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December 6, 2024

**Via Electronic Delivery**

Clerk of Council  
Council of the City of New Orleans  
Room 1E09, City Hall  
1300 Perdido Street  
New Orleans, LA 70112

**Re: Docket No. UD-23-02 Customer Protection**

Dear Clerk of Council:

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits Comments, in compliance with the requirements of Resolution No. R-24-574 (“Resolution”), adopted by the Council of the City of New Orleans (the “Council”) on October 10, 2024 to draft revised service regulations with respect to communications.

ENO submits this filing electronically and will submit the requisite original and number of hard copies as directed.

If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

Sincerely,

  
Kevin T. Boleware

Enclosures

cc: Official Service List (*via email*)

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

<b>RESOLUTION AND ORDER</b>	)	
<b>ESTABLISHING A DOCKET TO</b>	)	
<b>ASSESS AND AMEND SERVICE</b>	)	
<b>REGULATIONS AND CODE</b>	)	<b>DOCKET NO. UD-23-02</b>
<b>PROVISIONS RELATED TO</b>	)	
<b>CUSTOMER PROTECTIONS</b>	)	

**ENTERGY NEW ORLEANS, LLC’S COMMENTS IN RESPONSE TO RESOLUTION  
NO. R-24-574 WITH RESPECT TO THE PROPOSED REVISIONS OF THE SERVICE  
REGULATIONS RELATED TO OUTAGES IMPACTING CUSTOMERS**

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits Comments, in compliance with the requirements of Resolution No. R-24-574 (“Resolution”), which was adopted by the Council of the City of New Orleans (the “Council”) on October 10, 2024. Resolution R-24-574 ordered ENO to draft revised service regulations with respect to communications to the Council and Council Utilities Regulatory Office (“CURO”) regarding outages impacting over 100 customers; and 50 customers or more during a declared state-of-emergency or extreme weather conditions. This filing addresses these topics.

**I. EFFECTS OF THE PROPOSED REDUCTION REGARDING THE  
CUSTOMER COUNT THRESHOLD**

ENO has identified two proposed changes that will be extremely difficult for the Company to execute, to wit: the requirement to notify the council of any outage impacting over 100 customers and the requirement to notify the Council of any outage impacting over 50 customers during a declared state-of-emergency or extreme weather conditions.

Under the current service regulations, ENO is required to inform CURO and the Council of any outages involving over 2500 customers. However, following a technical conference and within its Reply Comments filed on May 3, 2024, in an effort to ensure that CURO and the Council

are fully informed, ENO proposed changes to the service regulations to reduce the notification threshold to 500 customers. Following the proposed revisions, Customer Service Managers (“CSMs”) began notifying Councilmembers of any outage impacting more than 500 customers. The process originates from either our Distribution Operations Center (“DOC”) or a field crew member of our Operations Team. The primary, and most important job for these employees is to restore power as quickly and safely to our customers in the event of an outage.

The proposed revisions to lower the customer count, will require additional personnel and, in the short-term, likely delay restoration of power to customers due to the manual notification process. This will require employees to stop the switching or restoration process, to send out additional required outage notification information to CSMs. The notification information generally includes time of outage, estimated restoration time, number of customers impacted and cause, as this information becomes available during the outage event. In the initial outage communication, the CSM for the respective council district then sends a group text with this information to the Councilmember whose district is impacted, the two At-Large Councilmembers and their staff, as well as CURO. ENO continues to provide updated information to the Council/CURO on the number of customers impacted until power is fully restored.

While safely restoring power is our top priority, we also understand that communicating information is important, which is how we settled on the 500-customer count. Anything less would require an increase in personnel, equipment and training at the DOC and Customer Service levels, which leads to increased costs to customers. The outage map also provides this information in almost real time and our quarterly reliability report provides this information post-outage. Additionally, in the event a Councilmember is contacted by a customer about an outage, whether it be one customer or hundreds who are impacted, CSMs will work with the network and DOC to

provide any information requested about the outage. The Company has and will continue to accommodate Councilmember's request to be advised of outages involving fewer customers on a case-by-case basis.

However, should ENO be required to communicate on outages impacting 100 customers or less, we anticipate bringing on seven (7) new employees at the DOC and ten (10) new employees in Customer Service. This would lead to an annual cost increase of approximately \$2M, including salary and benefits.

## **II. CONCLUSION**

ENO believes that communication is important and ensures that the Council and CURO will be well informed. However, the current proposal in R-24-574 requiring ENO to communicate to CURO and the Council for any outage(s) impacting over 100 customers and 50 during a state of emergency will ultimately lead to a cost increase for all customers, as new personnel will need to be hired. For the reasons set forth herein, ENO respectfully requests the Council accept the proposed revision to the service regulations in its Reply Comments filed on May 3, 2024, reducing the requirement to notify the CURO and Council members from 2500 to 500 customer count.

Respectfully submitted,



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**ATTORNEYS FOR  
ENTERGY NEW ORLEANS, LLC**

**CERTIFICATE OF SERVICE**

**Docket No. UD-23-02**

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.

New Orleans, Louisiana, this 6th day of December 2024



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Lacresha D. Wilkerson