

February 17, 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 Amended 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

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Enc.

cc: Official Service List by Electronic Mail

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

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

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DOCKET NO. UD-21-03

ENERGY NEW ORLEANS, LLC'S AMENDED MOTION TO EXTEND DEADLINE

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits this Amended Motion seeking to extend the March 1, 2022 deadline contained in Resolution R-21-401. While the original motion requested to move the current filing deadline of March 1, 2022 to August 31, 2022, ENO has consulted with its experts to determine whether anything can be done to accelerate its filing. While such an acceleration may require some scaling back of the analysis, at least for the initial filing, the Company believes that a filing by July 1, 2022 can be achieved; the Company further notes that this proposed deadline is the earliest that reasonably can be achieved consistent with the scope and scale of the supporting analysis that ENO envisions presenting to the Council to comply with the various terms of Resolution R-21-401. To help mitigate any timing concerns, ENO also commits to hosting two technical conferences, the first to be held in April 2022, and a second in June 2022, so that the parties (all parties are responsible for filing plans under Resolution R-21-401) can provide updates regarding their respective plans.

In its original motion, ENO explained in detail that the work to develop a comprehensive analysis that would support the Storm Hardening Plan contemplated in Resolution R-21-401 will not be completed by the current deadline. The Company explained that recommending an appropriate and optimal set of measures is important to avoid unnecessary costs to customers. The Company has stated that it needs additional time to produce an analysis that complies with the requirements of Resolution R-21-401, which specifically states as follows:

6. **Parties** are directed to submit to the Council a system resiliency and storm hardening plan no later than March 1, 2022. **Such plans** should include:
- a. A detailed **explanation of the specific investments** to be made under the plans including a **proposed timeframe** for such investments;
 - b. A detailed explanation and, as appropriate, calculations of the **benefits to be achieved** through each investment, and
 - c. A detailed explanation of the **estimated costs of the plans** along with proposed **cost recovery mechanisms** and **rate impact calculations**

(emphasis added). To be clear, consistent with Resolution R-21-401, the Company's storm hardening and resiliency plan will be a prospective proposal for the consideration of the Council and parties that addresses each of the required elements. And as stated, the Company is in the process of developing new tools that consider thousands of storm scenarios and solution-sets that drive to desired levels of lower damage probabilities considering costs. The Company also stated that other efforts to develop Storm Hardening and Resiliency plans have taken much longer to complete, citing to a study performed by Sandia National Laboratories regarding New Orleans, which took nearly two years.

The Alliance for Affordable Energy ("AAE") and Greater New Orleans Interfaith Climate Coalition ("GNOICC") have objected to ENO's Motion, recommending a set of extremely onerous requirements to be placed on ENO before it has even made a filing, which would amount to an almost constant reporting obligation regarding a regulatory filing still under development. These burdensome requirements have never before been adopted by this Council, violate ENO's legal privileges, and are punitive to one particular party, ignoring the fact that other parties are also required to submit their own plans pursuant to Resolution R-21-401, which requires the "parties" to submit their own "plans." Moreover, once these filings are made, as is typically the case in Council proceedings, ENO expects that a procedural schedule will follow that provides a full and

fair opportunity for the parties to review any plans submitted and provide feedback and suggestions for alternatives for the Council's consideration.

Finally, in its original motion, ENO stated that it has already undertaken certain hardening projects that will be complete by the 2022 hurricane season and are expected to benefit ENO customers. To be clear, however, the referenced work was not done pursuant to any proposed storm hardening plan and resiliency plan, which has not yet been developed. The referenced work is aligned with other reliability investments and will be reflected in its 2022 FRP to be filed in April 2022, which is the appropriate docket for parties to review such investments.

Again, the level of analysis and expertise necessary to submit a comprehensive plan takes time to procure, develop, then produce results. While the original motion requested to move the current filing deadline of March 1, 2022 to August 31, 2022, ENO has consulted with its experts to determine whether anything can be done to accelerate its filing; and the Company believes that a filing by July 1, 2022 is the earliest deadline that reasonably can be achieved, consistent with the scope and scale of the analysis that ENO envisions presenting to the Council to comply with the various requirements of the resolution as quoted above. However, by modifying its request to meet an earlier date, the July 1, 2022 filing may not include factors external to the City of New Orleans and it may be necessary to supplement the filing with additional analysis in the weeks or months that follow. ENO will certainly strive to complete the analysis as diligently and as reasonably possible and present the most fulsome analysis reasonably possible by the July 1, 2022 date. In addition, as stated above, in order to ensure that progress is being made by all parties, the Company also commits to hosting two technical conferences, one in April 2022 and another in June 2022, where parties can provide updates regarding their respective storm hardening and

resiliency plans. The specific dates for the technical conferences can be discussed and agreed to by the parties.

WHEREFORE, for the reasons set forth herein, ENO respectfully requests that its Amended Motion to extend the current deadline from March 1, 2022 to July 1, 2022 be granted, and that technical conferences in April 2022 and June 2022 be ordered, with the exact dates to be determined through discussions among the parties.

Respectfully submitted,

By:



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**ATTORNEYS FOR
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CERTIFICATE OF SERVICE

I hereby certify that I have this 17th 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.

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