



Lacresha Wilkerson
Senior Counsel
Entergy Services, LLC
504-576-6571 | lwilke1@entergy.com
639 Loyola Avenue, New Orleans, LA 70113

April 15, 2024

Via Electronic Delivery

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

**Re: CNO Docket No. UD-17-04: Electric System Distribution Reliability Standards
("ESDRS) 2023 Annual Compliance Filing pursuant to Resolution R-23-73**

Dear Ms. Johnson:

Please find enclosed for further handling Entergy New Orleans, LLC's ("ENO") 2023 ESDRS Compliance Filing, submitted pursuant to Resolution R-23-73. This filing provides 2023 SAIFI and SAIDI calculations for ENO's distribution and transmission systems, distribution system SAIFI and SAIDI for each of ENO's distribution feeders, and identification of the lowest five percent of feeders based on annual SAIFI performance, along with the Company's proposed plan, budget, and schedule to improve performance of those feeders, as well as an alternative methodology for determining and addressing the lowest performing feeders.

Additionally, the distribution and transmission system outage data sets for the period of January 1, 2023, through December 31, 2023 are being provided to the Council's Advisors bearing the designation "Highly Sensitive Protected Materials" pursuant to the terms and conditions of the Official Protective Order adopted in Council Resolution R-07-432.

ENO submits this filing electronically and will submit the requisite original and number of hard copies as directed. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Thank you for your assistance with this matter.

Best Regards,

A handwritten signature in blue ink, appearing to read 'LW', with a long horizontal flourish extending to the right.

Lacresha Wilkerson

Enclosures

cc: All Councilmembers
Council Utilities Regulatory Office
Council Advisors

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

RESOLUTION DIRECTING)	
ENTERGY NEW ORLEANS, INC. TO)	
INVESTIGATE AND REMEDIATE)	
ELECTRIC SERVICE DISRUPTIONS)	
AND COMPLAINTS AND TO)	DOCKET NO. UD-17-04
ESTABLISH MINIMUM ELECTRIC)	
RELIABILITY PERFORMANCE)	
STANDARDS AND FINANCIAL)	
PENALTY MECHANISMS)	

ENTERGY NEW ORLEANS, LLC’S 2023 ESDRS COMPLIANCE FILING

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits this annual filing in compliance with Resolution R-23-73, which was adopted by the Council of the City of New Orleans (the “Council”) on February 16, 2023, and approved the Electric System Distribution Reliability Standards (“ESDRS”). The ESDRS require ENO to provide in an ESDRS Annual Compliance Filing a data set including all distribution system and transmission system outages for the reporting year, SAIFI and SAIDI calculations for ENO’s distribution and transmission systems, distribution system SAIFI and SAIDI for each of ENO’s distribution feeders, and identification of the lowest five percent of feeders based on annual SAIFI performance, along with the Company’s proposed plan, budget, and schedule to improve the lowest performing feeders. Resolution R-23-73 also requires ENO to provide an “alternative methodology for determining and addressing the lowest performing feeders and how that ranking compares with the Council’s current proposed methodology, in its first ESDRS compliance filing.”¹ This filing addresses these requirements.

¹ The Council recognized in Resolution R-23-73 that ENO’s arguments may have merit with respect to the determination and evaluation of poor performing feeders, and rather than delay implementation of the ESDRS, the Council chose to receive information in ENO’s first ESDRS Annual Compliance Filing.

I. 2023 Reliability Performance

Under the ESDRS, the minimum annual performance level for distribution system SAIFI, measured annually and with respect to the Company's entire service territory, is 1.53. The minimum annual performance level for distribution SAIDI is 178.2. Table 1 below sets forth the Company's distribution and transmission system SAIFI and SAIDI calculations for the period of January 1, 2023, through December 31, 2023, and shows that ENO met annual minimum performance levels for that period:

TABLE 1

ENO'S 2023 ELECTRIC SYSTEM PERFORMANCE		
	SAIFI	SAIDI
Distribution	1.14	129.1
Transmission	0.12	11.3

In further compliance with the ESDRS and Resolution R-23-73, the Company is attaching the following information:

1. Distribution and Transmission System Outage Data Sets;²
2. Distribution System SAIFI and SAIDI Calculations for ENO's Distribution Feeders;³ and
3. Identification and Plans (Both Current and Proposed Alternative Methodology) for the Lowest 5% Performing Feeders.⁴

² This data may include Highly Sensitive Protected Material ("HSPM") and, accordingly, are being provided to be the Council's Advisors bearing the HSPM designation pursuant to the terms and conditions of the Official Protective Order adopted in Council Resolution R-07-432.

³ Data reflects time period from January 1, 2023, through December 31, 2023.

⁴ Data reflects modified time period from October 1, 2022, through September 30, 2023.

II. ENO's Proposed Alternative Methodology Identifying Lowest Performing Feeders

Under the ESDRS, the “poor performing feeders” are evaluated solely on the annual feeder-specific SAIFI scores, and the Company could be penalized up to \$500,000 annually for failing to “measurably improve” the “poor performing feeders” after implementation of a targeted improvement plan. The Company respectfully submits that the method for identifying those feeders could be more holistic than simply an evaluation of a feeder’s SAIFI score. Because the customer counts on feeders can change significantly throughout the year due to field switching, the SAIFI for a feeder may not accurately represent the performance of the feeder.

Instead, ENO proposes the following alternative methodology that may be a more appropriate representation of feeder performance based on customer interruptions. Both the original and alternate feeder lists provided with this filing reflect the distribution line view of SAIFI that ENO has traditionally reported. But the proposed alternative methodology also excludes outages due to scheduled interruptions and emergency switching. These outages reflect the work being undertaken to improve reliability and the Company’s continued use of enhanced safety practices that are designed to reduce the risk of electrical contact and arc-flash injuries when performing work on or near primary wires by requiring de-energization of all or portions of a work area. These safety practices help ENO maintain a safe work environment for its employees and contractors, but the protocols can contribute to increased outage frequency and/or duration. Although outages accompanying planned work may increase the feeder SAIFI as the Company completes the projects in a safe manner, this work helps improve system reliability over the long run.

ENO's proposed alternative therefore allows for consideration of specific issues that put outage data into proper context. For example, feeder 1202 is the worst performing feeder according to the original ESDRS methodology with a feeder SAIFI of 81.989; however, this feeder only experienced a total of five outages during the reporting period, of which only two outages impacted all customers associated with this feeder, with the remaining three outages impacting only a portion of these customers. Due to temporary reconfiguration at the time of two of these outages and the impact this has upon the SAIFI calculation, the feeder SAIFI exceeds the total outage count and suggests that the average customer on this feeder experienced 82 outages, which is not accurate. Under the alternate methodology that can consider the impact of any temporary changes to a feeder, feeder 1202 has a recalculated feeder SAIFI of 2.770, which more accurately shows the outages experienced by the average customer associated with this feeder.

Respectfully submitted,



Brian L. Guillot, La. Bar No. 31759
Lacresha Wilkerson, La. Bar No. 36084
Leslie LaCoste, La. Bar No. 38307
ENTERGY SERVICES, LLC
639 Loyola Avenue, Mail Unit L-ENT-26E
New Orleans, Louisiana 70113
Telephone: (504) 576-6523
Fax: (504) 576-5579
bguill1@entergy.com
lwilke1@entergy.com
llacost@entergy.com

-and-

W. Raley Alford, III, La. Bar No. 27354
STANLEY REUTER THORNTON ALFORD,
L.L.C.

909 Poydras Street, Suite 2500
New Orleans, Louisiana 70112
Telephone: (504) 523-1580
Facsimile: (504) 524-0069
wra@stanleyreuter.com

-and-

Timothy S. Cragin, La. Bar No. 22313
TAGGART MORTON, LLC
1100 Poydras Street, Suite 2100
New Orleans, Louisiana 70163
Telephone: (504) 250-4601
Facsimile: (504) 576-5579
tcragin@entergy.com

**ATTORNEYS FOR
ENTERGY NEW ORLEANS, LLC**

CERTIFICATE OF SERVICE
Docket No. UD-17-04

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.



Lacresha Wilkerson