

BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS

Establishing a Docket to Streamline Entergy)
New Orleans Reporting Requirements)
to the New Orleans City Council)

Docket No. UD-20-01

COUNCIL UTILITIES REGULATORY OFFICE
2025 BIENNIAL REPORT

Pursuant to Council Resolution No. R-20-223 and Resolution No. R-21-153 (“Streamlining Resolutions”), the Council Utilities Regulatory Office (“CURO”) submits its 2025 Biennial Report herein regarding the streamlining of Entergy New Orleans, LLC (“ENO”) reporting requirements.

Procedural Background

On July 16, 2020, the Council of the City of New Orleans (“Council”) as the governmental body with the power of supervision, regulation, and control over public utilities providing service within the City of New Orleans, issued a resolution establishing Council docket UD-20-01 to seek input from ENO, the Council’s Utility Advisors (“Advisors”), and interested parties as to which reporting requirements remain relevant to the Council’s regulatory responsibilities and whether ENO’s reporting requirements can be more effectively streamlined.

In addition to receiving comments from ENO and the Advisors, the Council received comments from the following parties: Crescent City Power Users Group (“CCPUG”) and the Alliance for Affordable Energy (“AAE”).¹ On May 6, 2021, the

¹ On September 14, 2020, ENO, the Advisors, and CCPUG filed their initial comments regarding this Streamline Docket. On October 14, 2020, ENO and the Advisors filed their respective reply comments. AAE did not file itemized comments for each reporting requirement as listed in Resolution R-20-223; however, CURO did insert specific AAE comments in CURO’s November 18, 2020 Recommendation Memorandum.

Council adopted Resolution R-21-153 modifying ENO's reporting requirements to achieve the Council's goals to mitigate regulatory costs and increase efficiency. Further, the Council required ENO to provide an updated list of all reporting requirements annually to CURO each year beginning in 2022.²

Resolution R-21-153 further requires that beginning in 2023, CURO shall file with the Council and distribute to the Service List a biennial report by March 30th. In the biennial report, CURO is directed to provide an updated list detailing ENO's reporting requirement. Parties can submit comments on CURO's biennial report, including requests to include reports that may have been omitted, no later than May 1st of the year in which the biennial report is filed.

Council Utilities Regulatory Office Recommendations

On January 30, 2025, ENO filed its updated list of all reporting requirements ("ENO Report") with CURO. CURO reviewed the ENO Report, supplemented that list with new reporting requirements, and developed recommendations regarding reporting requirements which may have either become unnecessary or which may be consolidated into other reports. Further, CURO incorporated the list of reporting requirements and its recommendations into a Reporting Requirements Reference Matrix [See attached, Exhibit "A"].

In response, and pursuant to Council Docket UD-20-01 ("Streamlining Docket"), CURO is distributing the Biennial Report herein and Reporting Requirement Reference Matrix [Exhibit A] to the Service List to allow parties to submit comments on or before May 1, 2025. CURO recommends streamlining ENO's reporting requirements as follows:

² On July 13, 2023, the Council adopted resolution R-23-306 directing ENO to file its internal Streamlining Report to CURO by January 30th of each year.

A. The CURO recognizes ENO's new reporting requirements in Exhibit A, Section A as follows:

1. Quarterly Transition Cost Reports
2. GRIP Progress Report
3. Annual Resilience Metric Report

B. The CURO recommends the following reporting requirements in Exhibit A, Section B *without* modification:

1. Post-MISO Integration Report;
2. NOPS Post-Implementation Report on Internal Controls and Cyber Security;
3. ENO's lost contribution to fixed costs (LCFC) and utility performance incentive to Program Year of Energy Smart;
4. Fuel Adjustment Clause (Paragraph B);
5. Annual review of General Service Customers' billing alternative rate schedules – new rate structures updated via the 2018 Rate Case;
6. Annual statement regarding the nature of inter-company transactions: independent accountants' report and annual report identifying non-clerical personnel from any regulated utility;
7. ENO MISO Cost Recovery Rider (True Up);
8. Bi-Annual application to the City Council for approval of ENO's financing plan;
9. Bi-Annual reporting of data in accordance with Section 210 of the Public Utility Regulatory Act of 1978;
10. Monthly EAC Rate Report;
11. Monthly Purchased Power Cost Recovery Rider (PPCR);
12. NOPS Quarterly Expenditures Reports;
13. Monthly PGA Report;

14. Annual Energy Efficiency Rider Rate Report;
15. Annual Distributed Energy Resources Report;
16. Annual Storm Escrow Report;
17. NOPS LDEQ Report - Semi-Annual Monitoring Report;
18. NOPS LDEQ Report - Title V Certification Report;
19. NOPS LDEQ Report - RICE Engine Annual Report;
20. NOPS LDEQ Report - Emergency Diesel Generator Operating Report;
21. NOPS LDEQ Report - Emissions Inventory;
22. NOPS LDEQ Report - Reports of Unauthorized Discharges of Pollutants;
23. Quarterly Reliability Report;
24. City of New Orleans' Reports on Outside Services;
25. Quarterly NOPS Usage Reports;
26. Semi-Annual Energy Smart Reports.
27. Monthly Fuel Adjustment Clause filing
28. Annual Streamlining Report
29. Annual Electric System Distribution Reliability Standards ("ESDRS") Compliance Filing Report
30. Bi-monthly Sullivan Substation construction monitoring reports
31. Semi-Annual SSCRII Rider Filing
32. Annual SSCOII Rider Filing
33. RCPS Compliance Report (Section 4f of RCPS Rules)
34. Triennial Renewable and Clean Portfolio Standard ("RCPS") Compliance Plan, (Section 4e of RCPS Rules)
35. ENO's Bi-annual filing of Gas Design peak demand

36. Annual Gas Marketing Justification Report (gas hedging request)

37. Annual Gas Distribution System Report

38. Annual Gas Storage Report

C. The CURO recommends modifications to ENO's remaining reporting requirements in Exhibit A, Section C as follows:

1. Semi-Annual Securitized Storm Cost Recovery Rider (SSCR Rider) Filing—This reporting requirement can be removed.
2. Annual Securitized Storm Cost Offset Rider (SSCO Rider) filing—This reporting requirement can be removed.
3. Quarterly Report of Entergy Corporation's proportionate share of its regulated utilities' assets, operating, and maintenance expenses (per Rule 53 Settlement Agreement) - This reporting requirement can be removed since Entergy exiting non-regulated businesses make the reporting unnecessary and provides no valuable information.
4. Annual 1992 Affiliate Settlement Agreement report per the 1998 revision & R-98-187 (the 1992 settlement related to Public Utility Holding Company Act ("PUHCA") revisions of Rule 53 relative to affiliates and holding company transactions later revised in 1998) - This reporting requirement can be removed since Entergy exiting non-regulated businesses makes the reporting unnecessary and provides no valuable information.
5. Semi-annual NOPS O&M Expenditures - This reporting requirement can be removed as Resolution R-19-78 allows for the request to remove this reporting requirement on February 21, 2024.
6. Estimated O&M Expenditures for NOPS—The reporting requirement can be removed per R-19-78, effective February 21, 2024.

C. Conclusion

The Council Utilities Regulatory Office intends this 2025 Biennial Report to serve as a guide for the parties to comment and to further assist the City Council in mitigating regulatory costs and increasing efficiency in ENO's current reporting requirements. Thank you.