #3 as contemplated by the original schedule, and the finalization of Council policies and IRP inputs that might bear on the Planning Strategies would all occur shortly thereafter, on August 15, 2021. With EPG having completed the MISO Market Expansion on August 13, this sequencing would allow EPG to then begin the work necessary to process the DSM inputs from the recently-filed DSM studies and generate optimized portfolios based on the finalized Planning Strategies in time to meet the December 21 deadline proposed by the Advisors. Once the optimized portfolios are completed, ENO's proposed dates align with the Advisors' as reflected in the following table:<sup>3</sup>

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<sup>3</sup> ENO's Proposed Deadlines that are listed in bold are the only deadlines that differ from the Advisors' Proposed dates.

<u>Event</u>	<u>Existing Deadline</u>	<u>ENO's Proposed Deadlines</u>
Technical Meeting 2	March 15-March 26, 2021	<b>May 10-May 21, 2021</b>
NEW—Finalize Scenarios and non-DSM Inputs		<b>May 24, 2021</b>
DSM Achievable Scenarios & Benchmarking circulated to Service List		June 15, 2021
DSM Potential Studies due	March 1, 2021	July 30, 2021
Technical Meeting 3	May 31-June 11, 2021	<b>August 2-August 13, 2021</b>
Deadline for new Council policies that can be incorporated in Strategies	May 14, 2021	<b>August 15, 2021</b>
Finalize all IRP inputs	June 14, 2021	<b>August 15, 2021</b>
Completion of optimized portfolio development and results	Oct. 8, 2021	Dec. 21, 2021
Technical Meeting 4	Oct. 25-Nov. 5, 2021	January 6-January 20, 2022
2021 IRP Report filed	January 24, 2022	March 25, 2022
Second Public Meeting	Feb. 7-Feb 18, 2022	April 8-15, 2022
Third Public Meeting (Council receives public comment)	March 7-March 18, 2022	April 29-May 6, 2022
Technical Meeting 5	March 7-March 18, 2022	April 29-May 6, 2022
Intervenor Comments on Final IRP	March 24, 2022	May 9, 2022
ENO Reply Comments	May 5, 2022	June 7, 2022
Discovery closes	May 25, 2022	June 27, 2022
Advisor Report	June 9, 2022	July 12, 2022
Energy Smart Implementation Plan Filing for PY 13-15	June 16, 2022	July 19, 2022

ENO is proposing only minimal modifications to the Advisors' proposed schedule in order to allow EPG the time necessary to complete the detailed analyses required under the Council's IRP Rules while remaining aligned with most of the revised milestones. As stated above, ENO does not anticipate that these necessary modifications would present issues for other stakeholders. Based on the current procedural schedule, DSM potential studies are due on March 1, 2021, and ENO

requests that the March 1<sup>st</sup> deadline be suspended. In addition, ENO would like the opportunity to engage the parties in a discussion to determine whether a consensus can be reached on a new schedule prior to the Judge's ruling. However, if a consensus cannot be reached, ENO respectfully requests that its proposed procedural schedule be adopted.

Respectfully submitted:

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

**CERTIFICATE OF SERVICE**  
**DOCKET NO. UD-20-02**

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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New Orleans, Louisiana, this 26<sup>th</sup> day of February, 2021.



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Kimberly R. Silas