

February 11, 2022

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

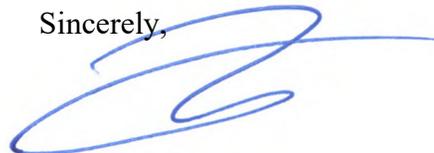
**Re: IN RE: SYSTEM RESILIENCY AND STORM HARDENING
Council Docket No. UD-21-03**

Dear Ms. Johnson:

Entergy New Orleans, LLC (“ENO”) respectfully submits its Motion to Extend Deadline. 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.

If you have any questions or concerns about this request, please contact me at your convenience.

Sincerely,



Brian L. Guillot

BLG/kll

cc: Official Service List by Electronic Mail

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

**IN RE: SYSTEM RESILIENCY AND
STORM HARDENING**

)
)

DOCKET NO. UD-21-03

ENTERGY NEW ORLEANS, LLC’S MOTION TO EXTEND DEADLINE

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits this motion seeking to extend the March 1, 2022 deadline contained in Resolution R-21-401. The requested extension would move the current filing deadline of March 1, 2022 to August 31, 2022, for the reasons set forth herein.

The work on developing a comprehensive storm hardening and resilience plan began in early September 2021, and ENO has already undertaken certain hardening projects since that time that will be complete by the 2022 hurricane season and are expected to benefit ENO customers. While the Company has been working to develop a comprehensive analysis that would support the Storm Hardening Plan contemplated in Resolution R-21-401, the analysis to support its plan is complex and resource-intensive. Despite diligent efforts, the Company does not expect to have completed its analysis in time to present it in a filing on the current deadline.

The Company is focused on recommending an appropriate and optimal set of measures, keeping in mind that anything less may result in unnecessary costs to customers—and that such a process deserves careful consideration given the potential rate and storm impact of the plan for years to come. That is why the Company is thinking innovatively and developing new tools that will be used to analyze this issue in a robust manner, considering thousands of storm scenarios and developing solution-sets that drive to desired levels of lower damage probabilities considering

costs. Moreover, because ENO is extremely dependent on generation and transmission elements outside of New Orleans, this analysis must be informed by elements external to ENO's system.

This level of analysis and expertise takes time to procure, develop, then produce results. Time is also needed to distill the results and produce expert testimony and an executable plan with alternatives. Moreover, the proposed timeframe is much shorter than storm-hardening/resiliency reports produced in the past. For example, Sandia National Laboratories was engaged by the City of New Orleans to study resiliency in January 2016 and took nearly two years to release its Phase I analysis, in October 2017. While ENO does not expect that its filing will take nearly that long to complete, the requested extension will provide the Company with the time it needs to ensure that the long-term objectives of this docket are addressed for the Council's consideration. Ultimately, the Company strives to make a filing that allows the Council and the parties to understand exactly what is being recommended and what alternatives exist.

The Company respectfully suggests that the public interest would be served by allowing more time for meaningful, workable hardening and resiliency strategies supported by robust analysis. Moreover, granting the requested extension of time would not have a material impact on the timeline for implementation of any Council approved plan, which in any case could not be approved and implemented before the 2022 hurricane season. At the time of this filing, Air Products and the New Orleans Sewerage and Water Board have indicated that they do not oppose the extension.

WHEREFORE, for the reasons set forth herein, ENO respectfully requests that the Council grant this motion and extend the current deadline from March 1, 2022 to August 31, 2022. ENO requests that the motion be considered at the next meeting of the full Council.

Respectfully submitted,

BY:



Brian L. Guillot, La. Bar #31759
Leslie LaCoste, La. Bar #38307
ENERGY SERVICES, LLC
639 Loyola Avenue
Mail Unit L-ENT-26E
New Orleans, Louisiana 70113
Telephone: (504) 576-6523
Facsimile: (504) 576-5579
bguill1@entergy.com
llacost@entergy.com

CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of February, 2022, served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual, by: electronic mail, facsimile, hand delivery, and/or by depositing same with overnight mail carrier, or the United States Postal Service, postage prepaid.

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

Erin Spears, Chief of Staff
Bobbie Mason
Christopher Roberts
Council Utilities Regulatory Office
City of New Orleans
City Hall, Room 6E07
1300 Perdido Street
New Orleans, LA 70112

Andrew Tuozzolo
CM Moreno Chief of Staff
1300 Perdido Street, Rm 2W40
New Orleans, LA 70112

Paul Harang
Interim Council Chief of Staff
New Orleans City Council
City Hall, Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Donesia D. Turner
City Attorney Office
City Hall, Room 5th Floor
1300 Perdido Street
New Orleans, LA 70112

Norman White
Department of Finance
City Hall – Room 3E06
1300 Perdido Street
New Orleans, LA 70112

Jonathan M. Rhodes
Director of Utilities, Mayor’s Office
City Hall-Room 2E04
1300 Perdido Street
New Orleans, LA 70012

Hon. Jeffrey S. Gulin
3203 Bridle Ridge Lane
Lutherville, MD 21093

Clinton A. Vince, Esq.
Presley R. Reed, Jr., Esq.
Emma F. Hand, Esq.
Adriana Velez-Leon
Dee McGill
Dentons US LLP
1900 K Street NW
Washington, DC 20006

Basile J. Uddo
J.A. “Jay” Beatmann, Jr.
c/o Dentons US LLP
650 Poydras Street, Suite 2850
New Orleans, LA 70130

Joseph W. Rogers
Victor M. Prep
Byron S. Watson
Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111

Courtney R. Nicholson
Vice-President, Regulatory Affairs
Entergy New Orleans, LLC
Mail Unit L-MAG-505B
1600 Perdido Street
New Orleans, LA 70112

Barbara Casey, Dir. Regulatory Operations
Polly Rosemond
Kevin T. Boleware
Brittany Dennis
Keith Wood
Derek Mills
Ross Thevenot
Entergy New Orleans, LLC
1600 Perdido Street
Mail Unit L-MAG-505B
New Orleans, LA 70112

Brian L. Guillot
Leslie M. LaCoste
Entergy Services, LLC
Mail Unit L-ENT-26E
639 Loyola Avenue
New Orleans, LA 70113

Joe Romano, III
Tim Rapier
Entergy Services, LLC
Mail Unit L-ENT-4C
639 Loyola Avenue
New Orleans, LA 70113

Vincent Avocato
Entergy Services, LLC
10055 Grogan's Mill Road
Parkwood II Bldg.
Mail Unit T-PKWD-2A
Suite 500, The Woodlands, TX 77380

Katherine W. King
Randy Young
Kean Miller LLP
400 Convention Street, Suite 700
Post Office Box 3513
Baton Rouge, LA 70821-3513

Carrie R. Tournillon
Kean Miller LLP
900 Poydras Street, Suite 3600
New Orleans, LA 70112

Maurice Brubaker
Brubaker & Associates, Inc.
16690 Swingley Ridge Road, Suite 140
Chesterfield, MO 63017

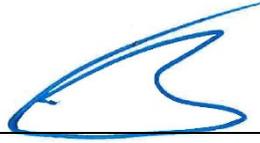
Jesse George
Logan Atkinson Burke
Sophie Zaken
Alliance for Affordable Energy
4505 S. Claiborne Avenue
New Orleans, La 70125

Yolanda Y. Grinstead, Esq.
Edward M. Morris, Esq.
Sewerage and Water Board
New Orleans – Legal Dept.
625 St. Joseph Street, Room 201
New Orleans, Louisiana 70165

Pastor Gregory Manning
President, Board of Directors of GNOICC
2021 S. Dupre Street
New Orleans, Louisiana 70125

Jonathan Sebastian Leo
Member, Board of Directors, GNOICC
10942 Neale Fraser Drive
Baton Rouge, Louisiana 70810

Myron Katz, PhD
Building Science Innovators, LLC
Prorate Energy, Inc.
302 Walnut Street
New Orleans, LA 70118



Brian L. Guillot