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November 16, 2022

Via Electronic Delivery

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

Re: **In Re: 2021 Triennial Integrated Resource Plan of Entergy New Orleans, LLC**
Docket No. UD-20-02

Dear Ms. Johnson:

Entergy New Orleans, LLC (“ENO”) respectfully submits its Comments Regarding the Advisors’ Recommendations for Future IRP Proceedings 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.

Should you have any questions regarding the above, I may be reached at (504) 670-3633. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Keith D. Wood'.

Keith D. Wood

KDW/bkd
Enclosures
cc: Official Service List (*via email*)

BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS

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

COMMENTS OF ENTERGY NEW ORLEANS, LLC REGARDING THE ADVISORS’
RECOMMENDATIONS FOR FUTURE IRP PROCEEDINGS

The Company appreciates the opportunity to submit comments regarding the Advisors’ four recommendations for future IRP proceedings included in the Resolution approving the 2021 IRP Report.¹

Recommendation #1

The Company agrees with the suggestion that the Council should provide guidance on making portfolios produced using inputs from different studies more directly comparable if the Council hires its own independent expert to produce a DSM potential study for the 2024 IRP. The Company acknowledges the difficulty in aligning input cases produced from two different studies for use in the IRP modeling and analysis, even when the two studies generally agree in outlook and approach as the Guidehouse and GDS studies did for the 2021 IRP. The Company would like to explore options for agreeing on a single DSM consultant to produce a report used for the 2024 IRP.

¹ See, Resolution R-22-369, at p. 20.

Recommendation #2

The Company notes that Sections 3.3.4 and 3.3.5 of the 2021 IRP Report included detail regarding how specific distributed energy resources such as behind-the-meter solar generation and electric vehicles impact the load forecast. Ideas for other types of resources or additional information that could be added to this section can be discussed among the parties during the technical meetings for the 2024 IRP.

Recommendation #3

The Company notes that the Advisors' Recommendation #3 is substantially similar to their Recommendation #8 provided in conjunction with approval of the 2018 IRP.² The Company filed comments in response to that recommendation and re-urges and incorporates those comments here as they continue to be applicable to this discussion.³

The Advisors' instant Recommendation #3 includes the additional suggestion that ENO "continue modeling an early retirement date for Union Power Station PB1." This is consistent with the agreements reached among the parties in the 2021 IRP Stakeholder Process to include manual portfolios to analyze an alternative 2025 deactivation date for Union 1. The Company believes using manual portfolios to model an alternative retirement date for Union 1 is a preferable approach and can be continued in the 2024 IRP cycle, provided the total number of optimized and manual portfolios required is within EPG's capacity to execute in the time allotted by the procedural schedule.

² See, Resolution R-20-50, at p. 24.

³ See, Entergy New Orleans, LLC's Comments Concerning the Advisors' Recommendations for Future IRP Proceedings, filed March 23, 2020, at pp. 6-9.

Recommendation #4

This recommendation would add a further layer of complexity to the IRP modeling by going beyond the analysis of early retirement dates suggested in Recommendation #3 to include “optimizing an energy-based model solution.” As an initial matter, ENO disagrees with optimizing for an energy-based model solution to add resources beyond ENO’s capacity needs because the value of those excess resources is dependent on uncertain market prices of capacity and energy, which increases the market risk imposed on ENO’s customers. Evaluation of early deactivations using manual portfolios will increase capacity needs; therefore, optimizing with an energy-based model is not necessary to force resource additions.

If the Council decides to consider this path despite the concerns articulated above, ENO agrees that evaluation of early retirements may require an increase in the procedural schedule depending on the number and scope of the evaluations. Furthermore, ENO believes that the number and scope of these evaluations should be limited to only those that may provide meaningful information. ENO does not believe that it is necessary to evaluate every possible deactivation alternative because the cost and time required exceeds the value of the insight such evaluations would provide for the reasons discussed in the Company’s March 23, 2020, comments referenced above. Instead, any deactivation alternatives that are evaluated should be judiciously chosen and limited to those that are both feasible and reasonably define the potential range of alternatives.

Conclusion

The Company appreciates the opportunity to file these comments for the Council’s consideration regarding future IRP cycles.

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 16th day of November 2022.



Keith D. Wood